

July 14, 1994

Mr. J. V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations  
Washington Public Power Supply System  
P.O. Box 968  
Richland, Washington 99352-0968

Dear Mr. Parrish:

SUBJECT: ISSUANCE OF EMERGENCY AMENDMENT FOR THE WASHINGTON PUBLIC POWER SUPPLY SYSTEM NUCLEAR PROJECT NO. 2 (TAC NO. M89836)

The Commission has issued the enclosed Amendment No.129 to Facility Operating License No. NPF-21 for WPPSS Nuclear Project No. 2. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated July 8, 1994.

The amendment allows post-maintenance control rod scram time testing to be performed at lower reactor coolant pressures than currently allowed by TS. To support this testing, the amendment also revises TS related to movement of a single control rod in Operational Conditions 3 and 4. You requested the change on an emergency basis when you discovered that the requirements to conduct scram time testing at no less than 950 psig and yet not be in Operational Conditions 1 or 2 could not be simultaneously satisfied. Failure to perform the scram time testing would require the plant to remain shut down.

A copy of the related safety evaluation is also enclosed. A Notice of Issuance and Final Determination of No Significant Hazards Consideration and Opportunity for Hearing will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,

Original signed by: Brian E. Holian for  
James W. Clifford, Senior Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 129 to NPF-21
- 2. Safety Evaluation

cc w/enclosures:  
See next page

DISTRIBUTION

Docket File ✓	NRC & Local PDRs
EAdensam	DFoster-Curseen
DHagan, T4A43	GHill (2), T5C3
OPA, 2G5	OC/LFDCB, T9E10
JRoe	PDIV-2/RF
TQuay	OGC, 15B18
CGrimes, 11E22	ACRS (10), P-315
Region IV	KPerkins, RIV/WCFO
JClifford	RSchaaf

7/14/94

\* See previous concurrence

OFC	LA/DRPW <i>Jc</i>	PE/PD4-1 <i>PK</i>	PM/PDIV-2 <i>get for</i>	SRXB	OGC	D/PDIV-2 <i>get for</i>	ADP <i>PK</i>
NAME	DFoster-Curseen	RSchaaf:pk	JClifford	MRubin*	STurk*	TQuay	EAdensam
DATE	7/14/94	7/14/94	7/14/94	7/13/94	7/14/94	7/14/94	7/14/94

OFFICIAL RECORD COPY

DOCUMENT NAME: WNP89836.AMD

9407250083 940714  
PDR ADDCK 05000397  
P PDR

REG FILE CENTER COPY

DF01



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 14, 1994

Docket No. 50-397

Mr. J. V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations  
Washington Public Power Supply System  
P. O. Box 968  
Richland, Washington 99352-0968

Dear Mr. Parrish:

SUBJECT: ISSUANCE OF EMERGENCY AMENDMENT FOR THE WASHINGTON PUBLIC POWER  
SUPPLY SYSTEM NUCLEAR PROJECT NO. 2 (TAC NO. M89836)

The Commission has issued the enclosed Amendment No.129 to Facility Operating License No. NPF-21 for WPPSS Nuclear Project No. 2. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated July 8, 1994.

The amendment allows post-maintenance control rod scram time testing to be performed at lower reactor coolant pressures than currently allowed by TS. To support this testing, the amendment also revises TS related to movement of a single control rod in Operational Conditions 3 and 4. You requested the change on an emergency basis when you discovered that the requirements to conduct scram time testing at no less than 950 psig and yet not be in Operational Conditions 1 or 2 could not be simultaneously satisfied. Failure to perform the scram time testing would require the plant to remain shut down.

A copy of the related safety evaluation is also enclosed. A Notice of Issuance and Final Determination of No Significant Hazards Consideration and Opportunity for Hearing will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Clifford".

James W. Clifford, Senior Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.129 to NPF-21
2. Safety Evaluation

cc w/enclosures:  
See next page

Mr. J. V. Parrish  
Washington Public Power Supply System

WPPSS Nuclear Project No. 2  
(WNP-2)

cc:

Mr. J. H. Swailes  
WNP-2 Plant Manager  
Washington Public Power Supply System  
P. O. Box 968  
Richland, Washington 99352-0968

Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
Harris Tower & Pavilion  
611 Ryan Plaza Drive, Suite 400  
Arlington, Texas 76011-8064

G. E. C. Doupe, Esq. (Mail Drop 396)  
Washington Public Power Supply System  
3000 George Washington Way  
Richland, Washington 99352-0968

