

The NRC has concluded, as stated in NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. As a result, maintaining an INPO accredited, systems approach based licensed operator training program is equivalent to maintaining [an] NRC approved licensed operator training program which conform[s] with applicable NRC Regulatory Guides or NRC endorsed industry standards. The margin of safety is maintained by virtue of maintaining an INPO accredited licensed operator training program.

In addition, the NRC has published NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001, "to familiarize addressees with the NRC's current guidelines for the qualification and training of reactor operator (RO) and senior operator (SO) license applicants." The document again acknowledges that the INPO National Academy for Nuclear Training (NANT) guidelines for education and experience, outline acceptable methods for implementing the NRC's regulations in this area.

Therefore, there is no change in the analysis results and the proposed amendment request does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on that review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the request for amendments involves no significant hazards consideration.

*Attorney for licensee:* Kenneth C. Manne, Senior Attorney, Arizona Public Service Company, P.O. Box 52034, Mail Station 7636, Phoenix, Arizona 85072-2034.

*NRC Section Chief:* Stephen Dembek.

*Entergy Nuclear Operations, Inc., Docket No. 50-293, Pilgrim Nuclear Power Station, Plymouth County, Massachusetts*

*Date of amendment request:* December 10, 2002.

*Description of amendment request:* The proposed amendment would revise Technical Specification (TS) 4.6.E, "Jet Pump Surveillance Requirements" and its Bases. Specifically, Notes 1 and 2 would be added to the surveillance to provide clarity for performing the surveillance under the designated condition. The proposed change would also modify the applicability of the surveillance. Additionally, the condition for flow imbalance of the two recirculation loops would be changed from 15% to 10%. A reference in TS 4.11.C.1 to the bases for Specification

3.3.B.5 would also be changed to reference TS Table 3.2.C.1, Note 5.

*Basis for proposed no significant hazards consideration determination:* As required by title 10 of the Code of Federal Regulations (10 CFR), section 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 Pilgrim TS 4.6.E imposes more restrictive surveillance requirements in accordance with the Standard Technical Specifications (STS) surveillance requirement 3.4.3.1 to ensure jet pump integrity during startup and run modes. The more restrictive conditions are: the recirculation loops have a flow imbalance of less than 10%, instead of the current 15%, when the pumps are operated at the same speed, and the occurrence of two of three conditions, instead of the simultaneous occurrence of all three conditions currently specified in TS 4.6.E for jet pump integrity.

The proposed more restrictive surveillance requirements ensure safe operation of the plant during startup and run modes. The requirements are not accident precursors. The proposed change that corrects a reference in Surveillance 4.11.C.1 is an administrative change with no impact on safety. These changes do not create accident conditions or increase the probability of previously evaluated accidents. The proposed changes provide additional assurance that the assumptions (*i.e.*, jet pump integrity) are met. Therefore, the probability or the consequences of an accident previously evaluated are not significantly increased.

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 do not involve a change to the plant design or a new mode of equipment operation. As a result, the proposed changes do not affect parameters or conditions that could contribute to the initiation of any new or different kind of accident. Therefore, these proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

*Response:* No.

The proposed surveillance requirements increase the margin of safety by providing additional assurance of jet pump integrity. The proposed change to correctly reference the existing Specification is administrative in nature. Therefore, the proposed changes do not involve 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.

*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 Nuclear Operations, Inc., Docket No. 50-293, Pilgrim Nuclear Power Station, Plymouth County, Massachusetts*

*Date of amendment request:* March 19, 2003.

*Description of amendment request:* The proposed amendment would delete Technical Specification (TS) 5.5.3, "Post Accident Sampling," requirements to maintain a Post-Accident Sampling System (PASS). Licensees were generally required to implement PASS upgrades as described in NUREG-0737, "Clarification of TMI [Three Mile Island] Action Plan Requirements," and Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident." Implementation of these upgrades was an outcome of the lessons learned from the accident that occurred at TMI, Unit 2. Requirements related to PASS were imposed by an Order for many facilities and were added to, or included in, the TSs for nuclear power reactors currently licensed to operate. Lessons learned and improvements implemented over the last 20 years have shown that the information obtained from PASS can be readily obtained through other means, or is of little use in the assessment and mitigation of accident conditions.

The changes are based on NRC-approved Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The U.S. Nuclear Regulatory Commission (NRC) staff issued a notice of opportunity for comment in the **Federal Register** on December 27, 2001 (66 FR 66949), on possible amendments concerning TSTF-413, including a model safety evaluation and model no significant hazards consideration (NSHC) determination, using the consolidated line item improvement process. The NRC staff subsequently issued a notice of availability of the models for referencing in license amendment applications in the **Federal Register** on March 20, 2002 (67 FR 13027). The licensee affirmed the