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SUBJECT: Application for Proposed Amend 111 to License DPR-43, changing TS 3.10, "Control Rod & Power Distribution Limits."

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December 1, 1993

10 CFR 50.90

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

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 111 to the Kewaunee
Nuclear Power Plant Technical Specifications

This proposed amendment (PA) to the Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS) is being submitted to incorporate changes to TS 3.10, "Control Rod and Power Distribution Limits." These proposed changes eliminate specifications for fuel designs no longer used at Kewaunee, specify required actions to be taken upon exceeding control bank insertion limits, and revise the limits for Departure from Nucleate Boiling (DNB) related parameters to assure operation within the assumptions of the Updated Safety Analysis Report (USAR) analyses.

Attachment 1 to this letter contains a description, a safety evaluation, a significant hazards determination and environmental considerations for the proposed changes. Attachment 2 contains the affected TS pages.

In accordance with the requirements of 10 CFR 50.30(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 10 CFR 50.91(b)(1).

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Sincerely,

C. R. Steinhardt
Senior Vice President - Nuclear Power

DJK/cjt

Attach.

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

Subscribed and Sworn to
Before Me This 1st Day
of December 1993

Jeanne M. Ferris
Notary Public, State of Wisconsin

My Commission Expires:
June 18, 1995

lic\nrc\pa111.wp

ATTACHMENT 1

To

Letter from C. R. Steinhardt (WPSC)

to

Document Control Desk (NRC)

Dated

December 1, 1993

Proposed Amendment 111

Description of Proposed Changes

Safety Evaluation

Significant Hazards Determination

Environmental Considerations

Description of Proposed Changes to Technical Specification (TS) 3.10, "Control Rod and Power Distribution Limits"

TS Section 3.10 is being revised as follows:

1) In TS 3.10.b.1, the specifications for the heat flux and nuclear enthalpy rise hot channel factors pertaining to Westinghouse Electric Corporation Fuel are being removed.

2) In TS 3.10.b.4, the specification for the heat flux hot channel factor under equilibrium conditions pertaining to Westinghouse Electric Corporation Fuel is being removed.

3) In TS 3.10.d, the required actions upon exceeding control bank insertion limits are specified.

4) In TS 3.10.k, the maximum Reactor Coolant System (RCS) inlet temperature limit for steady state 100% power operation is being decreased from 536.5 degrees Fahrenheit to 535.5 degrees Fahrenheit.

5) In TS 3.10.l, the minimum Reactor Coolant System (RCS) pressure limit for steady state 100% power operation is being increased from 2200 psig to 2205 psig.

6) TS 3.10.m, on Reactor Coolant System (RCS) flow rate, is being split into 3.10.m.1 and 3.10.m.2. TS 3.10.m.1 specifies the required reactor coolant flow rate per loop and references specification 3.10.n if the flow rate is not met. The required reactor coolant flow rate is being decreased from 92,560 gallons per minute (gpm) average per loop, to 89,000 gpm average per loop. Additional restrictions are imposed for reactor coolant flow rates less than 89,000 gpm average per loop. TS 3.10.m.2, which verifies reactor coolant flow, is being modified to add "during initial power escalation following each refueling, between 70% and 95% power with plant parameters as constant as practical."

7) A new specification, TS 3.10.n, is being added to specify actions required when the limits of TS 3.10.k, TS 3.10.l and 3.10.m.1 are not met.

8) In Table 3.10-2, the Hot Channel Factor Normalized Operating Envelope for Westinghouse Electric Corporation Fuel is being removed.

9) Administrative changes are being made to TS Section 3.10, including Table TS 3.10-2 to change the names "Advanced Nuclear Fuels Company" and "Exxon Nuclear" to "Siemens Power Corporation," and to correct minor typographical errors and format inconsistencies associated with converting the Technical Specifications to the WordPerfect software, and

10) The Table of Contents and Basis sections are being revised accordingly and being submitted for your information.

Safety Evaluation for Proposed Change to Technical Specifications (TS) 3.10.b.1, 3.10.b.4 and Table TS 3.10-2

The proposed change eliminates the hot channel factor limits for Westinghouse Electric Corporation Fuel. The TS currently specify limits for the heat flux hot channel factor, the nuclear enthalpy rise hot channel factor, heat flux hot channel factor under equilibrium conditions, and the hot channel factor normalized operating envelope associated with the Westinghouse Standard Fuel design. The Kewaunee Nuclear Power Plant no longer uses the Westinghouse Standard Fuel design. Accordingly, these limits are no longer required. The limits for Siemens Power Corporation fuel, the current fuel vendor, are retained and are not affected by this change. Therefore, this change will not affect the health and safety of the public.

