

Control Room Envelope (CRE) unfiltered leakage. The CREF system provides a configuration for mitigating radiological consequences of accidents; however, it does not involve the initiation of any previously analyzed accident. Similarly, the implementation of compensatory measures to address the failure of the surveillance to meet the design basis unfiltered leakage limits is required to mitigate the consequences of a radiological release. Therefore, the proposed changes cannot increase the probability of any previously evaluated accident.

The CREF system provides a radiologically controlled environment from which the plant can be safely operated following a radiological accident. Design basis accident analyses conclude that radiological consequences are within the regulatory acceptance criteria. The current TS surveillance (SR 3.7.3.6) measures leakage from four sections of CREF system duct work outside the CRE that are at negative pressure during accident conditions. The proposed Tracer Gas test provides a measurement of CRE leakage from all potential sources including the four sections of duct work. Measuring the CRE leakage using Tracer Gas testing has no effect on the CREF system function. The results of Tracer Gas testing will be evaluated against the assumptions in the approved Alternative Source Term (AST) design basis accident analyses and compensatory measures will be implemented, as necessary, to ensure compliance with 10 CFR 50.67. If compliance with 10 CFR 50.67 cannot be demonstrated or if compensatory measures have been in place for more than 18 months, a conservative plant shutdown will be required to minimize risk. Therefore, the proposed changes do not significantly increase the radiological consequences of any previously evaluated accident.

Based on the above, the proposed changes do not significantly increase the probability or consequences of any accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not alter the design function or operation of the system involved. The CREF system will still provide protection to control room occupants in case of a significant radioactive release. The revised TS surveillance requirements provide an alternative test method that has been widely accepted for the measurement of CRE unfiltered leakage. The proposed changes do not introduce any new modes of plant or CREF system operation. Therefore, the proposed changes do not create the potential for a new or different kind of accident from any accident previously evaluated.

3. The changes do not involve a significant reduction in the margin of safety.

The proposed changes to the Fermi 2 TS surveillance requirements do not affect the radiological release from a design basis accident nor the postulated dose to the control room occupants as a result of the accident. The alternate surveillance test requirements provide an acceptable approach for the measurement of CRE leakage. Safety

margins and analytical conservatisms are included in the analyses to ensure that all postulated event scenarios are bounded. The proposed TS requirements continue to ensure that the radiological consequences at the control room are below the corresponding regulatory guidelines and that compliance with 10 CFR 50.67 and GDC (General Design Criterion)-19 is not affected. Therefore, the proposed changes will not result in 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.

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*Dominion Nuclear Connecticut Inc., et al., Docket No. 50-423, Millstone Power Station, Unit No. 3, New London County, Connecticut*

*Date of amendment request:* April 7, 2003

*Description of amendment request:* The proposed amendment would move selected Technical Specification (TS) parameters to the Core Operating Limits Reports (COLR). Specifically, the changes proposed affect TSs 2.2, "Limiting Safety System Settings, Table 2.2-1;" 3/4.1.1.1.1, "Reactivity Control Systems, Boron Control, SHUTDOWN MARGIN—Modes 3, 4, and 5 Loops Filled;" 3/4.1.1.2, "Reactivity Control Systems, SHUTDOWN MARGIN—Cold Shutdown—Loops Not Filled;" 3/4.2.5, "Power Distribution Limits, DNB Parameters;" 3/4.3.5, "Instrumentation, SHUTDOWN MARGIN Monitor;" 3/4.9.1.1, "Refueling Operations, Boron Concentration;" Section 6.9.1.6.a, "Core Operating Limits Report, Core Operating Limits;" and Section 6.9.1.6.b, "Core Operating Limits Report, The Analytical Methods Used to Determine the Core Operating Limits," and the corresponding pages and Bases sections.

*Basis for proposed no significant hazards consideration determination:* As required by Title 10 of the Code of Federal Regulations (10 CFR), § 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The relocation of cycle-specific core operating limits from the technical specifications to the COLR has no influence or impact on the probability or consequences

of a Design Basis Accident. Adherence to the COLR and methodologies acceptable for establishing COLR parameters continues to be controlled by Technical Specifications. The proposed amendment still requires exactly the same actions to be taken when or if limits are exceeded. Each accident analysis addressed in the Final Safety Analysis Report (FSAR) will be examined with respect to the changes in cycle-dependent parameters, which are obtained from application of the Nuclear Regulatory Commission (NRC) approved reload design methodologies, to ensure that the transient evaluation of new core designs are bounded by previously accepted analysis. This examination, which will be performed in accordance with the requirements of 10 CFR 50.59, ensures that future designs will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to add new document references to Technical Specification Sections 6.9.1.6.b.16 and 6.9.1.6.b.17 are required to identify the most recent methodology to be used in the Millstone Unit No. 3 Small Break Loss of Coolant Accident (SBLOCA) analysis. Section 6.9.1.6.b.18 is added to describe NRC approved Overpower DT and Overtemperature DT trip function methodology. The use of these methodologies demonstrates that the acceptance criteria for SBLOCA events and Overpower DT and Overtemperature DT are met. This change has no impact on plant equipment operation. Since these changes only affect the method of analysis, they cannot affect the likelihood or consequences of accidents. Therefore, these changes will not increase the probability or consequences of an accident previously evaluated.

Deleting the revision number and the date from the documents contained in Technical Specification Section 6.9.1.6.b.1 and in Technical Specification Sections 6.9.1.6.b.4 through 6.9.1.6.b.10 has no impact on the actual analytical methods used to determine the core operating limits, nor does it affect the likelihood or consequences of accidents. Therefore, this change will not increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

As stated earlier, the relocation of the cycle-specific variables to the COLR, adding new document references and deleting the revision number and the date in Technical Specification Section 6.9.1.6.b have no influence or impact, nor does it contribute in any way to the probability or consequences of an accident. No safety related equipment, safety function, or plant operations will be altered as a result of this proposed change. The cycle specific variables are calculated using NRC-approved methods and submitted to the NRC to allow the Staff to continue to trend the values of these limits. The Technical Specifications will continue to require operation within the required core operating limits and appropriate actions will be taken when or if limits are exceeded. Therefore the proposed amendment does not in any way create the possibility of a new or