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John A. Scalice
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JAN 10 1997

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of) Docket No. 50-390
Tennessee Valley Authority)

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 - PROPOSED LICENSE AMENDMENT -
TECHNICAL SPECIFICATION CHANGE 96-11 - IMPLEMENTATION OF 10 CFR 50,
APPENDIX J, OPTION B, PERFORMANCE-BASED TESTING

In accordance with TVA's November 2, 1995, letter to the NRC staff, the purpose of this letter is to request that Facility Operating License NPF-90, and Appendix A of NPF-90, Watts Bar Unit 1 Technical Specifications (TSSs), be amended in accordance with 10 CFR 50.90 to eliminate exemption number 2.D(1) of NPF-90, and implement the revised regulation, 10 CFR 50, Appendix J, Option B. NRC revised 10 CFR 50, Appendix J to incorporate Option B for containment leakage rate testing; Option B is a voluntary performance-based option.

TVA's November 2, 1995, letter stated that effective with implementation of Appendix J, Option B, TVA would no longer require exemption from item III.D.2(b)(ii) pertaining to containment air lock testing, and committed to submit a license amendment request during WBN Unit 1 Cycle 1 to remove the exemption and provide proposed technical specification changes to implement Appendix J, Option B.

Option B allows licensees to extend the integrated leakage rate test (Type A test) frequency based on an acceptable past performance history. For Type B and Type C local leak-rate tests, Option B allows licensees to extend the testing frequencies based on plant-specific experience history of each component and establish controls to ensure continued performance during the extended testing interval.

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A description of the proposed amendment, and the basis for it, is included in Enclosure 1. TVA's analysis of significant hazards considerations, as required by 10 CFR 50.91(a), is included in Enclosure 2. Proposed revised TS pages are included in Enclosure 3.

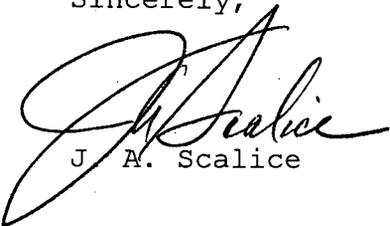
The proposed amendment has been reviewed and approved by the Watts Bar Plant Operations Review Committee and Nuclear Safety Review Board.

In accordance with 10 CFR 50.91(b)(1), a copy of this proposed license amendment is being forwarded to the state designee for the State of Tennessee.

TVA has determined that this amendment will provide significant cost savings and constitutes a cost beneficial licensing action by preventing an unnecessary plant shutdown transient that would otherwise be necessary to perform leakage testing under the current requirements of 10 CFR 50 Appendix J, Option A. Accordingly, TVA requests that the proposed changes be approved prior to April 30, 1997.

If you should have any questions, please contact P. L. Pace at (423) 365-1824.

Sincerely,



J. A. Scalice

Sworn to and subscribed before me
this 10th day of January 1997

E. Jeannette Long
Notary Public

My Commission Expires July 1, 1997

Enclosures

cc: See page 3

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PROPOSED LICENSE AMENDMENT
CONTAINMENT SYSTEMS**I. Description of Proposed License Amendment**

TVA proposes to modify the Watts Bar Nuclear Plant Unit 1 Technical Specifications (TSS) in order to implement the 1995 rule change (60 FR 49504-49505) to 10 CFR 50, Appendix J. The revised Appendix J rule (Option B) provides a voluntary performance-based testing option for containment leakage rate testing (CLRT). Option B CLRT requirements are based on system and component performance in lieu of compliance with the current prescriptive requirements of 10 CFR 50, Appendix J, Option A. Option B allows extension of the integrated leakage rate test (Type A test) frequency based on an acceptable past history. For Type B and Type C local leak-rate tests, Option B allows extension of the test frequency based on plant-specific experience history of each component and establishes controls to ensure continued performance during extended testing intervals. Option B provides flexibility to adopt cost-effective methods, including appropriate test intervals for implementing the safety objectives underlying the requirements of Appendix J. The proposed TS change is as follows:

General - The proposed change adopts less prescriptive and more performance oriented requirements within TSSs. Detailed technical methods for visual examination, containment testing, and test intervals are incorporated into the WBN TS by reference to approved industry guidelines (i.e., RG 1.163, Performance-Based Containment Leakage-Test Program). RG 1.163 endorses NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J." NEI 94-01 provides methods acceptable to the NRC staff for complying with the provisions of Option B.

