

May 22, 2000

Mr. James A. Hutton  
Director-Licensing, MC 62A-1  
PECO Energy Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
Wayne, PA 19087-0195

**SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONTROL ROD SCRAM ACCUMULATOR TESTING (TAC NOS. MA5546 AND MA5547)**

Dear Mr. Hutton:

The Commission has issued the enclosed Amendment No. 143 to Facility Operating License No. NPF-39 and Amendment No. 105 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated May 26, 1999.

These amendments remove TS Surveillance Requirement 4.1.3.5.b, control rod scram accumulators' alarm instrumentation, and relocate it to the Updated Final Safety Analysis Report; and revise TS Action Statement 3.1.3.5.a.2.a) to allow for an alternate method of determining whether a control rod drive pump is operating.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/RA/

Bartholomew C. Buckley, Sr. Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

- Enclosures: 1. Amendment No. 143 to License No. NPF-39
- 2. Amendment No. 105 to License No. NPF-85
- 3. Safety Evaluation

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 22, 2000

Mr. James A. Hutton  
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PECO Energy Company  
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A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in black ink that reads "Bartholomew C. Buckley".

Bartholomew C. Buckley, Sr. Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures: 1. Amendment No. 143 to  
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2. Amendment No. 105 to  
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3. Safety Evaluation

cc w/encls: See next page

Limerick Generating Station, Units 1 & 2

cc:

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

PECO ENERGY COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 143  
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by PECO Energy Company (the licensee) dated May 26, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

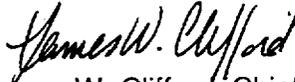
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 143 , are hereby incorporated into this license. PECO Energy Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days. In addition, the licensee shall include the relocated information in the Updated Final Safety Analysis Report submitted to the NRC, pursuant to 10 CFR 50.71(e), as was described in the licensee's application dated May 26, 1999, and evaluated in the staff's safety evaluation dated May 22, 2000.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the  
Technical Specifications

Date of Issuance: May 22, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 143

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 1-9

3/4 1-10

Insert

3/4 1-9

3/4 1-10

## REACTIVITY CONTROL SYSTEMS

### CONTROL ROD SCRAM ACCUMULATORS

#### LIMITING CONDITION FOR OPERATION

---

3.1.3.5 All control rod scram accumulators shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 5\*.

ACTION:

a. In OPERATIONAL CONDITION 1 or 2:

1. With one control rod scram accumulator inoperable, within 8 hours:

- a) Restore the inoperable accumulator to OPERABLE status, or
- b) Declare the control rod associated with the inoperable accumulator inoperable.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours.

2. With more than one control rod scram accumulator inoperable, declare the associated control rods inoperable and:

- a) If the control rod associated with any inoperable scram accumulator is withdrawn, immediately verify that at least one control rod drive pump is operating by verifying that control rod charging water header pressure is  $\geq 1400$  psig or by inserting at least one withdrawn control rod at least one notch. If no control rod drive pump is operating and:
  - 1) If reactor pressure is  $\geq 900$  psig, then restart at least one control rod drive pump within 20 minutes or place the reactor mode switch in the shutdown position, or
  - 2) If reactor pressure is  $< 900$  psig, then place the reactor mode switch in the Shutdown position.
- b) Insert the inoperable control rods and disarm the associated control valves either:
  - 1) Electrically, or
  - 2) Hydraulically by closing the drive water and exhaust water isolation valves.

Otherwise, be in at least HOT SHUTDOWN within 12 hours.

b. In OPERATIONAL CONDITION 5\*:

1. With one withdrawn control rod with its associated scram accumulator inoperable, insert the affected control rod and disarm the associated directional control valves within one hour, either:

- a) Electrically, or
- b) Hydraulically by closing the drive water and exhaust water isolation valves.

---

\*At least the accumulator associated with each withdrawn control rod. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.

## REACTIVITY CONTROL SYSTEMS

### SURVEILLANCE REQUIREMENTS

---

2. With more than one withdrawn control rod with the associated scram accumulator inoperable or no control rod drive pump operating, immediately place the reactor mode switch in the Shutdown position.

c. The provisions of Specification 3.0.4 are not applicable.

4.1.3.5 Each control rod scram accumulator shall be determined OPERABLE:

a. At least once per 7 days by verifying that the indicated pressure is greater than or equal to 955 psig unless the control rod is inserted and disarmed or scrambled.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

PECO ENERGY COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 105  
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by PECO Energy Company (the licensee) dated May 26, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

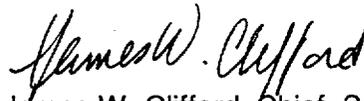
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 105 , are hereby incorporated in the license. PECO Energy Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days. In addition, the licensee shall include the relocated information in the Updated Final Safety Analysis Report submitted to the NRC, pursuant to 10 CFR 50.71(e), as was described in the licensee's application dated May 26, 1999, and evaluated in the staff's safety evaluation dated May 22, 2000.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the  
Technical Specifications

Date of Issuance: May 22, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 105

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 1-9

3/4 1-10

Insert

3/4 1-9

3/4 1-10

## REACTIVITY CONTROL SYSTEMS

### CONTROL ROD SCRAM ACCUMULATORS

#### LIMITING CONDITION FOR OPERATION

---

3.1.3.5 All control rod scram accumulators shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 5\*.

ACTION:

a. In OPERATIONAL CONDITION 1 or 2:

1. With one control rod scram accumulator inoperable, within 8 hours:

- a) Restore the inoperable accumulator to OPERABLE status, or
- b) Declare the control rod associated with the inoperable accumulator inoperable.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours.

