February 16, 1995

Mr. C. Randy Hutchin
Vice President, Operations GGNS
Entergy Operations, Inc.
Post Office Box 756
Port Gibson, Mississippi 39150

SUBJECT: ISSUANCE OF AMENDMENT NO. 118 TO FACILITY OPERATING LICENSE NO. NPF-29 - GRAND GULF NUCLEAR STATION, UNIT 1 (TAC NO. M87195)

Dear Mr. Hutchinson:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 118 to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. This amendment revises the Technical Specifications (TSs) in response to your application dated August 11, 1993.

The amendment deletes certain accident monitoring instruments from TS Table 3.3.7.5-1, "Accident Monitoring Instrumentation" and deletes the corresponding surveillance requirements (SRs) from Table 4.3.7.5-1, "Accident Monitoring Instrumentation Surveillance Requirements." The deleted requirements will be relocated to documents that are controlled by the licensee under the provisions of 10 CFR 50.59. The change is consistent with the format and content of the Improved Standard Technical Specifications (NUREG-1434, Revision 0).

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

Sincerely,

ORIGINAL SIGNED BY:
Paul W. O'Connor, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosures: 1. Amendment No. 118 to NPF-29
2. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION

Docket File	PUBLIC	PD4-1 r/f	PO'Connor
OPA(2G5)	OC/LFMB	JRoe	PNoonan
OGC (15B18)	DHagan	GHill (2)	CGrimes
DPickett	EMerschoff, RII	ACRS (4)	

Document Name: GG87195.AMD

w/ corrections

OFC	LA:PD4-1	PM:PD4-1 PWOC	BC:OTSB	OGC
NAME	PNoonan	PO'Connor/vw	CGrimes	R Bachmann
DATE	1/30/95	1/30/95	2/1/95	2/2/95
COPY	YES/NO	YES/NO	YES/NO 95-026	YES/NO

OFFICIAL RECORD COPY

2/16/95

9502270107 950216
PDR ADOCK 05000416
P PDR

DFO1

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

February 16, 1995

Mr. C. Randy Hutchinson
Vice President, Operations GGNS
Entergy Operations, Inc.
Post Office Box 756
Port Gibson, Mississippi 39150

SUBJECT: ISSUANCE OF AMENDMENT NO. 118 TO FACILITY OPERATING LICENSE NO. NPF-29 - GRAND GULF NUCLEAR STATION, UNIT 1 (TAC NO. M87195)

Dear Mr. Hutchinson:

The Nuclear Regulatory Commission has issued the enclosed Amendment No.118 to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. This amendment revises the Technical Specifications (TSs) in response to your application dated August 11, 1993.

The amendment deletes certain accident monitoring instruments from TS Table 3.3.7.5-1, "Accident Monitoring Instrumentation" and deletes the corresponding surveillance requirements (SRs) from Table 4.3.7.5-1, "Accident Monitoring Instrumentation Surveillance Requirements." The deleted requirements will be relocated to documents that are controlled by the licensee under the provisions of 10 CFR 50.59. The change is consistent with the format and content of the Improved Standard Technical Specifications (NUREG-1434, Revision 0).

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

Sincerely,

Paul W. O'Connor

Paul W. O'Connor, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosures: 1. Amendment No. 118 to NPF-29
2. Safety Evaluation

cc w/encls: See next page

Mr. C. Randy Hutchinson
Entergy Operations, Inc.

Grand Gulf Nuclear Station

cc:

Mr. H. W. Keiser, Exec. Vice President
and Chief Operating Officer
Entergy Operations, Inc.
P. O. Box 31995
Jackson, Mississippi 39286-1995

Robert B. McGehee, Esquire
Wise, Carter, Child & Caraway
P. O. Box 651
Jackson, Mississippi 39205

Nicholas S. Reynolds, Esquire
Winston & Strawn
1400 L Street, N.W. - 12th Floor
Washington, D.C. 20005-3502

Mr. Sam Mabry, Director
Division of Solid Waste Management
Mississippi Department of Natural
Resources
P. O. Box 10385
Jackson, Mississippi 39209

