

NRC Section Chief: L. Raghavan.
Entergy Operations, Inc., System
Energy Resources, Inc., South
Mississippi Electric Power Association,
and Entergy Mississippi, Inc., Docket
No. 50-416, Grand Gulf Nuclear Station,
Unit 1, Claiborne County, Mississippi.
Date of amendment request: October
24, 2003.

Description of amendment request:
 The proposed amendment would revise Technical Specification 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves," to allow a vent or drain line with one inoperable valve to be isolated instead of requiring the valve to be restored to Operable status within 7 days.

The NRC staff issued a notice of opportunity for comment in the **Federal Register** on February 24, 2003 (68 FR 8637), on possible amendments to revise the action for one or more SDV vent or drain lines with an inoperable valve, 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 April 15, 2003 (68 FR 18294). The licensee affirmed the applicability of the model NSHC determination in its application dated October 24, 2003.

Basis for proposed no significant hazards consideration determination:
 As required by 10 CFR 50.91(a), an analysis of the issue of no significant hazards consideration is presented below:

Criterion 1—The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

A change is proposed to allow the affected SDV vent and drain line to be isolated when there are one or more SDV vent or drain lines with one valve inoperable instead of requiring the valve to be restored to operable status within 7 days. With one SDV vent or drain valve inoperable in one or more lines, the isolation function would be maintained since the redundant valve in the affected line would perform its safety function of isolating the SDV. Following the completion of the required action, the isolation function is fulfilled since the associated line is isolated. The ability to vent and drain the SDVs is maintained and controlled through administrative controls. This requirement assures the reactor protection system is not adversely affected by the inoperable valves. With the safety functions of the valves being maintained, the probability or consequences of an accident previously evaluated are not significantly increased.

Criterion 2—The proposed change does not create the possibility of a new or different

kind of accident from any accident previously evaluated.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3—The proposed change does not involve a significant reduction in the margin of safety.

The proposed change ensures that the safety functions of the SDV vent and drain valves are fulfilled. The isolation function is maintained by redundant valves and by the required action to isolate the affected line. The ability to vent and drain the SDVs is maintained through administrative controls. In addition, the reactor protection system will prevent filling of an SDV to the point that it has insufficient volume to accept a full scram. Maintaining the safety functions related to isolation of the SDV and insertion of control rods ensures that the proposed change does not involve a significant reduction in the margin of safety.

The NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Attorney for licensee: Nicholas S. Reynolds, Esquire, Winston and Strawn, 1400 L Street, NW., 12th Floor, Washington, DC 20005-3502.

NRC Section Chief: Robert A. Gramm.
Entergy Nuclear Vermont Yankee,
LLC and Entergy Nuclear Operations,
Inc., Docket No. 50-271, Vermont
Yankee Nuclear Power Station, Vernon,
Vermont.

Date of amendment request: July 31,
2003, as supplemented on October 10,
2003.

Description of amendment request:
 This amendment request incorporates a revision to the licensing basis of the Vermont Yankee Nuclear Power Station (VYNPS) that supports a full scope application on an Alternative Source Term (AST) methodology.

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

Adoption of the AST and those plant systems affected by implementation of the AST do not initiate DBAs [design basis accidents]. The proposed change does not affect the design or manner in which the facility is operated; rather, once the occurrence of an accident has been postulated, the new accident source term is an input to analyses that evaluate the

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

The structures, systems and components (SSCs) affected by the proposed change act as mitigators to the consequences of accidents. Based on the revised analyses, the proposed changes do revise certain performance requirements; however, the proposed changes do not involve a revision to the parameters or conditions that could contribute to the initiation of a design basis accident discussed in Chapter 14 of the Updated Final Safety Analysis Report.

Because of the changed methodology, it is difficult to draw a quantitative comparison of before and after accident consequences due to the use of different dose calculations, conversion factors, source term, and other assumptions. However qualitatively, it can be shown that there is no significant increase in offsite doses, although there may be small variations in potential doses for postulated accidents. Plant-specific radiological analyses have been performed using the AST methodology. Based on the results of these analyses, it has been demonstrated that the dose consequences of the limiting events considered in the analyses meet the regulatory guidance provided for use with the AST, and the offsite doses are well within acceptable limits. This guidance is presented in 10 CFR 50.67, Regulatory Guide 1.183, and Standard Review Plan (SRP) Section 15.0.1.

Therefore, the proposed amendment does not result in a significant increase in the consequences or increase the probability of any previously evaluated accident.

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

Implementation of AST and the proposed changes does not alter or involve any design basis accident initiators. These changes do not affect the design function or mode of operations of SSCs in the facility prior to a postulated accident. Since SSCs are operated essentially no differently after the AST implementation, no new failure modes are created by this proposed change.

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

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

The changes proposed are associated with a revision to the licensing basis for the VYNPS. Approval of the licensing basis change from the original source term to the alternative source term is requested by this application for a license amendment. The results of the accident analyses revised in support of the proposed change are subject to the acceptance criteria in 10 CFR 50.67. The analyzed events have been carefully selected, and the analyses supporting these changes have been performed using approved methodologies to ensure that analyzed events are bounding and safety margin has not been reduced. The dose consequences of these limiting events are within the acceptance criteria presented in 10 CFR 50.67, Regulatory Guide 1.183, and SRP 15.0.1. Thus, by meeting the applicable regulatory