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SUBJECT: Application for amend to license DPR-43, incorporating technical & admin changes to TS 4.5, 4.7 & table 4.1-3.

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September 17, 1993

10CFR50.90

U. S. Nuclear Regulatory Commission  
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Ladies/Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Proposed Amendment No. 109 to the  
Kewaunee Nuclear Power Plant Technical Specifications

This proposed amendment (PA) to the Kewaunee Technical Specifications (TS) is being submitted to incorporate technical and administrative changes to TS 4.5, Emergency Core Cooling System and Containment Air Cooling System Tests, TS 4.7, Main Steam Isolation Valves, and Table TS 4.1-3, Minimum Frequencies for Equipment Tests. Included in this PA are line item improvements for the safety injection system (SI) automatic initiation test; the internal containment spray system (ICS) flow nozzle blockage test; the SI, ICS and residual heat removal pumps' periodic tests; the main steam isolation valves' test; and the periodic control rod functional test. This change is being proposed in support of the industry-wide cost reduction effort initiated by the Nuclear Regulatory Commission. These changes provide a significant cost benefit by eliminating excessive surveillance tests without impacting the reliability of Kewaunee Nuclear Power Plant safety systems. Consequently, plant safety will not be adversely affected by these changes.

Where appropriate NUREG-1431, "Westinghouse Standard Technical Specifications" Revision 0, and NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors", Revision 4, were used to develop the improved specifications for the Kewaunee TS.

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Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination and a statement of environmental consideration for each proposed change. Attachment 2 contains the affected TS pages. TS sections 4.5 and 4.7, and Table TS 4.1-3 are being submitted in their entirety due to Wisconsin Public Service Corporation's conversion of the TS to the WordPerfect software. Several administrative changes consisting of the correction of typographical errors and format changes resulted from this conversion process and are being submitted concurrent with the proposed technical changes.

In accordance with the requirements of 10CFR50.30(b), this submittal has been signed and notarized. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10CFR50.91(b)(1).

Sincerely,



C. R. Steinhardt  
Senior Vice President - Nuclear Power

RTS/cjt

cc - US NRC, Region III  
US NRC Senior Resident Inspector  
Mr. R. S. Cullen, PSCW

Subscribed and Sworn to  
Before Me This 17<sup>th</sup> Day  
of September 1993

  
Notary Public, State of Wisconsin

My Commission Expires:

June 18, 1995

LIC\NRC\PA109WP

ATTACHMENT I

To

Letter from C. R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated

September 17, 1993

Proposed Amendment No. 109

Description of Proposed Changes  
Significant Hazards Determination  
Environmental Considerations

**Description of Proposed Changes to TS Section 4.5 "Emergency Core Cooling System and Containment Air Cooling System Tests"**

Section 4.5 of TS is being revised as follows:

- 1) TS 4.5.a.1.A on Safety Injection (SI) system testing is being revised to change the last sentence of the specification from "The safety injection and residual heat removal pumps are not operated during this test," to state: "The safety injection and residual heat removal pumps need not be operated for this test."
- 2) TS 4.5.a.2.B on Containment Vessel Internal Spray System (ICS) nozzle surveillance is being revised to eliminate the phrase "using either air with telltales or smoke tests to determine that all nozzles are clear" and the required frequency is being changed from a 5 year to a 10 year interval.
- 3) TS 4.5.b.1.B for the SI, ICS, and Residual Heat Removal (RHR) quarterly pump testing is being revised from "Acceptable levels of performance shall be that the pumps start, reach their required developed head at miniflow, and operate for at least fifteen minutes on the miniflow line" to "Acceptable levels of performance are demonstrated by the pumps' ability to start and develop head within an acceptable range."
- 4) Administrative changes are being made to convert TS Section 4.5 to the WordPerfect software and correct minor typographical and format inconsistencies.
- 5) The basis section is being revised in accordance with the above stated changes.