Type A Test Interval - The proposed change implements Option B, which includes an alternative approach to determine surveillance test intervals based on past performance. An extension of the Type A test interval from three tests in 10 years to one test in 10 years is allowed based on satisfactory performance of two previous tests. However, in accordance with guidance provided in RG 1.163, Section C, Item 3, the visual examination of accessible interior and exterior surfaces of the containment system for structural problems should be conducted prior to initiating a Type A test and during two other refueling outages before the next Type A test if the interval for the Type A test has been extended to 10 years.

Type B and C Test Interval - For Type B and Type C local leakage rate tests, Option B allows licensees to extend the testing frequency on a plant-specific basis based on experience history of each component and established controls to ensure continued performance during the extended testing interval. The Type B test frequency can be extended up to a maximum of once every 120 months. In accordance with guidance provided in Section C, Item 2 of RG 1.163, extension of test intervals greater than 60 months for Type C tested components is not presently endorsed by the NRC staff. Further, the interval for Type C tests for containment purge and vent valves can only be extended to once every 30 months. Further, in accordance with the guidance provided in RG 1.163, Section C, Item 4, the NRC does not endorse

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"alternative test or analysis" as an appropriate substitute for the required as-found Type C test performed prior to any maintenance, repair, modification, or adjustment activity that could affect a valve's leak tightness.

Specific changes are described below:

Operating License:

Facility Operating License No. NPF-90 is revised to delete exemption number (1) at Section 2.D.

Technical Specifications (TS) and TS Bases:

1. TS Surveillance Requirement (SR) 3.6.1.1, TS page 3.6-2, and its associated frequency currently read:

"Perform required visual examinations and leakage rate testing except for containment air lock testing, in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions. The leakage rate acceptance criteria is $< 1.0 L_a$. However, during the first unit startup following testing performed in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, the leakage rate acceptance criteria are $< 0.6 L_a$ for Type B and Type C tests, and $< 0.75 L_a$ for the Type A tests."

Frequency:

"In accordance with 10 CFR 50, Appendix J, as modified by approved exemptions."

The proposed change would relocate leakage rate acceptance criteria to the CLRT, Section 5.7.2.19 (Refer to Item 4 below) and would read as follows:

"Perform required visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program."

The Frequency would be reworded as follows:

"In accordance with the Containment Leakage Rate Testing Program."

The TS Bases for SR 3.6.1.1 would be revised accordingly.

2. TS Surveillance Requirement (SR) 3.6.2.1, TS page 3.6-7, currently reads:

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"Perform required air lock leakage rate testing in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions. The acceptance criteria for air lock testing are:

- a. Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at ≥ 15.0 psig.
- b. For each door, leakage rate is $\leq 0.01 L_a$ when tested at ≥ 6 psig."

The proposed change for SR 3.6.2.1 would relocate leakage rate acceptance criteria to the CLRT Program, Section 5.7.2.19 (Refer to Item 4 below) and would read as follows:

"Perform required air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program."

Accordingly, Note 2 under SR 3.6.2.1 requires clarification since the leakage rate acceptance criteria of SR 3.6.1.1 are proposed to be relocated. Note 2 currently reads:

"Results shall be evaluated against acceptance criteria of SR 3.6.1.1 in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions."

Note 2 under SR 3.6.2.1 would be revised to read as follows:

"Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1"

The Frequency for SR 3.6.2.1 would be changed from "In accordance with 10 CFR 50, Appendix J, as modified by approved exemptions" to "In accordance with the Containment Leakage Rate Testing Program."

The TS Bases for SR 3.6.2.1 would be revised accordingly.

3. The Frequency for SR 3.6.3.8 currently reads "In accordance with 10 CFR 50, Appendix J, as modified by approved exemptions." The frequency would be changed to read "In accordance with the Containment Leakage Rate Testing Program."

