Mr. Robert G. Byram Senior Vice President-Generation and Chief Nuclear Officer Pennsylvania Power and Light Company 2 North Ninth Street Allentown, PA 18101

## SUBJECT: ENVIRONMENTAL ASSESSMENT RELATED TO REQUEST FOR CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS-SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 (TAC NOS. M96327 AND M96378)

Dear Mr. Byram:

Enclosed is a copy of the Environmental Assessment and Finding of No Significant Impact related to your application for amendments dated August 1, 1996, as supplemented by letters dated November 26, 1997, January 6, March 2, April 24 and June 18, 1998. The proposed amendments would convert the current Technical Specifications (TSs) to a set of TSs based on NUREG-1433, "Standard Technical Specifications-General Electric Plants," Revision 1, dated April 1995 (including approved modifications to be issued with the future Revision 2).

The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,

## /S/

Victor Nerses, Senior Project Manager Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

DFD

Docket Nos. 50-387/50-388

Enclosure: Environmental Assessment

cc w/encl: See next page

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## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001 July 15, 1998

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Mr. Robert G. Byram Pennsylvania Power & Light Company

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7590-01-P

# UNITED STATES NUCLEAR REGULATORY COMMISSION PENNSYLVANIA POWER AND LIGHT COMPANY DOCKET NOS. 50-387 AND 50-388 SUSQUEHANNA STEAM ELECTRIC PLANTS, UNITS 1 AND 2 ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License Nos. NPF-14 and NPF-22, issued to Pennsylvania Power and Light Company, (the licensee), for operation of the Susquehanna Steam Electric Station (SSES), Units 1 and 2, located in Luzerne County, Pennsylvania.

ENVIRONMENTAL ASSESSMENT

Identification of the Proposed Action:

The Environmental Assessment has been prepared to address potential environmental issues related to the licensee's application dated August 1, 1996, as supplemented by letters dated November 26, 1997, January 6, March 2, April 24, and June 18, 1998. The proposed amendments will replace the SSES, Units 1 and 2, Current Technical Specifications (CTSs) in their entirety with Improved Technical Specifications (ITSs) based on Revision 1 to NUREG-1433, "Standard Technical Specifications-General Electric Plants BWR/4" dated April 1995. The Need for the Proposed Action:

It has been recognized that nuclear safety in all plants would benefit from improvement and standardization of Technical Specifications (TS). The Commission's "NRC Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (52 Fed. Reg. 3788, February 6, 1987), and later the Commission's "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," 58 FR 39132 (July 22, 1993), formalized this need. To facilitate the development of individual improved TSs, each reactor vendor owners group (OG) and the NRC staff developed standard TS (STS). For General Electric plants, the STS are published as NUREG-1433, and this document was the basis for the new SSES, Units 1 and 2 TSs. The NRC Committee to Review Generic Requirements (CRGR) reviewed the STS and made note of the safety merits of the STS and indicated its support of conversion to the STS by operating plants.

#### Description of the Proposed Change:

The proposed revision to the TSs is based on NUREG-1433 and on guidance provided in the Final Policy Statement. Its objective is to completely rewrite, reformat, and streamline the CTS. Emphasis is placed on human factors principles to improve clarity and understanding. The Bases section has been significantly expanded to clarify and better explain the purpose and foundation of each specification. In addition to the NUREG, portions of the CTS were also used as the basis for the ITS. Plant-specific issues (unique design features, requirements, and operating practices) were discussed at length with the licensee, and generic matters with the OG.

The proposed changes from the existing CTS, can be grouped into four general categories, as follows:

1. Non-technical (administrative) changes, which were intended to make the ITS easier to use for plant operators personnel. They are purely editorial in nature or involve the movement or reformatting of requirements without affecting technical content. Every section of the SSES, Units 1 and 2 CTS has undergone these types of changes. In order to ensure consistency, the NRC staff and the licensee have used NUREG-1433 as guidance to reformat and make other administrative changes.