**Safety Evaluation for Proposed Change to TS 4.5.a.1.A**

The intent of the safety injection system test specified by TS 4.5.a.1.A is to demonstrate, on a periodic basis, the proper automatic operation of emergency core cooling system components. To verify proper automatic operation of the SI and Residual Heat Removal (RHR) components, a test signal is applied to initiate automatic action and to verify that components receive the SI signal in the proper sequence.

The purpose of this proposed change is to clarify the wording of TS 4.5.a.1.A to allow the option of operating the SI and RHR pumps during the SI system automatic initiation test. The existing TS wording states "The safety injection and residual heat removal pumps are not operated during this test." This wording has existed in Kewaunee's TS since the original issuance of the license and TS. This wording (presumably) was intended to ensure understanding that operation of the pumps was not a prerequisite condition nor acceptance

requirement for the test. Verifying that the appropriate pump motor breakers have opened and closed (as stated in TS 4.5.a.1.B) provides adequate demonstration that these components received the SI signal in the proper sequence.

The proposed modification of the TS clarifies that the pumps may be operated during the SI system automatic initiation test. Operation of the pumps during the actuation logic test will provide an equivalent method for determining proper component actuation. Since overpressurization protection is provided, start and operation of these pumps during the actuation logic test will not unnecessarily challenge the components. This method of component actuation verification is consistent with the requirements of Section 4.5.2.e.2 of NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," Revision 4.

#### Significant Hazards Determination for Proposed Change to TS 4.5.a.1.A

The proposed change was reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed change will not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated.

The probability of an accident previously evaluated is not increased by the TS change. The changes do not affect any structure, system, or component that initiates an accident analyzed in the Updated Safety Analysis Report (USAR). The probability of an accident occurring is independent of the availability of emergency core cooling components used to mitigate an accident.

The consequences of an accident previously evaluated will not be increased by this TS change. Revising the TS wording to clarify that the pumps may be operated during the periodic surveillance tests does not decrease their availability and therefore does not decrease their ability to mitigate the consequences of accidents previously evaluated in the USAR.

Clarifying the TS wording will not increase 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.

A new or different kind of accident from those previously evaluated in the USAR will not be created by this TS change.

The automatic SI actuation is designed to respond to various events analyzed in the USAR which take credit for SI in the event mitigation. The test required by TS 4.5.a.1.A verifies that the valves, pump circuit breakers, and automatic circuitry receive the SI signal in the proper sequence. The procedural prerequisites for the performance of this test ensure that an adequate flow path and overpressure protection are available for the pumps during the test.

This proposed amendment does not alter the plant configuration, operating setpoints, or overall plant performance. It simply provides clarification that the pumps may start and operate in conjunction with the automatic circuitry test; however, the pumps are not required to start and operate for this test. Therefore, the possibility of a new or different accident from any previously evaluated is not created.

- 3) involve a significant reduction in the margin of safety.

The intent of the TS, i.e., verify each component receives the SI signal in the proper sequence, is not altered by this proposed change. Clarifying that the pumps are allowed to operate during the performance of this surveillance requirement does not adversely affect the ability of the surveillance to demonstrate system actuation. Therefore, this proposed change will not reduce the margin of safety.

#### Safety Evaluation for Proposed Change to TS 4.5.a.2.B

The intent of the test specified by TS 4.5.a.2.B is to ensure that the required number of ICS spray flow nozzles are capable of proper functioning upon demand. The TS currently specifies two qualitative assessment methods that may be used to perform this verification; i.e. use of either an air test with telltales or a smoke test. In addition, the TS currently requires the determination that "all" nozzles are clear.

The purpose of the proposed change is to provide the flexibility to use other test techniques (such as thermal imaging) which would provide equivalent assurance that the nozzles are unobstructed and will function properly upon demand. The proposed change would also eliminate the requirement to determine that "all" (i.e. 100%) of the installed 168 spray nozzles are unobstructed. Of 168 nozzles provided by design, only 162 nozzles are required to provide adequate containment cooling, iodine scrubbing, and caustic addition in the event of a postulated accident. The existing specification does not acknowledge the overdesign of the system. The proposed change also revises the current surveillance interval from 5 to 10 years which is consistent with Section 3.6.6A and associated basis statements of NUREG 1431, "Westinghouse Standard Technical Specifications" (STS), Revision 0.