Significant Hazards Determination for Proposed Changes to Technical Specification (TS) 3.10.b.1, 3.10.b.4 and Table TS 3.10-2

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

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

   The proposed changes eliminate the specifications for fuel that is no longer used at the Kewaunee Nuclear Power Plant. Eliminating these specifications does not affect the probability of any accident previously evaluated.

   The specifications for the current fuel vendor are being retained and ensure the consequences of previously evaluated Departure from Nucleate Boiling (DNB) related accidents are enveloped by the Updated Safety Analysis Report (USAR) analyses. Therefore, these changes will not increase the consequences of an accident previously evaluated in the USAR.

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

   The proposed change does not alter the plant configuration, operating setpoints, or overall plant performance. Therefore, it does not create the possibility of a new or different kind of accident.

3) Involve a significant reduction in the margin of safety.

The proposed change deletes specifications for fuel that is no longer used at the Kewaunee Nuclear Power Plant. The limits for the current fuel vendor are retained and are not affected by this proposed change. This does not alter the input or assumptions of the safety analysis, and therefore it will not involve a reduction in the margin of safety.

Safety Evaluation for Proposed Change to Technical Specification (TS) 3.10.d

The proposed change specifies the required actions to be taken when the control bank insertion limits are exceeded. The current TS requires compliance with the control bank insertion limits, but gives no corrective action when these limits are exceeded. The new specification requires operators to initiate boration to restore shutdown margin within one hour of exceeding the control bank insertion limits, and to restore the control banks to within the required limits within 2 hours. If either of these requirements cannot be achieved, within 1 hour the operators must initiate actions to achieve Hot Standby within 6 hours and Hot Shutdown within an additional 6 hours. This shutdown sequence allows for a safe and orderly plant shutdown, and is consistent with the remainder of the Technical Specifications. The proposed change is conservative because it clarifies the necessary actions to be taken when control bank insertion limits are exceeded. This proposed change is an enhancement to the specification, does not reduce the margin of safety, and is similar to Westinghouse Standard Technical Specifications, Section 3.1.7.

Significant Hazards Determination for Proposed Change to Technical Specification (TS) 3.10.d

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 specifies the required actions to be taken when the control bank insertion limits are exceeded. The current TS requires compliance with the control bank insertion limits, but gives no corrective action for when these limits are exceeded. The new specification requires operators to initiate boration to restore shutdown margin within one hour of exceeding the control bank insertion limits and to restore the control banks to within the limits within 2 hours. If either of these requirements cannot be achieved, within 1 hour the operators must initiate actions to achieve Hot Standby within the next 6 hours and Hot Shutdown within the following 6 hours. Adding these requirements clarifies and enhances the Technical Specifications and will have no impact on the probability of an accident previously evaluated.

The proposed addition is conservative and ensures that proper and adequate measures are taken when the control bank exceeds the control bank insertion limits. Therefore, this addition will not increase the consequences of an accident previously evaluated in the USAR.

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

The proposed change does not alter the plant configuration, operating setpoints, or overall plant performance. Therefore, it does not create the possibility of a new or different kind of accident.

3) Involve a significant reduction in the margin of safety.

The proposed change is conservative and clarifies the necessary actions to be taken when control bank insertion limits are exceeded. This proposed change is an enhancement to the specification and does not reduce the margin of safety.

Safety Evaluation for Proposed Change to Technical Specification (TS) 3.10.k

The proposed change reduces the maximum RCS inlet temperature for steady state 100% power operation from 536.5 degrees Fahrenheit to 535.5 degrees Fahrenheit. This change is conservative because it increases the margin of safety to the DNB related accidents. These accidents are the Uncontrolled Rod Cluster Control Assembly Withdrawal at Power Accident, the Uncontrolled Rod Cluster Control Assembly Withdrawal from a Subcritical Condition Accident, the Rod Cluster Control Assembly Misalignment, the Start-Up of an Inactive Reactor Coolant Loop Accident, the Excessive Heat Removal due to Feedwater System Malfunction Accident, the Exeessive Load Increase Incident, the Loss of Reactor Coolant Flow Accident, the Loss of External Electrical Load, the Steam Line Break, and the Rod Cluster Control Assembly Ejection. The existing specification limit on RCS inlet temperature was proposed and approved as a part of TS Amendment 24 on January 15, 1979.

