March 10, 1998

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: EMERGENCY TECHNICAL SPECIFICATIONS, SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 (TAC NOS. MA0822 AND MA0823)

Dear Mr. Byram:

The Commission has issued the enclosed Amendment No. 173 to Facility Operating License No. NPF-14 and Amendment No. 146 to Facility Operating License No. NPF-22 for the Susquehanna Steam Electric Station, Units 1 and 2.

On February 3, 1998, you requested that the NRC exercise discretion not to enforce compliance with the actions required in Technical Specification (TS) Surveillance Requirement 4.6.1.2, which requires that Susquehanna enter TS 4.0.3 if there is a failure to perform a surveillance requirement within the allowed surveillance interval. The NRC verbally granted the enforcement discretion on February 3, 1998, and issued a Notice of Enforcement Discretion (98-6-002) on February 5, 1998.

By letter dated February 5, 1998, as supplemented February 12, March 3 and 5, 1998, you requested changes to the Susquehanna TS reflecting the enforcement discretion. Specifically, the proposed changes would add a footnote to TS 4.6.1.2.a stating that the requirement for Type A testing will not apply to certain penetrations until appropriate testing can be safely performed, but no later than the startup after the next refueling outages for each unit, planned for April 1998 for Unit 1 and spring 1999 for Unit 2.

A copy of our safety evaluation is enclosed. Notice of Issuance of Amendments to Facility Operating Licenses and Final Determination of No Significant Hazards Consideration and Opportunity for a Hearing will be included in the Commission's Biweekly Federal Register Notice.

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

Docket Nos. 50-387 and 50-388

Enclosures: 1. Amendment No. 173 to License No. NPF-14
2. Amendment No. 146 to License No. NPF-22
3. Safety Evaluation

cc w/encls: See next page

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

March 10, 1998

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

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Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosures: 1. Amendment No. 173 to License No. NPF-14
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3. Safety Evaluation

cc:

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

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-387

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 173
License No. NPF-14

1. The Nuclear Regulatory Commission (the Commission or the NRC) having found that:

   A. The application for the amendment filed by the Pennsylvania Power & Light Company, dated February 5, 1998, as supplemented February 12, March 3 and 5, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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 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 set forth in 10 CFR Chapter I;

   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 the Facility Operating License No. NPF-14 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.173 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PP&L 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.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: March 10, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 173

FACILITY OPERATING LICENSE NO. NPF-14

DOCKET NO. 50-387

Replace the following page of the Appendix A Technical Specifications with enclosed page. The revised page is identified by Amendment number and contains vertical lines indicating the area of change.

REMOVE	INSERT
3/4 6-3	3/4 6-3

LIMITING CONDITION FOR OPERATION (Continued)

ACTION: (Continued)

restore:

a. The overall integrated leakage rate (Type A test) to be in accordance with Specification 6.8.5, Primary Containment Leakage Rate Testing Program, and

b. The combined leakage rate for all penetrations and all valves listed in Table 3.6.3-1, except for main steam line isolation valves*, main steam line drain valves* and valves which are hydrostatically leak tested per Table 3.6.3-1, subject to Type B and C tests to be in accordance with Specification 6.8.5, Primary Containment Leakage Rate Testing Program, and

#c. The leakage rate to less than or equal to 11.5 scf per hour for any main steam isolation valve that exceeds 100 scf per hour, and restore the combined maximum pathway leakage rate to ≤ 300 scf per hour for all four main steam lines through the isolation valves, and

d. The leakage rate to less than or equal to 1.2 scf per hour for any one main steam line drain valve, and

e. The combined leakage rate for all containment isolation valves in hydrostatically tested lines which penetrate the primary containment to less than or equal to 3.3 gpm,

prior to increasing reactor coolant system temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The primary containment leakage rates shall be demonstrated in accordance with Specification 6.8.5, Primary Containment Leakage Rate Testing Program, for the following:

a. Type A Test**
b. Type B and C Tests (including air locks and purge supply and exhaust isolation valves)
c. Air Locks
d. Main Steam Line Isolation Valves
e. Hydrostatically Tested Containment Isolation Valves
f. Purge Supply and Exhaust Isolation Valves

Deletion of the MSIV Leakage Control System was approved in Amendment No. 151 and implemented during the U1 9 RIO.

