

NRR Project Manager
Regional Office
Resident Inspector
State Contact

Attachment 1—Description and Assessment

1.0 DESCRIPTION

The proposed License amendment deletes the program requirements of TS (5.5.3), "Post Accident Sampling."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-442. The availability of this technical specification improvement was announced in the **Federal Register** on [DATE] as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

[LICENSEE] has reviewed the safety evaluation published on March 3, 2003 (68 FR 10052) as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-442 (i.e., BAW -2387, "Justification for the Elimination of the Post Accident Sampling System (PASS) from the Licensing Basis of Babcock and Wilcox-Designed Plants," which was submitted to the NRC on June 25, 2001, and the associated NRC safety evaluation dated November 14, 2002). [LICENSEE] has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and justify this amendment for the incorporation of the changes to the [PLANT] Technical Specifications.

2.2 Optional Changes and Variations

[LICENSEE] is not proposing any variations or deviations from the technical specification changes described in TSTF-442 or the NRC staff's model safety evaluation published on March 3, 2003.

Plant-specific submittals may also include one or more of the following:

(1) Requirements for installing and maintaining PASS were included in a confirmatory order for [PLANT] issued on [DATE]. This amendment request includes superseding the requirements imposed by that confirmatory order.

(2) As described in the model safety evaluation published on March 3, 2003, the elimination of the TS and other regulatory requirements for PASS result in additional changes to the TS. These changes are [DESCRIBE ADDITIONAL CHANGES]. The changes are necessary due to the removal of the TS section on PASS. The changes do not revise technical requirements beyond that addressed by the NRC staff in the model safety evaluation published on March 3, 2003. [Note that these changes could involve the deletion or modification of license conditions in addition to other TS.]

(3) The elimination of PASS results in changes to the TS Bases. The revised Bases are provided in Attachment 5. [LICENSEE] will formally address the changes to the Bases in accordance with [the Bases Control Program or administrative procedure for revising Bases] and will provide the actual revised Bases pages in a future submittal.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

[LICENSEE] has reviewed the proposed no significant hazards consideration determination published on March 3, 2003 (68 FR 10052) as part of the CLIIP. [LICENSEE] has concluded that the proposed determination presented in the notice is applicable to [PLANT] and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the model SE published in **Federal Register** on March 3, 2003 for this technical specification improvement, plant-specific verifications were performed as follows:

1. [LICENSEE] [verified that it has or is making a regulatory commitment to develop] contingency plans for obtaining and analyzing highly radioactive samples from the RCS, containment sump, and containment atmosphere. The contingency plans will be contained in [specified document or program] and implementation [is complete, will be completed with the implementation of the License amendment, or will be completed within X days (<6 months) after the implementation of the License amendment]. Establishment and

maintenance of contingency plans is considered a regulatory commitment.

2. The capability for classifying fuel damage events at the Alert level threshold [has been or will be] established for [PLANT] at radioactivity levels of [300 mCi/cc dose equivalent iodine]. This capability will be described in [specified document or program] and implementation [is complete, will be completed with the implementation of the License amendment, or will be completed within X days (<6 months) after the implementation of the License amendment]. The capability for classifying fuel damage events is considered a regulatory commitment.

3. [LICENSEE] [verified that it has or is making a regulatory commitment to develop] an ability to assess radioactive iodines released to offsite environs. The capability for monitoring iodines will be maintained within the [specified document or program]. Implementation of this commitment [is complete, will be completed with the implementation of the License amendment, or will be completed within X days (<6 months) after the implementation of the License amendment]. The capability to monitor radioactive iodines is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION

[LICENSEE] has reviewed the environmental evaluation included in the model safety evaluation published on March 3, 2003 (68 FR 10052) as part of the CLIIP. [LICENSEE] has concluded that the staff's findings presented in that evaluation are applicable to [PLANT] and the evaluation is hereby incorporated by reference for this application.

Attachment 2—Proposed Technical Specification Changes (Mark-Up)

Attachment 3—Proposed Technical Specification Pages

Attachment 4—List of Regulatory Commitments

The following table identifies those actions committed to by [LICENSEE] in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to [].