2. With more than one control rod scram accumulator inoperable, declare the associated control rods inoperable and:

a) If the control rod associated with any inoperable scram accumulator is withdrawn, immediately verify that at least one control rod drive pump is operating by verifying that control rod charging water header pressure is  $\geq 1400$  psig or by inserting at least one withdrawn control rod at least one notch. If no control rod drive pump is operating and:

1) If reactor pressure is  $\geq 900$  psig, then restart at least one control rod drive pump within 20 minutes or place the reactor mode switch in the shutdown position, or

2) If reactor pressure is  $< 900$  psig, then place the reactor mode switch in the Shutdown position.

b) Insert the inoperable control rods and disarm the associated control valves either:

- 1) Electrically, or
- 2) Hydraulically by closing the drive water and exhaust water isolation valves.

Otherwise, be in at least HOT SHUTDOWN within 12 hours.

b. In OPERATIONAL CONDITION 5\*:

1. With one withdrawn control rod with its associated scram accumulator inoperable, insert the affected control rod and disarm the associated directional control valves within one hour, either:

- a) Electrically, or
- b) Hydraulically by closing the drive water and exhaust water isolation valves.

---

\*At least the accumulator associated with each withdrawn control rod. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.

## REACTIVITY CONTROL SYSTEMS

### SURVEILLANCE REQUIREMENTS

---

2. With more than one withdrawn control rod with the associated scram accumulator inoperable or no control rod drive pump operating, immediately place the reactor mode switch in the Shutdown position.

c. The provisions of Specification 3.0.4 are not applicable.

4.1.3.5 Each control rod scram accumulator shall be determined OPERABLE:

a. At least once per 7 days by verifying that the indicated pressure is greater than or equal to 955 psig unless the control rod is inserted and disarmed or scrammed.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 143 AND 105 TO FACILITY OPERATING

LICENSE NOS. NPF-39 AND NPF-85

PECO ENERGY COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated May 26, 1999, the PECO Energy Company (the licensee) submitted a request for changes to the Technical Specifications (TSs) for the Limerick Generating Station (LGS), Units 1 and 2. The requested change would remove TS Surveillance Requirement 4.1.3.5.b, control rod scram accumulators' alarm instrumentation, from the TSs and relocate it to the Updated Final Safety Analysis Report (UFSAR) and plant procedures. In addition, the licensee proposed to revise TS Section 3.1.3.5 to allow an alternate method to determine whether a control rod drive pump is operating.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act, as amended (the "Act"), requires applicants for nuclear power plant operating licenses to incorporate TSs as part of the license. The Commission's regulatory requirements related to the content of the TSs are set forth in Section 50.36 of Title 10 of the Code of Federal Regulations (10 CFR 50.36). That regulation requires that the TSs include items in five categories, including: (1) safety limits, limiting safety system settings, and limiting control settings, (2) limiting condition for operation, (3) surveillance requirements, (4) design features, and (5) administrative controls. It also states that the Commission may include such additional TSs as it finds to be appropriate. However, the regulation does not specify the particular TS to be included in a plant's license.

The Commission has provided guidance for the contents of the TSs in its "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactor," (58 FR 39132, July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. The Final Policy Statement identified four criteria to be used in determining whether a particular matter is required in the TSs. These four criteria have been codified in 10 CFR 50.36(b)(2)(ii) and provide that a TS is required for an item meeting one or more of the following criteria:

- (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary;

- (2) a process variable, design feature, or operating restriction that is an initial condition of a design-basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design-basis accident or transient that either assumes the failure of, or represents a challenge to the integrity of a fission product barrier; and
- (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

As a result, existing Limiting Conditions for Operation (LCO) requirements which fall within or satisfy any of the criteria in 10 CFR 50.36(b)(2)(ii) must be retained in the TSs, while those LCO requirements which do not fall within or satisfy these criteria may be relocated to other licensee-controlled documents.

Based on the above criteria, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 95-10, "Relocation of Selected Technical Specifications Requirements Related to Instrumentation," on December 15, 1995. In this GL, the staff noted that its intent was to reduce the resources spent by the staff and licensee in amending requirements related to selected instrument-related TSs through the relocation of these requirements to licensee-controlled documents or programs.

### 3.0 EVALUATION

#### 3.1 TS Surveillance Requirement 4.1.3.5.b

The licensee proposed to remove TS Surveillance Requirement 4.1.3.5.b from the TSs and relocate it to the LGS Units 1 and 2, UFSAR and their plant procedures. TS Surveillance Requirement 4.1.3.5.b requires that control rod scram accumulator leak detector channel functional testing and pressure detector channel calibration be conducted once per 24-months. This 24-month surveillance testing of the scram accumulators ensures that functional and accurate indication of their status is provided to the plant operator. The licensee stated in their submittal that the maintenance and calibration of the instrumentation for accumulator leakage and pressure detection would be unaffected by this proposed change; and upon relocation to the UFSAR, any changes to the testing, calibration or surveillance interval of these instruments will be made in accordance with 10 CFR 50.59.

The scram accumulators provide backup capability to insert a control rod at any reactor pressure. In addition, at reactor pressures above 600 psig, the reactor pressure can provide adequate energy to insert the control rod without the assistance of the assigned accumulator.

The Reactor Manual Control System (RMCS) receives the output from the level and pressure instrumentation on the scram accumulators, but is not considered a safety-related system. Due to the design of the RMCS, scram accumulators' alarm information is only provided to the control room if the RMCS is in the scan mode (monitoring control rod status). If the RMCS trips, scram accumulators status is no longer updated, until the RMCS is restored. This means that a loss of the RMCS renders the control rod scram accumulators' alarm inoperable.

Because there is no TS action statement for inoperable scram accumulators' alarm instrumentation, the affected accumulator must be declared inoperable, thereby placing the unit in a shutdown action statement. According to the licensee, restoration of the RMCS may be impractical within the allowable TS LCO time period of 12 hours; due to the complexity of the RMCS, status and inputs to the 185 control rods and electronic logic failures. The proposed TS change would allow the scram accumulators to remain operable, if the RMCS becomes temporarily inoperable.

Operability of the accumulators is determined by verifying that the pressure in each accumulator is greater than or equal to 955 psig. This can be accomplished through TS Surveillance Requirement 4.1.3.5.a which requires weekly verification of accumulator pressure. The local pressure indicator for each accumulator is the normal means of satisfying this surveillance requirement. In addition, inoperability of the scram accumulator alarm does not indicate inoperability of the scram accumulator or its associated control rod required by the LCO.

The staff finds that the proposed TS change to relocate the 24-month surveillance requirement from TSs to the UFSAR and plant procedures does not impact plant safety and is within the guidance of GL 95-10. The item removed from the TSs does not fall within any of the four criteria set forth in 10 CFR 50.36(b)(2)(ii) in that:

- (1) The subject instruments are used to detect and indicate scram accumulator pressure and water level rather than a degradation of the reactor coolant pressure boundary;
- (2) The subject instruments serve no active function in an accident or transient and, as such, are not included as initial conditions of these analyzed accidents and transients;
- (3) The subject instruments do not have automatic or interlock function to mitigate an accident or transient; and
- (4) Operating experience and the LGS probabilistic safety assessment have not determined these instruments to be significant to public health and safety.

Furthermore, the licensee's proposed change is consistent with the Standard Technical Specifications (STS), NUREG-1433, Rev. 1. The generic STS scram accumulator surveillance requirements are limited to verifying indicated accumulator pressure weekly as LGS Units 1 and 2 are proposing. Based on the staff's review and the information discussed in this section, we conclude that the licensee's proposed change is acceptable.

### 3.2 Technical Specification Action Statement 3.1.3.5.a.2.a

The licensee proposed to modify TS Action Statement 3.1.3.5.a.2.a) to allow for an alternate means for determining whether a Control Rod Drive (CRD) pump is operating. The TS action statement requires movement of a withdrawn control rod to demonstrate CRD pump operation when more than one control rod scram accumulator is inoperable. By specifying only one method of verifying CRD pump operation, the licensee believes that other methods of equal validity are being prohibited from use. For example, the current TS action statement requires

that CRD pump operability be verified by inserting at least one withdrawn control rod at least one notch when more than one control rod scram accumulator is inoperable. By specifying only one method of verifying CRD pump operation, if a loss of RMCS prevents normal control rod motion, the TS action statement cannot be satisfied, thereby placing the affected unit in a shutdown action statement. Therefore, the licensee has proposed an alternate method to verify that the CRD pump is operable by verifying that the control rod charging water header pressure is greater than 1400 psig.

The proposed TS action statement modification will add a check to verify that charging water header pressure is in excess of 1400 psig. The charging water header pressure is indicative of the operating status of the CRD pump. The pressure in the charging water header is shown in the Main Control Room. The operators are also alerted to a low charging water header pressure condition by the charging water header low pressure alarm. This pressure indicator and its associated instrument loop are powered from a diesel-backed, non-safety related power supply, as is the CRD pump itself. Consequently, if a loss of the RMCS prevents control rod motion, a pressure indicator and alarm in the Main Control Room is available to the operator to provide indication of whether a CRD pump is operating.

This change request does not alter any of the controls placed on the plant for controlled shutdown or scram. In addition, verification of the charging water header pressure to determine CRD pump operation is consistent with that found in the STS, NUREG-1433, Revision 1. Based on the staff's review and the information discussed in this section, we conclude that the licensee's proposed change is acceptable.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change the surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (65 FR 15382). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: H. Li

Date: May 22, 2000