

August 29, 1994

Docket Nos. 50-352
and 50-353

Mr. George A. Hunger, Jr.
Director-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: RELOCATION OF SEISMIC MONITORING EQUIPMENT, LIMERICK GENERATING
STATION, UNITS 1 AND 2 (TAC NOS. M88608 AND M88655)

The Commission has issued the enclosed Amendment No. 75 to Facility Operating License No. NPF-39 and Amendment No. 36 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 January 10, 1994, as supplemented by letter dated July 20, 1994.

These amendments relocate the seismic monitoring instrumentation Limiting Condition for Operation, Surveillance Requirements, and associated tables and Bases contained in TS Sections 3.3.7.2 and 4.3.7.2 to the Updated Final Safety Analysis Report, Section 3.7.4.

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

Sincerely,
/S/

Frank Rinaldi, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

9409070309 940829
PDR ADDCK 05000352
P PDR

Enclosures:

1. Amendment No. 75 to
License No. NPF-39
Amendment No. 36 to
License No. NPF-85
2. Safety Evaluation
cc w/enclosures:
See next page

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JCalvo	GHill(4), P1-22	OC/LFDCB
MThadani	EWenzinger, RGN-I	CAnderson, RGN-I
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OFC	: PDI-2/LA	: *PDI-3/PE	: PDI-2/PM	: *ECGB	: *OGC	: PDI-2/D(A):
NAME	: MO'Brien	: JHarold:rb	: FRinaldi	: GBagchi	:	: MThadani
DATE	: 8/29/94	: 07/27/94	: 8/25/94	: 07/29/94	: 08/17/94	: 8/29/94

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 29, 1994

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and 50-353

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Director-Licensing, MC 52A-5
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P.O. Box No. 195
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Dear Mr. Hunger:

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The Commission has issued the enclosed Amendment No. 75 to Facility Operating License No. NPF-39 and Amendment No. 36 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 January 10, 1994, as supplemented by letter dated July 20, 1994.

These amendments relocate the seismic monitoring instrumentation Limiting Condition for Operation, Surveillance Requirements, and associated tables and Bases contained in TS Sections 3.3.7.2 and 4.3.7.2 to the Updated Final Safety Analysis Report, Section 3.7.4.

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, appearing to read "Frank Rinaldi", is written above the typed name.

Frank Rinaldi, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 75 to
License No. NPF-39
Amendment No. 36 to
License No. NPF-85
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. George A. Hunger, Jr.
PECO Energy Company

Limerick Generating Station,
Units 1 & 2

cc:

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

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 75
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated January 10, 1994, as supplemented by letter dated July 20, 1994, 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.

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P PDR

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. 75, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Mohan C. Thadani, Acting 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: August 29, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 75

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages are provided to maintain document completeness.*

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xix	xix
xx	xx*
3/4 3-67	3/4 3-67*
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LIMERICK - UNIT 1

x

Amendment No. 48

effective January 2, 1990

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RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TABLE NOTATIONS

*When irradiated fuel is being handled in the secondary containment.

(a) With fuel in the spent* fuel storage pool.

(b) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.

Section 3.3.7.2 (Deleted)

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION HAS BEEN RELOCATED TO THE UFSAR. TECHNICAL SPECIFICATIONS PAGES 3/4 3-69 THROUGH 3/4 3-72 OF THIS SECTION HAVE BEEN INTENTIONALLY OMITTED.

INSTRUMENTATION

BASES

3/4.3.7 MONITORING INSTRUMENTATION

3/4.3.7.1 RADIATION MONITORING INSTRUMENTATION

The OPERABILITY of the radiation monitoring instrumentation ensures that; (1) the radiation levels are continually measured in the areas served by the individual channels, and (2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded; and (3) sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with 10 CFR Part 50, Appendix A, General Design Criteria 19, 41, 60, 61, 63, and 64.

The specified surveillance interval for the Main Control Room Normal Fresh Air Supply Radiation Monitor has been determined in accordance with GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," as approved by the NRC and documented in the SER (letter to R.D. Binz, IV, from C.E. Rossi dated July 21, 1992).