The TS Bases for SR 3.6.3.8 (page B 3.6-26) would be revised accordingly, including a required clarification for the calculation methodology for AS-FOUND leakage. The TS Bases for the SR currently reads, in part:

"...The leakage rate of each bypass leakage path is assumed to be the maximum pathway leakage (through the worse of the two isolation valves) unless the penetration is isolated by use of one closed and de-activated automatic valve, closed manual valve, or blind flange. In this case, the leakage rate of the isolated bypass leakage path is assumed to be the actual pathway leakage through the isolation device."

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This section would be revised as follows:

"...The as-left bypass leakage rate prior to the first startup after performing a required Containment Leakage Rate Testing Program leakage test requires calculation using maximum pathway leakage (leakage through the worse of the two isolation valves). At all other times the leakage rate will be calculated using minimum pathway leakage. If the penetration is isolated by use of one closed and deactivated automatic valve, closed manual valve, or blind flange, then the leakage rate of the isolated bypass leakage path is assumed to be the actual pathway leakage through the isolation device."

The last sentence for SR 3.6.3.8, page B 3.6-26 would be deleted.

4. Administrative Controls, Section 5.7 "Procedures, Programs, and Manuals," TS page 5.0-28 would be revised under the proposed change to include requirements of a new program entitled Containment Leakage Rate Testing Program (Section 5.7.2.19). The programmatic requirements implement 10 CFR 50, Appendix J, Option B, and require that visual examination and testing are performed in accordance with RG 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.
5. TS Bases Surveillance Requirement SR 3.0.2, page B 3.0-11, last paragraph, currently reads:

"...An example of where SR 3.0.2 does not apply is a Surveillance with a Frequency of 'in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions.' The requirements of regulations take precedent over the TS. The TS cannot in and of themselves extend a test interval specified in the regulations."

This paragraph would be revised as a result of the proposed relocation of all details associated with surveillance testing to the CLRT Program, as follows:

"An example of where SR 3.0.2 does not apply is in the Containment Leakage Rate Testing Program; criteria for extending test intervals for scheduling purposes are addressed within the Program."

In addition, the TS Bases for SRs 3.6.1.1, 3.6.2.1, and 3.6.3.8 would be revised to clarify the reason for the exception to SR 3.0.2 as follows:

"SR Frequencies are as . . ." or "The Frequency is . . . required by the Containment Leakage Rate Testing Program, therefore, SR 3.0.2 (which allows frequency extensions) does not apply."

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6. The TS Bases would be revised in the following sections to provide an appropriate reference to the new Containment Leakage Rate Testing Program (discussed in TS Section 5.7.2.19) which implements the requirements of 10 CFR 50, Appendix-J (Option B), "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors - Performance-Based Requirements:"

Section B 3.6.1, BACKGROUND	Page B 3.6-1
Section B 3.6.1, APPLICABLE SAFETY ANALYSES	Page B 3.6-2
Section B 3.6.1, LCO	Page B 3.6-3
Section B 3.6.1, SURVEILLANCE REQMTS (SR 3.6.1.1)	Page B 3.6-4
Section B 3.6.1, REFERENCES	Page B 3.6-5
Section B 3.6.2, SURVEILLANCE REQMTS (SR 3.6.2.1)	Page B 3.6-12
Section B 3.6.2, REFERENCES	Page B 3.6-13
Section B 3.6.3, SURVEILLANCE REQMTS (SR 3.6.3.5)	Page B 3.6-25
Section B 3.6.3, REFERENCES	Page B 3.6-27

7. The discussion of (L_a) in terms of (P_a) would be clarified in TS Bases Section B 3.6.1 (Containment), APPLICABLE SAFETY ANALYSIS (page B 3.6-2), consistent with the definition provided in 10 CFR 50, Appendix J (Option B), from:

" L_a : the maximum allowable containment leakage rate at the calculated peak containment internal pressure (P_a) resulting from the limiting DBA." to:

" L_a : the maximum allowable containment leakage rate at the calculated peak containment internal pressure (P_a) related to the design basis LOCA."

