

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

*Response:* No.

ECCS pumps are for accident mitigation and do not contribute to accident initiation. The ECCS system will still be verified capable of meeting its emergency core cooling and IST requirements. There is no change to the safety analysis.

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

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

*Response:* No.

There is no change to the safety analysis. Testing of the ECCS pumps as required by the IST Program combined with the existing Technical Specification 3.5.2—"ECCS—Operating" surveillance requirements ensure that the ECCS requirements remain met without a significant reduction in a margin of safety. Therefore, there is no significant reduction in a margin of safety.

Based on the above, SCE [Southern California Edison Company] concludes that the proposed amendments present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

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 amendments request involve no significant hazards consideration.

*Attorney for licensee:* Douglas K. Porter, Esquire, Southern California Edison Company, 2244 Walnut Grove Avenue, Rosemead, California 91770.

*NRC Section Chief:* Stephen Dembek.

*Tennessee Valley Authority, Docket Nos. 50-327 and 328, Sequoyah Nuclear Plant, Units 1 and 2, Hamilton County, Tennessee*

*Date of amendment request:* March 13, 2003.

*Description of amendment request:* The proposed amendments would modify the Sequoyah Nuclear Plant, Units 1 and 2, Operating Licenses DPR-77 and DPR-79. This proposed request provides Technical Specification (TS) change 03-01 that would revise the limiting condition for operation for TS Section 3.5.1, "Cold Leg Injection Accumulators" and TS Section 3.5.5, "Refueling Water Storage Tank." This revision would modify the single boron concentration requirement by inserting a table that defines the minimum and maximum amount of boron that is required for accident mitigation based on the number of tritium producing rods in the core.

*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?

The proposed change modifies the required boron concentration for the cold leg accumulators (CLAs) and refueling water storage tank (RWST). The proposed values have been verified to maintain the required accident mitigation safety function for the CLAs and RWST. The CLAs and RWST safety function is to mitigate accidents that require the injection of borated water to cool the core and to control reactivity. These functions are not potential sources for accident generation and the modification of the boron concentration that supports event mitigation will not increase the potential for an accident. Therefore, the possibility of an accident is not increased by the proposed changes. The boron levels for this change are based on the number or tritium producing rods in the core. As the number of rods is increased the need for additional shutdown boron also increases. This effect has been evaluated with the same methodology utilized for previous NRC approved amendments associated with tritium production. This methodology ensures that the impact of tritium producing rods is adequately compensated for by the required boron concentrations and has been incorporated into the proposed revision. Since the boron levels will continue to maintain the safety function of the CLAs and RWST in the same manner as currently approved, the consequences of an accident is not increased by the proposed changes.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change only modifies boron concentrations for accident mitigation functions of the CLAs and RWST. These functions do not have a potential to generate accidents as they only serve to perform mitigation functions associated with an accident. The proposed requirements will maintain the mitigation function in an identical manner as currently approved. There are no plant equipment or operational changes associated with the proposed revision other than the adjustment of the boron level in the CLAs and RWST. Therefore, since the CLA and RWST functions are not altered and the plant will continue to operate without change, the possibility of a new or different kind of an accident is not created.

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

This change proposes boron concentration requirements that support the accident mitigation functions of the CLAs and RWST equivalent to the currently approved limits. The proposed change does not alter any plant equipment or components and does not alter

any setpoints utilized for the actuation of accident mitigation system or control functions. The proposed boron values have been verified to provide the same level of reactivity control for accident mitigation. Therefore, the proposed change will 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 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:* General Counsel, Tennessee Valley Authority, 400 West Summit Hill Drive, ET 10H, Knoxville, Tennessee 37902.

*NRC Section Chief:* Allen G. Howe.

*Tennessee Valley Authority (TVA), Docket No. 50-390, Watts Bar Nuclear Plant, Unit 1, Rhea County, Tennessee*

*Date of amendment request:* March 12, 2003.

*Description of amendment request:* The proposed amendment would revise the Updated Final Safety Analysis Report (UFSAR) and the Technical Specification Bases. The revision would update the quality assurance criteria and the basis for the seismic qualification of the ducting installed as part of the suspended ceiling air delivery system in the main control room (MCR).

*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?

No. The design function of the MCR ducting system is to support pressurization and cooling of the control room during normal and accident conditions. The MCR ducting is a passive plant feature and does not act as an accident initiator. Consequently, the changes in the MCR ducting system and suspended ceiling quality assurance (QA) requirements and qualification methodology do not result in an increase in the probability of an accident previously evaluated.

For the principal design basis accidents, Loss of Coolant Accident (LOCA), Internal Flood, Steam Generator Tube Rupture (STGR), Main Steam Line Break (MSLB), etc., the integrity of the MCR HVAC [heating, ventilation, and air conditioning] system, including the suspended ceiling, will not be compromised. These accidents do not have a structural effect on the MCR. This means that for postulated radiological or toxic chemical accidents, the ability to both pressurize and