

Operation of the redundant train will ensure that the remaining subsystem is operable, that no failures, which could prevent automatic actuation, have occurred and that any other failures will be readily detected. This is consistent with STS, NUREG-1433 Vol.1, Rev. 2, Standard Technical Specifications, General Electric Plants, BWR/4.

The proposed changes associated with the FHA [fuel-handling accident] do not involve a change to structures, components, or systems that would affect the probability of an accident previously evaluated in the Hope Creek Updated Final Safety Analysis Report (UFSAR). The FHA for the HCGS [Hope Creek Generating Station] is defined as a drop of a fuel assembly over irradiated assemblies in the reactor core 24 hours after reactor shutdown. AST [accident source term] is used to evaluate the dose consequences of a postulated accident. The FHA has been analyzed without credit for Secondary Containment, Filtration Recirculation and Ventilation System (FRVS), and Control Room Emergency Filtration (CREF) system. The resultant radiological consequences are within the acceptance criteria set forth in 10 CFR 50.67 and Regulatory Guide 1.183. This amendment does not alter the methodology or equipment used directly in fuel handling operations. The equipment hatch, the personnel air locks, nor any other containment penetration, nor any component thereof is an accident initiator. Actual fuel handling operations are not affected by the proposed changes. Therefore, the probability of a Fuel Handling Accident is not affected with the proposed amendment. No other accident initiator is affected by the proposed changes.

The Loss of Coolant Accident (LOCA) Dose Calculation has been revised to (1) eliminate credit for the FRVS recirculation charcoal filters, (2) reduce credited efficiency of FRVS vent charcoal filters, (3) reduce Engineered Safety Feature (ESF) leakage from 10 gpm to 1 gpm and (4) reduce control room unfiltered in-leakage to 350 cfm [cubic feet per minute]. These proposed changes do not eliminate any safety system. The changes are only associated with the credit provided by the system in reducing the radiological consequences and therefore, do not affect any accident initiator. The results of that analysis show that the Exclusion Area Boundary (EAB), Low Population Zone (LPZ), and Control Room (CR) doses are of the same order of magnitude as the previous analysis and remain within the acceptance criteria in 10 CFR 50.67 and Regulatory Guide 1.183.

Therefore, this proposed amendment does not involve a significant increase in the probability of occurrence or consequences of an accident previously analyzed.

(2) Does the change create the possibility of a new or different kind of accident from any accident previously analyzed?

Response: No.

The proposed amendment will not create the possibility for a new or different type of accident from any accident previously evaluated. Changes to the allowable activity in the primary and secondary systems do not result in changes to the design or operation

of these systems. The evaluation of the effects of the proposed changes indicates that all design standard and applicable safety criteria limits are met.

Equipment important to safety will continue to operate as designed. Component integrity is not challenged. The changes do not result in any event previously deemed incredible being made credible. The changes do not result in more adverse conditions or result in any increase in the challenges to safety systems. The systems affected by the changes are used to mitigate the consequences of an accident that has already occurred. The proposed TS changes and modifications do not significantly affect the mitigative function of these systems.

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

(3) Does the change involve a significant reduction in [a] margin of safety?

Response: No.

The proposed changes revise the TS to establish operational conditions where specific activities represent situations during which significant radioactive releases can be postulated. These operational conditions are consistent with the design basis analysis and are established such that the radiological consequences are at or below the regulatory guidelines. Safety margins and analytical conservatism are retained to ensure that the analysis adequately bounds all postulated event scenarios. The proposed TS continue to ensure that the TEDE [total effective dose equivalent] for the CR, the EAB, and LPZ are below the corresponding acceptance criteria specified in 10 CFR 50.67 and RG1.183.

Therefore, these changes do 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:* Jeffrie J. Keenan, Esquire, Nuclear Business Unit—N21, P.O. Box 236, Hancocks Bridge, NJ 08038.

*NRC Section Chief:* James Clifford.

*PSEG Nuclear LLC, Docket No. 50-354, Hope Creek Generating Station, Salem County, New Jersey*

*Date of amendment request:* October 9, 2002, as supplemented November 22, 2002, and December 6, 2002.

*Description of amendment request:* The proposed amendment would revise Technical Specification (TS) 6.8.4.f, "Primary Containment Leakage Rate Testing Program," to allow a one-time interval extension to the requirement.

*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 change involve a significant increase in the probability or consequences of an accident previously analyzed?

Response: No.

The proposed revision to section 6.8.4.f adds a one-time extension to the current interval for containment integrated leak rate test (ILRT). The current test interval of 10 years, based upon past performance, would be extended on a one-time basis to 15 years from the last ILRT. The proposed extension to ILRT testing cannot increase the probability of an accident previously evaluated since the containment ILRT testing extension is not a modification to plant systems, nor a change to plant operation that could initiate an accident. The proposed extension to Type A testing does not involve a significant increase in the consequences of an accident since research documented in NUREG-1493, "Performance-Based Containment Leak-Test Program," found that very few potential containment leakage paths fail to be identified by Type B and C tests. The NUREG concluded that reducing the ILRT testing frequency to once per twenty years would lead to an imperceptible increase in risk. Containment performance monitoring is performed in accordance with the Maintenance Rule (10 CFR 50.65) and inspections required by American Society of Mechanical Engineers (ASME) code are performed in order to identify indications of containment degradation that could affect leak tightness. Type B and C testing required by the technical specifications (TS) will identify any containment opening, such as valves, that would otherwise be detected by the ILRT. Reg. Guide 1.174 provides guidance for determining the risk impact of plant-specific changes to the licensing basis. It also recommends the use of risk analysis techniques to ensure and show that the proposed change is consistent with the defense-in-depth philosophy. The increase in large early release frequency (LERF) resulting from a change in the ILRT test frequency from the current once in every 10 years to once in every 15 years is less than 1E-7 per year, thereby meeting Regulatory Guide 1.174 definition of a very small change in risk. The change in conditional containment failure probability (CCFP) is estimated to be 0.25% for the proposed change. These factors show that an ILRT test extension will not represent a significant increase in the consequences of an accident.

Therefore, this proposed amendment does not involve a significant increase in the probability of occurrence or consequences of an accident previously analyzed.

2. Does the change create the possibility of a new or different kind of accident from any accident previously analyzed?

Response: No.

The proposed revision to section 6.8.4.f adds a one-time exception to the current interval for the ILRT. The current test interval of 10 years, based upon past performance, would be extended on a one-time basis to 15 years from the last Type A test. Primary containment is designed to contain energy and fission products during and after an event. The Individual Plant