The surveillance requirement ensures that each spray nozzle is unobstructed and provides assurance that spray coverage of the containment during an accident is not degraded. Due to the passive design of the nozzle, as discussed in NUREG 1431, a test at 10 year intervals is considered adequate to detect obstruction of the nozzles.

Extension of the surveillance interval from 5 to 10 years is supported by Kewaunee experience. Kewaunee records show that throughout the 19 year operating history of Kewaunee, there has only been evidence of one (1) obstructed nozzle. Based on Kewaunee's historical evidence, overdesign of the system, and NUREG 1431, WPSC has concluded that the existing specification to perform this surveillance every 5 years is a requirement that is marginal to safety. Therefore, an extension of the surveillance interval to 10 years is warranted.

This proposed change does not alter the intent of the specification. The elimination of reference to specific test methods allows the option of using equivalent test techniques as the technology becomes available. The elimination of the requirement to verify "all" nozzles are clear, allows a determination of system acceptability to be predicated on design requirements assumed in the analysis. The performance of the required surveillance at a 10 year interval assures the required number of spray nozzles are capable of functioning in the event of an accident. Therefore, there is no adverse effect on public health and safety.

#### Significant Hazards Determination for Proposed Change to TS 4.5.a.2.B

The proposed change was reviewed in accordance with the provisions of 10CFR50.92 to show no significant hazards exist. The proposed change will not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated.

This proposed change does not affect the probability of an accident previously evaluated. The ICS system is designed to respond to various events analyzed in the USAR which take credit for spray for event mitigation. The probability of an accident occurring is independent of the availability of containment air cooling systems used to mitigate an accident.

This proposed change does not affect the consequences of an accident previously evaluated. The proposed change allows the use of surveillance methods that provide assurance of system capability to perform required design functions in the event of an accident. The configuration of containment air cooling components used to mitigate the consequences of accidents previously evaluated is not being changed.

Therefore, the proposed changes do not increase the probability or consequences of accidents previously evaluated.

- 2) create the probability of a new or different kind of accident from any accident previously evaluated.

A new or different kind of accident from those previously evaluated will not be created by this TS change. The proposed changes do not alter the operation, function or modes of plant or equipment operation. Allowing the use of equivalent surveillance methods does not create the probability of a new or different kind of accident.

- 3) involve a significant reduction in the margin of safety.

This proposed change does not alter the intent of the specification. The use of equivalent test methods to demonstrate component functionality does not reduce the margin of safety. The proposed change does remove a requirement to verify 100% (i.e. 168) of the installed nozzles are unobstructed; however, as noted in the safety evaluation, the original system was overdesigned by approximately 5%. Verification of the number of required nozzles to satisfy design assumptions is assured by the design requirements stated in the USAR. Since the minimum design requirements stated in the USAR are demonstrated by the surveillance, the margin of safety is not reduced. Consistent with Section 3.6.6A and associated basis statements of NUREG 1431, "Westinghouse Standard Technical Specifications", Revision 0, performing surveillance at ten year intervals assures the required number of spray nozzles are capable of functioning in the event of an accident. Therefore, there is no adverse effect on public health and safety.

#### Safety Evaluation for Proposed Change to TS 4.5.b.1.B

The intent of the test specified by TS 4.5.b.1.B is to demonstrate operability of the SI, RHR and ICS pumps and to detect degradation of the component. This testing may be accomplished by measuring the pump's developed head at one point on the pump's characteristic curve. This testing verifies measured performance is within acceptable limits of pump baseline performance.

The present TS wording designates the SI, RHR, and ICS pump developed head is to be measured on the miniflow line. When the TS was originally developed, there were only miniflow test lines available to perform these tests periodically with the plant at power.