Chairman  
Benton County Board of Commissioners  
P. O. Box 69  
Prosser, Washington 99350-0190

Mr. Warren Bishop, Chairman  
Energy Facility Site Evaluation Council  
P. O. Box 43172  
Olympia, Washington 98504-3172

Mr. R. C. Barr  
U. S. Nuclear Regulatory Commission  
P. O. Box 69  
Richland, Washington 99352-0968

Mr. H. K. Kook (Mail Drop PE20)  
WNP-2 Licensing Manager  
Washington Public Power Supply System  
P. O. Box 968  
Richland, Washington 99352-0968

M. H. Philips, Jr., Esq.  
Winston & Strawn  
1400 L Street, NW.  
Washington, DC 20005-3502

Mr. Paul R. Bemis (Mail Drop PE20)  
Regulatory Programs Manager  
Washington Public Power Supply System  
P. O. Box 968  
Richland, Washington 99352-0968



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

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

DOCKET NO. 50-397

NUCLEAR PROJECT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 129  
License No. NPF-21

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Washington Public Power Supply System (licensee) dated July 8, 1994, 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 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-21 is hereby amended to read as follows:

9407250090 940714  
PDR ADDCK 05000397  
P PDR

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 129 and the Environmental Protection Plan contained in Appendix B, 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 amendment is effective from the date of issuance to be implemented within 7 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Elinor G. Adensam, Assistant Director  
for Region IV Reactors  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: July 14, 1994

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 129 TO FACILITY OPERATING LICENSE NO. NPF-21

DOCKET NO. 50-397

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE

1-10  
3/4 1-6  
3/4 9-1

INSERT

1-10  
3/4 1-6  
3/4 9-1

TABLE 1.1  
SURVEILLANCE FREQUENCY NOTATION

<u>NOTATION</u>	<u>FREQUENCY</u>
S	At least once per 12 hours.
D	At least once per 24 hours.
W	At least once per 7 days.
M	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 184 days.
A	At least once per 366 days.
R	At least once per 18 months (550 days).
S/U	Prior to each reactor startup.
P	Prior to each radioactive release.
N. A.	Not applicable.

TABLE 1.2

<u>CONDITION</u>	<u>MODE SWITCH POSITION</u>	<u>AVERAGE REACTOR COOLANT TEMPERATURE</u>
1. POWER OPERATION	Run	Any temperature
2. STARTUP	Startup/Hot Standby	Any temperature
3. HOT SHUTDOWN	Shutdown# ***	> 200°F****
4. COLD SHUTDOWN	Shutdown# ## ***	≤ 200°F****
5. REFUELING*	Shutdown or Refuel** #	≤ 140°F

---

#The reactor mode switch may be placed in the Run or Startup/Hot Standby position to test the switch interlock functions provided that the control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff.

##The reactor mode switch may be placed in the Refuel position while a single control rod drive is being removed from the reactor pressure vessel per Specification 3.9.10.1.

\*Fuel in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

\*\*See Special Test Exceptions 3.10.1 and 3.10.3.

\*\*\*The reactor mode switch may be placed in the Refuel position while a single control rod is being moved provided that the one-rod-out interlock is OPERABLE.

\*\*\*\*See Special Test Exception 3.10.7.

## REACTIVITY CONTROL SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

---

4.1.3.1.4 The scram discharge volume shall be determined OPERABLE by demonstrating:

- a. The scram discharge volume drain and vent valves OPERABLE, when control rods are scram tested from a normal control rod configuration of less than or equal to 50% ROD DENSITY at least once per 18 months,\* by verifying that the drain and vent valves:
  1. Close within 30 seconds after receipt of a signal for control rods to scram, and
  2. Open when the scram signal is reset.
- b. Proper float response by performance of a CHANNEL FUNCTIONAL TEST of the scram discharge volume scram and control rod block level instrumentation after each scram from a pressurized condition.

---

\*The provisions of Specification 4.0.4 are not applicable for entry into OPERATIONAL CONDITION 2 provided the surveillance is performed within 12 hours after achieving less than or equal to 50% ROD DENSITY.

## REACTIVITY CONTROL SYSTEMS

### CONTROL ROD MAXIMUM SCRAM INSERTION TIMES

#### LIMITING CONDITION FOR OPERATION

3.1.3.2 The maximum scram insertion time of each control rod from the fully withdrawn position to notch position 6, based on deenergization of the scram pilot valve solenoids as time zero, shall not exceed 7 seconds.

APPLICABILITY: OPERATIONAL CONDITIONS 1 and 2.