** These requirements do not apply to penetrations X-32A and X-3B for the period not to exceed restart from the Unit 1 Spring 1998 refueling outage. However, until completion of the Appendix J tests described in PLA-4846, dated February 5, 1998, Attachment 1, page 6, "Planned Test Activities," monthly calibrations are required of each of the affected instruments associated with penetrations X-32A and X-3B to confirm the absence of unacceptable leakage. NOTE: This exception is only in effect until the restart from the Unit 1 Spring 1998 refueling outage, or in effect until the restart from an earlier forced outage, at which time the testing will be performed.

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

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 146
License No. NPF-22

1. The Nuclear Regulatory Commission (the Commission or the NRC) having found that:

   A. The application for the amendment filed by the Pennsylvania Power & Light Company, dated February 5, 1998, as supplemented February 12, March 3 and 5, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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 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 set forth in 10 CFR Chapter I;

   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 the Facility Operating License No. NPF-22 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. 146 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PP&L 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.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: March 10, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 146

FACILITY OPERATING LICENSE NO. NPF-22

DOCKET NO. 50-388

Replace the following page of the Appendix A Technical Specifications with enclosed page. The revised page is identified by Amendment number and contains vertical lines indicating the area of change.

REMOVE	INSERT
3/4 6-3	3/4 6-3

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

restore:

a. The overall integrated leakage rate (Type A test) to be in accordance with Specification 6.8.5, Primary Containment Leakage Rate Testing Program, and

b. The combined leakage rate for all penetrations and all valves listed in Table 3.6.3-1, except for main steam line isolation valves*, main steam line drain valves* and valves which are hydrostatically leak tested per Table 3.6.3-1, subject to Type B and C tests to be in accordance with Specification 6.8.5, Primary Containment Leakage Rate Testing Program, and

c. The leakage rate to less than or equal to 11.5 scf per hour for any main steam isolation valve that exceeds 100 scf per hour, and restore the combined maximum pathway leakage rate to ≤300 scf per hour for all four main steam lines through the isolation valves, and

d. The leakage rate to less than or equal to 1.2 scf per hour for any one main steam line drain valve, and

e. The combined leakage rate for all containment isolation valves in hydrostatically tested lines which penetrate the primary containment to less than or equal to 3.3 gpm,

prior to increasing reactor coolant system temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The primary containment leakage rates shall be demonstrated in accordance with Specification 6.8.5, Primary Containment Leakage Rate Testing Program, for the following:

a. Type A Test**
b. Type B and C Tests (including air locks and purge supply and exhaust isolation valve)
c. Air Locks
d. Main Steam Line Isolation Valves
e. Hydrostatically Tested Containment Isolation Valves
f. Purge Supply and Exhaust Isolation Valves

** These requirements do not apply to penetrations X-32A, X-3B, X-90A, X-90D and X-223A. However, until completion of the Appendix J tests described in PLA-4846, dated February 5, 1998, Attachment 1, page 6, "Planned Test Activities," monthly calibrations are required of each of the affected instruments associated with penetrations X-32A and X-3B to confirm the absence of unacceptable leakage. NOTE: This exception is only in effect until the restart from the Unit 2 Spring 1999 refueling outage, or in effect until the restart from an earlier forced outage, at which time the testing will be performed.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 173 TO FACILITY OPERATING LICENSE NO. NPF-14

AMENDMENT NO. 146 TO FACILITY OPERATING LICENSE NO. NPF-22

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-387 AND 388

1.0 INTRODUCTION

The Pennsylvania Power and Light Company (the licensee, PP&L) has determined that certain containment isolation pathways have not been leakage rate tested by being included in the latest Type A test (containment integrated leakage rate test) as required by the facility's Technical Specifications (TS) and Option B of Appendix J to 10 CFR Part 50. In a letter dated February 5, 1998, as revised by letters dated February 12, March 3 and 5, 1998, the licensee requested temporary relief from these requirements, in the form of an emergency TS change, to remain in effect until appropriate testing can be safely performed, but no later than the next refueling outages for each unit, planned for April 1998 for Unit 1 and spring 1999 for Unit 2. On February 5, 1998, the staff authorized, in writing, continued operation of the Susquehanna units in a notice of enforcement discretion (NOED) until such time as the staff acted on the proposed TS changes.