During the 1991 refueling shutdown, the ICS system was modified to accommodate full flow testing of the ICS pumps during power operation. This ICS system modification involved the installation of a full flow test line leading to the discharge piping of the Refueling Water Storage Tank. Installation of the full flow test line provided enhanced pump performance test capability

and the ability to satisfy the check valve test requirements in Section XI of the ASME Boiler and Pressure Vessel Code through full flow testing in lieu of disassembly and inspection, as allowed by Generic Letter 89-04.

Since completion of the 1991 ICS system modification, redundant tests of the ICS pumps are being conducted at quarterly intervals due to the existing wording of the TS. To demonstrate compliance with the existing requirements of TS 4.5.b.1.B, the ICS pumps are being tested on the miniflow line for greater than 15 minutes. To demonstrate compliance with the ASME Section XI check valve test requirements, the ICS pumps are also being tested on the full flow test line on a quarterly basis. This TS change would allow the flexibility for the full flow test to satisfy the requirements of both Section XI and the existing TS with one test.

#### Significant Hazards Determination for Proposed Change to TS 4.5.b.1.B

The proposed change was reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed change will not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change will not increase the probability of accidents previously evaluated. The probability of an accident occurring is independent of the availability of the systems used to mitigate an accident.

The proposed change will not increase the consequences of an accident previously evaluated. The consequences of previously evaluated accidents requiring SI, RHR, and containment spray for event mitigation are independent of the surveillance testing of these systems.

The SI, RHR, and ICS pumps are designed to operate in response to various events analyzed in the USAR which initiate on a SI or high-high containment pressure signal. The proposed change is intended to allow the use of full flow quarterly testing for the ICS pumps and retain the existing quarterly mini-flow requirements for the SI and RHR pumps. Surveillance testing verifies proper operation of the components and thereby ensures the consequences of the accident are consistent with the evaluations of the USAR.

Therefore, the proposed change will not result in 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.

A new or different kind of accident from those previously evaluated will not be created by this TS change. The proposed amendment does not alter the plant configuration, operating setpoints, or overall plant performance.

- 3) involve a significant reduction in the margin of safety.

The margin of safety will not be reduced by verifying the pump's performance through full flow testing or miniflow testing. The intent of the TS, i.e. verifying no degradation of the ICS pump is satisfied by performing a full flow test on a quarterly basis.

#### Safety Evaluation for Proposed Administrative Changes to Section TS 4.5

A number of formatting changes and correction of minor typographical errors are being included with this proposed TS amendment package. These changes are being proposed in conjunction with converting the TS document over to the WordPerfect software now being used at WPSC for word processing. These changes have been reviewed to ensure that they do not alter the intent or interpretation of the specification; therefore, there is no effect on public health or safety.

#### Significant Hazards Determination for Proposed Administrative Changes to Section TS 4.5

The proposed change was reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed change will 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 the margin of safety.

The proposed changes are administrative in nature and do not alter the intent or interpretation of the TS. Therefore, no significant hazards exist.

Additionally, the proposed change is similar to example C.2.e(i) in 51 FR 7751. Example C.2.e(i) states that changes which are purely administrative in nature; i.e. to achieve consistency throughout the technical specifications, correct an error, or a change in nomenclature, are not likely to involve a significant hazard.

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Safety Evaluation for Section 4.5 Basis Changes

The basis section is being revised to reflect WordPerfect format changes. This basis change does not alter the intent or interpretation of the Specifications, or reduce the surveillance requirements, therefore, there is no impact on public health or safety.

### Description of Proposed Changes to TS Section 4.7, "Main Steam Isolation Valves"

TS 4.7 is being revised to allow operability testing of the main steam isolation valves (MSIVs) when the plant conditions are analogous to anticipated conditions in which the MSIVs would be required to actuate. The affected TS section is being revised as follows:

- 1) the phrase "at major outages with the reactor at cold shutdown" is being deleted.
- 2) the basis section is being revised accordingly, and
- 3) administrative changes are being made to convert TS Section 4.7 to the WordPerfect software and correct minor typographical and format inconsistencies.

