

Response: No

The proposed amendment relocates the primary coolant system (PCS) departure from nucleate boiling (DNB) limits to the core operating limits report (COLR) and does not involve any change to the PCS DNB limits themselves. The proposed amendment does not involve operation of any required structures, systems, or components (SSCs) in a manner or configuration different from those previously recognized or evaluated. The Nuclear Regulatory Commission (NRC) has approved all the analytical methods described in Technical Specification (TS) section 5.6.5, "Core Operating Limits Report (COLR)." Relocation of the PCS DNB limits to the COLR will maintain existing operating fuel cycle analysis requirements. Any future revisions to the safety analyses that require prior NRC approval are identified per the 10 CFR 50.59 review process.

Therefore, the probability of an accident previously evaluated will not be increased by the proposed change.

The consequences of an accident previously evaluated will not be increased since the reactor is still protected from violating the PCS DNB parameters used in the safety analysis for Palisades Nuclear Plant.

Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed amendment to relocate the PCS DNB limits to the COLR would not change or add a system function. The proposed amendment does not involve operation of any required SSCs in a manner or configuration different from those previously recognized or evaluated. No new failure mechanisms will be introduced by the proposed change.

Therefore, this proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed amendment to relocate the PCS DNB limits to the COLR will continue to assure that the acceptance criteria established in the safety analysis will be met. The safety analyses of normal operating conditions and anticipated operational occurrences assume initial conditions within the normal steady state envelope. The limits placed on DNB related parameters ensure that these parameters, when appropriate measurement uncertainties are applied, will not be less conservative than those assumed in the safety analyses and thereby provide assurance that the minimum departure from nucleate boiling ratio (DNBR) will meet the required criteria for each of the analyzed transients. The proposed amendment does not change the existing PCS DNB limits. Any future revisions to the safety analyses that require prior NRC approval are identified per the 10 CFR 50.59 review process.

Therefore, the proposed amendment would 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.

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*NRC Section Chief:* L. Raghavan.

*Southern California Edison Company, et al., Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Units 2 and 3, San Diego County, California*

*Date of amendment requests:* September 15, 2003.

*Description of amendment requests:* In Technical Specification (TS) 2.0, "Safety Limits (SLs)," Reactor Core SL 2.1.1.2, the proposed change would replace the peak linear heat rate SL with a peak fuel centerline temperature SL. This change is requested so SL 2.1.1.2 adequately conforms to 10 CFR 50.36(c)(1)(ii)(A), which requires that Limiting Safety System Settings prevent a Safety Limit from being exceeded.

*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 does not require any physical change to any plant systems, structures, or components nor does it require any change in systems or plant operations. The proposed change does not require any change in safety analysis methods or results. The change to establish the PFCT [Peak Fuel Centerline Temperature] as the SL is consistent with the Standard Review Plan (SRP) and the SONGS Units 2 and 3 licensing basis for ensuring that the fuel design limits are met. Operations and analysis will continue to be in compliance with NRC regulations.

Therefore, the proposed change does 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.

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accident analysis for Anticipated Operational Occurrences (AOOs) where the peak linear heat rate may exceed the existing Safety Limit of 21 KW/ft is the Control Element Assembly (CEA) Withdrawal at subcritical and low power startup conditions.

The accident analyses indicate that the peak linear heat rate may exceed the Limiting Safety System Setpoint of 21 KW/ft during Control Element Assembly Withdrawal Events at Subcritical and Hot Zero Power conditions. The analyses for these AOOs indicate that the PFCT is not approached or exceeded. The existing analyses remain unchanged and do not affect any accident initiators that would create a new accident.

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 does not require any change in accident analysis methods or results. Therefore, by changing the SL from PLHR [Peak Linear Heat Rate] to Peak Fuel Centerline Temperature, the margin as established in the current license basis remains unchanged.

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 requests involve no significant hazards consideration.

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*NRC Section Chief:* Stephen Dembek.

*South Carolina Electric & Gas Company (SCE&G), South Carolina Public Service Authority, Docket No. 50-395, Virgil C. Summer Nuclear Station (VCSNS), Unit No. 1, Fairfield County, South Carolina*

*Date of amendment request:* July 29, 2003.

*Description of amendment request:* The proposed change will revise Surveillance Requirement 4.0.5 to reflect the deletion of Subsections IWP and IWV from Section XI of the 2000 Addenda of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. This change will also result in revising the Technical Specification (TS) Bases for 4.0.5, 3/4.4.2 and 3/4.4.6 to reflect the applicability of the Code for Operation and Maintenance of Nuclear Power Plants (OM Code) to inservice testing activities. TS 4.0.5 is also being revised as recommended by NUREG-1492, "Guidelines for Inservice Testing at Nuclear Power Plants," April 1995.