(LOCA) and the Steam Line Break (SLB) event. A decrease in the initial safety injection boron concentration from 20,000 ppm to 2400 ppm will not adversely affect the Large or Small-Break Loss-of-Coolant Accident analysis because the evaluation models used in analyzing these accidents do not take credit for the high concentration boric acid stored in the BASTs. However, the evaluation models did take credit for boron in maintaining the long term post LOCA reactor core sub-critical. An analysis was performed which concluded that the inventory contained in the BASTs would not be required provided the minimum RWST boron concentration was increased to 2400 ppm. The SLB event is the other design basis event that could be affected by the proposed elimination of the high boron concentration BASTs as a source of safety injection fluid. Analyses have been performed which conclude that the BASTs are not required and that a minimum RWST boron concentration of only 1950 ppm is sufficient to provide adequate protection for the SLB event although 2400 ppm will be maintained to address post-LOCA subcriticality thus providing further safety margin. The results of these analyses indicate that the departure from nucleate boiling (DNB) design basis continues to be met. (A minimum Departure from Nucleate Boiling Ratio (DNBR) of 1.45 can be maintained throughout the event.) Finally, the containment pressure and temperature remains within the acceptable containment design limits. Since these criteria have been satisfied, there will be no adverse effect on the health and safety of the public and the consequences of any accident previously evaluated have not significantly increased.

2) Create the possibility of a new or different kind of accident from any accident previously evaluated;

Neither the charging pumps, the removal of the BASTs from initial SI pump injection, nor the elimination of both the boric acid transfer pumps and the boric acid heat tracing system as safety-related components would create the possibility of a new or different kind of accident from any accident previously evaluated.

Furthermore, the reactivity control function of the boron in the CVCS and SI systems is not being changed. Therefore, the proposed changes will not adversely affect the health and safety of the public or create the possibility of a new or different kind of accident from any accident previously evaluated.

3) Involve a significant reduction in the margin of safety.

The reduction in the initial concentration of boron injected into the reactor coolant system for accident mitigation has been analyzed. These analyses conclude that all applicable criteria for a LOCA are satisfied. A decrease in the initial safety injection boron concentration from 20,000 ppm to 2400 ppm will not adversely effect the Largeor Small-Break Loss-of-Coolant Accident analysis because the evaluation models used in analyzing these accidents do not take credit for the high concentration boric acid stored in the BASTs. However, in order to maintain the long term post LOCA reactor core sub-critical, a minimum RWST boron concentration of 2400 ppm is required. To meet this requirement, the RWST boron concentration is being raised to 2400 ppm. All criteria of 10 CFR 50.46 can be achieved for both the Large or Small-Break LOCA with no BASTs and 2400 ppm boron in the RWST. Since all criteria of 10 CFR 50.46 are satisfied, there is no adverse effect on the health and safety of the public and there is not a significant reduction in the margin of safety for these casualties.

Since both the core response and the containment response can be limiting in the SLB event, both were considered in the boron concentration reduction analysis. This analysis concludes that a minimum RWST boron concentration of 1950 ppm is sufficient to provide adequate protection for the SLB event, although a 2400 ppm boron solution will be maintained to provide protection for the post LOCA concerns. Since the containment pressure and temperature remains within the acceptable containment design limits, and a minimum DNBR of 1.45 can be maintained throughout the event, there is not a significant reduction in the margin of safety for this event and therefore there is no adverse effect on the health and safety of the public.

These proposed changes involve the conversion of the TS to Word Perfect format now being used at WPSC. Minor typographical errors and format inconsistencies were corrected. These proposed changes are administrative in nature; accordingly, these proposed changes do not involve a significant hazards consideration.

Additionally, the proposed changes are similar to example C.2.e.(i) in 51 FR 7751. Example C.2.e.(i) states that changes which are purely administrative in nature; i.e., to achieve consistency throughout the Technical Specifications, correct an error, or a change in nomenclature, are not likely to involve a significant hazard.

Significant Hazards Determination for Proposed Changes to Table TS 4.1-1, "Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels" and Table TS 4.1-2 "Minimum Frequencies for Sampling Tests"

The proposed changes were reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed changes will not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated, or

2) Create the possibility of a new or different kind of accident from any accident previously evaluated, or

3) Involve a significant reduction in the margin of safety.

The above listed surveillance requirements insure BAST operability. The BASTs will no longer be relied upon as a source of boron for safety injection, and will serve no safety related function. Whether the BASTs are operable or not will have no effect on plant safety. Therefore, elimination of the surveillance requirements which insure BAST operability is possible without any adverse effect on the health and safety of the public and presents no significant hazards. Significant Hazards Determination for Proposed Changes to Technical Specification TS 3.3 and Section 4.5.

The proposed changes were reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed changes will not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

Neither the RWST, the boron solution contained within the RWST nor valves SI-3, SI-4A/B are accident initiators. Therefore, a change to these systems will not significantly increase the probability of an accident previously evaluated. The effect of a reduction in initial Safety Injection boron concentration on the accident analysis was evaluated. The limiting accidents were the Large-Break Loss-of-Coolant Accident (LOCA) and the Steam Line Break (SLB) event. A decrease in the initial safety injection boron concentration from 20,000 ppm to 2400 ppm will not adversely effect the Large or Small-Break Loss-of-Coolant Accident analysis because the evaluation models used in analyzing these accidents do not take credit for the high concentration boric acid stored in the BASTs. However, the evaluation models did take credit for boron in maintaining the long term post LOCA reactor core sub-critical. An analysis was performed which concluded that the BASTs could be eliminated provided the minimum RWST boron concentration was increased to 2400 ppm. The SLB event is the other design basis event that could be affected by the proposed elimination of the high concentration BASTs as a safety-related source for reactivity control injection fluid. However, analyses have been performed which conclude that a minimum RWST boron concentration of only 1950 ppm is sufficient to provide adequate protection for the SLB event although 2400 ppm will be maintained to address post-LOCA subcriticality thus providing further safety margin. The results of these analyses indicate that the departure from nucleate boiling (DNB) design basis continues to be met. (A minimum Departure from Nucleate Boiling Ratio (DNBR) of 1.45 can be maintained throughout the event.) Furthermore, maintaining the suction of the SI pumps to the RWST with valves SI-4A or SI-4B open with power removed places the system in a normal SI sequence and eliminates the requirement to switch suction from the BASTs to the RWST. This eliminates a potential failure mechanism and increases the overall reliability of the ECCS system Finally, the containment pressure and temperature remains within the acceptable containment design limits.

Since these criteria have been satisfied, there will be no adverse effect on the health and safety of the public and the consequences of any accident previously evaluated have not significantly increased.

2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

This change to the Technical Specifications allows use of 2400 ppm boron for safety injection. SI pump suction would be directly from the RWST. This eliminates