January 14, 2003

Mr. Mike Bellamy
Site Vice President
Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

SUBJECT: PILGRIM NUCLEAR POWER STATION - ISSUANCE OF AMENDMENT RE: RELOCATION OF SHOCK SUPPRESSORS (SNUBBERS) TECHNICAL SPECIFICATION REQUIREMENTS TO UPDATED FINAL SAFETY ANALYSIS REPORT (TAC NO. MB5682)

Dear Mr. Bellamy:

The Commission has issued the enclosed Amendment No. 195 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station. This amendment is in response to your application dated July 5, 2002.

This amendment relocates Technical Specification (TS) 3/4.6.I to the Pilgrim Nuclear Power Station Updated Final Safety Analysis Report. The affected TS contains snubber operability and surveillance requirements. The associated Bases section will also be relocated.

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,

/RA/

Travis L. Tate, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosures: 1. Amendment No. 195 to License No. DPR-35
2. Safety Evaluation

cc w/encls: See next page

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cc w/encls: See next page
DISTRIBUTION:

JClifford	CAnderson, RI	PUBLIC	LCox
PDI-2 Reading	TTate	OGC	GHill (2), T-5C3
ACRS	RDennig	SRichards	FArner, RI
JBobiak, RI	KKavanagh		

Accession Number: ML030150006
*SE provided 10/21/02, no major changes made ** see previous concurrence

OFFICE	PDI-2/PM	PDI-2/LA	PDI-2/PM	RORP/SC*	EMEB/BC**	OGC**	PDI-2/SC
NAME	VNerses	SLittle for Lcox, MO'Brien - changes only	Vnerses for TTate	RDennig	EImbro	RHefling	REnnis for JClifford
DATE	1/2/03	11/25/02, 1/2/03	1/2/03	10/21/02	12/19/02	12/4/02	1/6/03

OFFICIAL RECORD COPY

cc:
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ENTERGY NUCLEAR GENERATION COMPANY

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-293

PILGRIM NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 195
License No. DPR-35

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

   A. The application for amendment filed by the Entergy Nuclear Operations, Inc. (the licensee) dated July 5, 2002, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations;

   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 3.B of Facility Operating License No. DPR-35 is hereby amended to read as follows:

   B. Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 195, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance and shall be implemented within 60 days. The implementation of this amendment shall include the relocation of certain technical specification requirements to the Pilgrim Nuclear Power Station Updated Final Safety Analysis Report as described in the licensee's application dated July 5, 2002, and evaluated in the staff's Safety Evaluation attached to this amendment.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA REnnis for/

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: January 14, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 195

FACILITY OPERATING LICENSE NO. DPR-35

DOCKET NO. 50-293

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
3/4.6-9	3/4.6-9
3/4.6-10	3/4.6-10
3/4.6-11	3/4.6-11
3/4.6-12	3/4.6-12
B3/4.6-11	B3/4.6-11
B3/4.6-12	B3/4.6-12

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 195 TO FACILITY OPERATING LICENSE NO. DPR-35

ENTERGY NUCLEAR GENERATION COMPANY

ENTERGY NUCLEAR OPERATIONS, INC.

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 INTRODUCTION

By application dated July 5, 2002, Entergy Nuclear Operations, Inc. (ENO or the licensee) submitted a request for changes to the Pilgrim Nuclear Power Station (PNPS) Technical Specifications (TSs). The requested changes would relocate TS 3/4.6.I to the PNPS Updated Final Safety Analysis Report (UFSAR). The affected TS contains snubber operability and surveillance requirements (SRs). The associated Bases section would also be relocated.

2.0 REGULATORY EVALUATION

The Commission's regulatory requirements related to the content of TSs are set forth in 10 CFR 50.36. This regulation requires that the TSs include items in eight specific categories. These categories include 1) safety limits, limiting safety system settings, and limiting control settings, 2) limiting conditions for operation (LCO), 3) SRs, 4) design features, 5) administrative controls, 6) decommissioning, 7) initial notification, and 8) written reports. However, the regulation does not specify the particular requirements to be included in a plant's TSs.