The maximum temperature limitation provides assurance that normal steady state operation is maintained within the assumptions of the transient and safety analyses. The current safety analysis assumes a RCS inlet temperature of 539.5 degrees Fahrenheit. A four degree assumed instrument error reduces the maximum allowed RCS inlet temperature to 535.5 degrees Fahrenheit. The proposed reduction in the maximum allowable inlet temperature is consistent with the assumptions of the safety analyses. Operation within this limit assures a minimum DNBR of 1.30 is maintained throughout each analyzed transient.

Significant Hazards Determination for Proposed Change to Technical Specification (TS) 3.10.k

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 decreases the maximum RCS inlet temperature limit for steady state 100% operation from 536.5 degrees Fahrenheit to 535.5 degrees Fahrenheit. The value of 539.5 degrees Fahrenheit is the assumed RCS inlet temperature for the DNB related accidents analyzed in the USAR. These accidents are the Uncontrolled Rod Cluster Control Assembly Withdrawal at Power Accident, the Uncontrolled Rod Cluster Control Assembly Withdrawal from a Subcritical Condition Accident, the Rod Cluster Control Assembly Misalignment, the Start-Up of an Inactive Reactor Coolant Loop Accident, the Exeessive Heat Removal due to Feedwater System Malfunction Accident, the Excessive Load Increase Incident, the Loss of Reactor Coolant Flow Accident, the Loss of External Electrical Load, the Steam Line Break, and the Rod Cluster Control Assembly Ejection. A four degree assumed instrument error reduces the maximum allowed RCS inlet temperature to 535.5 degrees Fahrenheit. Decreasing this value to ensure consistency with the USAR analysis assumptions will have no impact on the probability of an accident previously evaluated.

The proposed change is conservative to ensure that the consequences of a previously evaluated DNB-related accident are enveloped by the USAR analysis. Therefore, this change will not increase the consequences of an accident previously evaluated in the USAR.

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

The proposed change does not alter the plant configuration, operating setpoints, or overall plant performance. Therefore, it does not create the possibility of a new or different kind of accident.

3) Involve a significant reduction in the margin of safety.

The proposed change is conservative and is consistent with the assumptions in the USAR. This proposed change is an enhancement to the specification and does not reduce the margin of safety.

Safety Evaluation for Proposed Change to Technical Specification (TS) 3.10.1

This proposed change will increase the minimum RCS pressure limit for steady-state 100% power operation from the currently specified value of 2200 psig to 2205 psig. The existing specification limit on RCS pressure was proposed and approved as a part of TS Amendment 10 on April 5, 1976. The purpose of the specifications is to address the analysis assumptions for the DNB related accidents addressed in the USAR. The DNB related accidents analyzed in the USAR assumed an initial RCS pressure of 30 psi below nominal design. These accidents are the Uncontrolled Rod Cluster Control Assembly Withdrawal at Power Accident, the

Uncontrolled Rod Cluster Control Assembly Withdrawal from a Subcritical Condition Accident, the Rod Cluster Control Assembly Misalignment, the Start-Up of an Inactive Reactor Coolant Loop Accident, the Excessive Heat Removal due to Feedwater System Malfunction Accident, the Exeessive Load Increase Incident, the Loss of Reactor Coolant Flow Accident, the Loss of External Electrical Load, the Steam Line Break, and the Rod Cluster Control Assembly Ejection.

The nominal design pressure for Kewaunee is 2235 psig; therefore, to accurately reflect the accident assumption, the specified limit should be 2205 psig. The change is minor, but appropriate based on the significance of the parameter.

The proposed change increases the minimum RCS pressure limit for steady-state 100% power operation to ensure the parameter is consistent with the USAR safety analysis assumptions. The proposed change is conservative; therefore, there is reasonable assurance that it will not adversely affect the health and safety of the public.

Significant Hazards Determination for Proposed Change to Technical Specification (TS) 3.10.1

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 consequenees of an accident previously evaluated.

   The proposed change increased the minimum RCS pressure limit for steady-state 100% power operation from the currently specified 2200 psig to 2205 psig. The value of 2205 psig (30 psig below the nominal design value of 2235 psig) was the assumed initial condition for the DNB related accidents analyzed in the USAR. These accidents are the Uncontrolled Rod Cluster Control Assembly Withdrawal at Power Accident, the Uncontrolled Rod Cluster Control Assembly Withdrawal from a Subcritical Condition Accident, the Rod Cluster Control Assembly Misalignment, the Start-Up of an Inactive Reactor Coolant Loop Accident, the Exeessive Heat Removal due to Feedwater System Malfunction Accident, the Excessive Load Increase Incident, the Loss of Reactor Coolant Flow Accident, the Loss of External Electrical Load, the Steam Line Break, and the Rod Cluster Control Assembly Ejection. Increasing this value to ensure consistency with the USAR analysis assumptions will have no impact on the probability of an accident previously evaluated.

