

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

3. The proposed change does not involve a significant reduction in a margin of safety.

The Technical Specification changes proposed by this license amendment request will provide an adequate safety margin to ensure that the stored fuel assembly array of maximum enriched fuel will always remain subcritical. Those limits are based on a plant specific criticality analysis performed for the Calvert Cliffs Unit 1 SFP, that include technically supported margins.

While the criticality analysis utilized credit for soluble boron, the SFP rack k-effective will remain less than 0.986 with no soluble boron with a 95 percent probability at a 95 percent confidence level. This substantial reduction in the SFP soluble boron concentration was evaluated and shown not to be credible. Soluble boron is used to provide subcritical margin such that the spent fuel pool k-effective is maintained less than or equal to 0.95. Since k-effective is less than or equal to 0.95, the current margin of safety is maintained.

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 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposed to determine that the amendment request involves no significant hazards consideration.

*Attorney for licensee:* Jay E. Silberg, Esquire, Shaw, Pittman, Potts and Trowbridge, 2300 N Street, NW., Washington, DC 20037.

*NRC Section Chief:* Richard J. Laufer.

*Calvert Cliffs Nuclear Power Plant, Inc., Docket Nos. 50-317 and 50-318, Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, Calvert County, Maryland*

*Date of amendments request:* April 17, 2003.

*Description of amendments request:* The proposed amendment would (1) make 19 specific changes to the Technical Specifications actions currently requiring suspension of operations involving positive reactivity additions, and (2) revise various notes precluding reduction in boron concentration. The proposed changes follow the guidance of Technical Specification Task Force (TSTF) Change Traveler 286, Revision 2.

*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. Would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The intent of this change is to clarify those Technical Specifications involving positive reactivity additions to the shutdown reactor so that small, controlled, safe insertions of positive reactivity will be allowed where they are now categorically prohibited, posing operational difficulties. These controlled activities could result in a slight change in the probability of an event occurring as Reactor Coolant System (RCS) manipulations that are currently prohibited would now be allowed. However, RCS manipulations are rigidly controlled to minimize the possibility of a significant reactivity increase. In addition, there is sufficient shutdown margin available in these conditions to allow for these slight reactivity changes without significantly increasing the probability of an accident previously evaluated.

The proposed change does not permit the shutdown margin required by the Technical Specifications to be reduced. While the proposed change will permit changes in the discretionary boron concentration above the technical specification requirements, this excess concentration is not credited in the Updated Final Safety Analysis Report safety analysis. Because the initial conditions assumed in the safety analysis are preserved, no increase in the consequence of an accident previously evaluated would occur. In addition, small temperature changes in the RCS impose reactivity changes by means of the moderator temperature coefficient of reactivity. These small changes are within the required shutdown margin, therefore, there is no increase in the consequence of an accident previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Would not create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed amendment allows for minor plant operational adjustments without adversely impacting the safety analysis required shutdown margin. It does not involve any change to plant equipment or the shutdown margin requirements in the Technical Specifications.

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

3. Would not involve a significant reduction in [a] margin of safety.

The margin of safety in Modes 3, 4, 5, and 6 is preserved by the calculated shutdown margin which prevents a return to criticality. The proposed change will permit reductions in the discretionary shutdown margin beyond the Technical Specification requirements. However, the shutdown margin required by the Technical Specifications is not changed. The proposed change only affects Reactor Coolant System temperature and boron concentration above the calculated shutdown margin. By not impacting the shutdown margin, the margin of safety is not affected.

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:* Jay E. Silberg, Esquire, Shaw, Pittman, Potts and Trowbridge, 2300 N Street, NW., Washington, DC 20037.

*NRC Section Chief:* Richard J. Laufer.

*Detroit Edison Company, Docket No. 50-341, Fermi 2, Monroe County, Michigan*

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

*Description of amendment request:* The proposed amendment would allow the use of an alternative source term (AST) methodology in accordance with 10 CFR 50.67 based on a reevaluation of the loss-of-coolant accident (LOCA) design-basis accident (DBA). Using an approved AST, the licensee has also proposed changes to increase the allowable secondary containment bypass and main steam isolation valve (MSIV) leakage limits and eliminate the MSIV leakage control system. The licensee also proposed changes to the TS Bases.

*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 implementation of AST assumptions has been evaluated in a revision to the analysis of the Loss of Coolant Accident (LOCA) and an update to the analysis of the Fuel Handling Accident (FHA).

Based upon the results of the analyses, it has been demonstrated that, with the requested changes, the dose consequences of these limiting Design Basis Accidents (DBAs) are within the regulatory guidance provided by the NRC for use with the AST. This guidance is presented in 10 CFR 50.67, Regulatory Guide 1.183 ["Alternative Radiological Source Terms For Evaluating Design Basis Accidents At Nuclear Power Reactors"], and Standard Review Plan (SRP) Section 15.0.1.

The requirements for MSIV [main steam isolation valve] Leakage Control System operability for eliminating MSIV leakage to the environment are being eliminated. This is acceptable because, with the application of AST, this system is no longer credited in mitigating the consequences of a LOCA or any other DBA.

The proposed changes also increase the limits on maximum allowable leakage from