

Specification requirements to the UFSAR, based on regulatory guidance and previously approved changes for other stations. The proposed change is administrative in nature, does not negate any existing requirement, and does not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analysis. As such, there are no changes being made to safety analysis assumptions, safety limits or safety system settings that would adversely affect plant safety as a result of the proposed change. Margins of safety are unaffected by requirements that are retained, but relocated from the Technical Specifications to the UFSAR. 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 proposes to determine that the amendment request involves no significant hazards consideration.

*Attorney for licensee:* J.M. Fulton, Esquire, Assistant General Counsel, Pilgrim Nuclear Power Station, 600 Rocky Hill Road, Plymouth, Massachusetts, 02360-5599.

*NRC Section Chief:* James W. Clifford.

*Entergy Operations, Inc., Docket No. 50-368, Arkansas Nuclear One, Unit No. 2, Pope County, Arkansas*

*Date of amendment request:* May 1, 2003.

*Description of amendment request:* The proposed amendment would modify the surveillance testing requirements for the containment spray system (CSS) by deleting the requirement to verify the position of valves that are locked, sealed, or otherwise secured in their correct position and replacing the quantitative allowable pump degradation value with a requirement to verify the pumps perform in accordance with the Inservice Testing Program.

*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.

Analyzed events are assumed to be initiated by the failure of plant structures, systems, or components. Altering the surveillance requirements for the CSS does not increase the probability that a failure leading to an analyzed event will occur. The CSS components are passive until an actuation signal is generated. This change

does not increase the failure probability of the CSS components. Therefore, the probability of occurrence for a previously analyzed accident is not significantly increased.

The CSS is primarily designed to mitigate the consequences of a loss of coolant accident (LOCA) or main steam line break (MSLB) accident. The proposed change does not affect any of the assumptions used in the deterministic LOCA or MSLB analyses. Hence the consequences of accidents previously evaluated do not change.

Therefore, the change associated with modifying the CSS surveillance requirements does not involve an increase in the probability or consequences of any 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.

The proposed change does not change the design or configuration of the plant. No new equipment is introduced, nor will any installed equipment be operated in a new or different manner. No changes are proposed to the plant's operating parameters or setpoints at which protective or mitigative actions are initiated. Additionally, no substantive changes are proposed to the procedures which ensure the plant remains within analyzed limits or the procedures relied upon to respond to off-normal events. As such, no new failure modes are being introduced. The proposed change does not alter assumptions made in the safety analysis or licensing basis.

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.

The proposed change associated with modifying the surveillance requirements for the CSS does not affect the limiting conditions for operation used in the deterministic analysis to establish the margin of safety. The margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. None of these are adversely impacted by the proposed change. Sufficient equipment remains available to actuate upon demand for the purpose of mitigating a transient event.

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 proposes to determine that the amendment request involves no significant hazards consideration.

*Attorney for licensee:* Nicholas S. Reynolds, Esquire, Winston and Strawn, 1400 L Street, NW., Washington, DC 20005-3502.

*NRC Section Chief:* Robert A. Gramm.

*Entergy Operations Inc., Docket No. 50-382, Waterford Steam Electric Station, Unit 3, St. Charles Parish, Louisiana*

*Date of amendment request:* March 11, 2003.

*Description of amendment request:* The proposed amendment will revise and relocate Surveillance Requirement (SR) 4.0.5 and SR 4.4.9 to the administrative section of the Technical Specifications (TS) under sections 6.5.8 and 6.5.7, respectively. The proposed amendment will also relocate TS 3.4.9, "Reactor Coolant System Structural Integrity" and its Bases to the Waterford Steam Electric Station, Unit 3 (Waterford 3) Technical Requirements Manual (TRM). Additionally, the proposed amendment extends the Waterford 3 flywheel volumetric examination interval to ten years.

*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 proposed change to relocate SR 4.0.5 to the administrative section of the TSs, including modifications to the wording to make it consistent with NUREG-1432, will not reduce the current testing and inspection requirements. The performance of a code (American Society of Mechanical Engineers (ASME) Boiler & Pressure Vessel Code) inservice test is not an accident initiator. Verbally issuing relief to the ASME Code by the NRC (Nuclear Regulatory Commission) staff in lieu of written relief does not reduce assurance of the health and safety of the public since the NRC staff still reviews the basis for the relief on its technical merit and the NRC staff still obtains management approval prior to granting the relief.

Inspections of the reactor coolant pump (RCP) flywheels are conducted to detect a flaw in the flywheel prior to it becoming a missile that could damage other portions of the facility. The fracture mechanics analyses conducted as part of NRC approved Topical Report SIR-94-080-A, Rev(ision) 1 shows that a conservatively sized pre-existing crack will not grow to a flaw size necessary to create flywheel missiles within the current or extended life of the facility thus the flywheel will remain intact and perform its function to reduce the rate of decay of coolant flow during a postulated loss of power to the RCP motor. This analysis conservatively assumes minimum material properties, maximum flywheel speed, location of the flaw in the highest stress area, and a number of startup and shutdown cycles higher than expected. Since a conservative flaw in the RCP flywheels will not grow to the allowable flaw size under large break LOCA (loss-of-coolant