

inoperable for up to 72 hours prior to requiring initiation of a plant shutdown. If more than one MSIV is inoperable in Mode 1 (and not closed), ITS LCO 3.0.3 is immediately applicable and a plant shutdown must be initiated within one hour. Proposed ITS 3.7.2 deviates from STS 3.7.2 which allows all four MSIVs to be inoperable for up to 72 hours prior to requiring initiation of plant shutdown.

4. The licensee proposed ITS LCO 3.7.3 for Main Feedwater Isolation to add requirements for operability, allowable out of service times and SRs which are deviations from the Scope of STS conversion.

5. The licensee proposed ITS LCO 3.7.8 of 72 hours allowed out of service time which is less restrictive (*i.e.*, longer) than the STS allowed out of service time of 12 hours, without adopting NUREG-1431, STS LCO 3.7.8 Notes 1 and 2, for the service water pumps.

6. The licensee proposed ITS LCO 3.8.1 to replace the current CTS 3.7 and to require that onsite and offsite electrical power systems are operable in Modes 1, 2, 3, and 4. Current requirements of CTS 3.7 specify that requirements for onsite and offsite electrical power systems are applicable only when the reactor is critical and, therefore, requires only that the reactor be made subcritical when requirements are not met. CTS 4.6 does not establish any requirements for the periodic verification of correct breaker alignment and indicated power availability for offsite circuits.

7. The licensee proposed the following SRs for ITS LCO 3.8.3—Diesel Fuel Oil and Starting Air:

(a) ITS SR 3.8.3.1, requirement for verification regarding the emergency diesel generator fuel oil inventory in the fuel oil storage tanks, is relaxed.

(b) Proposed ITS does not adopt STS SR 3.8.3.2 requirement for verification regarding the lube oil inventory; and

(c) The licensee added new sections to specify a range of pressure limits and impose LCOs and SRs for the starting air receivers. CTS does not currently have these requirements.

8. The licensee proposed ITS LCO 3.8.4, “DC Sources—Operating” and associated ITS SR 3.8.4 which are less restrictive than CTS 3.7.B.5 and CTS 3.7.B.6, CTS 3.7.B.5, and CTS 3.7.B.6 allow one of the four batteries to be inoperable for 24 hours if the associated charger is operable or allow one of the four chargers to be inoperable for 24 hours if the associated battery is operable.

9. The licensee originally proposed ITS LCO 3.8.6, which did not include a

requirement to verify battery float current every seven days in accordance with STS 3.8.6, but required seven days with associated conditions. The original proposed ITS 3.8.6 was a deviation from STS 3.8.6, which specified the seven-day interval requirement. However, the licensee later modified its proposed ITS 3.8.6 to include the seven-day SR.

10. The licensee originally proposed ITS LCO 3.8.7, “Inverter—Operating,” which limits the time the inverter may be inoperable to seven days in its March 27, 2002, submittal in lieu of 24 hours as recommended by NUREG-1431. The staff was concerned that the seven-day LCO was too long and also was not consistent with NUREG-1431. Subsequently, the licensee modified its proposed ITS LCO 3.8.7 to reduce the LCO from seven days to 24 hours.

11. The licensee proposed ITS 5.5.11, “Diesel Fuel Oil Testing Program,” which is a deviation from STS 5.5.13. The current CTS and UFSAR do not have any requirements for testing diesel fuel oil. Proposed ITS 5.5.11 adds a new program, “Diesel Fuel Oil Testing,” to require that a diesel fuel oil testing program is maintained with specific TS requirements for acceptance criteria and testing frequency. IP2 design and licensing basis requires that each diesel generator (DG) has an onsite underground storage tank containing oil for 48 hours of minimum safeguards load and a DG fuel oil reserve with sufficient fuel to support an additional 5 days of operation. ITS 5.5.11 will establish separate fuel oil testing programs for onsite underground storage tanks and the DG fuel oil reserve tanks. The proposed ITS adds to the Administrative Control Section of the TS a new diesel fuel oil testing program. It also incorporates several editorial changes in order to make the ITS consistent with the STS. With a few exceptions, this program follows the requirements specified in the STS.

Environmental Impacts of the Proposed Action

The NRC has completed its evaluation of the proposed conversion of the CTS to the ITS for IP2, including the beyond scope issues discussed above. Changes which are administrative in nature have been found to have no effect on the technical content of the TSs. The increased clarity and understanding that these changes bring to the TSs are expected to improve the operators’ control of IP2 in normal and accident conditions.

Relocation of the requirements from the ITS to other licensee-controlled documents does not change the requirements themselves. Future

changes to these requirements may be made by the licensee under 10 CFR 50.59 and other NRC-approved control mechanisms, which will ensure continued maintenance of adequate requirements. All such relocations have been found consistent with the guidelines of NUREG-1431, Revision 2, and the Commissions’ Final Policy Statement.

Changes involving more restrictive requirements have been found to enhance plant safety.

Changes involving less restrictive requirements have been reviewed individually. When requirements have been shown to provide little or no safety benefit, or to place an unnecessary burden on the licensee, their removal from the TSs was justified. In most cases, the relaxations previously granted to individual plants on a plant-specific basis were the result of generic action, or of agreements reached during discussions with the owners’ groups, and found to be acceptable for the plant. Generic relaxations contained in NUREG-1431, Revision 2, have been reviewed by the NRC staff and found to be acceptable.

In summary, the proposed revisions to the TSs were found to provide control of plant operations such that reasonable assurance will be provided that the health and safety of the public will be adequately protected.

The proposed action will not significantly increase the probability or consequences of accidents, no changes are being made in the types of any effluents that may be released off site, and there is no significant increase in occupational or public radiation exposure. Therefore, there are no significant radiological environmental impacts associated with the proposed action.

With regard to potential non-radiological impacts, the proposed action involves features located entirely within the restricted area for the plant defined in 10 CFR part 20 and does not have the potential to affect any historic sites. It does not affect non-radiological plant effluents and has no other environmental impact. It does not increase any discharge limit for the plant. Therefore, there are no significant non-radiological environmental impacts associated with the proposed action.

Accordingly, the NRC concludes that there are no significant environmental impacts associated with the proposed action.

Environmental Impacts of the Alternatives to the Proposed Action

As an alternative to the proposed action, the staff considered denial of the