Additionally, 10 CFR 50.36(c)(2)(ii) sets forth four criteria to be used in determining whether a TS LCO is required to be established for an item. These 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 risk assessment has shown to be significant to public health and safety.

Existing LCOs and related surveillances included as TS requirements which satisfy any of the criteria stated above must be retained in the TSs. Those TS requirements which do not satisfy these criteria may be relocated to other licensee-controlled documents.

The U.S. Nuclear Regulatory Commission (NRC) staff developed NUREG-1433, Rev. 2, "Standard Technical Specifications, General Electric Plants, BWR/4," for boiling-water reactors (BWRs) based on the four criteria in 10 CFR 50.36(c)(2)(ii). Licensees are encouraged to upgrade their TSs consistent with those criteria and conforming, to the extent practical, to Revision 2 to the improved Standard Technical Specifications (STS).

3.0 TECHNICAL EVALUATION

TS LCO 3/4.6.I provides the requirements for shock suppressors (snubbers) for all MODES of operation except Cold Shutdown and Refuel. Specifically, LCO 3/4.6.I.1 requires all safety related snubbers listed in PNPS procedures shall be operable except as noted in TS 3.6.I.2 and TS 3.6.I.3. TS 3.6.I.2 requires the replacement or repair of an inoperable snubber within 72 hours from the time declared inoperable, and the initiation of an engineering evaluation to determine whether the component supported by the snubber(s) is and remains capable of meeting its intended function in the specific safety system involved. TS 3.6.I.3 requires that the affected safety system or affected portions of that system shall be declared inoperable and the limiting condition for that system entered if the requirements of TS 3.6.I.1 and 3.6.I.2 cannot be met.

The NRC staff evaluated the proposed change to the existing TSs against the four criteria set forth in 10 CFR 50.36(c)(2)(ii). Snubbers are not a form of instrumentation used to detect a significant abnormal degradation of the reactor coolant pressure boundary, and therefore, do not meet criterion 1. The snubbers are design features used to prevent unrestrained pipe motion under dynamic loads from a seismic event or severe transient. However, these design features are not an initial condition for a design-basis accident (DBA) or transient analysis. Therefore, snubbers do not meet criterion 2 for inclusion in the TSs. Snubbers are components which function to prevent the propagation of a DBA or transient to systems that are part of the primary success path for accident mitigation. Snubbers provide a support function to those systems and as such, do not meet criterion 3. Snubbers are components which operating experience or probabilistic risk assessments has not shown to be significant to public health and safety, and therefore, do not meet criterion 4. Since snubbers does not satisfy these criteria, TS 3/4.6.I and the associated Bases may be relocated to other licensee-controlled documents. This proposed change is also consistent with STS, NUREG-1433, for BWRs.

The staff notes that the relocation of support system LCOs and related surveillance requirements from the TSs has not changed the relationship between support and supported systems, and it does not create an exception to the definition of Operable - Operability. Supported systems have always been required to be declared inoperable at the time when their support systems are determined to have rendered the supported system inoperable. In NRC Generic Letter (GL) 91-18, "Information to Licensees Regarding NRC Inspection Manual Section on Resolution of Degraded and Nonconforming Conditions," the staff stated its position as to what constitutes timeliness that is commensurate with the potential safety significance of

the issue. In this context, licensees which use the relocated TSs as guidance to determine an acceptable maximum evaluation period after which the supported system must be declared inoperable, meets GL 91-18 guidance. Additionally, licensees can and have entered the completion times for associated supported systems as needed in response to inoperability of relocated support systems.

Changes to the PNPS UFSAR will be controlled in accordance with approved station procedures and the requirements of 10 CFR 50.59. Therefore, the staff considers that sufficient regulatory controls exists and, therefore, TS 3/4.6.I discussed above, may be relocated from the TSs to the PNPS UFSAR.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Massachusetts 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 (67 FR 68735). 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: K. Kavanagh

Date: January 14, 2003