NUREG-1600, "General Statement of Policy and Procedures for NRC Enforcement Actions," Enforcement Policy (previously Appendix C to Part 2 of Title 10 of the Code of Federal Regulations) allows the staff to not enforce compliance with a power reactor license. It provides relief to licensees when compliance with TS or other license conditions would involve unnecessary plant transients, performance of testing, inspection, or system realignment that is inappropriate for the specific plant conditions, or unnecessary delays in plant startup without a corresponding health and safety benefit. This type of discretion, designated as an NOED, is addressed in Section VII.C. of the Enforcement Policy. Follow-up license amendments for NOEDs should be processed on an emergency or exigent basis, as appropriate. In this case, the amendment is being processed on an emergency basis.

2.0 BACKGROUND

TS 4.6.1.2 requires the containment leakage rate for Type A tests to be determined in accordance with TS 6.8.5, "Primary Containment Leakage Rate Testing Program," which further states that the applicable leakage rate acceptance criterion, L_a, applies for testing conducted at pressure P_a, which is the peak calculated containment internal pressure for the design basis accident (DBA) loss-of-coolant accident (LOCA). P_a for the Susquehanna station is 45.0 psig.

Several instrument line penetrations at the Susquehanna station have been designated as "extensions of containment," which requires the lines to be vented to the containment atmosphere during Type A tests so that the lines, including the instruments themselves, would be tested as part of the Type A test. However, the licensee has identified certain of these lines, on each unit, for which the instruments and adjacent sections of pipe have been isolated (by closed valves) from the test pressure, P_a, during Type A tests. The licensee plans to correct this testing deficiency by performing local leakage rate tests (LLRTs) at pressure P_a on the untested portions of the lines and instruments and assuring that containment leakage rate totals are below appropriate limits. However, the licensee considers it prudent to conduct most of the LLRTs only during unit shutdown, because there would be a potential for causing an inadvertent reactor scram if the LLRTs were conducted during plant operation. Thus, the licensee proposes to perform the tests at the next refueling outage for each unit, unless a forced outage occurs beforehand; there are also some conditions which could result in earlier testing, which are discussed in the following evaluation.

3.0 EVALUATION

The subject instrument lines pass through containment penetrations X-32A and X-3B in Unit 1, and X-32A, X-3B, X-90A, X-90D, and X-223A in Unit 2. For Unit 1, there are 15 instruments associated with the 2 listed penetrations, and for Unit 2, 18 instruments associated with the 5 listed penetrations. The instrument lines, which are 3/8-inch tubing, branch out outside of the containment to connect to the various instruments. Four of the instruments provide only indication and alarm functions, but the rest function to actuate Engineered Safety Feature (ESF) functions. Each instrument has a root valve near it, which was closed during the last Type A tests in 1992. Between each root valve and its instrument is a test tap that can be used to pressurize the portion of the line and instrument which was not tested by the Type A test. These test taps are used quarterly to calibrate the instruments, during which time the volumes are pressurized to approximately 2.5 psig. These tests have indicated that the volumes are relatively leak-tight at 2.5 psig, but this is not a substitute for an LLRT at P_a (45 psig).

These same test taps will be used to perform the LLRTs at P_a. However, because various instruments connect to common headers, an LLRT at P_a could potentially cause a sudden large leak-through of a root valve (which has no safety function to stop through-valve leakage) and the resultant pressure spike could hit the other instruments and scram the reactor if the plant were operating. The licensee could not isolate the other instruments to protect them from this transient, because the other instruments must remain operational while the plant is operating. For this reason, the licensee finds it inadvisable, and the staff concurs, to test at other than shutdown conditions.

Nevertheless, the licensee will perform certain interim tests before the refueling outages:

- LLRT of the untested portions of Unit 2 penetrations X-90A, X-90D, and X-223A will be performed during February 1998. The instruments associated with the untested portions of these penetrations are stand-alone and have no active safety functions, so they may be tested while the plant is operating. If the results are not acceptable, the licensee plans to perform a controlled shutdown of each unit and test all of the untested instrument lines.