#### ACTION:

- a. With the maximum scram insertion time of one or more control rods exceeding 7 seconds:
  1. Declare the control rod(s) with the slow insertion time inoperable, and
  2. Perform the Surveillance Requirements of Specification 4.1.3.2c. at least once per 60 days when operation is continued with three or more control rods with maximum scram insertion times in excess of 7 seconds.

Otherwise, be in at least HOT SHUTDOWN within 12 hours.

- b. The provisions of Specification 3.0.4 are not applicable.

#### SURVEILLANCE REQUIREMENTS

4.1.3.2 The maximum scram insertion time of the control rods shall be demonstrated through measurement with reactor coolant pressure greater than or equal to 950 psig and, during single control rod scram time tests, the control rod drive pumps isolated from the accumulators:

- a. For all control rods prior to THERMAL POWER exceeding 40% of RATED THERMAL POWER following CORE ALTERATIONS\* or after a reactor shutdown that is greater than 120 days.
- b. For specifically affected individual control rods following maintenance on or modification to the control rod or control rod drive system\*\* which could affect the scram insertion time of those specific control rods, and
- c. For at least 10% of the control rods, on a rotating basis, at least once per 120 days of POWER OPERATION.

---

\*Except movement of SRM, IRM, or special movable detectors or normal control rod movement.

\*\*Demonstration may be performed at reactor coolant pressure less than 950 psig provided the measured scram insertion times are within established limits based on reactor coolant pressure and provided the test is repeated at greater than 950 psig prior to exceeding 40% of RATED THERMAL POWER.

### 3/4.9 REFUELING OPERATIONS

#### 3/4.9.1 REACTOR MODE SWITCH

##### LIMITING CONDITION FOR OPERATION

---

3.9.1 The reactor mode switch shall be OPERABLE and locked in the Shutdown or Refuel position. When the reactor mode switch is locked in the Refuel position:

- a. A control rod shall not be withdrawn unless the Refuel position one-rod-out interlock is OPERABLE.
- b. CORE ALTERATIONS shall not be performed using equipment associated with a Refuel position interlock unless at least the following associated Refuel position interlocks are OPERABLE for such equipment.
  1. All rods in.
  2. Refuel platform position.
  3. Refuel platform hoists fuel-loaded.
  4. Service platform hoist fuel-loaded.

APPLICABILITY: OPERATIONAL CONDITION 5\* #, OPERATIONAL CONDITIONS 3 and 4 when the reactor mode switch is in the Refuel position.

##### ACTION:

- a. With the reactor mode switch not locked in the Shutdown or Refuel position as specified, suspend CORE ALTERATIONS and lock the reactor mode switch in the Shutdown or Refuel position.
- b. With the one-rod-out interlock inoperable, lock the reactor mode switch in the Shutdown position.
- c. With any of the above required Refuel position equipment interlocks inoperable, suspend CORE ALTERATIONS with equipment associated with the inoperable Refuel position equipment interlock.

---

\*See Special Test Exceptions 3.10.1 and 3.10.3.

#The reactor shall be maintained in OPERATIONAL CONDITION 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

## REFUELING OPERATIONS

### SURVEILLANCE REQUIREMENTS

---

4.9.1.1 The reactor mode switch shall be verified to be locked in the Shutdown or Refuel position as specified:

- a. Within 2 hours prior to:
  1. Beginning CORE ALTERATIONS, and
  2. Resuming CORE ALTERATIONS when the reactor mode switch has been unlocked.
- b. At least once per 12 hours.

4.9.1.2 Each of the above required reactor mode switch Refuel position interlocks\* shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST within 24 hours prior to the start of and at least once per 7 days during control rod withdrawal or CORE ALTERATIONS, as applicable.

4.9.1.3 Each of the above required reactor mode switch Refuel position interlocks\* that is affected shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST prior to resuming control rod withdrawal or CORE ALTERATIONS, as applicable, following repair, maintenance or replacement of any component that could affect the Refuel position interlock.

---

\* The reactor mode switch may be placed in the Run or Startup/Hot Standby position to test the switch interlock functions provided that all control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO.129 TO FACILITY OPERATING LICENSE NO. NPF-21

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

NUCLEAR PROJECT NO. 2

DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated July 8, 1994, Washington Public Power Supply System (the licensee) requested changes to the Technical Specifications (TS) for the Washington Nuclear Project No. 2 (WNP-2) on an emergency basis. The proposed amendment would allow the licensee to perform post-maintenance control rod scram time testing at lower reactor coolant pressures than currently allowed by TS.

