

of the TS. The TS allow operation of the plant without the full complement of equipment through the conditions for not meeting the TS LCO. The risk associated with this allowance is managed by the imposition of required actions that must be performed within the prescribed completion times. The net effect of being in a TS condition on the margin of safety is not considered significant. The proposed change does not alter the required actions or completion times of the TS. The proposed change allows TS conditions to be entered, and the associated required actions and completion times to be used in new circumstances. This use is predicated upon the licensee's performance of a risk assessment and the management of plant risk. The change also eliminates current allowances for utilizing required actions and completion times in similar circumstances, without assessing and managing risk. The net change to the margin of safety is insignificant. Therefore, this change does not involve a significant reduction in a margin of safety.

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

Attorney for licensee: Mr. Edward Cullen, Vice President & General Counsel, Exelon Generation Company, LLC, 2301 Market Street, Philadelphia, PA 19101.

NRC Section Chief: James W. Clifford.

Exelon Generation Company, LLC, and PSEG Nuclear LLC, Dockets Nos. 50-277 and 50-278, Peach Bottom Atomic Power Station, Units 2 and 3, York and Lancaster Counties, Pennsylvania

Date of application for amendments: September 26, 2003.

Description of amendment request:

The proposed amendment would modify the fire protection plan (FPP). The change to the FPP would allow converting the existing carbon dioxide (CO₂) fire suppression systems, located in the cable spreading room (CSR) and each of the four emergency diesel generator rooms, from automatic to manual actuation systems.

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 activity involves changing the actuation of the carbon dioxide (CO₂) fire suppression systems from automatic to manual. With the exception of the Emergency Diesel Generator (EDG) CO₂ system itself, the proposed activity does not result in any physical changes to safety-related structures, systems, or components (SSCs), or the

manner in which safety-related SSCs are operated, maintained, modified, tested, or inspected. The EDG CO₂ system is safety related due to a potential common mode effect on all four EDGs in the event of a seismic event. Eliminating the automatic actuation function of the EDG CO₂ system will thereby eliminate a potential common mode effect on the EDGs. The proposed activity does not degrade the performance or increase the challenges of any safety-related SSCs assumed to function in the accident analysis. As a result, the proposed activity does not introduce any new accident initiators. In addition, fires are not an accident that is previously evaluated. Regardless, the proposed activity does not change the probability of a fire occurring since fire ignition frequency is independent of the method of fire suppression in the room. The consequences of the proposed activity are bounded by the fire safe shutdown analysis, which assumes fire damage throughout the affected fire area. The fire safe shutdown analysis for each of the areas addressed by the proposed activity demonstrates that safe shutdown can be accomplished assuming that no fire suppression is available. In addition, the removal of the automatic discharge capability of the CO₂ system in each of the EDG rooms significantly reduces the potential for an inadvertent discharge to shutdown the EDG if needed for non-fire accident conditions. Similarly, removal of the automatic discharge feature in the CSR significantly reduces the potential for an inadvertent discharge that would require (by procedure) immediate shutdown of both units, and the potential migration of CO₂ into the main control room or other areas. In the future, CO₂ discharge will only occur as a deliberate action to the most extreme fires, as one element of an overall graded approach to fire fighting in the affected areas.

Therefore, changing the actuation of the CO₂ fire suppression systems from automatic to manual 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.

The proposed activity involves changing the actuation of the CO₂ fire suppression systems from automatic to manual. With the exception of the Emergency Diesel Generator (EDG) CO₂ system itself, the proposed activity does not result in any physical changes to safety-related structures, systems, or components (SSCs), or the manner in which safety-related SSCs are operated, maintained, modified, tested, or inspected. The proposed activity does not degrade the performance or increase the challenges of any safety-related SSCs assumed to function in the accident analysis. As a result, the proposed activity does not introduce nor increase the number of failure mechanisms of a new or different type than those previously evaluated. The fire safe shutdown analysis assumes fire damage throughout the area consistent with a complete lack of fire suppression capability. The elimination of

the potential for inadvertent actuation accomplished by changing the CO₂ systems from automatic to manual prevents the CO₂ systems from creating a challenge to existing accidents.

Therefore, changing the actuation of the CO₂ fire suppression system from automatic to manual does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed activity involves changing the actuation of the CO₂ fire suppression systems from automatic to manual. With the exception of the Emergency Diesel Generator (EDG) CO₂ system itself, the proposed activity does not result in any physical changes to safety-related structures, systems, or components (SSCs), or the manner in which safety-related SSCs are operated, maintained, modified, tested, or inspected. The proposed activity does not degrade the performance or increase the challenges of any safety-related SSCs assumed to function in the accident analysis. The proposed activity does not impact plant safety since the conclusions of the fire safe shutdown analysis remain unchanged.

Therefore, changing the actuation of the CO₂ fire suppression system from automatic to manual 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 request involves no significant hazards consideration.

Attorney for Licensee: Mr. Edward Cullen, Vice President and General Counsel, Exelon Generation Company, LLC, 2301 Market Street, S23-1, Philadelphia, PA 19101.

NRC Section Chief: James W. Clifford.

FPL Energy Seabrook, LLC, Docket No. 50-443, Seabrook Station, Unit No. 1, Rockingham County, New Hampshire

Date of amendment request: August 25, 2003.

Description of amendment request:

The proposed amendment would allow extension of the current Emergency Diesel Generator (EDG) Technical Specifications allowed outage time (AOT) from 72 hours to a period of 14 days. This proposal would be supported by permanently installing a non-safety-related supplemental emergency power system (SEPS).

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: