October 2, 2000

Mr. Charles M. Dugger
Vice President Operations
Entergy Operations, Inc.
P. O. Box B
Killona, LA 70066

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ISSUANCE OF AMENDMENT RE: CONTAINMENT BUILDING PENETRATIONS DURING CORE ALTERATIONS AND IRRADIATED FUEL MOVEMENT IN CONTAINMENT (TAC NO. MA7999)

Dear Mr. Dugger:

The Commission has issued the enclosed Amendment No. 169 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated January 12, 2000, as supplemented by letters dated June 15, 2000, and September 7, 2000.

The proposed change modifies TS 3.9.4, "Containment Building Penetrations," to allow the containment equipment door, airlocks, and other penetrations to remain open, but capable of being closed during core alterations or movement of irradiated fuel in containment. Additionally, a note, Bases changes, and Surveillance Requirements changes provide further enhancements to clarify equipment door, airlock, and penetration closure capability.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,
/RA/
N. Kalyanam, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosures: 1. Amendment No. 169 to NPF-38
2. Safety Evaluation

cc w/encls: See next page

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cc:

Administrator
Louisiana Department of Environmental Quality
P. O. Box 82215
Baton Rouge, LA 70884-2215

Vice President, Operations Support
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286

Director, Nuclear Safety & Regulatory Affairs
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

Wise, Carter, Child & Caraway
P. O. Box 651
Jackson, MS 39205

General Manager Plant Operations
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

Licensing Manager
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

Winston & Strawn
1400 L Street, NW
Washington, DC 20005-3502

Resident Inspector/Waterford NPS
P. O. Box 822
Killona, LA 70066-0751

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Parish President Council
St. Charles Parish
P. O. Box 302
Hahnville, LA 70057

Executive VP & Chief Operating Officer
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286-1995

Chairman
Louisiana Public Service Commission
Baton Rouge, LA 70825-1697

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

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 169
License No. NPF-38

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Entergy Operations, Inc. (the licensee) dated January 12, 2000, as supplemented by letters dated June 15, 2000, and September 7, 2000, 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-38 is hereby amended to read as follows:

   (2) Technical Specifications and Environmental Protection Plan

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 169, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee 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 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: October 2, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 169

TO FACILITY OPERATING LICENSE NO. NPF-38

DOCKET NO. 50-382

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	Insert
3/4 9-4	3/4 9-4
B 3/4 9-1	B 3/4 9-1

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPERATION

3.9.4 The containment building penetrations shall be in the following status:

a. The equipment door is capable* of being closed,

b. A minimum of one door in each airlock capable * of being closed, and

c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:

1. Capable * of being closed by an isolation valve, blind flange, or manual valve, or

2. Be capable of being closed by an OPERABLE automatic containment purge valve.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

SURVEILLANCE REQUIREMENTS

4.9.4 Each of the above required containment building penetrations shall be verified to be either in its closed/isolated condition or capable of being closed prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building.

*Administrative controls shall ensure that appropriate personnel are aware that equipment door, both personnel airlock doors and/or penetrations are open, a specific individual(s) is designated and available to close the equipment door, an airlock door and the penetrations as part of a required evacuation of containment, and any obstruction(s) (e.g., cables and hoses) that could prevent closure of an airlock door and the equipment door be capable of being quickly removed.

3/4.9 REFUELING OPERATIONS

BASES

3/4.9.1 BORON CONCENTRATION

The limitations on reactivity conditions during REFUELING ensure that: (1) the reactor will remain subcritical during CORE ALTERATIONS, and (2) a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the safety analyses. The K_{eff} value specified in the COLR includes a 1% delta k/k conservative allowance for uncertainties. Similarly, the boron concentration value specified in the COLR also includes a conservative uncertainty allowance of 50 ppm boron.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the source range neutron flux monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor pressure vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the safety analyses.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment penetration closure and OPERABILITY ensure that a release of radioactive material within containment will be restricted from leakage to the environment. The OPERABILITY and closure restrictions are sufficient to restrict radioactive material release from a fuel element rupture based upon the lack of containment pressurization potential while in the REFUELING MODE.

The equipment door, personnel airlock doors, or penetrations may be open during movement of irradiated fuel in the containment and during CORE ALTERATIONS provided the equipment door, a minimum of one door in the airlock, and penetrations are capable of being closed in the event of a fuel handling accident. Should a fuel handling accident occur inside containment, the equipment door, a minimum of one personnel airlock and the open penetrations will be closed as part of an evacuation of containment. For closure, the equipment door will be held in place by a minimum of four symmetrically-placed bolts.

3/4.9.5 COMMUNICATIONS

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity condition during CORE ALTERATIONS.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 169 TO

FACILITY OPERATING LICENSE NO. NPF-38

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION:

By letter dated January 12, 2000, as supplemented by letters dated June 15, 2000, and September 7, 2000, Entergy Operations, Inc. (EOI, the licensee) submitted a request for changes to the Waterford Steam Electric Station, Unit 3 (Waterford 3) Technical Specifications (TS).

TS 3.9.4 currently specifies that, during core alterations or the movement of irradiated fuel within the containment, the containment building penetrations shall be in the following status:

a. The equipment door closed and held in place by a minimum of four bolts,

b. A minimum of one door in each airlock is closed, and

c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:

   1. Closed by an isolation valve, blind flange, or manual valve, or

   2. Be capable of being closed by an OPERABLE automatic containment purge valve.

The proposed changes would revise the TSs to permit the containment equipment hatch door to be open during handling of irradiated fuel in containment and during core alterations, subject to the capability for quick containment closure being maintained. In addition, during core alterations and movement of irradiated fuel within the containment, a minimum of one door in each airlock shall be capable of being closed and each penetration providing direct access from the containment atmosphere to the outside atmosphere shall 1) be capable of being closed by an isolation valve, blind flange, or manual valve, or 2) be capable of being closed by an OPERABLE automatic containment purge valve.

2.0 BACKGROUND:

Containment barriers are provided for nuclear power plants as the final barrier of the defense-in-depth concept to protect against the uncontrolled release of radioactivity to the environs. The containment function, in combination with other fission product barriers and accident mitigating systems, limits the radiological dose consequences of design-basis transients and accidents to the regulatory guidelines defined by Title 10 of the *Code of Federal Regulations* (10 CFR) Part 100.

Prior to 1977, the staff did not require licensees to analyze the radiological consequences of a fuel handling accident (FHA) inside containment (FHA-IC), since the FHA-IC accident consequences were bounded by the "outside containment" FHA case. However, on January 3, 1977, Commissioner Victor Gilinsky received a letter from Mr. Robert Pollard of Union of Concerned Scientists that forwarded information indicating that FHAs in containment could have potential radiological dose consequences in excess of Part 100 limits if containment isolation and filtration were not available. Subsequently, on January 14, 1977, B. Rusche, Director of the Office of Nuclear Reactor Regulation, requested all nuclear power reactor licensees having an operating license to act on Mr. Pollard's request to analyze the radiological consequences of an FHA-IC, and provide the results to the staff. As part of its reviews, the staff ensured that the TSs included containment and safety feature filtration systems operability requirements during handling of irradiated fuel in the containment, to the extent necessary to ensure acceptable accident consequences. Prior to this generic action, Waterford 3 TSs did not typically require that the containment integrity be maintained during periods when the reactor coolant system temperature was ≤210 °F, but only required that containment vent/purge isolation systems be operable. In a July 1981 revision to the Standard Review Plan (SRP), Section 15.7.4 was revised to specifically require the analysis of an FHA-IC, since the guidance of Regulatory Guide 1.25 (March 1972) assumes an accident in the "fuel handling and storage facility."

The acceptance criteria of SRP 15.7.4, paragraph 11.5, allow a containment to be "open" to the environment during fuel handling, it being expected that the containment will be undergoing ventilation to minimize worker radiation exposure and for worker comfort. However, if fuel handling operations are to be conducted with the containment open, capability for prompt detection of radiation and automatic isolation is to be provided and reflected in the analysis of FHA radiological consequences. The Waterford 3 licensee's proposal would result in containment conditions wherein containment closure would not meet these criteria (i.e., would not be automatic/immediate). Equipment hatch closure time would require manual actions taking up to possibly 15 minutes.

For the purpose of evaluating the Waterford 3 application, the staff focused on two features which are (1) acceptability of manual personnel actions to initiate containment closure, and (2) acceptability, from the standpoint of dose increase, of the additional time delay in closing the containment. The acceptability of dependence on manual operator actions for operation of safety systems is well-recognized for actions required in the "long-term" phase of an accident (i.e., loss-of-coolant accident, post-recirculation switchover). For short-term required actions, the staff accepts limited operator manual actions as substitutes for automatic controls subject to a stringent review of human factors considerations including implementation of appropriate procedures and training.

3.0 EVALUATION:

3.1 Component Description:

The Waterford 3 containment equipment hatch door is 14 feet in diameter and provides a means for moving large equipment and components into and out of containment during refueling outages. The equipment hatch door is a welded steel assembly, with double gasketed flanged and bolted cover, uses swing bolts for closure, and is of the pressure sealing design. Closure is accomplished manually with four of sixteen bolts required during MODE 5 and 6 operations.

The containment personnel airlock (PAL) connects the containment interior with the auxiliary building. The PAL is provided for the purpose of permitting personnel to enter and exit the containment building. The PAL contains two airlock doors with a personnel chamber between the two doors. The containment is also provided with an Emergency Airlock (EAL). The EAL is a smaller airlock that connects the containment with the outside environs. Both of these airlocks are of the pressure seating design.

Other penetrations are provided for system connections between the containment and those portions of the systems outside the containment. A typical penetration is equipped with isolation valves inside and outside containment and drain or vent valves to the atmosphere. These penetrations, when subject to Local Leak Rate Testing (LLRT) during an outage, are required to be opened in order to drain the penetration piping, providing direct access from the containment atmosphere to the outside atmosphere. To mitigate the consequences of a FHA-IC, these penetrations are currently required by TS 3.9.4 to be closed.

3.2 Manual Personnel Actions to Close Containment Equipment Hatch Door:

On the issue of acceptability of manual personnel actions to initiate containment closure and human factors considerations and reliability considerations involved in the use of manual personnel action to close the containment under FHA conditions, the licensee states that an individual will be designated to monitor the condition of the open equipment hatch door during core alterations and fuel movement inside containment to assure closure of the equipment hatch door following containment evacuation. The assurance that the open equipment hatch door will remain capable of prompt closure will be administratively controlled in site procedures. Any items passing through the door that could obstruct closure of the door will have quick disconnect capability or will be readily removable.

The Waterford 3 design is such that its containment equipment hatch door can be opened and closed easily and efficiently. On September 29, 1989, as part of the initiatives to address Generic Letter (GL) 88-17, EOI performed an equipment hatch closure test at Waterford 3 to verify the time required to close the equipment hatch. The test simulated conditions normally found during an outage. The total time required to close the equipment hatch was less than 15 minutes. These measures for the expeditious closure of the equipment hatch were established to address GL 88-17, and were documented in plant procedures. In the event of a FHA-IC, an open equipment hatch will be the most limiting containment opening with respect to establishment of containment closure. The equipment hatch door will be closed as part of an evacuation of containment, allowing personnel to evacuate through the equipment hatch in addition to the PAL. However, in order to protect the health and safety of the public, the equipment hatch closure would be completed within 30 minutes of the determination of the need

to evacuate containment. The licensee has committed that action will be taken to have the equipment hatch door closed within 30 minutes of determination of the need to evacuate containment. The Nuclear Regulatory Commission (NRC) staff has based its conclusions, in part, on the licensee's 30-minute closure time for the containment equipment hatch. The 30-minute closure time is an appropriate time limit to allow for the evacuation of personnel from containment while ensuring that the equipment hatch is in place to provide a barrier in the event of an accident. In addition, based on the number of evacuation pathways, it is reasonable to ensure the closure of the equipment hatch within 30 minutes regardless of the status of the evacuation.

3.3 Radiological Consequences of FHA-IC:

In support of the proposed changes, the licensee performed a dose consequences analysis of the FHA-IC. The analysis was based on the current analysis of the FHA in the fuel handling building as documented in the Waterford 3 Final Safety Analysis Report (FSAR). The supporting calculation assumed that the noble gases and iodine from the gap of the broken fuel rods are released instantaneously to the outside atmosphere, effectively ignoring the existence of the containment building. The licensee also conservatively based the fuel gap inventory on an anticipated 8 percent power uprate, using 113.4 percent of current rated core power. The licensee-calculated dose consequences are well within the dose guidelines of 10 CFR Part 100 for offsite dose and meet General Design Criterion 19 for the dose to an operator in the control room.

Based on information given in the Waterford 3 FSAR, the licensee currently assumes 13 cfm of unfiltered inleakage. By letter dated April, 25, 2000, the staff sent a Request for Additional Information (RAI) to the licesee asking how the 13 cfm value was verified and also requested the licensee to verify the locations of the equipment hatch and control room intakes. The unfiltered inleakage question is related to a long-standing generic issue on control room integrity. The locations of the equipment hatch and control room intakes were required to determine acceptability of the licensee's position that the current FSAR values for the atmospheric dispersion factor (X/Q) for the control room are bounding for the release from the equipment hatch. With the licensee's response to the RAI, provided in its letter dated June 15, 2000, the staff was able to determine that the use of current control room X/Qs was acceptable. With regard to the staff's question on unfiltered inleakage, the licensee's response indicated their awareness and participation in the ongoing voluntary industry effort to investigate issues associated with control room habitability, including the question of unfiltered inleakage to the control room. The staff reviewed the licensee's analysis and assumptions documented in the submittal and supplements, and found them acceptable. The staff performed confirmatory calculations using the licensee's stated assumptions and confirmed the licensee's dose results, which are well within the exposure guidelines of 10 CFR Part 100.

3.4 Considerations Involved in Rapid Equipment Hatch Closure:

Paragraph 6.9.2 of NUREG-1449, Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States, identifies the considerations involved in rapid equipment hatch closure; they are: (1) radiological and environmental conditions in containment resulting from coolant boiling, (2) number and location of hatch closure bolts, (3) need for and availability of compressed air and electrical power, (4) nearness of required tools, and (5) training and rehearsing of personnel. Each of these five factors is discussed below.

(1) Radiological and environmental conditions in containment resulting from coolant boiling: This item is not a consideration for the proposed amendment, as the staff has determined that the hatch must be capable of being closed prior to boiling.

(2) Number and location of hatch closure bolts: Appendix B of NUREG-1449 provides the details of the staff's Equipment Hatch Survey conducted as part of the NUREG-1449 investigation. It is noted that the Waterford 3 hatch design is particularly well-suited for rapid closure in that it uses swing bolting.

(3) Need for and availability of compressed air and electrical power: Table B.2 of NUREG-1449 notes that Waterford 3 equipment hatch closure does not require services such as compressed air or electrical power. The Waterford 3 equipment hatch can be manually closed without service power.

(4) Nearness of required tools: In accordance with EOI Administrative Procedure PLG-009-016, "Containment Building Administrative Controls During Refueling Outages," tools such as closure wrenches used to tighten the swing bolts and the other equipment such as the hatch handling mechanism and the equipment hatch bridge lifting rig attached to the bridge are located at the Equipment Hatch location. The handling mechanism consisting of three chain-operated hoists and a support beam used to remove the hatch, move it to the storage position, and reinstall the hatch, remains attached to the hatch during the storage period and reinstallation. The activities involving the removal of the equipment hatch bridge, and the reinstallation and securing of the hatch will be completed within a 30 minute period of time following a request from the Operators to close the door.

(5) Training and Rehearsing of Personnel: Under EOI's existing administrative controls, training of Waterford 3 personnel is the responsibility of the Containment Director. The Containment Director is responsible for providing direction and control for activities performed in the Containment, outside of fuel movement, and reactor vessel disassembly/assembly, during planned outages. The Containment Coordinators, reporting to the Containment Director, are trained on containment closure responsibilities such as closing the airlocks and all other penetrations, ensuring all work activities are stopped and placed in a safe condition, ensuring all personnel are evacuating the containment in a orderly but expeditious manner, and implementing the overall working level coordination and control of these containment activities.

The Containment Director is further responsible for training containment closure personnel and maintaining a roster of qualified personnel. These personnel, permanent plant employees, or contract personnel, are trained and tested on fast closure of the equipment hatch. In addition, a standard outage activity is placed in the outage schedule to ensure the training of all containment personnel responsible for equipment hatch closure.

Waterford 3 has closed the equipment hatch in less than 15 minutes dating as far back as September 29, 1989, when EOI performed an equipment hatch closure test at Waterford 3 to verify the time required to close the equipment hatch. This test simulated conditions normally found during an outage as part of the initiatives to address GL 88-17.

The existing administrative controls require appropriate training in containment closure procedures to ensure the personnel responsible for containment closure can perform this requirement within the existing one-hour time period (Amendment 148 Safety Evaluation). Commitments contained in the letter dated January 12, 2000, specify that (1) additional action would be taken to have the containment equipment hatch closed within 30 minutes, (2) administrative procedures would be implemented that the equipment hatch and at least one door in each personnel airlock would be closed following a containment evacuation, and (3) open penetrations would also be promptly closed. These commitments enhance the existing administrative controls for rapid equipment hatch closure.

3.5 Loss of Decay Heat Removal:

GL 88-17, "Loss of Decay Heat Removal," discusses problems with shutdown modes of plant operation, provides recommendations, and requests information from licensees pertaining to (1) prevention of accident initiation, (2) mitigating of accidents before they potentially progress to core damage, and (3) control of radioactive material if a core damage accident should occur. The guidance provided by GL 88-17, including the recommended time limits for closure of containment penetrations, is primarily aimed at reduced inventory "mid-loop" operations, a condition of increased vulnerability to core damage due to a more rapid boiloff. The proposed amendments would apply primarily to refueling operations during which there is a greatly increased inventory compared to the events described in GL 88-17. The staff has previously found that the Waterford 3 licensee has implemented plans and procedures to comply with the GL 88-17 guidance related to loss of decay heat removal during shutdown operations. The bases for the staff's acceptance of the licensee's response to GL 88-17 is not affected by the changes included in the proposed amendments.

Based on the onsite findings of the NUREG-1449 investigation team, and the information documented in the application, the proposed amendments are acceptable with respect to shutdown risk loss of decay heat removal considerations.

3.6 Other Considerations:

The staff finds credible the licensee's statements of other potential beneficial effects of an open equipment hatch.

- On radiological consequences of an FHA-IC, the exposure of personnel in containment (and perhaps overall radiological consequences) could be lower as a result of the faster evacuation of containment if an FHA-IC occurred when an equipment hatch is available as an escape route.

- Maintaining the hatch open, but capable of being closed, makes it easier to maintain a clean, safe working environment inside the containment. Trash that is accumulated inside the containment can be easily and efficiently moved in and out of the containment. This eliminates a potential fire hazard.

- During a typical refueling outage, the work scope and related critical path sequencing is related to the availability of the containment equipment hatch being open. With an open

hatch, equipment can be moved in and out of the containment in a more schedule efficient manner, without impacting the refuel critical path.

- Frequent use of the PAL doors result in accelerated wear of the door components such as door hinges, door seals, and the packing of equalizing valves. Leaving the doors open should reduce the wear on the doors, thus increase the reliability of the doors.

- During the performance of LLRT, certain containment isolation valves subject to Type C testing are required to be opened in order to drain the penetration piping. This opens up a direct access from inside the containment to the outside atmosphere with the result that LLRT tests cannot be performed during core alterations or fuel movement. This restriction significantly complicates the logistics for performing LLRT and reduces overall refueling efficiency. The proposed change to TS 3.9.4, which would allow containment penetrations to be open on an intermittent basis, provided that the penetration is capable of being closed by an isolation valve, blind flange, or manual valve, and increases the overall refueling outage efficiency.

The staff finds that the radiological dose consequences are well within the radiological dose guidelines of 10 CFR Part 100, with regard to the dose consequences of the FHA inside containment with the containment equipment door, air locks, and other specified penetrations open for the duration of the accident release. The staff has also determined that the proposed changes are consistent with precautions considered necessary to minimize the risks associated with a loss of decay heat removal during outage operations. Based on these findings, the staff concludes that the proposed changes are acceptable.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves 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 amendment involves no significant hazards consideration and there has been no public comment on such finding (65 FR 9008, dated February 23, 2000). The June 15, 2000, and September 7, 2000, supplemental letters provided clarifying information that did not expand the scope of the original *Federal Register* notice, or change the scope of the initial proposed no significant hazards consideration determination. Accordingly, the amendment meets 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 amendment.

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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: M. Hart and N. Kalyanam

Date: October 2, 2000