   The proposed change is conservative to ensure that the consequences of a previously evaluated DNB-related accident is enveloped by the USAR analysis. Therefore, this change will not increase the consequences of an accident previously evaluated in the USAR.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

   The proposed change does not alter the plant configuration, operating setpoints, or overall plant performance. Therefore, it does not create the possibility of a new or different kind of accident.

3. Involve a significant reduction in the margin of safety.

   The proposed change is conservative and is consistent with the assumptions in the USAR. This proposed change is an enhancement to the specification and does not reduce the margin of safety.

Safety Evaluation for Proposed Change to Technical Specification (TS) 3.10.m

The existing TS 3.10.m is being split into two specifications; TS 3.10.m.1 describes the limits for steady-state reactor coolant flow rate, and TS 3.10.m.2 describes the conditions under which reactor coolant flow is verified.

The limits and conditions of proposed TS 3.10.m.1 are in accordance with the existing TS 3.10.m with one exception. The current specification directs the reduction of the nuclear enthalpy rise hot channel factor (for fuel of greater than 15,000 MWD/MTU) by 1% for every 1.8% of reactor coolant flow below 92,560 gallons per minute average per loop. The proposed specification does not direct reduction of hot channel factors for flow rates less than 92,560 gallons per minute, but imposes more restrictive required actions when the RCS flow rate is less than the design flow rate.

The existing specification was approved as part of TS Amendment 24 on January 15, 1979. TS 3.10.m was established as a partial offset for the hot channel factor for fuel rod bow effects of Westinghouse Standard Fuel. To address the concerns for reductions in DNBR due to fuel rod bowing, WPSC elected to partially offset the fuel rod bowing penalties by taking credit for the actual reactor coolant flow rate exceeding the design flow rate. The design flow rate assumed in the USAR analysis is 89,000 gallons per minute average per loop.

The Kewaunee Nuclear Power Plant no longer uses the standard fuel design manufactured by Westinghouse. The current fuel vendor (Siemens Power Corporation) does not require assessment of a penalty for rod bow effects. Since Westinghouse Standard Fuel is not used, the existing specification crediting excess reactor coolant flow is no longer required to compensate for reductions in DNBR due to rod bow effects.

The proposed reactor coolant flow limitation does, however, provide assurance that normal steady state operation is maintained within the assumptions of the transient and safety analysis. The proposed reduction in the reactor coolant flow limitation is consistent with the design flow rate and the assumptions of the safety analyses. Operation with reactor coolant flows greater than or equal to the proposed reactor coolant flow limit assures a minimum DNBR of 1.30 is maintained throughout each analyzed transient.

In conjunction with the decrease in the reactor coolant flow rate limit, additional restrictions are being imposed when the limitation is not met. If flow were to decrease to less than 89,000 gallons per minute, the proposed TS 3.10.m.1 imposes restrictions on thermal power levels. The intent of these restrictions is to ensure appropriate compensatory actions are taken to regain the DNBR margin. The proposed Technical Specification provides operating restrictions on the RCS flow rate that do not currently exist in the Technical Specifications.

Existing TS 3.10.m requires verification of the minimum flow requirement after each refueling. The basis for existing TS 3.10 clarifies that this verifieation is performed after each refueling prior to exceeding 95% power. Proposed TS 3.10.m.2 provides, within the specification, clarification of the conditions under which the minimum flow verification is performed. These conditions are the initial power escalation following each refueling, between 70% and 95% power with plant parameters as constant as practical. The intent of the proposed change is to clarify the power range during initial power escalation that allows for accurate verification of the RCS flow rate. Methodology used for verification of reactor coolant flow prior to 95% power, and uncertainties in reactor coolant flow were previously addressed and reviewed in the safety evaluation for TS Amendment 24.

Significant Hazards Determination for Proposed Changes to Section 3.10.m

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.

   TS 3.10.m.1 provides the limits and required actions to be taken when the RCS flow rate per loop is less than the USAR analysis assumptions. Decreasing the flow limit to be consistent with the USAR assumptions will have no impact on the probability of an accident previously evaluated. Compliance with the flow limit assumed in the USAR analyses ensures the consequences of previously evaluated DNB-related accidents are enveloped by the USAR analyses. Therefore, this change will not increase the consequences of an accident previously evaluated in the USAR.

The proposed revision places an additional restriction on RCS flow when less than the design flow rate of 89,000 gallons per minute per loop. The intent of specifying action in accordance with 3.10.n is to ensure that reactor power is reduced to a point at which the DNB ratio margin is restored. Compliance with this specification will not increase the probability of an accident previously evaluated, nor increase the consequences of an accident.

The intent of TS 3.10.m.2 is to clarify the conditions under which the reactor coolant flow rate is verified. The conditions, methodology, and uncertainties associated with this verification are not changed by this specification. Clarifying the TS by inclusion of the conditions for verifying the flow rate will not increase the probability or consequences of any accident previously evaluated.

2) Create the possibility of a new or different kind of accident from any accidents 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.

A specification on steady-state RCS flow rate is necessary to ensure DNB ratio criteria will be met during the DNBR limiting events analyzed in the USAR. Reducing the reactor coolant flow limit to the value assumed in the USAR analyses does not result in a reduction in the margin of safety.

The additional restrictions being imposed if the specified limit is not met provide additional assurance the DNBR margin will be restored. These additional restrictions do not exist in the current TS. The imposition of these restrictions results in an enhancement to the margin of safety.

Clarifying the TS by inclusion of conditions under which the flow verification is to be performed will not reduce the margin of safety. Existing approved constraints, methodology, and uncertainties are not being changed by this clarification.

<u>Safety Evaluation for Proposed Technical Specification (TS) 3.10.n (New)</u>

The intent of this new specification is to outline the actions required when the limits of TS 3.10.k (RCS temperature), TS 3.10.l (RCS pressure) and TS 3.10.m.1 (RCS flow) are not met. Collectively, these three specifications place limits on the DNB-related parameters to assure each is maintained within the normal steady-state envelope assumed in the USAR safety analysis.

The new specification will allow 2 hours to restore the parameter(s) to withim limits. If this is not satisfied, then power shall be reduced to less than 5% of the thermal-rated power within the next 6 hours. Following analysis, thermal power may be raised not to exceed a level analyzed to maintain a minimum DNBR of 1.30. A completion time of two hours provides sufficient time to determine the cause of exceeding the limit and to correct the condition. In addition, the probability of a DNB-limited event during the completion time interval is acceptably low.

If these parameters cannot be controlled during steady-state operation, then power must be reduced to restore the margin of safety. Addition of TS 3.10.n is an enhancement to the Technical Specifications to provide guidance to the operator on actions required when a DNB-related parameter is outside the limits assumed in the safety analysis. This guidance does not currently exist in the TS; addition of this guidance will not adversely affect the health and safety of the public.

Significant Hazards Determination for Proposed TS 3.10.n

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 incrcase in the probability or consequences of an accident previously evaluated.

   The intent of this new TS is to outline the actions required when the limits of TS 3.10.k (RCS temperature), TS 3.10.l (RCS pressure) and TS 3.10.m.l (RCS flow) are exceeded. Collectively, these three specifications place limits on the DNB-related parameters to assure each is maintained within the normal steady-state envelope assumed in the USAR safety analysis. This specification is an enhancement to our existing specification to add clear guidance which does not presently exist. Providing this information for the plant staff and operators will not increase the probability of an accident previously evaluated.

   The addition of this action statement will ensure that the consequences of an analyzed accident are not increased. The proposed specifieation allows 2 hours to evaluate and restore the parameter to within limits. If this time frame is not satisfied, then within the next 6 hours, power is reduced in order to restore a margin of safety. Following analysis, thermal power may be raised not to exceed a level analyzed to maintain a minimum DNBR of 1.30.

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.

3) Involve a significant reduction in the margin of safety.

Addition of the specification is an enhancement to the current specifieation which does not alter input to the safety analysis. Therefore, it will not involve a reduction in the margin of safety.

Safety Evaluation for Proposed Administrative Changes to Technical Specification (TS) 3.10 Including Figure TS 3.10-2

The name "Siemens Power Corporation" has evolved from being known as "Exxon Nuclear", "Advanced Nuclear Fuels Company", and "Siemens Nuclear Power Corporation." The changes in company name do not affect the power distribution limits or the overall quality of the fuel provided for use at the Kewaunee Nuclear Power Plant. This change is administrative to maintain the accuracy of the specification.

A number of formatting changes and correction of minor typographical errors are also 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 not effect on public health or safety.

Significant Hazards Determination for Proposed Administrative Changes to Section TS 3.10 Including Figure TS 3.10-2

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 20, or a change to a surveillance requirement. WPSC has determined that the proposed amendment involves no significant hazards considerations and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in the individual or cumulative occupational radiation exposure. Accordingly, this proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.