

the Technical Specifications does not result in any changes to the Technical Specification requirements and, as a result, does not involve a significant increase in the probability or consequences of an accident previously evaluated. Also, changing the requirements of the Technical Specifications to more closely match the design bases of the plant will continue to assure that the plant will respond as assumed in the accident analyses and, as a result, does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes relocate information to the Technical Specification Bases. In the Technical Specifications Bases the relocated information will be maintained in accordance with 10 CFR 50.59 and subject to the change control provisions in Chapter 5 of Technical Specifications. Since any changes to the Technical Specifications Bases will be evaluated per the requirements of 10 CFR 50.59, no increase (significant or insignificant) in the probability or consequences of an accident previously evaluated will be allowed. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

3. The proposed changes in frequency for the drywell bypass leakage and drywell air lock surveillances will continue to ensure that no paths exist through passive drywell boundary components that would permit gross leakage from the drywell to the primary containment air space and result in bypassing the primary containment pressure-suppression feature beyond the design basis limit. The Mark III primary containment system satisfies General Design Criterion 16 of Appendix A to 10 CFR Part 50. Maximum drywell bypass leakage was determined previously by reviewing the full range of postulated primary system break sizes. The limiting case was a primary system small break loss of coolant accident (LOCA) and yielded a design allowable drywell bypass leakage rate limit of approximately 35,000 scfm for GGNS and 46,000 scfm (the Technical Specification limit is based on a lower limit of 40,110 scfm) for RBS. The Technical Specifications acceptable limit for the bypass leakage following a surveillance is less than 10% of this design basis value. The most recent bypass leakage value was approximately 2.5% for GGNS and .91% for RBS of the design allowable leakage rate limit for the limiting event. EOI is committed to maintaining programmatic and oversight controls that ensure that drywell bypass leakage remains a small fraction of the design allowable leakage limit.

The drywell is typically exposed to essentially 0 psig during normal plant operation and 3 psig during drywell bypass leak rate testing. These pressures are considerably lower than the structural integrity test pressure and are less likely to initiate a crack or cause an existing crack to grow. Visual inspections of the accessible drywell surfaces that have been performed since the structural integrity tests have not revealed the presence of additional cracking or other abnormalities. Therefore, additional cracking of the drywell structure is not

expected due to testing or operation and, similar to the justification for the ten year 10 CFR 50 Appendix J Type A test interval, it is not considered credible for the passive drywell structure to begin to leak sufficiently to impact the design drywell bypass leakage limit.

The primary containment's ability to perform its safety function is fairly insensitive to the amount of drywell leakage, thereby providing a margin to loss of the drywell safety function that is not normally available for safety systems. This insensitivity is demonstrated by the extremely high limiting event design basis allowable leakage for the drywell (e.g., 35,000 scfm for GGNS and 46,000 scfm for RBS). The limiting leakage is almost an order of magnitude higher for other events. Additionally, an even higher allowable leakage can be realistically accommodated by the primary containment due to the margins in the containment design. Because of the margins available, it will take valves in multiple penetration flow paths leaking excessively to cause the primary containment to fail as a result of overpressurization, the probability that drywell isolation valve leakage will result in primary containment failure due to excessive drywell leakage is not considered significant and this drywell/primary containment failure mode is not considered credible.

The proposed Technical Specification changes have no significant impact on the GGNS Individual Plant Examination (IPE) or the RBS IPE conducted per NRC Generic Letter 88-20. The IPEs considered overpressurization failure of primary containment as part of the primary containment performance assessment. Due to the magnitude of acceptable drywell leakage and the extremely low probabilities of achieving such leakage, primary containment failure due to preexisting excessive drywell leakage was considered a non significant contributor to primary containment failure. Primary containment overpressurization failure can occur with or without preexisting excessive drywell leakage in a severe accident. This is due to physical phenomena associated with potentially extreme environmental conditions inside primary containment following a severe accident. However, the calculated frequency of such extreme conditions is very small. The proposed changes do not impact the IPE evaluated phenomena causing primary containment overpressurization failure nor significantly increase the probability that the drywell has preexisting excessive leakage and therefore would not contribute to these accident scenarios.

For the reasons discussed above, the proposed changes do not have any significant risk impact to accidents previously evaluated and do not significantly increase the consequences of an accident previously evaluated. Additionally, drywell leakage is not the initiator of any accident evaluated; therefore, changes in the frequency of the surveillance for drywell leakage does not increase the probability of any accident evaluated.

Therefore, the proposed changes do not significantly increase the probability or

consequences of an accident previously evaluated.

II. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The requested changes are either administrative changes which clarify the format of the requirement or change the requirement to match the design bases of the plant, a change which relocates the requirement to the Technical Specification Bases, or a change in surveillance interval. Each of these types of change are discussed below:

1. The administrative changes in the Technical Specification requirements do not involve a physical alteration of the plant (no new or different type of equipment will be installed) nor does it change the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

2. The proposed relocation of requirements does not involve a physical alteration of the plant (no new or different type of equipment will be installed) nor does it change the methods governing normal plant operation. The proposed change will not impose or eliminate any requirements. Adequate control of the information will be maintained in the Technical Specification Bases. Thus, the change proposed does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed change modifies the surveillance frequency for drywell bypass leakage and drywell air lock surveillances. The changes only impact the test frequency and do not result in any change in the response of the equipment to an accident. The changes do not alter equipment design or capabilities. The changes do not present any new or additional failure mechanisms. The drywell is passive in nature and the surveillance will continue to verify that its integrity has not deteriorated. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

III. The proposed change does not involve a significant reduction in a margin of safety.

The requested changes are either administrative changes which clarify the format of the requirement or change the requirement to match the design bases of the plant, a change which relocates the requirement to the Technical Specification Bases, or a change in surveillance interval. Each of these types of changes are discussed below:

1. The administrative changes in the Technical Specification requirements do not involve a physical alteration of the plant (no new or different type of equipment will be installed) nor does it change the methods governing normal plant operation. Thus, this change does not cause a significant reduction in the margin of safety.