

below. The no significant hazards consideration analysis has been divided into three parts: AC Sources Operating, DC Sources Operating, and On-Site Power distribution:

In accordance with 10CFR50.92, CYAPCO has reviewed the proposed changes and concluded that they do not involve an SHC. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve an SHC because the changes would not:

*AC Sources Operating*

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

The proposed change will increase the interval between a surveillance that is performed during plant shutdown from once per 18 months to a maximum of once per 30 months (i.e., 24 months nominal + 25% as allowed by Specification 4.0.2). The proposed change to Surveillance Requirement 4.8.1.1.2.f does not alter the intent or the method by which the surveillance is conducted. In addition, the acceptance criterion for the surveillance is unchanged. As such, the proposed change will not degrade the ability of the EDG [emergency diesel generator] to perform its intended function.

A review of the past surveillances, and preventive maintenance of the diesel generators indicates that the appropriate acceptance criterion was met in each case. Additional assurance of the diesel generator's operability is provided by Surveillance Requirement 4.8.1.1.2.a.4 and the performance of other on-line testing as described above. As such, the proposed changes do not adversely affect the probability of an accident previously analyzed.

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

The proposed change regarding the testing frequency of the diesel generators [i.e., from once per 18 months to a maximum of once per 30 months (i.e., 24 months + 25 percent as allowed by Specification 4.0.2)] does not affect the operation or response of any plant equipment, including the diesel generators, or introduce any new failure mechanism. The proposed change does not affect the test acceptance criteria of the EDGs. The plant equipment will respond per design and analyses, and there will not be a malfunction of a new or different type introduced by the testing frequency revision to the EDG surveillance requirements. As such, the changes do not create the possibility of a new or different kind of accident from any previously analyzed.

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

The Bases Section of Technical Specification Section 3/4.8, "Electrical Power Systems," states that the operability of the AC and DC power systems and associated distribution systems ensure that sufficient power will be available to supply the safety-related equipment required for safe shutdown and mitigation and control of

accident conditions. Bases Section 3/4.8 also states that the surveillance requirements for determining the operability of the EDGs are in accordance with the recommendations of Regulatory Guide 1.108, Revision 1. The revision of surveillance requirements will continue to verify that the EDGs are operable. Operable EDGs ensure that the assumptions in the Bases of the Technical Specifications are not affected and ensure that the margin of safety is not reduced. Therefore, the assumptions in the Bases of the Technical Specifications are not affected and the change does not result in a significant reduction in the margin of safety.

*DC Sources Operating*

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

CYAPCO is proposing to modify the frequency of Surveillance Requirements 4.8.2.1.c, d, and f of the Haddam Neck Plant Technical Specifications from at least once per 18 months to at least once each refueling interval. These surveillance requirements verify the operability of components of the Class 1E DC power system. CYAPCO is also proposing to delete the term "during shutdown" contained in Surveillance Requirements 4.8.2.1.d, 4.8.2.1.e, and 4.8.2.1.f.

Additional assurance of the operability of the Class 1E DC power system is provided by Surveillance Requirements 4.8.2.1.a, b, and e.

The proposed changes do not alter the intent or method by which the surveillances are conducted, do not involve any physical changes to the plant, do not alter the way any structure, system, or component functions, and do not modify the manner in which the plant is operated. As such, the proposed changes in the frequency of Surveillance Requirements 4.8.2.1.c, d, and f will not degrade the ability of the Class 1E DC power system to perform its intended safety function. Also, the Class 1E DC power system is designed to perform its intended safety function even in the event of a single failure.

Equipment performance over the last four operating cycles was evaluated to determine the impact of extending the frequency of Surveillance Requirements 4.8.2.1.c, d and f. This evaluation included a review of surveillance results, preventive maintenance associated with normal surveillance activities, and corrective maintenance records. It concluded that the Class 1E DC power system is highly reliable, and that there is no indication that the proposed extension could cause deterioration in the condition or performance of any of the subject Class 1E DC power system components.

The deletion of the phrase "during shutdown" in Surveillance Requirement 4.8.2.1.d, e, and f is acceptable. The terms "Cold Shutdown" and "Hot Shutdown" are defined in the Haddam Neck Plant Technical Specifications as operating modes or conditions. The proposed deletion of the term "during shutdown" is intended to prevent possible misinterpretations and is consistent with the recommendations of GL 91-04.

Based on the above, the proposed changes to Surveillance Requirements 4.8.2.1.c, d, e,

and f of the Haddam Neck Plant Technical Specifications 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 than any accident previously evaluated.

CYAPCO is proposing to modify the frequency of Surveillance Requirements 4.8.2.1.c, d, and f of the Haddam Neck Plant Technical Specifications from at least once per 18 months to at least once each refueling interval. CYAPCO is also proposing to delete the term "during shutdown" contained in Surveillance Requirements 4.8.2.1.d, 4.8.2.1.e, and 4.8.2.1.f. These surveillance requirements verify the operability of components of the Class 1E DC power system.

The proposed changes do not alter the intent or method by which the surveillances are conducted, do not involve any physical changes to the plant, do not alter the way any structure, system, or component functions, and do not modify the manner in which the plant is operated. As such, the proposed changes to Surveillance Requirements 4.8.2.1.c, d, e, and f will not introduce a new failure mode.

Based on the above, the proposed changes to Surveillance Requirements 4.8.2.1.c, d, e, and f of the Haddam Neck Plant Technical Specifications will not create the possibility of a new or different kind of accident from any previously evaluated.

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

CYAPCO is proposing to modify the frequency of Surveillance Requirements 4.8.2.1.c, d, and f of the Haddam Neck Plant Technical Specifications from at least once per 18 months to at least once each refueling interval. CYAPCO is also proposing to delete the term "during shutdown" contained in Surveillance Requirements 4.8.2.1.d, 4.8.2.1.e, and 4.8.2.1.f. These surveillance requirements verify the operability of components of the Class 1E DC power system.

Equipment performance over the last four operating cycles was evaluated to determine the impact of extending the frequency of Surveillance Requirements 4.8.2.1.c, d and f. This evaluation included a review of surveillance results, preventive maintenance associated with normal surveillance activities, and corrective maintenance records. It concluded that the Class 1E DC power system is highly reliable, and that there is no indication that the proposed extension could cause deterioration in the condition or performance of any of the subject Class 1E DC power system components.

Additional assurance of the operability of the Class 1E DC power system is provided by Surveillance Requirements 4.8.2.1.a, b, and e.

Since decreasing the surveillance frequency does not involve a significant increase in the consequences of a design basis accident previously analyzed, the proposed changes to Surveillance Requirements 4.8.2.1.c, d, e, and f of the Haddam Neck Plant Technical Specifications do not involve a significant reduction in the margin of safety.