8. TS Bases Section B 3.6.1 (Containment), LCO, page B 3.6-3, would be revised to relocate the containment OPERABILITY criteria to the specific acceptance criteria provided in the Containment Leakage Rate Testing Program. The first two sentences would be changed from:

"Containment OPERABILITY is maintained by limiting leakage to $\leq 1.0 L_a$, except prior to the first startup after performing a required 10 CFR 50, Appendix J, leakage test. At this time, the combined Type B and C leakage must be $< 0.6 L_a$, and the overall Type A leakage must be $< 0.75 L_a$." to:

"Containment OPERABILITY is maintained by limiting leakage to the leakage rate acceptance criteria described in the Containment Leakage Rate Testing Program."

9. TS Bases Section B 3.6.2 (Containment Air Locks), APPLICABLE SAFETY ANALYSIS, page B 3.6-7, would be revised to delete repetitious information addressed in the APPLICABLE SAFETY ANALYSIS for TS Bases Section B 3.6.1, Containment.

The LCO Bases in this section, first sentence (page B 3.6-7), would be editorially revised from: "As part of containment, the air lock ..." to "As part of the containment pressure boundary, the air lock ..."

PROPOSED LICENSE AMENDMENT
CONTAINMENT SYSTEMS**II. Bases for Proposed License Amendment**

TVA is revising the WBN Unit 1 Technical Specifications (TS) to implement the recent revision to 10 CFR 50, Appendix J, Leakage Rate Testing of Containment of Light Water Cooled Nuclear Power Plants. Currently, CLRT is performed in accordance with the prescriptive requirements of Option A to 10 CFR 50, Appendix J. Option A specifies containment leak-rate test requirements, including the types of tests required. In addition, for each type of test, Appendix J discusses leakage acceptance criteria, test methodology, frequency of testing, and reporting requirements. The Option A details of Appendix J are currently contained in the WBN TSs, with specified exemptions.

NRC amended the regulations to provide an Option B to the existing Appendix J requirements. Option B is a performance based approach to Appendix J leakage testing requirements. This option allows licensees with good performance history to reduce the Type A testing frequency from three tests in 10 years to one test in 10 years. For Type B and Type C tests, Option B allows licensees to reduce testing frequency on a plant specific basis based on experience history of each component, and established controls to ensure continued performance during the extended testing interval. Additionally, Option B allows utilities to remove the prescriptive details from the TSs. Therefore, TVA is revising the WBN TSs to comply with the performance based approach provided in the revision to 10 CFR 50, Appendix J.

Justification for Changes

The function of WBN's steel containment vessel is to isolate and contain fission products released from the reactor coolant system following a design basis accident and to confine the postulated release of radioactive material. The safety design basis for containment is that it must withstand the pressures and temperatures of the limiting design basis accident without exceeding the design leakage rate. Periodic testing of the leak tightness of containment, as well as individual penetrations and valves, is necessary to assure that the assumed release rate in WBN's safety analysis is conservative.

TVA's proposed license amendment revises WBN TSs to implement the recently promulgated 10 CFR 50, Appendix J, Option B. Prior to this rulemaking, NRC performed a review of current regulatory requirements in an effort to relax or eliminate requirements that are marginal to safety and yet impose significant regulatory burden on licensees. Reactor containment leak testing was identified as an area where NRC determined that a change to the regulations was warranted.

As discussed in the final regulatory impact analysis for the revised rule, the primary consideration in implementing the performance based leakage rate testing requirements of Appendix J, Option B, is that changes will have at most only a marginal impact on safety. The results

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of the analysis under NUREG 1150 confirm previous observations of insensitivity of population risks from severe reactor accidents to containment leakage rates. The analysis includes comparisons of the predicted reactor accident risks as a function of containment leakage rate with the NRC's safety goals. The calculated risks are well below the safety goal for all the reactors considered even at assumed containment leakage rates several orders of magnitudes above current requirements.

The risk to both the general population and the most exposed members of the public were analyzed. Based on a detailed examination of the results of the Probabilistic Risk Assessments (PRAs) for the five plants evaluated in NUREG-1150, the Technical Support Document (TSD, NUREG-1493) found that leakage rates as high as 100 times those currently permitted by the licensees' Technical Specifications would not increase the containment contribution to risk from severe accidents more than approximately one percent. This increase is marginal to safety.

For Type A tests, specific changes in test frequency are recommended based on risk considerations. For Type B and C tests, analyses indicate the viability of reducing the frequency of testing.

Type A Tests - Reducing the frequency of Type A tests (integrated leak rate tests [ILRTs]) from the current three every 10 years to one every 10 years was found to lead to an imperceptible increase in risk. The estimated increase in risk is very small because ILRTs identify only a few potential containment leakage paths that cannot be identified by Type B and C testing, and the leaks that have been found by Type A tests have been only marginally above existing requirements. Given the insensitivity of risk to containment leakage rate and the small fraction of leakage paths detected solely by Type A testing, increasing the interval between integrated leakage rate tests is possible with minimal impact on public risk.

Type B Tests - Reducing the frequency of Type B testing of electrical penetrations should be possible with marginal impact on risk, based on findings that leakages through these penetrations are both infrequent and small (on the order of one percent of the total allowable leakage rate). As the performance history of Type B electrical penetrations shows no instances where leakage was more than a small fraction of the current allowable leakage rate, changing the frequency of testing to coincide with the schedule for ILRTs is not estimated to result in any change in public radiation exposure.

Type C Tests - The considerable majority of leakage paths are identified by local leak rate tests (LLRTs) of containment isolation valves (Type C tests). Based on the model of component failure with time, it has been found that performance-based alternatives to current LLRT requirements are feasible without significant risk impacts. For Type C tests, the population risk for a performance-based testing schedule would increase overall accident risk by about 2.2 percent per year. This increase is marginal to safety.

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TVA's proposed change reflects a programmatic approach for implementing the containment leakage rate testing requirements within WBN TSs. The current TS details associated with visual examination and testing, test intervals, and containment leakage rate acceptance criteria, are relocated to the administrative control section of WBN TSs. Implementation of 10 CFR 50, Appendix J, Option B, is provided in a newly proposed TS Section 5.7.2.19, which is entitled, "Containment Leakage Rate Testing Program."

Implementation of WBN's CLRT Program will be based on Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak Test Program," dated September 1995. RG 1.163 endorses NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J." NEI 94-01 provides methods acceptable to the NRC staff for complying with the provisions of 10 CFR 50, Appendix J, Option B.

TVA has included within the WBN TS CLRT Program a definition for P_a , L_a , and a description of the leakage rate acceptance criteria. The leakage rate acceptance criteria is outlined as follows:

<u>Area</u>	<u>Acceptance Criteria</u>
a. Containment overall leakage rate	$< 1.0 L_a$
Combined Type B and Type C tests	$< 0.60 L_a$
Type A tests	$\leq 0.75 L_a$
b. Air Lock	
1. Overall leakage rate	$< 0.05 L_a$ when tested at $\geq P_a$
2. Door seal leakage rate	$< 0.01 L_a$ when pressurized to ≥ 6 psig

Under TVA's proposed change, the leakage rate acceptance criteria listed above are relocated from the individual LCOS or SRs to WBN's administrative control section (Section 5.7.2.19).

Shield Building Bypass Leakage (SR 3.6.3.8)

In addition to the surveillance requirements specifically addressed within the CLRT Program (SR 3.6.1.1 and SR 3.6.2.1), a clarification would be made to the Technical Specification Bases for SR 3.6.3.8 (surveillance testing of shield building bypass leakage paths) as a result of changing to the performance-based requirements of Option B. The clarification notes that the AS-FOUND leakage rate for shield building bypass leakage paths is calculated on a minimum pathway leakage rate basis (MNPLR); the AS-LEFT criteria remains the same, e.g., on a maximum pathway leakage rate basis (MXPLR). This change is consistent with the new methodology endorsed by NEI-94-01 for calculating AS-FOUND leakage for Type B and Type C penetrations.

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Shield building bypass leakage paths are those leakage paths from primary containment which bypass the shield building annulus (secondary containment enclosure) and potentially leak into the auxiliary building. Shield building bypass leakage paths are considered Type B and Type C leakage paths and are subject to Type B or Type C leakage tests. Because potential leakage through these penetrations is not subject to cleanup (filtration) by the emergency gas treatment system (EGTS) within the secondary containment enclosure, these Type B and Type C leakage paths are tested more rigorously under two different criteria. The first criteria (addressed in SR 3.6.1.1) determines the contribution of individual local leak rate tests (LLRTs) to the overall leakage acceptance criteria ($<0.6 L_a$) for all combined Type B and Type C penetrations, including shield building bypass penetrations. The second criteria (addressed by SR 3.6.3.8) imposes an additional specific acceptance criteria ($\leq 0.25 L_a$) for shield building bypass leakage penetrations, while using the same leakage methodology and leakage rates determined under SR 3.6.1.1.

WBN's current leak-testing methodology (under 10 CFR 50, Option A) for all Type B and Type C AS-FOUND leakage measurements determined under surveillances SR 3.6.1.1 and SR 3.6.3.8 is based on maximum pathway leakage. However, with the adoption of the performance-based requirements of Option B, as stipulated in NEI-94-01, Revision 0, Type B and Type C leakage testing methodology and criteria are redefined. NEI 94-01 recommends that due to the performance-based nature of Appendix J (Option B), acceptance criteria for the combined leakage rates for all penetrations subject to Type B or Type C tests be similar to that described in ANSI/ANS 56.8-1994. NEI-94-01 requires that for penetrations subject to Type B or Type C tests, the combined AS-LEFT leakage rates are to be determined on a MXPLR basis for all penetrations, and shall be verified to be less than $0.6 L_a$ prior to entering a mode where containment integrity is required following an outage or shutdown that included Type B or Type C testing only. The combined AS-FOUND leakage rates determined on a MNPLR basis for all penetrations shall be less than $0.6 L_a$ at all other times when containment integrity is required. These combined leakage rate determinations are performed with the latest leakage rate test data and are kept as a running summation of the leakage rates. The measurement of shield building bypass leakage under SR 3.6.3.8 would be determined using this same methodology for determining AS-FOUND and AS-LEFT leakage, except that the acceptance criteria remains $\leq 0.25 L_a$, not $<0.6 L_a$.

Testing performed in accordance with the proposed Containment Leakage Rate Testing Program (Appendix J, Option B) and application of the ANSI/NEI combined leakage rate methodology for determining total shield building bypass leakage provides assurance that the combined leakage rate of all shield building bypass leakage paths remains less than or equal to the specified leakage rate of $0.25 L_a$ and that the assumptions in the safety analysis are satisfied. Application of the ANSI/NEI combined leakage rate methodologies does not adversely affect the design basis or alter the safety analysis related to containment integrity, including the EGTS and ABGTS systems.

PROPOSED LICENSE AMENDMENT
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Facility Operating License No. NPF-90 would be revised to delete exemption number 2.D (1) which pertains to containment airlock testing requirements of 10 CFR 50, Appendix J, Option A, Item III.D.2(b)(ii). This regulation requires that air locks opened during periods when containment integrity is not required by the plant's Technical Specifications shall be tested at the end of such periods at not less than P_a . Under Option B, NEI-94-01 requires that following maintenance on an airlock pressure retaining boundary, that either an airlock shall be tested at a pressure of not less than P_a ; or leakage rate testing at P_a shall be performed on the affected area or equipment. TVA's November 2, 1995, letter to the NRC stated that effective with implementation of Appendix J, Option B, TVA would no longer require exemption from item III.D.2(b)(ii), and committed to submit a license amendment request during WBN Unit 1 Cycle 1 to remove the exemption and provide proposed technical specification changes to implement 10 CFR 50 Appendix J, Option B.

