

accident) conditions over the life of the plant, reducing the inspection frequency of the flywheels will not significantly increase the probability or consequences of an accident previously evaluated.

The change to move the surveillance requirements for the RCP flywheels to the programs section of the technical specifications is administrative and has no impact on probability or consequences of an accident.

The change to move TS 3.4.9 to the Waterford 3 TRM will have no adverse effect on plant operation or the availability or operation of any accident mitigation equipment. Changes to the TRM are controlled in accordance with 10 CFR 50.59. Therefore, moving TS 3.4.9 to the Waterford 3 TRM will not adversely impact [as] an accident initiator and can not cause an accident.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an 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 changes will not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. They do not alter the way any structure, system, or component functions and do not alter the manner in which the plant is operated. These changes do not introduce any new failure modes.

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 testing and inspection requirements contained in TS 4.0.5 are governed by 10 CFR 50.55a, "Codes and Standards." The 10 CFR requirements to perform the ASME code testing and inspections will not be reduced by the proposed change. The inspections and tests will continue to be performed as they are currently. The proposed change has no impact on plant equipment operation.

The fracture mechanics analysis conducted in support of extending the RCP flywheel volumetric examination interval from three years to ten years shows that significant conservatism has been used for calculating the allowable flaw size, critical flaw size, and crack growth rate in the RCP flywheels. These include minimum material properties, maximum flywheel accident speed, location of the flaw in the highest stress area, and a number of startup/shutdown cycles eight times greater than expected. Since a postulated flaw in a Waterford 3 flywheel will not grow to the allowable flaw size under normal operating conditions or to the critical flaw size under loss of coolant accident conditions over the life of the plant, reducing the examination requirements for the detection of such cracks over the life of the plant will not involve a significant reduction in the margin of safety. The

proposed change has no impact on plant equipment operation.

The change to move the surveillance requirements for the RCP flywheels to the programs section of the technical specifications is administrative and has no impact on plant operation.

Relocation of TS 3.4.9 to the TRM does not imply any reduction in its importance in ensuring that the structural integrity and operational readiness of ASME Code Class 1, 2, and 3 components will be maintained at an acceptable level throughout the life of the plant. The proposed change has no impact on plant operation.

Therefore, the proposed changes do 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:* N.S. Reynolds, Esquire, Winston & Strawn, 1400 L Street NW., Washington, DC 20005-3502.

*NRC Section Chief:* Robert A. Gramm.

*Exelon Generation Company, LLC, Docket Nos. 50-373 and 50-374, LaSalle County Station, Units 1 and 2, LaSalle County, Illinois*

*Date of amendment request:* March 31, 2003.

*Description of amendment request:*

The proposed amendments would revise Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18. Specifically, the proposed change will modify TS 5.7, "High Radiation Area," by incorporating the wording and requirements from NUREG-1434, "Standard Technical Specifications General Electric Plants, BWR/6," Revision 2, dated June 2001.

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

The proposed change will modify LaSalle County Station (LSCS) TS 5.7, "High Radiation Area," by incorporating into the TS the corresponding wording and requirements from NUREG-1434, "Standard Technical Specifications General Electric Plants, BWR/6," Revision 2, dated June 2001. TS 5.7 establishes the administrative controls on entry into high radiation areas. High radiation area administrative controls are not

a precursor to accidents previously evaluated. Thus, the proposed change does not have any effect on the probability of an accident previously evaluated.

The proposed change in administrative controls on entry into a radiation area does not affect the ability of LSCS to successfully respond to previously evaluated accidents and does not affect radiological assumptions used in the evaluations. Thus, the radiological consequences of any accident previously evaluated are not increased.

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

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

The proposed change does not affect the control parameters governing unit operation or the response of plant equipment to transient conditions. The proposed change does not introduce any new equipment, modes of system operation or failure mechanisms.

Therefore, the proposed 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 proposed change incorporates corresponding wording and requirements from NUREG-1434, into the LSCS TS. The LSCS evaluation of the proposed change concluded the following:

- Both the proposed and current TS 5.7.1 describe the requirements for access into areas that have radiation levels that exceed 100 mrem/hr but are less than or equal to 1000 mrem/hr. The proposed and current TS 5.7.1 are considered to have equivalent level access controls as both contain the need to provide a barricade, conspicuously post the area and issue an RWP to control entrance to the area.

- Proposed TS 5.7.2 and current TS 5.7.4 describe the requirements for access into areas that have radiation levels that exceed 1000 mrem/hr. Proposed TS 5.7.2 and current TS 5.7.4 are considered to have equivalent level access controls as both require these areas to be locked. For those areas where locking is not practical, proposed TS 5.7.2 and current TS 5.7.4 both require the area to be barricaded, conspicuously posted, and have an activated flashing light.

- The proposed change includes the deletion of the use of computer controlled doors in current TS 5.7.2. This description is being removed as computer controlled doors are no longer utilized at LSCS. Rather, manual locking mechanisms are used on doors providing an equivalent level of control.

- Current TS 5.7.4 also discusses "high-high" radiation areas. The term "high-high" radiation area is a legacy term that is being deleted from the proposed TS. This is an administrative change only to remove an outdated term.

Therefore, LSCS has determined that the proposed change provides an equivalent level of protection as that currently provided.