

assembly are ruptured, and the assembly damaged has the highest peaking factor. The resultant Exclusion Area Boundary doses for the UFSAR Chapter 15 accident are 0.8 Rem Whole Body and 9.1 Rem Thyroid.

For the planned evolution, the cladding on only one rod will be breached and the fission product gas contained. This evolution will occur approximately ten years after reactor shutdown. The fuel rod burnup is only 20.46 GWD/MTU, and the fuel pin peaking factor is 1.28. Some accident mitigation will be provided by the fuel building ventilation system filters, although the majority of the activity will be from Kr-85, a noble gas, which is unaffected by these filters. The highest potential dose occurs to a worker in the fuel building, with whole body doses of less than 3 mRem and a thyroid dose of less than 3E-11 mRem. Doses at the Exclusion Area Boundary are trivial.

Should the gas container fail, the offsite activity release and, as such, the consequences of this accident will be less than any previously evaluated. Analyses have been performed to determine upper bounds for the source term, the offsite doses, and the control room dose. Both the source term and doses were found to be significantly lower than the results of the corresponding design basis analyses.

For the above reasons, it is determined that the intentional degassing of the Mk-BW fuel rod does not involve a significant increase in either the probability or the 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?

As discussed above, no "accident initiators" are affected by the proposed activity. The planned evolution is bounded by the dropped fuel assembly fuel handling accident inside the fuel handling building. The fuel rod straightening and degassing tools are no heavier than other fuel handling tools utilized in the spent fuel pool during routine operations. A safety tray will be placed on top of the racks and below the work area to capture any falling debris during the operation. Also a mockup operation will be performed at the Framatome facilities to identify and correct any deficiencies in the tools and processes.

For these reasons, the activity will not create the possibility of a new or different type of accident from any previously evaluated.

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

Margin of safety is associated with the confidence in the ability of the fission product barriers (the fuel and fuel cladding, the reactor coolant system pressure boundary, and the containment) to limit the level of radiation doses to the public. The proposed degassing of the fuel rod will intentionally breach the fuel rod cladding, but the fuel rod gap gasses will be captured in a collection chamber for holdup and later controlled release.

This evolution will occur beyond a nine year cooling and isotopic decay period. The level of activity in the fuel rod is very low compared to the level of activity associated

with the postulated fuel handling accident; the only significant activity remaining is approximately 10 Ci [Curies] of Krypton 85. The bent rod will be maintained under 23 feet of water. Should the collection chamber fail, and the fuel rod gap gas activity released, the highest potential dose occurs to a worker in the fuel handling building, with whole body doses of less than 3 mRem, and a thyroid dose of less than 3E-11 mRem. For this reason, the resulting dose to the public is inconsequential. Both offsite doses and doses to the control room were found to be small compared to the limits of 10 CFR 100 and GDC 19. For these reasons, the activity does not involve a significant reduction in the margin of safety.

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.

*Attorney for licensee:* Ms. Lisa F. Vaughn, Duke Energy Corporation, 422 South Church Street, Charlotte, North Carolina 28201-1006.

*NRC Section Chief:* John A. Nakoski.

*Entergy Gulf States, Inc., and Entergy Operations, Inc., Docket No. 50-458, River Bend Station, Unit 1, West Feliciana Parish, Louisiana*

*Date of amendment request:* March 14, 2003.

*Description of amendment request:* The licensee requests modification of the River Bend Technical Specifications to revise several of the Surveillance Requirements (SRs) pertaining to testing of the Division 1 and 2 standby diesel generators (DGs). The proposed change would modify specific restrictions associated with these SRs that prohibit performing required testing in Modes 1 and 2. The affected SRs are SR 3.8.1.9 and SR 3.8.1.10.

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

*Response:* No.

The DG and its associated emergency loads are accident mitigating features, not accident initiating equipment. Therefore, there will be no impact on any accident probabilities by the approval of the requested amendment.

The design of plant equipment is not being modified by these proposed changes. As such, the ability of the DG to respond to a design basis accident will not be adversely impacted by these proposed changes. The

capability of the DG to supply power in a timely manner will not be compromised by permitting performance of DG testing during periods of power operation. Additionally, limiting testing to only one DG at a time ensures that design basis requirements for backup power is met, should a fault occur on the tested DG. Therefore, there would be no significant impact on any accident consequences.

Based on the above, the proposed change to permit certain DG surveillance tests to be performed during plant operation will have no effect on accident probabilities or consequences. 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?

*Response:* No.

No new accident causal mechanisms would be created as a result of NRC [U.S. Nuclear Regulatory Commission] approval of this amendment request since no changes are being made to the plant that would introduce any new accident causal mechanisms. Equipment will be operated in the same configuration with the exception of the plant mode in which the testing is conducted. This amendment request does not impact any plant systems that are accident initiators; neither does it adversely impact any accident mitigating systems.

Based on the above, implementation of the proposed changes would 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?

*Response:* No.

Margin of safety is related to the confidence in the ability of the fission product barriers to perform their design functions during and following an accident situation. These barriers include the fuel cladding, the reactor coolant system, and the containment system. The proposed changes to the testing requirements for the DG do not affect the operability requirements for the DG, as verification of such operability will continue to be performed as required. Continued verification of operability supports the capability of the DG to perform its required function of providing emergency power to plant equipment that supports or constitutes the fission product barriers.

Consequently, the performance of these fission product barriers will not be impacted by implementation of this proposed amendment.

In addition, the proposed changes involve no changes to setpoints or limits established or assumed by the accident analysis. On this and the above basis, no safety margins will be impacted.

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