S1 125V dc bus, and the S2 LNP instrumentation is powered from the S2 125V dc bus. The loss of voltage, and degraded voltage, sensing relays can be placed in the tripped condition by removing the relay from the case. To minimize the likelihood of an inadvertent safety division initiation, the loss of voltage trip requires 3/3 relays and the degraded voltage trip requires 2/3 relays.

If the LNP instrumentation senses that the preferred offsite power source has been lost for that safety division, the safety related buses for that safety division are disconnected from the offsite source and connected to their emergency power source. If the LNP instrumentation determines that the preferred offsite power source is in a degraded condition for that safety division, and that an ECCS [emergency core cooling system] signal is present, then the safety related buses for that safety division are disconnected from the offsite source and connected to their emergency power source. For a degraded voltage condition on either safety division, without ECCS actuation, the operators are alerted to this condition by an annunciator and will initiate the appropriate corrective actions. This design fulfills the safety functions assumed in the accident analyses relating to loss of normal power/loss of offsite power.

If one instrument channel for a safety division were to fail in the non-conservative state, the safety division's other instrument channel would provide the loss of voltage trip and the degraded voltage trip for that safety division. The ability of the safety division to detect an undervoltage condition and respond is maintained. Each instrument channel has a separate feed, from separate breakers, from the 125 V dc power supply associated with that safety division. The seven day LCO of section 3.2.F.2 is justified based on continued operability of the safety division's redundant trip channel. Seven days allows reasonable time to perform repairs.

The time delays and voltage setpoints specified in Table 3.2.4 ensure that the emergency power source starting and loading times continue to meet the current technical specification requirements. Also, these time delays are long enough to precluded false trips due to voltage transients (e.g., during motor starts). The relay calibration surveillance procedure will establish acceptance criteria for each relay to ensure that the total times specified in Table 3.2.4 are not exceeded. The proposed surveillance testing and calibration frequency of every refueling outage is consistent with the requirements in the current technical specification.

Some of the redundancy in the existing LNP logic will be lost as a result of separating the two divisions of LNP logic, yielding a small increase in the probability of failure of certain portions of LNP logic. However, this impact is not significant, and is outweighed by the beneficial automatic repowering of a deenergized division following an LNP.

Based on the above, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously analyzed. 2. Create the possibility of a new or different kind of accident from any previously evaluated:

Following the proposed changes, plant response to an LNP on one division would be improved, since a deenergized division would be automatically repowered by its emergency power source while the other division remains aligned to offsite power. There are no malfunctions which would adversely impact both safety divisions while in this alignment.

There are no new failure modes associated with these changes which will prevent the LNP instrumentation from performing its intended safety function. Each individual voltage sensing relay, when removed from its case, provides the tripped contact configuration. The proposed technical specifications would allow relays to be placed in the tripped condition as long as this would not inhibit the LNP function or cause an inadvertent initiation. Additionally, since the design function to ensure that adequate power is available to operate the emergency safeguards equipment has not changed, no new accident or accident of a different kind is created.

The test switches provided for load shed logic testing are similar to the existing test switches on the secondary side of the Potential Transformers. Moreover, they require preplanned removal of a switch box cover, and require the switch to be in its original position before the switch box cover can be replaced. These switches help to avoid operator error in the present practice of sleeving contacts, installing jumpers, and pulling fuses. Administrative controls and personnel training ensure that there are no new failure modes or new or different accident scenarios than those previously evaluated.

A keylock bypass switch when placed in the "Bypass" position will block LNP actuation, thus, preventing the starting and loading of the emergency generator for the associated division, if an LNP were to occur. This is not a new failure mode since similar blocking mechanisms currently exist for each of the emergency generators. Currently, the EDG [emergency diesel generator] and GTG [gas turbine generator] can be prevented from starting on an ECCS signal by placement of an existing keylock switch in the "Off-Normal" position. To minimize the impact of inadvertent use of the bypass switch, an annunciation is provided. Also, these switches would be strictly administratively controlled to prevent their use during power operation. This restriction on the use of the keylock bypass switches during non-power operation is discussed in the Bases section of these proposed technical specifications. Operation of a keylock switch will result in the emergency power source being declared inoperable per proposed Technical Specification 3.2.F.3. The current logic will not actuate the LNP logic if power is removed from bus 14E or bus 14F individually. These switches will help avoid inadvertent actuation of equipment during surveillance testing by eliminating the need for sleeving of relay contacts, installing jumpers and pulling fuses to perform testing. Administrative controls and personnel

training ensure that there are no new failure modes. Careful isolation of a bus for preplanned maintenance is part of the existing maintenance and surveillance activities, and the provision of the keylock switches does not change the infrequent need for these activities. Administrative controls and personnel training ensure that there are no new failure modes or new or different accident scenarios than those previously evaluated.

Although the proposed design does not provide an LNP signal if the 14C/E tie breaker is inadvertently opened, the loss of voltage on bus 14E (which would result from the failure or the inadvertent opening of the tie breaker) is enveloped by the single failure of one safety division. This would be mitigated by the redundant safety division. For a division S1 loss of normal power, plus LOCA [loss of coolant accident], the S2 division is available to power the A and C LPCI [low pressure coolant injection] trains and the A train of core spray. This scenario is no different than the existing design.

Based on the above, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously analyzed.

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

The protective boundaries (i.e., fuel cladding, reactor coolant system, containment building) are not affected because the consequences of a design basis accident are not changed. Since the protective boundaries are not affected, any margin of safety is also unaffected. The proposed changes ensure that adequate electrical power is available to operate the emergency safeguards equipment. By maximizing the operability of the LNP Instrumentation without requiring high risk testing, the proposed changes will improve the margin of safety as related to availability of electric power to safety related loads.

Based on the above, the proposed changes do not involve a significant reduction in a margin of safety.

The NRC staff has reviewed NNECO's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

The Commission is seeking public comments on this proposed determination. Any comments received within 30 days after the date of publication of this notice will be considered in making any final determination.

Normally, the Commission will not issue the amendment until the expiration of the 30-day notice period. However, should circumstances change during the notice period such that failure to act in a timely way would result, for example, in derating or shutdown of the facility, the Commission may issue the license amendment before the expiration of the