3/4.3.7.2 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE UFSAR.

3/4.3.7.3 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE ODCM.

3/4.3.7.4 REMOTE SHUTDOWN SYSTEM INSTRUMENTATION AND CONTROLS

The OPERABILITY of the remote shutdown system instrumentation and controls ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the unit from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criterion 19 of 10 CFR Part 50, Appendix A.

3/4.3.7.5 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess important variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

3/4.3.7.6 SOURCE RANGE MONITORS

The source range monitors provide the operator with information of the status of the neutron level in the core at very low power levels during startup and shutdown. At these power levels, reactivity additions shall not be made without this flux level information available to the operator. When the intermediate range monitors are on scale, adequate information is available without the SRMs and they can be retracted.

INSTRUMENTATION

BASES

3/4.3.7.7 TRAVERSING IN-CORE PROBE SYSTEM

The OPERABILITY of the traversing in-core probe system with the specified minimum complement of equipment ensures that the measurements obtained from use of this equipment accurately represent the spatial neutron flux distribution of the reactor core.

The TIP system OPERABILITY is demonstrated by normalizing all probes (i.e., detectors) prior to performing an LPRM calibration function. Monitoring core thermal limits may involve utilizing individual detectors to monitor selected areas of the reactor core, thus all detectors may not be required to be OPERABLE. The OPERABILITY of individual detectors to be used for monitoring is demonstrated by comparing the detector(s) output in the resultant heat balance calculation (P-1) with data obtained during a previous heat balance calculation (P-1).

3/4.3.7.8 CHLORINE AND TOXIC GAS DETECTION SYSTEMS

The OPERABILITY of the chlorine and toxic gas detection systems ensures that an accidental chlorine and/or toxic gas release will be detected promptly and the necessary protective actions will be automatically initiated for chlorine and manually initiated for toxic gas to provide protection for control room personnel. Upon detection of a high concentration of chlorine, the control room emergency ventilation system will automatically be placed in the chlorine isolation mode of operation to provide the required protection. Upon detection of a high concentration of toxic gas, the control room emergency ventilation system will manually be placed in the chlorine isolation mode of operation to provide the required protection. The detection systems required by this specification are consistent with the recommendations of Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators against an Accidental Chlorine Release," February 1975.

Specified surveillance intervals and maintenance outage times have been determined in accordance with GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," as approved by the NRC and documented in the SER (letter to R.D. Binz, IV, from C.E. Rossi dated July 21, 1992).

3/4.3.7.9 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the detection instrumentation ensures that both adequate warning capability is available for prompt detection of fires and that fire suppression systems, that are actuated by fire detectors, will discharge extinguishing agent in a timely manner. Prompt detection and suppression of fires will reduce the potential for damage to safety-related equipment and is an integral element in the overall facility fire protection program.

Fire detectors that are used to actuate fire suppression systems represent a more critically important component of a plant's fire protection program than detectors that are installed solely for early fire warning and notification. Consequently, the minimum number of OPERABLE fire detectors must be greater.

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. 36, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Mohan C. Thadani, Acting 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: August 29, 1994



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

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 36
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated January 10, 1994, as supplemented by letter dated July 20, 1994, 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.

ATTACHMENT TO LICENSE AMENDMENT NO. 36

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages are provided to maintain document completeness.*

<u>Remove</u>	<u>Insert</u>
ix	ix
x	x*
xix	xix
xx	xx*
3/4 3-67	3/4 3-67*
3/4 3-68	3/4 3-68
3/4 3-69	-
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RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TABLE NOTATIONS

*When irradiated fuel is being handled in the secondary containment.

(a) With fuel in the spent fuel storage pool.

(b) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION HAS BEEN RELOCATED TO THE UFSAR. TECHNICAL SPECIFICATIONS PAGES 3/4 3-69 THROUGH 3/4 3-72 OF THIS SECTION HAVE BEEN INTENTIONALLY OMITTED.