President,
Claiborne County Board of Supervisors
Port Gibson, Mississippi 39150

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta St., Suite 2900
Atlanta, Georgia 30323

Mr. K. G. Hess
Bechtel Power Corporation
P. O. Box 2166
Houston, Texas 77252-2166

Mr. Rudolph H. Bernard
Senior Resident Inspector
U. S. Nuclear Regulatory Commission
Route 2, Box 399
Port Gibson, Mississippi 39150

N. G. Chapman, Manager
Bechtel Power Corporation
9801 Washington Boulevard
Gaithersburg, Maryland 20878

Mr. D. L. Pace
GGNS General Manager
Entergy Operations, Inc.
P. O. Box 756
Port Gibson, Mississippi 39150

The Honorable William J. Guste, Jr.
Attorney General
Department of Justice
State of Louisiana
P. O. Box 94005
Baton Rouge, Louisiana 70804-9005

Dr. F. E. Thompson, Jr.
State Health Officer
State Board of Health
P. O. Box 1700
Jackson, Mississippi 39205

Office of the Governor
State of Mississippi
Jackson, Mississippi 39201

Mike Moore, Attorney General
Frank Spencer, Asst. Attorney General
State of Mississippi
Post Office Box 22947
Jackson, Mississippi 39225

Mr. Jerrold G. Dewease
Vice President, Operations Support
Entergy Operations, Inc.
P.O. Box 31995
Jackson, Mississippi 39286-1995

Mr. Michael J. Meisner
Director, Nuclear Safety
and Regulatory Affairs
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, Mississippi 39150

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

ENTERGY OPERATIONS, INC.

SYSTEM ENERGY RESOURCES, INC.

SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

MISSISSIPPI POWER AND LIGHT COMPANY

DOCKET NO. 50-416

GRAND GULF NUCLEAR STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 118
License No. NPF-29

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

   A. The application for amendment by Entergy Operations, Inc. (the licensee) dated August 11, 1993, 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-29 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 118, are hereby incorporated into this license. Entergy Operations, Inc. 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

Paul W. O'Connor

Paul W. O'Connor, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: **February 16, 1995**

ATTACHMENT TO LICENSE AMENDMENT NO. 118

FACILITY OPERATING LICENSE NO. NPF-29

DOCKET NO. 50-416

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. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE PAGES	INSERT PAGES
3/4 3-74	3/4 3-74
3/4 3-76	3/4 3-76
3/4 4-5	3/4 4-5
3/4 4-6	3/4 4-6

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.7.5 The accident monitoring instrumentation channels shown in Table 3.3.7.5-1 shall be OPERABLE.

APPLICABILITY: As shown in Table 3.3.7.5-1.

ACTION:

With one or more accident monitoring instrumentation channels inoperable, take the ACTION required by Table 3.3.7.5-1.

SURVEILLANCE REQUIREMENTS

4.3.7.5 Each of the above required accident monitoring instrumentation channels shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.7.5-1.

TABLE 3.3.7.5-1
ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	APPLICABLE OPERATIONAL CONDITIONS	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION
1. Reactor Vessel Pressure	1, 2, 3	2	1	80
2. Reactor Vessel Water Level	1, 2, 3, 4, 5	2	1	82
3. Suppression Pool Water Level	1, 2, 3	2	1	80
4. Suppression Pool Water Temperature	1, 2, 3	6, 1/sector	6, 1/sector	80
5. Deleted				
6. Drywell Pressure	1, 2, 3	2	1	80
7. Drywell and Control Rod Drive Cavity Temperature	1, 2, 3	2 (each)	1 (each)	80
8. Containment Hydrogen Concentration Analyzer and Monitor	1, 2, 3	2	1	83
9. Drywell Hydrogen Concentration Analyzer and Monitor	1, 2, 3	2	1	83
10. Containment Pressure (wide and narrow range)	1, 2, 3	2 (each)	1 (each)	80
11. Containment Air Temperature	1, 2, 3	2	1	80
12. Deleted				
13. Containment/Drywell Area Radiation Monitors	1, 2, 3, 4, 5	2#	2#	81
14. Deleted				
15. Deleted				
16. Deleted				
17. Deleted				
18. Deleted				

#Each for containment and drywell.

