

**MODEL APPLICATION FOR PLANT-SPECIFIC ADOPTION OF TSTF-514, REVISION 3,  
“REVISE BWR OPERABILITY REQUIREMENTS AND ACTIONS FOR RCS LEAKAGE  
INSTRUMENTATION”**

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

SUBJECT: [PLANT]  
DOCKET NO. 50-[XXX]  
LICENSE AMENDMENT REQUEST FOR ADOPTION OF TECHNICAL  
SPECIFICATION TASK FORCE TRAVELER TSTF-514, REVISION 3, “REVISE  
BWR OPERABILITY REQUIREMENTS AND ACTIONS FOR RCS LEAKAGE  
INSTRUMENTATION”

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), [LICENSEE] is submitting a request for an amendment to the Technical Specifications (TS) for [PLANT].

The proposed amendment would revise the TS to define a new time limit for restoring inoperable Reactor Coolant System (RCS) leakage detection instrumentation to operable status; establish alternate methods of monitoring RCS leakage when one or more required monitors are inoperable; and make TS Bases changes which reflect the proposed changes and more accurately reflect the contents of the facility design basis related to operability of the RCS leakage detection instrumentation. These changes are consistent with NRC-approved Revision 3 to TSTF Improved Standard Technical Specification (STS) Change Traveler TSTF-514, “Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation.” The availability of this TS improvement was announced in the *Federal Register* on [Date] ([ ] FR [ ]) as part of the consolidated line item improvement process (CLIP).

- Attachment 1 provides an evaluation of the proposed changes.
- Attachment 2 provides the markup pages of existing TS to show the proposed changes.
- Attachment 3 provides a markup pages of the existing TS Bases to show the proposed changes.
- Attachment 4 provides revised (clean) TS pages.

[LICENSEE] requests approval of the proposed license amendment by [DATE], with the amendment being implemented [BY DATE OR WITHIN X DAYS].

In accordance with 10 CFR 50.91(a)(1), “Notice for Public Comment,” the analysis about the issue of no significant hazards consideration using the standards in 10 CFR 50.92 is being provided to the Commission in accordance with the distribution requirements in 10 CFR 50.4.

In accordance with 10 CFR 50.91(b)(1), “State Consultation,” a copy of this application and its reasoned analysis about no significant hazards considerations is being provided to the designated [STATE] Official.

I declare [or certify, verify, state] under penalty of perjury that the foregoing is correct and true.

Executed on [date] [Signature]

If you should have any questions about this submittal, please contact [NAME, TELEPHONE NUMBER].

Sincerely,

[Name, Title]

Attachments: [As stated or provide list]

cc: [NRR Project Manager]  
[Regional Office]  
[Resident Inspector]  
[State Contact]

## ATTACHMENT 1

### EVALUATION OF PROPOSED CHANGES

#### License Amendment Request for Adoption of TSTF-514, Revision 3, “Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation”

##### 1.0 DESCRIPTION

The proposed amendment would revise the Technical Specifications (TS) to define a new time limit for restoring inoperable Reactor Coolant System (RCS) leakage detection instrumentation to operable status; establish alternate methods of monitoring RCS leakage when one or more required monitors are inoperable and make conforming TS Bases changes. These changes are consistent with NRC-approved Revision 3 to Technical Specification Task Force (TSTF) Standard Technical Specification (STS) Change Traveler TSTF-514, “Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation.” The availability of this TS improvement was announced in the *Federal Register* on [DATE] ([ ] FR [ ]) as part of the consolidated line item improvement process (CLIP).

##### 2.0 PROPOSED CHANGES

The proposed changes revise and add a new Condition [D] to [TS 3.4.6][TS 3.4.7], “[RCS Leakage Detection Instrumentation],” and revise the associated bases. New Condition [D] is applicable when the [primary containment/drywell] atmosphere gaseous radiation monitor is the only operable TS-required instrument monitoring RCS leakage, i.e., TS-required particulate, sump, and [primary containment air cooler condensate flow] monitors are inoperable. New Condition [D] Required Actions require monitoring RCS leakage by obtaining and analyzing grab samples of the [primary containment/drywell] atmosphere every 12 hours; monitoring RCS leakage using administrative means every 12 hours; and taking action to restore monitoring capability using another monitor within 7 days.