### Safety Evaluation for Changes to TS 4.7 and Basis

Both main steam lines have MSIVs, which are swing-disc type isolation valves. However, at Kewaunee, the term MSIV has evolved into a less precise term that refers to the combination of the swing-disc type isolation valve and the swing-disc type non-return valve. This misuse of the term MSIV is partially due to the fact that both valves, the isolation valve and the non-return valve, are procured from the manufacturer as a valve package. However, TS section 4.7, "Main Steam Isolation Valves," refers only to the isolation valves and does not address the non-return valves. The MSIVs (swing-disc type isolation valves) are designed to isolate steam flow from the secondary side of the steam generators (SG) following a main steam line break (SLB). The combination of all four valves (one isolation valve and one non-return valve in each main steam line) is designed to prevent blowdown of more than one SG in the event of a SLB. This would limit the cooldown rate of the reactor coolant system (RCS) and, (for the case of a SLB in the containment) protect containment integrity by limiting the amount of steam released to the containment vessel.

The current specification has been interpreted to require the MSIV closure time be verified at cold shutdown conditions (i.e., reactor coolant system temperature  $\leq 200$  F). The proposed specification allows the MSIV surveillance to be performed during plant conditions that are more similar to the expected conditions in which MSIV actuation would be required. Additionally, Section XI of the ASME Boiler and Pressure Vessel Code requires the same test (MSIV closure time verification) be performed with the plant at hot shutdown conditions (i.e., reactor coolant system at operating temperature and pressure). This proposed specification would allow one test to satisfy both ASME and TS requirements, thus eliminating a repetitive test. This proposed surveillance specification has a required frequency of once each operating cycle not to exceed 18 months. The proposed specification is consistent with the recommendations of NUREG-1431, "Westinghouse Standard Technical Specifications (STS)", Revision 0. Basis 3.7.2 of NUREG-1431 recommends the performance of this surveillance in MODE 3 with the unit at

operating temperature and pressure. Surveillance testing in MODES 1 or 2 is not recommended since even a partial stroke exercise increases the risk of an inadvertent valve closure when the unit is generating power.

The formatting changes and correction of minor typographical errors are being proposed as a part of converting the TS document over to the WordPerfect software now being used at WPSC for word processing. These changes have been reviewed to ensure that they do not alter the intent or interpretation of the specification; therefore, there is no impact on public health or safety.

#### Significant Hazards Determination for Proposed Changes to TS Section 4.7

The proposed changes were reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed change will not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated.

The probability of an accident previously evaluated will not be increased by this TS change. The MSIVs are designed to limit the cooldown rate of the RCS and prevent structural damage to the containment, resulting from a SLB incident, by closing to isolate the SGs. The probability of a SLB occurring is independent of MSIV operability.

The consequences of an accident previously evaluated will not be increased by this TS change. This TS change allows testing of the MSIVs when operating temperature and pressure conditions exist that are consistent with the conditions under which the acceptance criteria were generated. The acceptable closure time for the MSIVs is not being modified by this TS change, therefore the consequences of accidents relying on the closure of the MSIVs are not increased.

An evaluation of the Updated Safety Analysis Report (USAR) SLB analyses was performed. The existing core power and reactor coolant system transient analyses assumed initial hot shutdown conditions for all cases analyzed since this represents the most conservative initial conditions for the accident. The analysis of the containment pressure transient also assumed initial hot shutdown conditions (at which time the steam pressure is highest and there is the greatest inventory of water in the steam generator). The containment pressure analysis also conservatively delayed the MSIV closures such that steam flow from both steam generators existed for the first ten seconds. It has been determined that the proposed change in mode for surveillance testing is enveloped by the existing analyses, therefore the consequences of an accident remain unchanged.

- 2) create the possibility of a new or different kind of accident from any accident previously evaluated.

A new or different kind of accident from those previously evaluated will not be created by this TS change. The proposed amendment does not alter the plant configuration, operating setpoints or overall plant performance.

- 3) involve a significant reduction in the margin of safety.

The margin of safety will not be reduced by this TS change. Changing the plant conditions under which this surveillance is performed does not alter the acceptance criterion for closure time. Changing the operating mode for the surveillance test is based on engineering judgement which recognizes the importance of demonstrating the capability of the components to perform in a steam environment.