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- 2. Relocation of requirements, which includes items that were in the SSES, Units 1 and 2 CTS. The CTS items that are being relocated to licensee-controlled documents are not required to be in the TSs under 10 CFR 50.36 and do not meet any of the four criteria in the Commission's Final Policy Statement for inclusion in the TSs. They are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. The NRC staff has concluded that appropriate controls have been established for all of the current specifications, information, and requirements that are being moved to licensee-controlled documents. In general, the proposed relocation of items in the SSES, Units 1 and 2, CTS to the Final Safety Analysis Report (FSAR), appropriate plant-specific programs, procedures and ITS Bases follows the guidance of the General Electric STS (NUREG-1433). Once these items have been relocated by removing them from the CTS to licensee-controlled documents, the licensee may revise them under the provisions of 10 CFR 50.59 or other NRC staff-approved control mechanisms, which provide appropriate procedural means to control changes.
- 3. More restrictive requirements, which consist of proposed SSES, Units 1 and 2 ITSs items that are either more conservative than corresponding requirements in the SSES, Units 1 and 2, CTS or are additional restrictions that are not in the SSES, Units 1 and 2, CTS, but are contained in NUREG-1433. Examples of more restrictive requirements include: placing a Limiting Condition of Operation (LCO) on plant equipment that is not required by the CTS to be operable; more restrictive requirements to restore inoperable equipment; and more restrictive surveillance requirements.
- 4. Less restrictive requirements are relaxations of corresponding requirements in the SSES, Units 1 and 2, CTS that provide little or no safety benefit and place unnecessary burdens

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on the licensee. These relaxations were the result of generic NRC actions or other analyses. They have been justified on a case-by-case basis for SSES, Units 1 and 2, as will be described in the staff's Safety Evaluation to be issued with the license amendment, which will be noticed in the FEDERAL REGISTER.

In addition to the changes described above, the licensee proposed certain changes to the CTS that deviated from the STS in NUREG-1433. These additional proposed changes are described in the licensee's application and in the staff's Notice of Consideration of Issuance of Amendment to Facility Operating License and Opportunity for a Hearing (61 FR 56972) published in the <u>Federal Register</u> on November 5, 1996. Where these changes represent a change to the current licensing basis for SSES, Units 1 and 2, they have been justified on a case-by-case and will be described in the staff's safety evaluation to be issued with the license amendment.

## Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed action and concludes that the proposed TS conversion would not increase the probability or consequences of accidents previously analyzed and would not affect facility radiation levels or facility radiological effluents.

Changes that are administrative in nature would have no effect on the technical content of the TSs and are acceptable. The increased clarity and understanding these changes bring to the TSs are expected to improve the operator's control of the plant in normal and accident conditions.

Relocation of requirements to licensee-controlled documents would not change the requirements themselves. Future changes to these requirements may be made by the licensee under 10 CFR 50.59 or other NRC-approved control mechanisms, which ensures continued

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maintenance of adequate requirements. All such relocations have been found to be in conformance with the guidelines of NUREG-1433 and the Final Policy Statement, and, therefore, are acceptable.

Changes involving more restrictive requirements would be likely to enhance the safety of plant operations and are acceptable.

Changes involving less restrictive requirements have been reviewed individually. When requirements have been shown to provide little or no safety benefit or to place unnecessary burdens on plant operations, those requirements have been relaxed in an overall effort to enhance safety. The changes will not increase the probability or consequences of accidents, no changes are being made in the types of any effluents that may be released offsite, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure. Accordingly, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed action.

With regard to potential nonradiological impacts, the proposed action does involve features located entirely within the restricted area as defined in 10 CFR Part 20. It does not affect nonradiological plant effluents and has no other environmental impact.

Accordingly, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed action.

#### Alternatives to the Proposed Action:

Since the Commission has concluded there is no measurable environmental impact associated with the proposed action, any alternatives with equal or greater environmental impact need not be evaluated. The principal alternative to this action would be to deny the request for the amendment. Such action would not reduce the environmental impacts of plant operations.

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#### Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the Final Environmental Statement related to the operation of the SSES, Units 1 and 2, dated June 1981.

### Agencies and Persons Consulted:

In accordance with its stated policy, on June 19, 1998, the staff consulted with the Pennsylvania State official, Mr. M. Mangi of the Pennsylvania Department of Environmental Protection Bureau, Division of Nuclear Safety, regarding the environmental impact of the proposed action. The State official had no comments.

## FINDING OF NO SIGNIFICANT IMPACT

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's letter dated August 1, 1996, as supplemented by letters dated November 26, 1997, January 6, March 2, April 24, and June 18, 1998, which are available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW., Washington DC, and at the local public document room located at the Osterhout Free Library, Reference Department, 71 South Franklin Street, Wilkes -Barre, PA 18701.

Dated at Rockville, Maryland, this 15th day of July 1998.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert a. Caper

Robert A. Capra, Director Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

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