Additionally, the TS Bases, which summarize the reasons for the specifications, are revised to clarify the specified safety function for each required instrument in Limiting Condition for Operation (LCO) Bases, delete discussion from the TS Bases that could be construed to alter the meaning of TS operability requirements, and reflect the changes made to [TS 3.4.6][TS 3.4.7].

[LICENSEE] is [not] proposing variations or deviations from the TS changes described in TSTF-514, Revision 3, or the NRC staff’s model safety evaluation (SE) published in the *Federal Register* on [DATE] ([ ] FR [ ]) as part of the CLIP Notice of Availability. [Discuss any differences with TSTF-514, Revision 3, and the effect of any changes on the NRC staff model SE].

### **3.0 BACKGROUND**

NRC Information Notice (IN) 2005-24, "Nonconservatism in Leakage Detection Sensitivity," dated August 3, 2005, informed addressees that the reactor coolant activity assumptions for primary containment atmosphere gaseous radioactivity monitors may be non-conservative. This means the monitors may not be able to detect a one gallon per minute leak within one hour. Some licensees, in response to IN 2005-24, have taken action to remove the gaseous radioactivity monitor from the TS list of required monitors. However, industry experience has shown that the primary containment atmosphere gaseous radiation monitor is often the first monitor to indicate an increase in RCS leak rate. As a result, the TSTF and the NRC staff met on April 29, 2008, and April 14, 2009, to develop an alternative approach to address the issue identified in IN 2005-24. The agreed solution is to retain the primary containment atmosphere gaseous radiation monitor in the LCO list of required equipment, revise the specified safety function of the gas monitor to specify the required instrument sensitivity level, to revise the Actions requiring additional monitoring, and provide less time before a plant shutdown is required when the primary containment atmosphere gaseous radiation monitor is the only operable monitor.

### **4.0 TECHNICAL ANALYSIS**

[LICENSEE] has reviewed TSTF-514, Revision 3, and the model SE published on [DATE] ([ ] FR [ ]) as part of the CLIP Notice of Availability. [LICENSEE] has concluded that the technical bases presented in TSTF Traveler-514, Revision 3, and the model SE prepared by the NRC staff are applicable to [PLANT].

{NOTE: Provide a brief description of the current licensing basis for the RCS leakage detection instrumentation required by the LCO, commitment to General Design Criteria (GDC) 30 or any plant-specific criteria equivalent to 10 CFR 50, Appendix A, GDC 30, any commitment to Regulatory Guide 1.45, Revision 0, and cite the applicable Final Safety Analysis Report references.}

The administrative means of monitoring include diverse alternative mechanisms from which appropriate indicators may be selected based on plant conditions. [Licensee] will utilize the following method or methods considering the current plant conditions and historical or expected sources of unidentified leakage: [[primary containment/drywell] pressure, [primary containment/drywell] temperature, [primary containment/drywell] humidity, component cooling water system outlet temperatures, component cooling water system makeup, reactor recirculation system pump seal pressure and temperature, reactor recirculation system pump motor cooler temperatures, [primary containment/drywell] cooling fan outlet temperatures, reactor building chiller amperage, control rod drive system flange temperatures, and/or safety relief valve tailpipe temperature, flow or pressure].

There are diverse alternative methods for determining that RCS leakage has not increased, from which appropriate indicators may be selected based on plant conditions. [LICENSEE] will utilize the following method or methods considering the current plant conditions and historical or expected sources of unidentified leakage: [[primary containment/drywell] pressure, [primary containment/drywell] temperature, [primary containment/drywell] humidity, component cooling water system outlet temperatures, component cooling water system makeup, reactor

recirculation system pump seal pressure and temperature, reactor recirculation system pump motor cooler temperatures, [primary containment/drywell] cooling fan outlet temperatures, reactor building chiller amperage, control rod drive system flange temperatures, and/or safety relief valve tailpipe temperature, flow or pressure]. Actions to verify that these indications have not increased since the required monitors became inoperable and analyze [primary containment/drywell] atmospheric grab samples are sufficient to alert the operating staff to an unexpected increase in RCS leakage.

## **5.0 REGULATORY SAFETY ANALYSIS**

### **5.1 NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION**

[LICENSEE] has evaluated the proposed changes to the TS using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below:

Description of Amendment Request: The proposed amendment would revise [TS 3.4.6][TS 3.4.7], "[Reactor Coolant System (RCS) Leakage Detection Instrumentation]" Conditions and Required Actions and the licensing basis for the [primary containment/drywell] atmospheric gaseous radiation monitor, as well as make associated TS Bases changes for [TS 3.4.6][TS 3.4.7].

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the [LICENSEE] analysis of the issue of no significant hazards consideration using the standards in 10 CFR 50.92 is presented below:

- 1: Does the Proposed Change Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated?

Response: No

The proposed change clarifies the operability requirements for the RCS leakage detection instrumentation and reduces the time allowed for the plant to operate when the only TS-required operable RCS leakage detection instrumentation monitor is the [primary containment/drywell] atmospheric gaseous radiation monitor. The monitoring of RCS leakage is not a precursor to any accident previously evaluated. The monitoring of RCS leakage is not used to mitigate the consequences of any accident previously evaluated. Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2: Does the Proposed Change Create the Possibility of a New or Different Kind of Accident from any Accident Previously Evaluated?

Response: No

The proposed change clarifies the operability requirements for the RCS leakage detection instrumentation and reduces the time allowed for the plant to operate when the

only TS-required operable RCS leakage detection instrumentation monitor is the [primary containment/drywell] atmospheric gaseous radiation monitor. The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Therefore, it is concluded that the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3: Does the Proposed Change Involve a Significant Reduction in a Margin of Safety?

Response: No

The proposed change clarifies the operability requirements for the RCS leakage detection instrumentation and reduces the time allowed for the plant to operate when the only TS-required operable RCS leakage detection instrumentation monitor is the [primary containment/drywell] atmospheric gaseous radiation monitor. Reducing the amount of time the plant is allowed to operate with only the [primary containment/drywell] atmospheric gaseous radiation monitor operable increases the margin of safety by increasing the likelihood that an increase in RCS leakage will be detected before it potentially results in gross failure. Therefore, it is concluded that the proposed change does not involve a significant reduction in a margin of safety.

Based upon the above analysis, [LICENSEE] concludes that the requested change does not involve a significant hazards consideration, as set forth in 10 CFR 50.92(c), "Issuance of Amendment."

## 5.2 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA

{Note: Use the following paragraph if the regulatory evaluation section of the NRC staff's model IS applicable.}

A description of the proposed TS change and its relationship to applicable regulatory requirements were published in the *Federal Register* Notice of Availability on [DATE] ([ ] FR [ ]). [LICENSEE] has reviewed the NRC staff's model SE referenced in the CLIIP Notice of Availability and concluded that the regulatory evaluation section is applicable to [PLANT].

{Note: Use the following paragraphs if the regulatory evaluation section of the NRC staff's model is NOT applicable.}

A description of the proposed TS change and its relationship to applicable regulatory requirements were published in the *Federal Register* Notice of Availability on [DATE] ([ ] FR [ ]). [LICENSEE] has reviewed the NRC staff's model SE referenced in the CLIIP Notice of Availability and concluded that the regulatory evaluation section is not applicable to [PLANT]. The following regulatory requirements apply to [PLANT].

[Include a brief description of the regulatory requirement(s) applicable to the [PLANT] current licensing basis for the RCS leakage detection instrumentation required by the Limiting Condition for Operation, commitment to General Design Criteria (GDC) 30 or any plant-specific criteria

equivalent to 10 CFR 50, Appendix A, GDC 30, any commitment to Regulatory Guide 1.45, Revision [1], and cite the applicable Final Safety Analysis Report references.]

## **6.0 ENVIRONMENTAL CONSIDERATION**

The proposed change would change 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 would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

## **7.0 REFERENCES**

{NOTE: Provide list of references.}

**MODEL SAFETY EVALUATION FOR PLANT-SPECIFIC ADOPTION OF TECHNICAL  
SPECIFICATIONS TASK FORCE TRAVELER TSTF-514, REVISION 3, “REVISE BWR  
OPERABILITY REQUIREMENTS AND ACTIONS FOR RCS LEAKAGE  
INSTRUMENTATION”**

**1.0 INTRODUCTION**

By application dated [DATE], [LICENSEE] (the licensee) proposed changes to the Technical Specifications (TS) for [PLANT]. The proposed changes revise [TS 3.4.6][TS 3.4.7], “[RCS Leakage Detection Instrumentation],” and includes TS Bases changes that summarize and clarify the purpose of the TS and the specified safety function of the leakage detection monitors.

The licensee stated that the license amendment request (LAR) is consistent with NRC-approved Revision 3 to Technical Specification Task Force (TSTF) Standard Technical Specification (STS) Change Traveler TSTF-514, “Revise BWR Operability Requirements and Actions for RCS [reactor coolant system] Leakage Instrumentation.” [Discuss any differences with TSTF-514, Revision 3.] The availability of this TS improvement was announced in the *Federal Register* on [DATE] ([ ] FR [ ]) as part of the consolidated line item improvement process (CLIP).

**2.0 REGULATORY EVALUATION**

The NRC’s regulatory requirements related to the content of the TS are contained in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36. Paragraph (c)(2)(i) of 10 CFR 50.36 states that limiting conditions for operation (LCOs) are the lowest functional capability or performance levels of equipment required for safe operation of the facility. Paragraph (c)(2)(ii) of 10 CFR 50.36 lists four criteria for determining whether particular items are required to be included in the TS LCOs. Criterion 1 applies to installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary (RCPB). As described in the *Federal Register* notice associated with this regulation (60 FR 36953, July 16, 1995), the scope of TS includes two general classes of technical matters: (1) those related to prevention of accidents, and (2) those related to mitigation of the consequences of accidents. Criterion 1 addresses systems and process variables that alert the operator to a situation when accident initiation is more likely, and supports the first of these two general classes of technical matters which are included in TS. As specified in Paragraph (c)(2)(i) of 10 CFR 50.36, when a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TSs until the condition can be met.

The NRC’s guidance for the format and content of BWR TS can be found in [NUREG-1433, Revision 3.0, “Standard Technical Specifications General Electric Plants, BWR/4.”][NUREG-1434, Revision 3.0, “Standard Technical Specifications General Electric Plants, BWR/6.”] STS [3.4.6, “RCS Leakage Detection Instrumentation” in NUREG-1433][3.4.7,



“RCS Leakage Detection Instrumentation” in NUREG-1434] contains the guidance specific to the RCS leakage detection instrumentation for BWRs.

The Bases for STS [3.4.6 contained in NUREG-1433, Revision 3.0][3.4.7 contained in NUREG-1434, Revision 3.0], provide background information, the applicable safety analyses, a description of the LCO, the applicability for the RCS leakage detection instrumentation TS, and describe the Actions and Surveillance Requirements. The TS Bases provide the purpose or reason for the TS which are derived from the analyses and evaluation included in the safety analysis report, and for these Specifications, the RCS leakage detection instrumentation design assumptions and licensing basis for the plant.

As stated in NRC Information Notice (IN) 2005-24, “Non conservatism in Leakage Detection Sensitivity,” (Agencywide Documents Access and Management System (ADAMS) Accession No. ML051780073) the reactor coolant activity assumptions for primary containment/drywell atmosphere gaseous radioactivity monitors may be nonconservative. This means the monitors may not be able to detect a one gpm leak within one hour under all likely operating conditions.

The issue described in IN 2005-24 has raised questions regarding operability requirements for primary containment/drywell atmosphere gaseous radioactivity monitors. TSTF-514, Revision 3, revises the TS Bases to summarize the proposed TS changes and more accurately describe the contents of the facility design basis related to operability of the RCS leakage detection instrumentation. Part of the TS Bases changes revise the specified safety function of the RCS leakage detection monitors to specify the required instrument sensitivity level. In addition, TSTF-514, Revision 3, includes revisions to TS Actions for RCS leakage detection instrumentation to establish limits for operation during conditions of reduced monitoring sensitivity because of inoperable gaseous radioactivity instrumentation.

The regulation at 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 30, “Quality of Reactor Coolant Pressure Boundary,” requires means for detecting and, to the extent practical, identifying the location of the source of RCS leakage. Regulatory Guide (RG) 1.45, Revision 0, “Reactor Coolant Pressure Boundary Leakage Detection Systems,” May 1973, describes acceptable methods of implementing the GDC 30 requirements with regard to the selection of leakage detection systems for the RCPB.

RG 1.45, Revision 0, Regulatory Position C.2, states that “Leakage to the primary reactor containment from unidentified sources should be collected and the flow rate monitored with an accuracy of one gallon per minute (gpm) or better.”

RG 1.45, Revision 0, Regulatory Position C.3 states:

At least three separate detection methods should be employed and two of these methods should be (1) sump level and flow monitoring and (2) airborne particulate radioactivity monitoring. The third method may be selected from the following: a. monitoring of condensate flow rate from air coolers [or]  
b. monitoring of airborne gaseous radioactivity. Humidity, temperature, or pressure monitoring of the containment atmosphere should be considered as alarms or indirect indication of leakage to the containment.

RG 1.45, Revision 0, Regulatory Position C.5 states, "The sensitivity and response time of each leakage detection system in regulatory position 3. above employed for unidentified leakage should be adequate to detect a leakage rate, or its equivalent, of one gpm in less than one hour." RG 1.45, Revision 0, states, "In analyzing the sensitivity of leak detection systems using airborne particulate or gaseous radioactivity, a realistic primary coolant radioactivity concentration assumption should be used. The expected values used in the plant environmental report would be acceptable." The appropriate sensitivity of a plant's primary containment/drywell atmosphere gaseous radioactivity monitors is dependent on the design assumptions and the plant-specific licensing basis as described in the plant's final safety analysis report (FSAR). The NRC staff's approval of the use of expected primary coolant radioactivity concentration values used in the environmental report creates a potential licensing conflict when a licensee is able to achieve and maintain primary coolant radioactivity concentration values lower than the value assumed in the environmental report.

RG 1.45, Revision 1, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage," was issued in May 2008. RG 1.45, Revision 1, describes methods for implementing the GDC 30 requirements that are different from those in RG 1.45, Revision 0, and was developed and issued to support new reactor licensing. Revision 1 allows that having two TS leakage detection methods capable of detecting a one gpm leak within one hour provides adequate leakage detection capability from a safety perspective. It recommends that other potential indicators (including the gaseous radiation monitors) be maintained even though they may not have the same detection capability. These indicators, in effect, provide additional defense-in-depth.

{NOTE: Discuss the licensee's description of the current licensing basis for the RCS leakage detection instrumentation required by the Limiting Condition for Operation.}

### **3.0 TECHNICAL EVALUATION**

In adopting the changes to TS included in TSTF-514, Revision 3, the licensee proposed to revise TS [3.4.6][3.4.7], "[RCS Leakage Detection Instrumentation]" Conditions and Required Actions. The licensee proposed adding new Condition [D] to TS [3.4.6][3.4.7]. New Condition [D] would be applicable when the [primary containment/drywell] atmosphere gaseous radiation monitor is the only operable RCS leakage detection monitor. This new Condition is necessary because improved fuel integrity and the resulting lower primary coolant radioactivity concentration affect the response of a plant's [primary containment/drywell] atmosphere gaseous radioactivity monitor to a greater extent than the response of other RCS leakage detection monitors to leakage radioactivity. The proposed Required Actions for new Condition [D] require the licensee to analyze grab samples of the [primary containment/drywell] atmosphere once per 12 hours, restore [either the [primary containment/drywell] air cooler condensate flow rate monitoring system or the required drywell floor drain sump monitoring system] to Operable status within 7 days, and monitor RCS leakage by administrative means once per 12 hours.

Administrative means of monitoring RCS leakage include trending parameters that may indicate an increase in RCS leakage. There are diverse alternative methods from which appropriate indicators for identifying RCS leakage may be selected based on plant conditions. [LICENSEE] will utilize the following method[s] considering the current plant conditions and historical or

expected sources of unidentified leakage, as their TS administrative means: [[primary containment/drywell] pressure, [primary containment/drywell] temperature, [primary containment/drywell] humidity, component cooling water system outlet temperatures, component cooling water system makeup, reactor recirculation system pump seal pressure and temperature, reactor recirculation system pump motor cooler temperatures, [primary containment/drywell] cooling fan outlet temperatures, reactor building chiller amperage, control rod drive system flange temperatures, and/or safety relief valve tailpipe temperature, flow or pressure].

The NRC staff determined that the proposed Condition [D] is more restrictive than the current requirement, because there is no current TS Condition for the plant condition of the [primary containment/drywell] atmosphere gaseous radioactivity monitor being the only operable RCS leakage detection monitor. The associated proposed Actions and Completion Times are adequate because monitoring the RCS by administrative means, coupled with [primary containment/drywell] atmospheric grab samples, are sufficient to alert the operating staff to an unexpected increase in unidentified leakage. The [primary containment/drywell] atmospheric grab samples are comparable to the atmospheric particulate radiation monitor with respect to the ability to detect RCS leakage. However, taking frequent grab samples will ensure there is no significant loss of monitoring capability during the Required Action Completion Time. The 12-hour interval is reasonable given the availability of the [primary containment/drywell] atmospheric gaseous radiation monitor. Allowing 7 days to restore another RCS leakage monitor to operable status is reasonable given the diverse methods employed in the Required Actions to detect an RCS leak and the low probability of a large RCS leak during this period. Proposed Condition [D] is conservative relative to the STS, sufficiently alerts the operating staff, provides a comparable ability to detect RCS leakage, and provides time intervals that are reasonable. Therefore, the NRC staff determined that proposed Condition [D] provides an adequate assurance of safety when judged against current regulatory standards.

The licensee proposes minor changes to ensure continuity of the TS format. These changes re-letter current Condition [D], which applies when the drywell floor drain sump monitoring system is the only operable RCS leakage detection instrument, to Condition [E], current Condition [E], which applies when the required action and the associated Completion Time are not satisfied, to Condition [F], and current Condition [F], which applies when all required leakage detection systems are inoperable, to Condition [G]. Similar changes were made to the associated Required Actions. The NRC staff determines that these changes are editorial, and therefore acceptable.

In adopting TSTF-514, Revision 3, the licensee proposed changes that would revise the Bases for TS [3.4.6][3.4.7] to reflect the proposed TS changes and more accurately describe the contents of the facility design basis related to operability of the RCS leakage detection instrumentation and reflect the proposed TS changes. The regulation at 10 CFR 50.36(a)(1) requires a summary statement of the TS Bases or reasons for such specifications be included with the application. The proposed TS Bases changes related to operability of the RCS leakage detection instrumentation are acceptable because they are consistent with the design basis of the facility and provide: background information, applicable safety analyses, a description of the limiting condition for operation, and the applicability for the RCS leakage detection instrumentation TS. These instruments satisfy Criterion 1 of 10 CFR 50.36(c)(2)(ii) in that they

are installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the RCPB.

The NRC staff evaluated the licensee's proposed changes against the applicable regulatory requirements listed in Section 2 of this SE. The NRC staff also compared the proposed changes to the changes made to STS by TSTF-514, Revision 3. The NRC staff determined that all the proposed changes afford adequate assurance of safety when judged against current regulatory standards. Therefore, the NRC staff finds the proposed changes acceptable.

#### **4.0 STATE CONSULTATION**

{NOTE: Per LIC-101, the PM is responsible for contacting the state official and verifying that this statement is correct.}

In accordance with the Commission's regulations, the [Name of State] State official was notified of the proposed issuance of the amendment. The State official had [no] comments. [If comments were provided, they should be addressed here].

#### **5.0 ENVIRONMENTAL CONSIDERATION**

{NOTE: Caution per LIC-101: The environmental consideration discussed below is written for a categorical exclusion based on 10 CFR 51.22(c)(9). The PM is responsible to ensure that this is accurate for the specific amendment being issued.}

The amendments change 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 amendments involve 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 amendments involve no significant hazards consideration, and there has been no public comment on such finding ([ ] FR [ ]). Accordingly, the amendments meet 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 amendments.

#### **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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

#### **7.0 REFERENCES**

{NOTE: Provide list of references.}

Principal Contributor:

Date: