

Mr. Neil S. Carns
 Senior Vice President
 and Chief Nuclear Officer
 Northeast Nuclear Energy Company
 c/o Ms. Patricia A. Loftus
 Director - Regulatory Affairs
 P.O. Box 128
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October 22, 1997

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. M99041)

Dear Mr. Carns:

The Commission has issued the enclosed Amendment No. 152 to Facility Operating License No. NPF-49 for the Millstone Nuclear Power Station, Unit No. 3, in response to your application dated June 19, 1997.

Technical Specification Table 2.2-1 Notes 1 and 3 define the values for the constants used in the Overttemperature Delta-T and Overpower Delta-T reactor trip system instrumentation setpoint calculators. The amendment makes changes to the notes as well as the associated Bases section.

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

Sincerely,
Original signed by:
 James W. Andersen, Project Manager
 Special Projects Office - Licensing
 Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosures: 1. Amendment No. 152 to NPF-49
 2. Safety Evaluation

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 22, 1997

Mr. Neil S. Carns
Senior Vice President
and Chief Nuclear Officer
Northeast Nuclear Energy Company
c/o Ms. Patricia A. Loftus
Director - Regulatory Affairs
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Sincerely,

A handwritten signature in black ink, appearing to be "JW Andersen", written over a horizontal line.

James W. Andersen, Project Manager
Special Projects Office - Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosures: 1. Amendment No. 152 to NPF-49
2. Safety Evaluation

cc w/encls: See next page

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Northeast Nuclear Energy Company

Millstone Nuclear Power Station
Unit 3

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

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

DOCKET NO. 50-423

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 152
License No. NPF-49

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Northeast Nuclear Energy Company, et al. (the licensee) dated June 19, 1997, 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-49 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 152 , and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto 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 the date of its issuance, to be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Phillip F. McKee
Deputy Director for Licensing
Special Projects Office
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: October 22, 1997

ATTACHMENT TO LICENSE AMENDMENT NO. 152

FACILITY OPERATING LICENSE NO. NPF-49

DOCKET NO. 50-423

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 areas of change.

<u>Remove</u>	<u>Insert</u>
2-9	2-9
2-10	2-10
2-11	2-11
2-12	2-12
B 2-5	B 2-5

TABLE 2.2-1 (Continued)

TABLE NOTATIONS

NOTE 1: OVERTEMPERATURE ΔT

$$\left(\frac{\Delta T}{\Delta T_0} \right) \frac{(1+\tau_1 s)}{(1+\tau_2 s)} \leq K_1 - K_2 \frac{(1+\tau_4 s)}{(1+\tau_5 s)} (T - T') + K_3 (P - P') - f_1 (\Delta I)$$

Where: ΔT is measured Reactor Coolant System ΔT , °F;
 ΔT_0 is loop specific indicated ΔT at RATED THERMAL POWER, °F;

$\frac{(1+\tau_1 s)}{(1+\tau_2 s)}$ is the function generated by the lead-lag compensator on measured ΔT ;

τ_1 and τ_2 are the time constants utilized in the lead-lag compensator for ΔT , $\tau_1 \geq 8$ sec, $\tau_2 \leq 3$ sec;

$K_1 \leq 1.20$ (Four Loops Operating); ≤ 1.20 (Three Loops Operating);

$K_2 \geq 0.02456/^\circ\text{F}$;

$\frac{(1+\tau_4 s)}{(1+\tau_5 s)}$ is the function generated by the lead-lag compensator for T_{avg} ;

τ_4 and τ_5 are the time constants utilized in the lead-lag compensator for T_{avg} , $\tau_4 \geq 20$ sec, $\tau_5 \leq 4$ sec;

T is measured Reactor Coolant System average temperature, °F;

T' is loop specific indicated T_{avg} at RATED THERMAL POWER, $\leq 587.1^\circ\text{F}$;

$K_3 \geq 0.001311/\text{psi}$

P is measured pressurizer pressure, psia;

P' is nominal pressurizer pressure, ≥ 2250 psia;

s is the Laplace transform operator, sec^{-1} ;

TABLE 2.2-1 (Continued)TABLE NOTATIONS (Continued)

NOTE 1: (Continued)

and $f_1(\Delta I)$ is a function of the indicated difference between top and bottom detectors of the power range neutron ion chambers; with nominal gains to be selected based on measured instrument response during plant startup tests calibrations such that:

- (1) For $q_t - q_b$ between -26% and +3%, $f_1(\Delta I) \geq 0$, where q_t and q_b are percent RATED THERMAL POWER in the upper and lower halves of the core, respectively, and $q_t + q_b$ is the total THERMAL POWER in percent RATED THERMAL POWER;
- (2) For each percent that the magnitude of $q_t - q_b$ exceeds -26%, the ΔT Trip Setpoint shall be automatically reduced by $\geq 3.55\%$ of its value at RATED THERMAL POWER.
- (3) For each percent that the magnitude of $q_t - q_b$ exceeds +3%, the ΔT Trip Setpoint shall be automatically reduced by $\geq 1.98\%$ of its value at RATED THERMAL POWER.

NOTE 2: The channel's maximum Trip Setpoint shall not exceed its computed Trip Setpoint by more than 1.4% ΔT span (Four Loop Operation); 2.7% ΔT span (Three Loop Operation).

TABLE 2.2-1 (Continued)

TABLE NOTATIONS (Continued)

NOTE 3: OVERPOWER ΔT

$$\left(\frac{\Delta T}{\Delta T_0} \right) \frac{(1+\tau_1 s)}{(1+\tau_2 s)} \leq K_4 - K_5 \frac{(\tau_7 s)}{(1+\tau_7 s)} T - K_6 (T - T'')$$

Where: ΔT is measured Reactor Coolant System ΔT , °F;
 ΔT_0 is loop specific indicated ΔT at RATED THERMAL POWER, °F;

$\frac{(1+\tau_1 s)}{(1+\tau_2 s)}$ is the function generated by the lead-lag compensator on measured ΔT ;

τ_1 and τ_2 are the time constants utilized in the lead-lag compensator for ΔT , $\tau_1 \geq 8$ sec, $\tau_2 \leq 3$ sec;

$K_4 \leq 1.09$;

$K_5 \geq 0.02/^\circ\text{F}$ for increasing T_{avg} and $K_5 \leq 0$ for decreasing T_{avg} ;

$\frac{(\tau_7 s)}{(1+\tau_7 s)}$ is the function generated by the rate-lag compensator for T_{avg} ;

τ_7 is the time constant utilized in the rate-lag compensator for T_{avg} , $\tau_7 \geq 10$ sec;

T is measured average Reactor Coolant System temperature, °F;

T'' is loop specific indicated T_{avg} at RATED THERMAL POWER, $\leq 587.1^\circ\text{F}$;

$K_6 \geq 0.00180/^\circ\text{F}$ when $T > T''$ and $K_6 \leq 0/^\circ\text{F}$ when $T \leq T''$;

s is the Laplace transform operator, sec^{-1} .

TABLE 2.2-1 (Continued)

TABLE NOTATIONS (Continued)

- NOTE 4: The channel's maximum Trip Setpoint shall not exceed its computed Trip Setpoint by more than 2.7% ΔT span. (Four Loop Operation)
- NOTE 5: Setpoint is for increasing power.
- NOTE 6: Setpoint is for decreasing power.

LIMITING SAFETY SYSTEM SETTINGS

BASES

Intermediate and Source Range, Neutron Flux

The Intermediate and Source Range, Neutron Flux trips provide core protection during reactor startup to mitigate the consequences of an uncontrolled rod cluster control assembly bank withdrawal from a subcritical condition. These trips provide redundant protection to the Low Setpoint trip of the Power Range, Neutron Flux channels. The Source Range channels will initiate a Reactor trip at about 10^5 counts per second unless manually blocked when P-6 becomes active. The Intermediate Range channels will initiate a Reactor trip at a current level equivalent to approximately 25% of RATED THERMAL POWER unless manually blocked when P-10 becomes active. No credit was taken for operation of the trips associated with either the Intermediate or Source Range Channels in the accident analyses; however, their functional capability at the specified trip settings is required by this specification to enhance the overall reliability of the Reactor Trip System.

Overtemperature ΔT

The Overtemperature ΔT trip provides core protection to prevent DNB for all combinations of pressure, power, coolant temperature, and axial power distribution, provided that the transient is slow with respect to piping transit delays from the core to the temperature detectors, and pressure is within the range between the Pressurizer High and Low Pressure trips. The Setpoint is automatically varied with: (1) coolant temperature to correct for temperature induced changes in density and heat capacity of water and includes dynamic compensation for piping delays from the core to the loop temperature detectors, (2) pressurizer pressure, and (3) axial power distribution. With normal axial power distribution, this Reactor trip limit is always below the core Safety Limit as shown in Figure 2.1-1. If axial peaks are greater than design, as indicated by the difference between top and bottom power range nuclear detectors, the Reactor trip is automatically reduced according to the notations in Table 2.2-1. Although a direction of conservatism is identified for the Overtemperature ΔT reactor trip function K_2 and K_3 gains, the gains should be set as close as possible to the values contained in Note 1 to ensure that the Overtemperature ΔT setpoint is consistent with the assumptions of the safety analyses.

Operation with a reactor coolant loop out of service requires Reactor Trip System modification. Three loop operation is permissible after resetting the K1 input to the Overtemperature ΔT channels, reducing the Power Range Neutron Flux High setpoint to a value just above the three loop maximum permissible power level, and resetting the P-8 setpoint to its three loop value. These modifications have been chosen so that, in three loop operation, each component of the Reactor Trip System performs its normal four loop function, prevents operation outside the safety limit curves, and prevents the DNBR from going below the design limit during normal operational and anticipated transients.

Overpower ΔT

The Overpower ΔT trip provides assurance of fuel integrity (e.g., no fuel pellet melting and less than 1% cladding strain) under all possible overpower conditions, limits the required range for Overtemperature ΔT



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 152

TO FACILITY OPERATING LICENSE NO. NPF-49

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3

DOCKET NO. 50-423

1.0 INTRODUCTION

By letter dated June 19, 1997, the Northeast Nuclear Energy Company, et al. (the licensee), submitted a request for changes to the Millstone Nuclear Power Station, Unit No. 3 Technical Specifications (TS). The proposed changes modify the definition of the constants associated with the Overtemperature Delta-T (OT Δ T) and Overpower Delta-T (OP Δ T) Reactor Trip System Instrumentation setpoint calculators. The proposed TS revision redefines the numeric constants with either " \leq " or " \geq ," modifies the NOTES to reflect hardware modifications that were made during construction, moves the ΔT_0 term from the right side to the left side of the OT Δ T and OP Δ T algorithms, rewords the definitions for clarity, and expands the Bases description.

2.0 BACKGROUND

On March 11, 1997, the staff approved Millstone Unit 3 TS Amendment No. 134, which revised notations in Table 2.2-1, Reactor Trip System Instrumentation Trip Setpoints. Specifically, the amendment redefined time constants associated with NOTE 1: Overtemperature ΔT and NOTE 3: Overpower ΔT in terms of inequalities. Previously, the time constants were defined in a manner implying the terms must be set exactly to defined values. Millstone Unit 3 surveillances allow for a tolerance around individual values. These tolerances are equivalent to equipment accuracy specifications that are included in the Channel Statistical Allowance provided in WCAP-10991, Revision 4, Westinghouse Setpoint Methodology for Protection Systems, Millstone Nuclear Power Station Unit 3. Although nominal treatment is allowed for individual constants, surveillance procedures require the as left channel setpoints to trip at less than or equal to the setpoint defined by the OT Δ T and OP Δ T algorithms.

3.0 EVALUATION

3.1 Table 2.2-1 NOTE 1: Overtemperature ΔT (OT Δ T)

The licensee proposed to redefine constants K_1 , K_2 , and K_3 with inequalities (\geq or \leq) and expand the OT Δ T Bases description. The constants K_1 , K_2 , and K_3

are preset bias gains that compensate for temperature and pressure effects on departure from nucleate boiling limits. The licensee's current practice is to treat numeric constant values utilized in the Overtemperature ΔT calculation as nominal settings and allow the instrumentation to be adjusted to within a calibration tolerance. As a result of the licensee's analysis and its discussions with Westinghouse, it was determined that the constants should be treated as limiting settings, thus, the instrumentation would then be adjusted conservatively with respect to these constants. The polarity of the inequality operator indicates the direction of conservatism. The use of inequalities to define numerical constants associated with $OT\Delta T$ is consistent with the Westinghouse Standard Technical Specifications, NUREG-1431. The Bases change adds clarification that the gains be set as close as possible to the values provided in NOTE 1 to be consistent with safety analysis assumptions. The staff finds the proposed changes acceptable as they are consistent with the guidelines of NUREG-1431.

In addition, the licensee proposes to eliminate the terms involving time constants τ_3 and τ_6 from the equation for $OT\Delta T$. The time constants, τ_3 and τ_6 , are utilized in the lag compensators for ΔT and the measured T_{avg} , respectively. The associated functions generated by the lag compensators appear as $[1/(1+\tau)]$ terms. In the current TS Table 2.2-1, the licensee has mathematically eliminated the time constants and the associated terms by defining τ_3 and τ_6 equal to zero in the $[1/(1+\tau)]$ terms. This makes the $[1/(1+\tau)]$ terms a multiplier of one, which is conservative. The proposed changes reflect modifications that eliminated hardware that was not required. Thus, eliminating τ_3 and τ_6 and associated terms has no effect on the Overtemperature ΔT trip calculation. Therefore, the staff finds the proposed change acceptable.

The licensee further proposes to clarify the definition of ΔT_o as loop-specific and to move the term from the right side of the equation to the left side of the algorithm. The proposed change shows ΔT and ΔT_o as the ratio ($\Delta T/\Delta T_o$) and is mathematically equivalent to the current notation. The staff considers this change editorial in nature and finds it acceptable.

The licensee proposes to redefine terms with the word "is" instead of an equal sign. The proposed change is editorial in nature and consistent with NUREG-1431, Revision 1. The staff finds this change acceptable.

3.2 Table 2.2-1 NOTE 3: Overpower ΔT (OPAT)

The licensee proposed to redefine constants K_4 , K_5 , and K_6 with inequalities (\geq or \leq). The constants K_4 , K_5 , and K_6 are preset bias gains that compensate for temperature effects on departure from nucleate boiling limits, and the change in density flow and heat capacity of water. The licensee's current practice is to treat numeric constant values utilized in the Overpower ΔT calculation as nominal settings and allow the instrumentation to be adjusted to within a calibration tolerance. As a result of the licensee's analysis and its discussions with Westinghouse, it was determined that the constants should be treated as limiting settings, thus, the instrumentation would then be adjusted conservatively with respect to these constants. The polarity of the inequality operator indicates the direction of conservatism. The use of

inequalities to define numerical constants associated with OP Δ T is consistent with NUREG-1431. The staff finds the proposed changes acceptable as they are consistent with the guidelines of NUREG-1431.

In addition, the licensee proposes to eliminate the terms τ_3 , τ_6 , and $f_2(\Delta I)$ from the OP Δ T equation. The time constants, τ_3 and τ_6 , are utilized in the lag compensators for ΔT and the measured T_{avg} , respectively. The associated functions generated by the lag compensators appear as $[1/(1+\tau)]$ terms. In the current TS Table 2.2-1, the licensee has mathematically eliminated the time constants and the associated terms by defining τ_3 and τ_6 equal to zero in the $[1/(1+\tau)]$ terms. This makes the $[1/(1+\tau)]$ terms a multiplier of one, which is conservative. The proposed changes reflect modifications that eliminated hardware that was not required. Thus, eliminating τ_3 and τ_6 and associated terms has no effect on the Overpower ΔT trip calculation. The licensee has mathematically eliminated $f_2(\Delta I)$ from the expression by defining it to be zero for all ΔI (where ΔI is the indicated difference between top and bottom detectors of the power range neutron ion chambers). The licensee defines $f_2(\Delta I)$ as zero because the source of temperature and flux information is identical to that of the OT Δ T trip. Eliminating $f_2(\Delta I)$ term has no effect on the Overpower ΔT calculation. Therefore, the staff finds the proposed changes acceptable.

The licensee further proposes to clarify the definition of ΔT_o as loop-specific and to move the term from the right side of the equation to the left side of the equation. The proposed change shows ΔT and ΔT_o as the ratio ($\Delta T/\Delta T_o$) and is mathematically equivalent to the current notation. The staff considers this change editorial in nature and finds it acceptable. The licensee proposes to redefine terms with the word "is" instead of an equal sign. The proposed change is editorial in nature and consistent with NUREG-1431, Revision 1. The staff finds this change acceptable.

3.3 Staff Conclusion

The staff has reviewed the licensee's proposed changes to the TS to modify the descriptions of the OT Δ T and OP Δ T numeric constants and notes, reword definitions, move the ΔT_o term to the left side of the OT Δ T and OP Δ T algorithms, and expand the Bases description. The changes ensure that instrumentation adjustments will be conservative with respect to the safety analysis assumptions and are consistent with appropriate sections of WCAP-10991 and NUREG-1431. Based on the review of the licensee's submittal, the staff concludes that the above TS changes are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Connecticut 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 (62 FR 40852 dated July 30, 1997). 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 Contributor: A. Bryant

Date: October 22, 1997