

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

*Attorney for licensee:* M.S. Ross, Attorney, Florida Power & Light, P.O. Box 14000, Juno Beach, Florida 33408-0420.

*NRC Section Chief:* Allen G. Howe.

*Florida Power and Light Company, Docket No. 50-389, St. Lucie Plant, Unit No. 2, St. Lucie County, Florida*

*Date of amendment request:* September 18, 2003.

*Description of amendment request:* This amendment would revise the licensing bases for St. Lucie Unit 2 to utilize the alternate source term (AST) as allowed in 10 CFR 50.67 for reanalysis of the radiological consequences of the Updated Final Safety Analysis Report (UFSAR) Chapter 15 accidents. The established Regulatory Guide 1.183 AST methodology is being used to calculate the radiological consequences in the control room and offsite. The AST results are used to support the habitability program of the control room by addressing the radiological impact of increased control room unfiltered air in-leakage. *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 amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Alternative source term analyses have been performed for St. Lucie Unit 2 that demonstrate the dose consequences remain below limits specified in NRC Regulatory Guide 1.183 and 10 CFR 50.67. The proposed change does not modify the design or operation of the plant. The use of an AST changes only the regulatory assumptions regarding the analytical treatment of the design basis accidents and has no direct effect on the probability of any accident. The AST has been utilized in the analysis of the limiting design basis accidents listed above. The results of the analyses, which include the proposed changes to the Technical Specifications, demonstrate that the dose consequences of these limiting events are all within the regulatory limits.

The proposed Technical Specification changes to the RCS operational leakage limits, the shield building bypass leakage rate acceptance criterion, and the ECCS ventilation system surveillance requirements result in more restrictive requirements and

support the AST revisions to the limiting design basis accidents. The ECCS area ventilation system does not initiate any design basis accidents. Thus, performing additional surveillance tests do not increase the probability of any previously evaluated accident. The additional surveillance tests will not increase the consequence of any previously evaluated accident, rather the surveillance tests provide additional assurance that the HEPA filters are capable of mitigating the consequences of accidents consistent with AST assumptions.

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

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

The proposed change does not affect any plant structures, systems, or components. The operation of plant systems and equipment will not be affected by this proposed change. The alternative source term, the more restrictive proposed leakage limits, and the ECCS filter surveillance do not have the capability to initiate accidents.

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

3. The proposed amendment does not involve a significant reduction in the margin of safety.

The proposed implementation of the alternative source term methodology is consistent with NRC Regulatory Guide 1.183. The Technical Specification changes to the RCS operational leakage limits, the shield building bypass leakage rate acceptance criterion, and the ECCS ventilation system surveillance requirement, result in more restrictive requirements and support revisions to the radiological analyses of the limiting design basis accidents. Conservative RG 1.183 methodologies have been used in performing the accident analyses. The radiological consequences of these accidents are all within the regulatory acceptance criteria associated with use of the alternative source term methodology.

The proposed changes continue to ensure that the doses at the exclusion area and low population zone boundaries and in the control room are within the corresponding regulatory limits of RG 1.183 and 10 CFR 50.67. The margin of safety for the radiological consequences of these accidents is considered to be that provided by meeting the applicable regulatory limits, which are set at or below the 10 CFR 50.67 limits. An acceptable margin of safety is inherent in these limits.

Therefore, the proposed change does 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 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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*Nebraska Public Power District, Docket No. 50-298, Cooper Nuclear Station, Nemaha County, Nebraska*

*Date of amendment request:* July 15, 2003.

*Description of amendment request:* The proposed license amendment request would revise technical specification surveillance requirement 3.6.4.2.1 for locked, sealed, or secured secondary containment isolation valves (SCIVs).

*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. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change does not affect the SCIV design or function. In addition, mispositioned or failed SCIVs are not the initiator of any event. The position of a locked, sealed or secured valve and blind flange is verified at the time it is locked, sealed or secured. Further, since the change impacts only the frequency of verification of the blind flange and valve position, it does not result in any change in the response of the equipment to an accident.

Based on the above, NPPD concludes that changing the frequency for verifying the position of a locked, sealed or secured SCIV does not affect the probability or consequences of an accident previously evaluated.

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

This change does not add any new equipment or result in any changes to equipment design or capabilities. This change also does not result in any changes to the operation of the plant. The position of a locked, sealed or secured blind flange and valve is verified at the time it is locked, sealed or secured. Further, since the change impacts only the frequency of verification of the blind flange and valve position, it does not result in any change in the response of the equipment to an accident.

Based on the above, NPPD concludes that changing the frequency for verifying the position of a locked, sealed or secured SCIV does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Do the proposed changes involve a significant reduction in the margin of safety?

The SCIVs are administratively controlled and their operation is a non-routine event. The position of a locked, sealed or secured