TABLE 4.3.7.5-1

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

	INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1.	Reactor Vessel Pressure	M	R
2.	Reactor Vessel Water Level	M	R
3.	Suppression Pool Water Level	M	R
4.	Suppression Pool Water Temperature	M	R
5.	Deleted		
6.	Drywell Pressure	M	R
7.	Drywell and Control Rod Cavity Temperature	M	R
8.	Containment Hydrogen Concentration Analyzer and Monitor	NA	M*
9.	Drywell Hydrogen Concentration Analyzer and Monitor	NA	M*
10.	Containment Pressure	M	R
11.	Containment Air Temperature	M	R
12.	Deleted		
13.	Containment/Drywell Area Radiation Monitors	M	R**
14.	Deleted		
15.	Deleted		
16.	Deleted		
17.	Deleted		
18.	Deleted		

*Using sample gas containing:

a. One volume percent hydrogen, remainder nitrogen.

b. Four volume percent hydrogen, remainder nitrogen.

**The CHANNEL CALIBRATION shall consist of an electronic calibration of the channel, not including the detector, for range decades above 10R/hr and a one point calibration check of the detector below 10R/hr with an installed or portable gamma source.

REACTOR COOLANT SYSTEM

3/4.4.2 SAFETY VALVES

SAFETY/RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.4.2.1 For the following safety/relief valves:

a. The safety valve function of at least 7 valves and the relief valve function of at least 6 valves other than those satisfying the safety valve function requirement shall be OPERABLE with the specified lift settings

b. Deleted

Number of Valves	Function	Setpoint* (psig)
8	Safety	1165 ± 11.6 psi
6	Safety	1180 ± 11.8 psi
6	Safety	1190 ± 11.9 psi
1	Relief	1103 ± 15 psi
10#	Relief	1113 ± 15 psi
9	Relief	1123 ± 15 psi

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

a. With the safety and/or relief valve function of one or more of the above required safety/relief valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
b. With one or more safety/relief valves stuck open, provided that suppression pool average water temperature is less than 110°F, take action close the stuck open relief valve(s); if suppression pool average water temperature is 110°F or greater, place the reactor mode switch in the Shutdown position.
c. Deleted
d. With either relief valve function pressure actuation trip system "A" or "B" inoperable, restore the inoperable trip system to OPERABLE status within 7 days; otherwise be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.4.2.1.1 Deleted

* The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.
\# Initial opening of 1B21-F051B is 1103 ± 15 psig due to low-low set

SURVEILLANCE REQUIREMENTS (Continued)

4.4.2.1.2 The relief valve function pressure actuation instrumentation shall be demonstrated OPERABLE** by performance of a:

a. CHANNEL FUNCTIONAL TEST, including calibration of the trip unit, at least once per 92 days.

b. CHANNEL CALIBRATION, LOGIC SYSTEM FUNCTIONAL TEST and simulated automatic operation of the entire system at least once per 18 months.

** A channel may be placed in an inoperable status for up to 6 hours for required surveillance without placing the trip system in the tripped condition.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 118 TO FACILITY OPERATING LICENSE NO. NPF-29

ENTERGY OPERATIONS, INC., ET AL.

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

1.0 INTRODUCTION

By letter dated August 11, 1993, the licensee (Entergy Operations, Inc.), submitted a request for changes to the Grand Gulf Nuclear Station, Unit 1 (GGNS) Technical Specifications (TSs). The requested amendment deletes certain accident monitoring instrument limiting conditions for operations (LCOs) from TS Table 3.3.7.5-1 "Accident Monitoring Instrumentation" and deletes the corresponding surveillance requirements (SRs) from Table 4.3.7.5-1, "Accident Monitoring Instrumentation Surveillance Requirements." The deleted requirements will be relocated to documents that are controlled by the licensee under the provisions of 10 CFR 50.59. The change is consistent with the format and content of the Improved Standard Technical Specifications (NUREG-1434, Revision 0).