- If, however, the Unit 2 results are acceptable, the licensee will perform the Unit 1 tests at the next refueling outage, planned for April 1998. If the Unit 1 results are not acceptable, the licensee will perform a controlled shutdown of Unit 2 and test all of the untested instrument lines.

- If the Unit 1 results are acceptable, the licensee will complete the Unit 2 tests during the next refueling outage, planned for spring 1999.

- If a forced outage occurs on a unit prior to the testing milestones discussed above, the licensee will perform the tests for that unit during the outage.

The licensee's leakage rate testing program, in accordance with TS 6.8.5, "Primary Containment Leakage Rate Testing Program," and Option B of Appendix J to 10 CFR Part 50, limits the sum of the leakage rates from Type B and Type C tests (local leakage rate tests) to 0.6 L_a, where L_a is the maximum allowable containment leakage rate at pressure P_a. The leakage rates from the tests of the instrument lines will be added to the current Type B and C totals and the new total for each unit must not exceed 0.6 L_a. They will not be added to the leakage rates from the last Type A tests, which were performed in 1992, since that would not give as good of an indication of the current leak-tightness of the containment as would the local leakage rate total. Also, in accordance with its program, the licensee will set administrative limits on the individual leakage rate of each instrument line tested; if an administrative limit is exceeded, the component must be restored to below the administrative limit.

The licensee has also evaluated the potential risks of not testing the instrument lines immediately:

- The licensee calculated the maximum possible leakage from the untested lines by assuming that the 3/8-inch lines were completely sheared off with a pressure differential of P_a pushing air through the open, broken lines. Because the flowpaths would be relatively long, and small in diameter, and because the leakage would be held up by the secondary containment and filtered by the standby gas treatment system before release, the resultant leakage rates do not result in excessive doses. When combined with the current measured leakage rates for each unit, new total leakage rates are 2.3 L_a for Unit 1 and 4.1 L_a for Unit 2. The licensee's dose calculations show that the resultant doses are still below 10 CFR Part 100 guidelines and General Design Criterion (GDC) 19 limits. Thus, even with the conservative assumption of the maximum possible leakage area through the untested components, consequences to the public would still be within regulatory limits. Actual leakage would, of course, be expected to be smaller.

- The licensee performed a probabilistic risk evaluation that concluded that there was a negligible impact on risk to public health and safety as a result of delaying the testing of the instrument lines.

4.0 STAFF CONCLUSION

The licensee has shown that the requested delay in the testing of the instrument lines will not have an undue impact on public health and safety. The prudent testing schedule described above will provide test results at the earliest opportunities without risking plant transients or

requiring unnecessary plant shutdowns, while on the other hand triggering shutdowns with full testing if the initial testing indicates excessive leakage. Therefore, the staff finds the proposed TS changes to be acceptable.

5.0 EMERGENCY CIRCUMSTANCES

The licensee's February 5, 1998, request states the following in regard to the emergency circumstances related to the proposed action:

> SSES [Susquehanna Steam Electric Station], Units 1 and 2 are currently operating at 100% power. The need for prompt action is required because failure to satisfy the cited Technical Specification surveillance requirement requires application of the action statement of LCO [Limiting Condition for Operation] 3.6.1.1, "Primary Containment Integrity." This LCO provides 1 hour to restore primary containment integrity, or the unit must be in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours.
>
> PP&L's request for a license amendment under emergency circumstances has resulted in the recent discovery described above and in Reference No. 1 [PP&L Letter PLA-4844, "Request for Enforcement Discretion: Instrument Line Leak Testing," dated February 3, 1998], of a missed surveillance requirement. The enforcement discretion allows both units to operate until surveillance testing, determined to have been missed on certain portions of these lines, can be performed to support operability.

On February 2, 1998, PP&L identified, during a review of the Unit 2 Integrated Leak Rate Test valve line-up, instrument line penetrations on each unit that were designated "extensions of containment" that were not Type A tested. As a result, on February 3, 1998, at 12:05 a.m., TS 4.0.3 was entered on Units 1 and 2. PP&L requested, and NRC verbally granted, enforcement discretion on February 3, 1998, at 5:30 p.m.

PP&L's request for enforcement discretion was based upon the premise that the enforcement discretion will minimize the potential safety consequences and operational risks associated with a dual-unit shutdown in which to perform the required testing. This would create an undesirable transient on the units and a challenge to control room operators. This also forms the basis for the emergency request.