III. Environmental Consideration

The proposed change does not involve a significant hazards consideration, a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or a significant increase in individual or cumulative occupational exposure. Therefore, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

I. Description of Proposed License Amendment

TVA proposes to modify the Watts Bar Nuclear Plant Unit 1 Technical Specifications (TSS) in order to implement the 1995 rule change (60 FR 49504-49505) to 10 CFR 50, Appendix J. The revised Appendix J rule (Option B) provides a voluntary performance-based testing option for containment leakage rate testing (CLRT). Option B CLRT requirements are based on system and component performance in lieu of compliance with the current prescriptive requirements of 10 CFR 50, Appendix J, Option A. Option B allows extension of the integrated leakage rate test (Type A test) frequency based on an acceptable past history. For Type B and Type C local leak rate tests, Option B allows extension of the test frequency based on plant-specific experience history of each component and establishes controls to ensure continued performance during extended testing intervals.

Specifically, Technical Specification Surveillance Requirements 3.6.1.1 and 3.6.2.1, and their associated bases and frequencies would be revised to require performance of leakage rate testing in accordance with the CLRT Program; the Frequency for SR 3.6.3.8 would be revised in the same manner. A new administrative control program would be added to TS 5.7.2.19 (Containment Leakage Rate Testing Program) to reflect TVA's adoption of 10 CFR 50, Appendix J, Option B, for WBN Unit 1. TS Bases for SR 3.6.3.8 would be revised to clarify the method for determining AS-FOUND leakage rates for shield building bypass penetrations. TS Bases Section SR 3.0.2 would be revised to clarify the exception to SR 3.0.2 related to extension of test intervals for scheduling purposes.

II. Basis for No Significant Hazards Consideration Determination

The Nuclear Regulatory Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92 (c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if 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. Each standard is discussed below for the proposed amendment.

- (1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment to WBN TSS is in accordance with Option B to 10 CFR 50, Appendix J. The proposed amendment adds a voluntary performance-based option for containment leak-rate testing. The changes being proposed do not affect the precursor for an accident or transient analyzed in Chapter 15 of WBN Final Safety Analysis Report. The proposed change does not increase the total allowable primary containment leakage rate. The proposed change does not reflect a revision to the physical design and/or operation of the plant. herefore, operation of the facility, in accordance with the proposed change, does not significantly affect the probability or consequences of an accident previously evaluated.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

- (2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment to WBN TSs is in accordance with the new performance-based option (Option B) to 10 CFR 50, Appendix J. The changes being proposed will not change the physical plant or the modes of operation defined in the facility license. The proposed changes do not increase the total allowable primary containment leakage rate. The changes do not involve the addition or modification of equipment, nor do they alter the design or operation of plant systems. Therefore, operation of the facility in accordance with the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in margin of safety.

The proposed change to WBN TSs is in accordance with the new option to 10 CFR 50, Appendix J. The proposed option is formulated to adopt performance-based approaches. This option removes the current prescriptive details from the TS. The proposed changes do not affect plant safety analyses or change the physical design or operation of the plant. The proposed change does not increase the total allowable primary containment leakage rate. Therefore, operation of the facility, in accordance with the proposed change, does not involve a significant reduction in the margin of safety.

III. Summary

TVA has evaluated the proposed technical specification change and has determined that it does not represent a significant hazards consideration based on criteria established in 10 CFR 50.92(c). Based on the above, TVA has determined that operation of Watts Bar in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (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. Therefore, operation of Watts Bar in accordance with the proposed amendment would not involve a significant hazards consideration as defined in 10 CFR 50.92.

ENCLOSURE 3

PROPOSED TECHNICAL SPECIFICATIONS

Marked-up Operating License and Technical Specification/TS Bases Pages:

OL Page 4
3.6-2
3.6-7
3.6-14
5.0-28
Insert for page 5.0-28
B3.0-11
B3.6-1 through 5
B3.6-7
B3.6-12
B3.6-13
B3.6-25
B3.6-26
B3.6-27

Revised Technical Specification pages incorporating the proposed change are also enclosed.

OL Page 4
3.6-2
3.6-7
3.6-14
5.0-28
5.0-28a
B3.0-11
B3.6-1 through 5
B3.6-7
B3.6-12
B3.6-13
B3.6-25
B3.6-26
B3.6-27