Specifically, the licensee requests the deletion of the specifications from the TSs and their relocation to the Grand Gulf Updated Final Safety Analysis Report (UFSAR) and controlled under the provisions of 10 CFR 50.59:

1. Relocate the following accident monitoring instrumentation from TS Table 3.3.7.5-1 as well as the LCO requirements to the UFSAR under the licensee's administrative control:

   Drywell/Containment Differential Pressure
   Safety Relief Valve Tail Pipe Pressure Switch Indicators
   Containment Ventilation Exhaust Radiation Monitor
   Off-gas and Radwaste Bldg. Ventilation Exhaust Radiation Monitor
   Fuel Handling Area Ventilation Exhaust Radiation Monitor
   Turbine Bldg. Ventilation Exhaust Radiation Monitor
   Standby Gas Treatment System A & B Exhaust Radiation Monitor

2. Relocate the corresponding surveillance requirements for these accident monitoring instruments listed in TS Table 4.3.7.5-1 to the UFSAR.

2.0 BACKGROUND

On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Proposed Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3288). During 1989 through 1992, the utility Owners Groups and the NRC staff developed improved Standard Technical Specifications (STSs) that would establish models of the Commission's policy for each primary reactor type. In addition, the staff, licensees, and the Owners Groups developed generic administrative and editorial guidelines in the form of a "Writers Guide" for TSs, which affords a significant enhancement of human factors considerations and was used throughout the development of licensee-specific improved TSs.

In September 1992, the Commission issued NUREG-1434, which was developed utilizing the guidance and criteria contained in the Commission's interim policy statement. It was established as a model for developing improved TSs for the BWR/6 plants in general and for the improved Grand Gulf Nuclear Station TSs specifically. NUREG-1434 reflects the results of a detailed review of the application of the interim policy statement criteria to generic system functions, which were published in a "Split Report" issued to the NSSS Owners Groups in May 1988. NUREG-1434 also reflects the results of extensive discussions on various drafts of STSs, so that the application of the TS criteria and the Writers Guide would consistently reflect detailed system configurations and operating characteristics for all NSSS designs. As such, the generic Bases presented in NUREG-1434 provide an abundance of information regarding the extent to which the STSs present requirements which are necessary to protect the public health and safety.

On July 22, 1993, the Commission issued its Final Policy Statement. Therein, the Commission expressed its view that satisfying the guidance in the policy statement also satisfies section 182a of the Atomic Energy Act and 10 CFR 50.36. The Final Policy Statement described the safety benefits of the improved STSs and encouraged licensees to use the improved STSs as the basis for plant specific TS amendments, and for complete conversions to improved STSs.

Further, the Final Policy Statement provided guidance to evaluate the required scope of the technical specifications, and finalized the guidance criteria to be used in determining which of the design conditions and associated surveillances need to be located in the TS. The Commission noted (58 FR at 39136) that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed:

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally

> binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

In accordance with this approach, existing TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TSs, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other licensee-controlled documents. The Final Policy Statement criteria are as follows:

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

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.

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.

4. A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.[1]

In its license amendment application, the licensee proposed changes to relocate existing TS requirements using the Final Policy Statement and NUREG-1434 as guidance.

---

[1] The Commission recently promulgated a proposed change to 10 CFR 50.36, pursuant to which the rule would be amended to codify and incorporate these criteria. This proposed rule clarified the contents of the Bases in NUREG-1434 and specified that only LCOs for Reactor Core Isolation Cooling, Isolation Condenser, Residual Heat Removal, Standby Liquid Control, and Recirculation Pump Trip meet the guidance for inclusion in the TS under Criterion 4. In the proposed change to §50.36, the Commission specifically requested public comments regarding application of Criterion 4. For the purpose of this evaluation, Criterion 4 has not been applied to add TS restrictions other than those indicated above. See Proposed Rule, "Technical Specifications," 59 FR 48180 (September 20, 1994).

Relocated requirements

As summarized above, the Commission's policy statement provides that existing TS requirements which do not satisfy or fall within any of the four specified criteria may be relocated to appropriate licensee-controlled documents. In the licensee's application, such requirements are generally relocated to the UFSAR and to the TS Bases. The relocated provisions of the existing TS SRs will be relocated to appropriate plant procedures; i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures, depending on the nature of the requirements being relocated.