The NRC staff reviewed the licensee's justification for failing to file an application sufficiently in advance of the event. The staff considers that given the recent (February 2, 1998) unexpected discovery of the missed surveillance requirements on the testing of the instrument lines and the immediate action required by the TS, the licensee could not avoid this situation. Accordingly, the staff concludes that the licensee has satisfied the requirements of 10 CFR 50.90(a)(5), and that a valid emergency exists.

6.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the amendment would not: (1) involve a significant increase in the probability or consequences of any accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or

The amendments have been evaluated against the three standards in 10 CFR 50.92(c). In its analysis of the issue of no significant hazards consideration, as required by 10 CFR 50.91(a), the licensee has provided the following:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

   As described in Attachment 1 [of the licensee's submittal], the safety analysis included an assessment of the safety significance and potential consequences of this instrumentation not being leak rate tested, as well as a discussion of the potential risk associated with this condition.

   The dose values demonstrate that the worst case leakage from the headers/lines which are assumed to be sheared, will result in doses which are less than 10CFR100 and 10CFR50, Appendix A, GDC [General Design Criterion] 19 limits. As noted previously, upon the successful near term completion of the leakage rate testing of penetrations X-90A, X-90D, & X-223A committed to in PLA-4844, dated 2/3/98, "Request for Enforcement Discretion: Instrument Line Leak Testing", the Unit 2 Doses would be bounded by those on Unit 1. Given that the actual leakage would be expected to be far less than that determined by assuming a total failure of the untested lines, it is reasonable to conclude that the actual dose will be within that previously analyzed in the FSAR [Final Safety Analysis Report], or at most an increase of only a small fraction of 10CFR100 and 10CFR50, Appendix A, GDC 19 limits. Therefore, given that leakage will be through fittings rather than a sheared line, the consequences of an accident previously evaluated in the FSAR will not be significantly increased and the margin of safety will remain unaffected.

   Furthermore, the analysis included a risk assessment. It concluded that 10 CFR 50 Appendix J testing on the pressure instruments in question has a negligible impact on the risk to the health and safety of the general public and the plant employees. Failure to perform these tests: (1) does not increase the frequency of an Initiating Event, (2) does not degrade the response of equipment used to maintain core integrity, and (3) has at most a minor increase in the radiological source term released from the primary containment should the event proceed to core damage. Since each of the components of risk is either unaffected or only marginally impacted by this lack of testing, no discernible increase in risk can be detected.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

   Leakage through the untested portion of the subject instrument lines is a potential consequence of an accident; it does not create the possibility of a new or different type of accident from any previously evaluated. The consequences are discussed in the evaluation of [standard] 1 above.

3. The proposed change does not involve a significant reduction in the margin of safety.

   As described in the evaluation of [standard] 1 above, even if one were to assume the untested instrumentation and tubing were open to atmosphere, the maximum leakage would be expected to be within the margin available between the current minimum

pathways Appendix J test results and that assumed in the DBA LOCA [design-basis accident loss-of-coolant accident] Dose Analysis. Even if leakage were to exceed that assumed in the dose analysis, significant additional leakage into secondary containment could be accommodated without exceeding 10 CFR 100 limits. Based upon these circumstances, it is reasonable to conclude that leakage through the fittings would be far less than that needed to exceed the DBA LOCA Dose Analysis or 10 CFR 100 limits. Consequently, the consequences of an accident previously evaluated in the FSAR will not be increased and the margin of safety will not be significantly reduced.

Based on the above discussion, the staff concludes that the amendments meet the criteria set forth in 10 CFR 50.92, and therefore, does not involve a significant hazard consideration.

7.0 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.

8.0 ENVIRONMENTAL CONSIDERATION

The amendments change a surveillance requirement. 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. 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. The Commission has made a final no significant hazards finding with respect to the amendments.

9.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) the amendments do not (a) significantly increase the probability or consequences of an accident previously evaluated, (b) increase the possibility of a new or different kind of accident from any previously evaluated, or (c) significantly reduce a safety margin and, therefore, the amendments do not involve a significant hazards consideration; (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (3) such activities will be conducted in compliance with the Commission's regulations, and (4) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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