The licensee requested an emergency TS change to add a note to TS Surveillance Requirement 4.1.3.2.b to allow post-maintenance control rod scram time testing to be performed at reactor coolant pressures less than 950 psig. To support this proposed change, the licensee also proposed changes to TS Table 1.2, "Operational Conditions," to expand the circumstances for which movement of a single control rod in Operational Conditions 3 and 4 would be allowed, and to TS 3/4.9.1, "Reactor Mode Switch," to expand the applicability of the surveillance requirements for operability of the one-rod-out interlock.

2.0 DISCUSSION

The scram reactivity used in the design basis accident (DBA) and transient analyses is based on an assumed control rod scram time. Confirmation that the individual control rod scram times are within established limits provides confirmation that specified acceptable fuel design limits will not be exceeded for the transients analyzed in the Final Safety Analysis Report (FSAR). When work that could affect the scram insertion time is performed on a control rod or the control rod drive (CRD) system, testing must be done to demonstrate that each affected control rod retains adequate scram performance to remain within the bounds of the FSAR analyses.

TS 3.1.3.2 requires the control rod scram insertion time of each control rod to be within the specified limit for operation in Operational Conditions 1 and 2. Surveillance Requirement 4.1.3.2.b requires the control rod scram insertion time test to be performed following maintenance or modification to the control rod or the CRD system. As currently written, the surveillance requirement requires this test to be performed with reactor coolant pressure

9407250094 940714  
PDR ADDCK 05000397  
PDR

greater than or equal to 950 psig. The licensee proposed the addition of a footnote to Surveillance Requirement 4.1.3.2.b which would read:

\*\* Demonstration may be performed at reactor coolant pressure less than 950 psig provided the measured scram insertion times are within established limits based on reactor coolant pressure and provided the test is repeated at greater than 950 psig prior to exceeding 40% of rated thermal power.

The footnote would allow post-maintenance scram time testing to be performed at less than 950 psig. Acceptable scram insertion times would be specified as a function of reactor pressure to account for the sensitivity of the scram insertion times to reactor steam dome pressure (scram insertion times increase with increasing reactor pressure because of the competing effects of reactor steam dome pressure and stored scram accumulator energy).

The staff finds that verification of acceptable scram insertion times, specified as a function of reactor pressure, combined with additional existing surveillance requirements which verify other aspects of control rod operability, provide reasonable assurance that the control rods are capable of performing their design function prior to entering Operational Conditions 1 and 2. Furthermore, confirmatory testing at greater than 950 psig ensures that the control rod scram performance is acceptable for operating reactor pressure conditions at higher power levels. Therefore, the staff finds the proposed change to Surveillance Requirement 4.1.3.2 to be acceptable.

To support the proposed testing, the licensee also proposed changes to TS Table 1.2 and TS 3/4.9.1 to revise requirements related to single control rod movement in Operational Conditions 3 and 4. These changes are similar to existing approved specifications in other boiling water reactors (e.g., Grand Gulf, LaSalle, and Nine Mile Point 2). These were either in the initial TS for these plants or the result of approved changes similar to those proposed by the licensee.

The licensee proposed to modify TS Table 1.2 to allow movement of a single control rod in Operational Conditions 3 and 4 for purposes other than recoupling by replacing "recoupled" in footnote "\*\*\*" with "moved."

Control rod movement is blocked when the mode switch is in the Shutdown position, as is normally required in Operational Conditions 3 and 4. Movement of the switch to Refuel (or to Startup or Run) is necessary to move a rod for recoupling (e.g., after repairs on the CRD) or for any other purpose. When the mode switch is in the Refuel position, the redundant logic of the one-rod-out interlock limits rod movement to one rod. Because of the requirement for adequate shutdown margin with one control rod fully withdrawn, there is reasonable assurance that the reactor will remain subcritical with the mode switch in the Refuel position.

The proposed change to TS Table 1.2 does not change the current permission to withdraw a single control rod in Operational Conditions 3 and 4, but it does expand the testing and maintenance activities for which withdrawal is

permitted (e.g., scram time testing). This will increase the frequency of single control rod withdrawals in Operational Conditions 3 and 4. However, the probability of inadvertent criticality due to rod withdrawal events is not significantly affected since there is no postulated set of circumstances which results in an additional rod withdrawal with the mode switch in the Refuel position.

The licensee proposed to modify TS 3/4.9.1 to extend the applicability of the surveillance requirements for the one-rod-out interlock to Operational Conditions 3 and 4.

The staff finds that the proposed change to TS Table 1.2 provides for necessary maintenance and testing of control rods, is not significantly different from currently permitted rod withdrawal operations, does not increase the probability of a rod withdrawal event, and is consistent with previous NRC staff approvals and existing TS for other BWR plants. The proposed change to TS 3/4.9.1 provides additional appropriate surveillance requirements for rod withdrawal in Operational Conditions 3 and 4. Therefore, the staff concludes that the proposed changes to TS Table 1.2 and TS 3/4.9.1 are acceptable.

### 3.0 EMERGENCY CIRCUMSTANCES

During a reevaluation of Surveillance Requirement 4.1.3.2, the licensee determined that, under certain circumstances, the specification as currently written does not permit verification of control rod operability as required prior to entry into Operational Condition 2. The surveillance requirement requires that scram insertion times be measured with reactor coolant pressure equal to or greater than 950 psig. Surveillance Requirement 4.1.3.2.b requires verification of scram times to be performed following maintenance on or modification to a control rod or the CRD system. The licensee determined that the requirements to conduct scram time testing at greater than or equal to 950 psig and yet not be in Operational Conditions 1 or 2 could not be simultaneously satisfied and required a change to the TS.

WNP-2 is currently completing a refueling outage and will be ready to startup on July 18, 1994. The licensee completed a significant amount of CRD scram solenoid pilot valve and CRD maintenance during the present outage, requiring verification of control rod scram times in accordance with Surveillance Requirement 4.1.3.2.b. As noted above, a TS change is required to enable this testing to be performed correctly. This condition was identified on July 1, 1994. The licensee submitted a request for an emergency amendment to the TS on July 8, 1994. Processing the licensee's request on an emergency basis would enable the licensee to verify control rod operability, preventing an unnecessary extended plant shutdown. The staff has concluded that these circumstances warrant issuance of an emergency amendment.

### 4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has made a determination that the amendment involves no significant hazards consideration. Under the Commission's regulations in 10

CFR 50.92(c), this means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The staff has evaluated the proposed changes against the standards as required by 10 CFR 50.91(a) and has concluded that:

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

The amendment revises the TS to provide a means of verifying control rod operability prior to entering an Operational Condition in which the control rods are required to be operable. The movement of a single rod for scram time testing in Operational Conditions 3 and 4 is the same as the movement of a single rod presently allowed in these operational conditions to recouple a control rod to its CRD. The amendment does not involve any physical changes to plant systems, structures, or components; and does not alter operation of plant systems, structures, or components as described in the safety analysis. The amendment assures that plant variables are maintained within the limits necessary to satisfy the initial conditions assumed in the safety analysis. The amendment establishes adequate assurance that the control rods will be operable prior to the operational conditions in which they are necessary to mitigate the consequences of an accident. This change will increase the frequency of single control rod withdrawals in Operational Conditions 3 and 4. However, the probability of inadvertent criticality due to rod withdrawal events is not significantly affected since there is no postulated set of circumstances which results in an additional rod withdrawal with the mode switch in the Refuel position. Therefore, the amendment does not result in a significant increase in the probability or consequences of an accident previously evaluated.

- b. The change does not create the possibility of a new or different kind of accident from any accident previously evaluated:

The amendment does not create any new configurations or physical modification of the plant. The amendment does not alter the method used by any system to perform its design function. The plant conditions for scram time testing following maintenance (in Operational Conditions 3 and 4 at pressure less than 950 psig with the one-rod-out interlock operable and the shutdown margin requirement of TS 3.1.1 satisfied) have been previously analyzed for control rod recoupling. The movement of the control rod remains unchanged. Therefore, this amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

- c. The change does not involve a significant reduction in a margin of safety:

Withdrawal of a single control rod in Operational Conditions 3 and 4 is currently permitted to facilitate recoupling a control rod to its CRD. The amendment expands the activities for which single control rod withdrawal is permitted in these operational conditions. Single control rod withdrawal in Operational Conditions 3 and 4 is evaluated in the safety analysis. The shutdown margin requirement of TS 3.1.1 provides assurance that the reactor remains subcritical with the highest worth control rod withdrawn, and the mode switch refuel position one-rod-out interlock prevents withdrawal of a second control rod with any single control rod withdrawn. The withdrawal of a single control rod for scram time testing is no different from the withdrawal of a single control rod presently allowed to facilitate recoupling a control rod to its CRD. Therefore, the amendment does not involve a significant reduction in a margin of safety.

#### 5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Washington State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 6.0 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 made a final no significant hazards consideration finding with respect to this amendment. 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.

#### 7.0 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: R. Schaaf

Date: July 14, 1994