adopt the expanded Bases format adding information specific to CPSES.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes are to (1) revise the CPSES Technical Specification Limiting Condition for Operation (LCO) for the MSIVs to increase the Allowed Outage Time (AOT) from 4 hours to 8 hours in Mode 1; (2) modify the Mode 2 and 3 Action Statement to better reflect the safety significance of these valves by requiring that the valves be closed within 8 hours and verified at least every 7 days; (3) relocate the MSIVs full closure time requirement to a program administratively controlled by the TS; and (4) revise the associated Bases to adopt the expanded Bases format adding information specific to CPSES.

The revision of the CPSES Technical Specification Limiting Condition For Operation (LCO) for the MSIVs to increase the Allowed Outage Time (AOT) from 4 hours to 8 hours in Mode 1 only affects the time that a condition can exist and as such does not affect any of the conditions that could initiate an accident; therefore the probability of an accident is not affected. Likewise, no new conditions are created that would affect the analyses of any accident; therefore the consequences of the accidents postulated for CPSES are not affected.

Modifying the Mode 2 and 3 Action Statement to better reflect the safety significance of these valves by requiring that the valves be closed within 8 hours and verified at least every 7 days provides clarity and adds a new verification requirement. Again no new plant conditions are established, time limits and verification requirements are merely being established; therefore, no accident initiators are affected and there is no impact on the probability of any accident. Likewise no conditions are being altered which affect the analyses of any accidents which are postulated at CPSES and thus the consequences of those accidents are unaffected.

Relocating the MSIVs full closure time requirement to a program administratively controlled by the TS is an administrative change only. It has no impact on actual plant operation and thus there is no impact on the probability of any accident or on the consequences of any accident.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated? None of the changes in this request affect plant design or create new operating configurations. The only things affected are the times that certain conditions are allowed, how soon actions need be performed, how often to verify conditions and the administrative location of certain requirements. These items do not create the

possibility of a new type or different kind of accident.

3. Do the proposed changes involve a significant reduction in a margin of safety?

The Technical Specifications LCOs ensure that the assumptions of the safety analyses are preserved. There are no substantive changes to the LCO; therefore, the safety analyses are unaffected and there is no affect on the margin of safety.

Revising the CPSES Technical Specification Limiting Condition For Operation (LCO) for the MSIVs to increase the Allowed Outage Time (AOT) from 4 hours to 8 hours in Mode 1 allows the unit to operate with an inoperable MSIV for a longer period of time. Although the unavailability of equipment required to mitigate or assess the consequence of an accident is increased, a more reasonable completion time is provided to diagnose the problem, mobilize the corrective action, obtain administrative clearances, complete the maintenance, restore the valve to an operable condition, and perform postmaintenance verification, where appropriate. The additional time would reduce the probability of unnecessary plant transients and plant shutdowns, thus improving plant safety and increasing plant availability, while a qualitative assessment has concluded that the impact on Core Damage Frequency is negligible. TU Electric has concluded based on the discussion above that there is no significant impact on the overall margin of safety due to this change.

Modifying the Mode 2 and 3 Action Statement to better reflect the safety significance of these valves by requiring that the valves be closed within 8 hours and verified at least every 7 days is primarily a clarification and a new verification requirement. Specifying that an inoperable valve be closed within 8 hours makes the requirement specific where no time limit was provided before. The 8 hours specified is the same as is allowed in Mode 1 which was qualitatively assessed as noted above and thus is a logical limitation. The new requirement to verify the valves closed on a periodic basis will increase assurance that the valves remain closed and will thus enhance the margin of safety. Overall, TU Electric concludes that these Mode 2 and 3 changes do not significantly affect the margin of safety.

Relocating the MSIVs full closure time requirement to a program administratively controlled by the TS is an administrative change only. There is no impact on the margin of safety.

Revising the associated Bases to adopt the expanded Bases format adding information specific to CPSES enhances the useability of the Technical Specification. Overall, this is considered an improvement which will benefit both the operators and support personnel. There is no significant impact on the margin of safety and if there is an impact, it improves the margin by providing easy access to support information.

The NRC staff has reviewed the licensee'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.

Local Public Document Room location: University of Texas at Arlington Library, Government Publications/Maps, 702 College, P.O. Box 19497, Arlington, Texas 76019.

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TU Electric Company, Docket Nos. 50– 445 and 50–446, Comanche Peak Steam Electric Station, Units 1 and 2, Somervell County, Texas

Date of amendment request: December 19, 1994.

Brief description of amendments: The proposed changes to the Technical Specification Action Statements of Tables 3.3–1 and 3.3–2 would allow testing of the reactor protective system (RPS) and the engineered safety features actuation system (ESFAS) with the channel under test in bypass.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

(1) Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes will revise those Action Statements which limit the use of bypass while testing for Reactor Protection System (RPS) and Engineered Safety Feature Actuation System (ESFAS) functions. The Actions Statements concern testing with a channel inoperable and will be revised to allow testing with either the inoperable channel or the channel being tested (but not both) placed in bypass.

Testing in a bypass condition when all channels are operable will not introduce new operating configurations. The number [of] available channels with one channel in bypass for testing will remain the same as the minimum number of channels and is the same as the number of channels available when testing in trip. The number of channels to trip will be unchanged when testing in bypass while the number of channels to trip is reduced to one when testing in trip. Although there may be a sight [slight] increase in possibility that the failure of a channel could prevent the actuation of a function (because testing in bypass could result in two-out-of-two logic while testing in trip would have resulted in one-out-of-two logic), testing in bypass will reduce the vulnerability to inadvertent actuation of a function while maintaining the normal channels to trip and the minimum channels