The facility and procedures described in the UFSAR and can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures an auditable and appropriate control over the relocated requirements and any future changes to these provisions. Temporary procedure changes are also controlled by 10 CFR 50.54(a).

As described in more detail in this evaluation, the staff concludes that appropriate controls have been identified for all of the requirements that are being relocated from the licensee's TSs to licensee-controlled documents. Until incorporated in the UFSAR and procedures, changes to the provisions being relocated from the TSs will be controlled in accordance with the applicable existing procedures that control these documents.

3.0 EVALUATION

The licensee has requested the relocation of the LCOs and SRs for the following post accident monitoring (PAM) instrumentation from Table 4.3.7.5-1 to other licensee controlled documents that are controlled under the provisions of 10 CFR 50.59:

Drywell/Containment Differential Pressure
Safety Relief Valve Tail Pipe Pressure Switch Indicators
Containment Ventilation Exhaust Radiation Monitor
Off-gas and Radwaste Bldg. Ventilation Exhaust Radiation Monitor
Fuel Handling Area Ventilation Exhaust Radiation Monitor
Turbine Bldg. Ventilation Exhaust Radiation Monitor
Standby Gas Treatment System A & B Exhaust Radiation Monitor

The primary purpose of the PAM instrumentation is to display plant variables that provide information required by the control room operators during accident situations. This information provides the necessary support for the operator to take the manual actions for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for design basis events. The NUREG-1434 instruments that monitor these variables are designated as Type A, Category I, and non-Type A, Category I in accordance with Regulatory Guide 1.97

The operability of required accident monitoring instrumentation ensures that there is sufficient information available on selected plant parameters to monitor and assess plant status and behavior following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97.

The PAM instrumentation LCO requires the operability of Regulatory Guide 1.97, Type A, variables to ensure that the control room operating staff can:

Perform the diagnosis specified in the Emergency Operating Procedures (EOP). These diagnoses are restricted to preplanned actions for the primary success path of Design Basis Accidents (DBAs) (e.g., loss of coolant accident (LOCA)); and

Take the specified, preplanned, manually controlled actions for which no automatic control is provided, which are required for safety systems to accomplish their safety function.

The PAM instrumentation LCO also requires operability of Category I, non-Type A, variables. This ensures the control room operating staff can:

Determine whether systems important to safety are performing their intended functions;

Determine the potential for a gross breach of the barriers to radioactivity release;

Determine whether a gross breach of a barrier has occurred; and

Initiate action necessary to protect the public and to obtain an estimate of the magnitude of any impending threat.

Instrumentation that meets the definition of Type A in Regulatory Guide 1.97 satisfies Criterion 3 of the NRC Policy Statement and should be retained in the TSs. Category I, non-Type A, instrumentation is retained in the TSs because it is intended to assist operators in minimizing the consequences of accidents. Therefore, these Category I, non-Type A, variables are important for reducing public risk.

None of the above instrument requirements, that the licensee proposes to relocate, are categorized as either Type A, Category I, or non-Type A, Category I. They do not provide information that is required by the control room operator during and following an accident, nor, do they provide necessary support for the operator to take manual action for which no automatic control is provided that is required for safety systems to accomplish their safety function for design basis events. The relocation of instrument functions and SRs will not affect installed control room instrumentation that is used to detect and indicate a significant degradation of the reactor coolant pressure boundary, nor will the relocation affect any structure, system, or component that is required to mitigate the consequences of a design basis accident.

The above relocated requirements relating to installed plant instrumentation are not required to be in the TSs under 10 CFR 50.36, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, they do not fall within any of the four criteria set forth in the Commission's Final Policy Statement, discussed in the Introduction above. In addition, the staff finds that sufficient regulatory controls exist under 10 CFR 50.59 to assure continued protection of the public health and safety. Accordingly, the staff has concluded that these requirements may be relocated from the TSs to the licensee's TS Bases or UFSAR, as applicable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Mississippi 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 and changes surveillance requirements. 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 (58 FR 46234). 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.

5.0 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: Paul W. O'Connor

Date: **February 16, 1995**