**Description of Proposed Changes to Table TS 4.1-3, "Minimum Frequencies for Equipment Tests"**

Table TS 4.1-3 on minimum frequencies for equipment tests is being revised as follows:

- 1) Item #1 on control rod testing is being revised to clarify that partial movement of the control rods not fully inserted into the core is to be performed every 2 weeks when the plant is at or above HOT STANDBY, and
- 2) Administrative changes are being made to convert Table TS 4.1-3 to the WordPerfect software and correct minor typographical errors and format inconsistencies.

**Safety Evaluation for Proposed Changes to Table TS 4.1-3**

The intent of the test specified by Table TS 4.1-3 item 1 is to demonstrate that the control rods are operable and capable of performing their safety-related function of negative reactivity insertion during Updated Safety Analysis Report (USAR) analyzed events. The requirement to periodically exercise the rods provides assurance of their capability to insert into the core during a reactor trip or other conditions requiring rod movement.

Only control rods which are partially or fully withdrawn need to be tested since these rods are being used to control reactor power and ensure adequate shutdown margin. Control rods fully inserted into the core are already performing their safety-related function; therefore, additional assurance of operability is not required.

The purpose of this change is to clarify the applicability and mode conditions for which this test is required. This change clarifies the existing TS wording to require that partial movement of control rods not fully inserted into the core is to be performed every 2 weeks when the plant is at or above HOT STANDBY. This change is consistent with the requirements of Section 3.1.5.2 of NUREG-1431, "Westinghouse Standard Technical Specifications," Revision 0.

This change does not decrease the safety of the plant since freedom of movement of control rods not in their safety position (i.e., fully inserted into the core) is verified by the surveillance. Verifying freedom of movement provides assurance that the rods could be tripped and are capable of performing their safety function if required.

**Significant Hazards Determination for Proposed Changes to Table TS 4.1-3**

The proposed change was reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed change will not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated.

This proposed change will not alter the intent of this specification which is to ensure that the control rods are operable and capable of performing their safety-related function during a USAR analyzed event. Control rods fully inserted into the core are already performing their safety-related function and therefore, by definition, are operable. Revising the specification clarifies that the control rods fully inserted into the core need not be tested. Therefore, the probability or consequences of an accident previously evaluated will not be increased.

- 2) create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment does not alter the plant configuration, operating setpoints, or overall plant performance. Therefore, a new or different kind of accident from those previously evaluated will not be created by this TS change.

- 3) involve a significant reduction in a margin of safety.

Rods which are fully inserted into the core are already performing their safety function and therefore, by definition, are already operable. Exempting these control rods from a partial movement test will not reduce the margin of safety.

#### Safety Evaluation for Proposed Administrative Changes to Table TS 4.1-3

A number of formatting changes and corrections of minor typographical errors are being included with this proposed TS change. These changes are being proposed in conjunction with converting the TS document over to the WordPerfect software now being used at WPSC for word processing. Among these changes are renumbering the footnotes and boxing in the tables to enhance the appearance of the specification. These changes have been reviewed to ensure that they do not alter the intent or interpretation of the specification; therefore, there is no effect on public health or safety.

#### Significant Hazards Determination for Proposed Administrative Changes to Table TS 4.1-3

The proposed change was reviewed in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. The proposed change will 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 the margin of safety.

The proposed changes are administrative in nature and do not alter the intent or interpretation of the TS. Therefore, no significant hazards exist.

Additionally, the proposed change is similar to example C.2.e(i) in 51 FR 7751. Example C.2.e(i) states that changes which are purely administrative in nature; i.e., to achieve consistency throughout the technical specifications, correct an error, or a change in nomenclature, are not likely to involve a significant hazard.

#### **Environmental Considerations**

This proposed amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes to a surveillance requirement. Wisconsin Public Service Corporation has determined that the proposed amendment involves no significant hazards considerations and no significant change in the types of any effluent that may be released off site and that there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, this proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.