

*Entergy Nuclear Operations, Inc.,
Docket No. 50-293, Pilgrim Nuclear
Power Station, Plymouth County,
Massachusetts*

Date of amendment request: January 23, 2003.

Description of amendment request: The proposed amendment would modify the Pilgrim Nuclear Power Station Technical Specification (TS) requirements for the Emergency Core Cooling System (ECCS) during shutdown conditions. The proposed amendment would change the Core Spray and Low Pressure Coolant Injection System's TS requirements to be applicable during the Run, Startup, and Hot Shutdown Modes. The proposed change would also modify the High Drywell Pressure Instrumentation TSs to require the instrumentation to be Operable during the Run, Startup and Hot Shutdown Modes. The proposed change would also remove unnecessary TS requirements based on the plant's operating Mode. Other proposed changes are administrative in nature.

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. The NRC staff has reviewed the licensee's analysis against the standards of 10 CFR 50.92(c). The NRC staff's review is presented below:

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

The proposed change involves modifications to the TS operability requirements for the ECCS during shutdown conditions. The ECCS is designed to mitigate the release of radioactive materials to the environment following a Loss of Coolant Accident (LOCA). The modifications remove certain ECCS TS requirements during shutdown conditions and includes additional requirements for the Cold Shutdown or Refuel Modes when the availability of the ECCS is most likely to be needed. The additional requirements are more restrictive and are proposed to reduce the probability or consequences of potential accidents. The requirements proposed to be removed are unnecessary due to the associated plant conditions and other changes are administrative in nature. No increase in the probability or consequences of an accident previously evaluated has been identified for these changes. The ECCS is not an initiator of any accidents previously evaluated and the proposed change does not increase the amount of radioactive materials available to be released for a previously evaluated accident. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of

accident from any accident previously evaluated?

The proposed change involves modifications to the TS operability requirements for the ECCS during shutdown conditions. The modifications remove unnecessary ECCS TS requirements during shutdown conditions and includes additional requirements for the Cold Shutdown or Refuel Modes when the availability of the ECCS is most likely to be needed. In addition, the proposed change makes administrative changes. The proposed change does not involve any physical alteration of ECCS equipment and does not create a new mode of system operation. In addition, no new or different types of ECCS equipment will be installed as a result of the proposed change. The proposed change will allow the installation of modifications on the reference and variable legs of the instrument racks that support the ECCS and Feedwater level instrumentation. No other types of accidents or accident initiators associated with the proposed change or modifications have been identified. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

The ECCS is designed to mitigate the release of radioactive materials to the environment following a LOCA. The long-term cooling analysis following a design basis LOCA demonstrates that only one low-pressure ECCS injection/spray subsystem is required, post LOCA, to maintain adequate reactor vessel water level. The proposed change includes an additional requirement that two low-pressure injection/spray subsystems be Operable for the Cold Shutdown or Refuel Modes. The requirements proposed to be removed are unnecessary due to the associated plant conditions and other proposed changes are administrative in nature. No scenario has been identified that, as a result of the proposed change, would create a single component failure which prevents the automatic initiation of the ECCS. The proposed change will not modify the method by which any safety-related system performs its function and ECCS operation and testing will remain consistent with current safety analysis assumptions. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

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

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*Exelon Generation Company, LLC,
Docket Nos. 50-237 and 50-249,
Dresden Nuclear Power Station, Units 2
and 3, Grundy County, Illinois*

Date of amendment request: December 20, 2002.

Description of amendment request: The proposed amendments would remove technical specification requirements for reactor protection system Function 5, main steam isolation valve closure, and Function 10, turbine condenser vacuum low, when in startup.

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. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to the Dresden Nuclear Power Station (DNPS) Units 2 and 3 Technical Specifications (TS) revise the applicability of TS 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," Function 5 (*i.e.*, Main Steam Isolation Valve—Closure) and Function 10 (*i.e.*, Turbine Condenser Vacuum—Low) to eliminate the requirement for these functions to be operable while in Mode 2 with reactor pressure ≥ 600 psig. The proposed changes also delete Required Action F.2 of TS 3.3.1.1 to align with the revised applicability for Functions 5 and 10.

TS requirements that govern operability or routine testing of plant instruments are not assumed to be initiators of any analyzed event because these instruments are intended to prevent, detect, or mitigate accidents. Therefore, these proposed changes will not involve an increase in the probability of an accident previously evaluated.

Additionally, these proposed changes will not increase the consequences of an accident previously evaluated because the proposed changes do not adversely impact structures, systems, or components. These changes will not alter the operation of equipment assumed to be available for the mitigation of accidents or transients by the plant safety analysis. Functions 5 and 10 are currently required in Mode 2 with reactor pressure ≥ 600 psig to ensure that the reactor is shut down to prevent an overpressurization transient due to closure of main steam isolation valves or turbine stop valves. The existing scram logic is the result of experience gained during the startup of an early vintage boiling water reactor in 1966 when operators had difficulty controlling reactor power above approximately 600 psig without pressure control. Experience on later plant startups indicates that the early experience may not be inherent to the boiling water reactor design. As such, General Electric subsequently recommended that the scram requirement be eliminated. In Mode 2, the heat generation rate is low enough so that the