INSTRUMENTATION

BASES

3/4.3.7 MONITORING INSTRUMENTATION

3/4.3.7.1 RADIATION MONITORING INSTRUMENTATION

The OPERABILITY of the radiation monitoring instrumentation ensures that; (1) the radiation levels are continually measured in the areas served by the individual channels, and (2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded; and (3) sufficient information is available on selected plant parameters to monitor and assess these variable following an accident. This capability is consistent with 10 CFR Part 50, Appendix A, General Design Criteria 19, 41, 60, 61, 63, and 64.

The specified surveillance interval for the Main Control Room Normal Fresh Air Supply Radiation Monitor has been determined in accordance with GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specification," as approved by the NRC and documented in the SER (letter to R. D. Binz, IV, from C. E. Rossi dated July 21, 1992).

3/4.3.7.2 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE UFSAR.

3/4.3.7.3 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE ODCM.

3/4.3.7.4 REMOTE SHUTDOWN SYSTEM INSTRUMENTATION AND CONTROLS

The OPERABILITY of the remote shutdown system instrumentation and controls ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the unit from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criterion 19 of 10 CFR Part 50, Appendix A. The Unit 1 RHR transfer switches are included only due to their potential impact on the RHRSW system, which is common to both units.

3/4.3.7.5 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess important variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

3/4.3.7.6 SOURCE RANGE MONITORS

The source range monitors provide the operator with information of the status of the neutron level in the core at very low power levels during startup and shutdown. At these power levels, reactivity additions shall not be made without this flux level information available to the operator. When the intermediate range monitors are on scale, adequate information is available without the SRMs and they can be retracted.

INSTRUMENTATION BASES

3/4.3.7.7 TRAVERSING IN-CORE PROBE SYSTEM

The OPERABILITY of the traversing in-core probe system with the specified minimum complement of equipment ensures that the measurements obtained from use of this equipment accurately represent the spatial neutron flux distribution of the reactor core.

The TIP system OPERABILITY is demonstrated by normalizing all probes (i.e., detectors) prior to performing an LPRM calibration function. Monitoring core thermal limits may involve utilizing individual detectors to monitor selected areas of the reactor core, thus all detectors may not be required to be OPERABLE. The OPERABILITY of individual detectors to be used for monitoring is demonstrated by comparing the detector(s) output in the resultant heat balance calculation (P-1) with data obtained during a previous heat balance calculation (P-1).

3/4.3.7.8 CHLORINE AND TOXIC GAS DETECTION SYSTEMS

The OPERABILITY of the chlorine and toxic gas detection systems ensures that an accidental chlorine and/or toxic gas release will be detected promptly and the necessary protective actions will be automatically initiated for chlorine and manually initiated for toxic gas to provide protection for control room personnel. Upon detection of a high concentration of chlorine, the control room emergency ventilating system will automatically be placed in the chlorine isolation mode of operation to provide the required protection. Upon detection of a high concentration of toxic gas, the control room emergency ventilation system will manually be placed in the chlorine isolation mode of operation to provide the required protection. The detection systems required by this specification are consistent with the recommendations of Regulatory Guide 1.95 "Protection of Nuclear Power Plant Control Room Operators against an Accidental Chlorine Release," February 1975.

Specified surveillance intervals and maintenance outage times have been determined in accordance with GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," as approved by the NRC and documented in the SER (letter to R.D. Binz, IV, from C.E. Rossi dated July 21, 1992).

3/4.3.7.9 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the detection instrumentation ensures that both adequate warning capability is available for prompt detection of fires and that fire suppression systems, that are actuated by fire detectors, will discharge extinguishing agent in a timely manner. Prompt detection and suppression of fires will reduce the potential for damage to safety-related equipment and is an integral element in the overall facility fire protection program.

Fire detectors that are used to actuate fire suppression systems represent a more critically important component of a plant's fire protection program than detectors that are installed solely for early fire warning and notification. Consequently, the minimum number of OPERABLE fire detectors must be greater.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 75 AND 36 TO FACILITY OPERATING
LICENSE NOS. NPF-39 AND NPF-85
PHILADELPHIA ELECTRIC COMPANY
LIMERICK GENERATING STATION, UNITS 1 AND 2
DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated January 10, 1994, as supplemented by letter dated July 20, 1994, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS). The requested changes would relocate the seismic monitoring instrumentation Limiting Condition for Operation, Surveillance Requirements, and associated Tables and Bases contained in TS Sections 3.3.7.2 and 4.3.7.2 to the Updated Final Safety Analysis Report (UFSAR), Section 3.7.4. The supplemental letter provided TS and did not change the initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

TS cannot be changed by licensees without prior NRC approval. However, since 1969, there has been a trend towards including in the TS not only those requirements derived from the analyses and evaluations included in the safety analysis report, but other requirements governing the operation of nuclear power reactors. This trend has contributed to the volume of TS and to the increase in the number of license amendment applications to affect changes to the TS.

In the policy statement published in the Federal Register July 22, 1993 (58 FR 39132), dated July 16, 1993, effective, July 22, 1993, "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," the NRC adopted criteria for defining the scope of the TS as required by 10 CFR 50.36. These criteria are used by the NRC and each of the nuclear steam supply system vendor owners groups to completely rewrite and streamline the existing standard TS. As a result of this process, many requirements are being transferred from the TS to other licensing documents (e.g., the Final Safety Analysis Report (FSAR), Operating Procedures, Quality Assurance (QA) Plan), which, when transferred, will not require a license amendment or prior NRC approval when changes are needed. The following criteria from the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," delineate those constraints on design and operation of nuclear power plants that belong in the TS in accordance with 10 CFR 50.36.

Criterion 1: "Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary."

Criterion 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."

Criterion 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 presents a challenge to the integrity of a fission product barrier."

Criterion 4: "A structure, system or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety."

3.0 EVALUATION

The staff has reviewed the request to relocate the seismic monitoring instrumentation Limiting Condition for Operation, Surveillance Requirements, and associated tables and Bases contained in TS Sections 3.3.7.2 and 4.3.7.2 to the UFSAR, Section 3.7.4. The request was evaluated utilizing the four criteria set forth in the above NRC policy statement. In addition, the proposed amendment does not involve a change in the manner in which the plant will be operated, maintained, or tested. The requirements described in the affected TS will be maintained and any subsequent changes to the FSAR related to these instruments will be made in accordance with 10 CFR 50.59.

On this basis, the staff concludes that TS LCO 3.3.7.2, Surveillance Requirement (SRs) 4.3.7.2.1 and 4.3.7.2.2, Tables 3.3.7.2-1 and 4.3.7.2-1 and the Bases for TS 3/4.3.7.2, which are related to seismic monitoring instrumentation, do not need to be controlled by TS; changes to these requirements are adequately controlled by 10 CFR 50.59. Should the licensee's determination conclude that an unreviewed safety question is involved, due to either (1) an increase in the probability or consequences of accidents or malfunctions of equipment important to safety, (2) the creation of a possibility for an accident or malfunction of a different type than any evaluated previously, or (3) a reduction in the margin of safety, as defined for any TS, NRC approval and a license amendment would be required prior to implementation of the change. NRC inspection and enforcement programs also enable the staff to monitor facility changes and licensee adherence to updated final safety analysis report commitments and to take any remedial action that may be appropriate.

The staff has concluded, therefore, that relocation of requirements related to seismic monitoring instrumentation (TS LCO 3.3.7.2, SRs 4.3.7.2.1 and 4.3.7.2.2, Tables 3.3.7.2-1 and the Bases for TS 3/4.3.7.2) is acceptable because (1) their inclusion in technical specifications is not specifically required by 10 CFR 50.36 or other regulations, (2) these requirements are not required to avert an immediate threat to the public health and safety, and (3) changes that are deemed to involve an unreviewed safety question will require prior NRC approval in accordance with 10 CFR 50.59(c).

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. 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 (59 FR 12364). 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.

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