

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

April 23, 2012

Mr. Mark E. Reddemann Chief Executive Officer Energy Northwest P.O. Box 968 (Mail Drop 1023) Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - ISSUANCE OF AMENDMENT RE: ADOPTION OF TSTF-514, REVISION 3, "REVISE BWR OPERABILITY REQUIREMENTS AND ACTIONS FOR RCS LEAKAGE INSTRUMENTATION" (TAC NO. ME6017)

Dear Mr. Reddemann:

The U.S. Nuclear Regulatory Commission (NRC) has issued the enclosed Amendment No. 224 to Facility Operating License No. NPF-21 for the Columbia Generating Station. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated April 11, 2011.

The amendment revises TS 3.7.4, "RCS Leakage Detection Instrumentation," to define a new time limit for restoring inoperable reactor coolant system (RCS) leakage detection instrumentation to operable status and establish alternate methods of monitoring RCS leakage when one or more required monitors are inoperable. The NRC has no objection to the conforming 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 Technical Specifications Task Force (TSTF) Change Traveler TSTF-514, "Revise BWR [Boiling-Water Reactor] Operability Requirements and Actions for RCS Leakage Instrumentation," as part of the consolidated line item improvement process.

M. Reddemann

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

Mohan Chayani

Mohan C. Thadani, Senior Project Manager Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures:

1. Amendment No. 224 to NPF-21

2. Safety Evaluation

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

ENERGY NORTHWEST

DOCKET NO. 50-397

COLUMBIA GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 224 License No. NPF-21

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Energy Northwest (licensee), dated April 11, 2011, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-21 is hereby amended to read as follows:
 - (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 224 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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Michael T. Markley, Chief Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Attachment: Changes to the Facility Operating License No. NPF-21 and Technical Specifications

Date of Issuance: April 23, 2012

ATTACHMENT TO LICENSE AMENDMENT NO. 224

FACILITY OPERATING LICENSE NO. NPF-21

DOCKET NO. 50-397

Replace the following pages of the Facility Operating License No. NPF-21 and Appendix A, Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

| Facility Operating License | | | | | |
|----------------------------|---------|--|--|--|--|
| REMOVE | INSERT | | | | |
| -3- | -3- | | | | |
| Technical Specifications | | | | | |
| REMOVE | INSERT | | | | |
| 3.4.7-2 | 3.4.7-2 | | | | |

- (3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source of special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- (6) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to store byproduct, source and special nuclear materials not intended for use at Columbia Generating Station. The materials shall be no more than 9 sealed neutron radiation sources designed for insertion into pressurized water reactors and no more than 40 sealed beta radiation sources designed for use in area radiation monitors. The total inventory shall not exceed 24 microcuries of strontium-90, 20 microcuries of uranium-235, 30 curies of plutonium-238, and 3 curies of americium-241.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
 - (1) <u>Maximum Power Level</u>

The licensee is authorized to operate the facility at reactor core power levels not in excess of full power (3486 megawatts thermal).

(2) <u>Technical Specifications and Environmental Protection Plan</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 224 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

a. For Surveillance Requirements (SRs) not previously performed by existing SRs or other plant tests, the requirement will be considered met on the implementation date and the next required test will be at the interval specified in the Technical Specifications as revised in Amendment No. 149.

RCS Leakage Detection Instrumentation 3.4.7

| | CONDITION | REQUIRED ACTION | | COMPLETION TIME | |
|--|--|---|--|----------------------|--|
| Only applicable when the drywell atmospheric gaseous monitoring system is the only OPERABLE monitor. | | C.1 Analyze grab samples of the drywell atmosphere. <u>AND</u> | | Once per 12 hours | |
| C. Drywell floor d | Drywell floor drain sump flow monitoring | C.2 <u>AND</u> | Monitor RCS LEAKAGE by administrative means. | Once per 12 hours | |
| | system inoperable. | C.3 | Restore drywell floor drain sump flow monitoring system to OPERABLE status. | 7 days | |
| associated Completion Time of | Completion Time of | D.1 <u>AND</u> | Be in MODE 3. | 12 hours | |
| | Condition A, B, or C not met. | D.2 | Be in MODE 4. | 36 hours | |
| E. | All required leakage detection systems inoperable. | E.1 | Enter LCO 3.0.3. | Immediately | |

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 224 TO

FACILITY OPERATING LICENSE NO. NPF-21

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

1.0 INTRODUCTION

By application dated April 11, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11109A080), Energy Northwest (the licensee) proposed changes to the Technical Specifications (TSs) for Columbia Generating Station (CGS). The proposed changes would revise TS 3.4.7, "RCS [Reactor Coolant System] Leakage Detection Instrumentation," and include TS Bases changes that summarize and clarify the purpose of the TS and the specified safety function of the leakage detection monitors.

Specifically, the amendment would modify the TSs to define a new time limit for restoring inoperable reactor coolant system (RCS) leakage detection instrumentation to operable status and establish alternate methods of monitoring RCS leakage when one or more required monitors are inoperable. The NRC staff has no objection to the conforming 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 U.S. Nuclear Regulatory Commission (NRC)-approved Revision 3 to Technical Specification Task Force (TSTF) Change Traveler TSTF-514, "Revise BWR [Boiling-Water Reactor] Operability Requirements and Actions for RCS Leakage Instrumentation." The availability of this TS improvement was announced in the *Federal Register* on December 17, 2010 (75 FR 79048), as part of the consolidated line item improvement process.

2.0 REGULATORY EVALUATION

The NRC's regulatory requirements related to the content of the TSs are contained in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, "Technical specifications." Pursuant to 10 CFR 50.36, TSs are required to include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design

Enclosure 2

features; and (5) administrative controls. The rule does not specify the particular requirements to be included in a plant's TSs. The regulations in 10 CFR 50.36(c)(2)(i), 'Limiting conditions for operations,' state, in part, that

Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. 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 technical specifications until the condition can be met.

The regulations in 10 CFR 50.36(c)(2)(ii) list four criteria for determining whether particular items are required to be included in the TS LCOs. Criterion 1 applies to "[i]nstalled instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary." As described in the *Federal Register* notice associated with this regulation (60 FR 36953; July 16, 1995), the scope of TSs 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 the changes to the TS.

The NRC's guidance for the format and content of boiling-water reactor (BWR) TSs can be found in NUREG-1434, Revision 3, "Standard Technical Specifications General Electric Plants, BWR/6" (STS) (ADAMS Accession No. ML041910220). STS 3.4.7, "RCS Leakage Detection Instrumentation," in NUREG-1434, Revision 3, contains the guidance specific to the RCS leakage detection instrumentation for BWRs.

The Bases for STS 3.4.7 contained in NUREG-1434, Revision 3, 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, "Nonconservatism in Leakage Detection Sensitivity," dated August 5, 2005 (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 1-gallon per minute (gpm) leak within 1 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 regulations in 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 30, "Quality of reactor coolant pressure boundary," require means for detecting and, to the extent practical, identifying the location of the source of RCS leakage. NRC 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 reactor coolant pressure boundary (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 that,

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 that,

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, "Detector Response Time," states, in part, that,

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 staffs approval of the use of expected primary coolant radioactivity concentration values used in the environmental report created 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 1 gpm leak within 1 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.

The RCS leakage detection instrumentation required by the TS 3.4.7 includes the drywell floor drain sump flow monitoring system and either the drywell atmosphere particulate or gaseous monitoring system.

- The drywell floor drain sump flow monitoring system monitors the unidentified leakage collected in the drywell floor drain sump, which consists of leakage from the control rod drives, valve flanges or packing, floor drains, closed cooling water system drywell cooling unit drains, and leakage not collected in the drywell equipment drain sump. The drywell floor drain sump gravity drains to a reactor building floor drain sump. The drywell floor drain sump piping to the reactor building floor drain sump has a transmitter that supplies flow indication to the control room. If the sump drain flow increases to the high flow alarm setpoint, an alarm sounds in the control room.
- The drywell atmosphere monitoring system monitors the drywell atmosphere for airborne particulate and gaseous radioactivity. A sudden increase in radioactivity may be attributed to a reactor coolant pressure boundary (RCPB) steam or water leak. The system has two redundant subsystems, each having two detectors, individually monitoring particulates and noble gas activity. In each system the sample is drawn into the sample system by its vacuum pump. Flow control is provided to ensure proper sample flow. The sample flow path is from the sample point inside the primary containment, through the inlet isolation valve to the particulate monitor chamber. The sample is passed through a fixed filter where the particulate matter is deposited while allowing the noble gases to pass through. After removal of any particulate matter, the gaseous sample passes into a volume chamber where noble gas activity is measured. Associated radiation readout modules and recorders are mounted in the main control room along with alarm annunciators.

CGS FSAR Section 1.2.1.3, "Plant Design Criteria," states, in part, that:

The plant design criteria are based on general design criteria given in Appendix A of 10 CFR Part 50. Conformance to these criteria is discussed in Section 3.1.

CGS FSAR Section 3.1.2.4.1, "Criterion 30 - Quality of Reactor Coolant Pressure Boundary," states, in part, that:

By utilizing conservative design practices and detailed quality control procedures, the pressure retaining components of the RCPB are designed and fabricated to retain their integrity during normal and postulated accident conditions. Accordingly, components that compose the RCPB are designed, fabricated, erected, and tested in accordance with recognized industry codes and standards listed in Table 3.2-1 and Chapter 5. Further, product and process quality planning is provided to ensure conformance with the applicable codes and standards and to retain appropriate documented evidence verifying compliance. Because the subject matter of this criterion deals with aspects of the RCPB, further discussion on this subject is treated in the response to Criterion 14, Reactor Coolant Pressure Boundary.

Means are provided for detecting reactor coolant leakage. The leak detection system consists of sensors and instruments to detect, annunciate, and in some cases, isolate the RCPB from potential hazardous leaks before predetermined limits are exceeded. Small leaks are detected by temperature and pressure changes, increased frequency of sump pump operation, and by measuring fission product concentration. In addition to these means of detection, large leaks are detected by changes in flow rates in process lines and changes in reactor water level. The allowable leakage rates have been based on the predicted and experimentally determined behavior of cracks in pipes, the ability to make up coolant system leakage, the normally expected background leakage due to equipment design, and the detection capability of the various sensors and instruments. The total leakage rate limit is established so that in the absence of normal ac power with loss of feedwater supply, makeup capabilities are provided by the RCIC [reactor core isolation cooling] system. While the leak detection system provides protection from small leaks, the ECCS [emergency core cooling system] network provides protection for the complete range of discharges from ruptured pipes. Thus, protection is provided for the full spectrum of possible discharges.

The RCPB and leak detection system are designed to meet the requirements of Criterion 30.

CGS FSAR Section 1.8.2, "Nuclear Steam Supply System Scope of Supply Evaluation," regarding RG 1.45, Revision 0, May 1973, states that CGS "is in compliance with the intent of this regulatory guide through the incorporation of the alternate approach cited." In addition, FSAR Section 1.8.2 states that CGS satisfies RG 1.45 Position C.2 by collecting unidentified leakage to the drywell in the drywell floor drain sump. The flow rate is monitored with an accuracy of one gpm or better. The sensitivity and response time for the drywell floor drain sump flow monitoring system satisfies RG 1.45 Position C.5 and Position C.3 is satisfied by using the drywell floor drain sump flow monitor, airborne particulate radioactivity monitor, and airborne gaseous radioactivity monitor. Conformance to RG 1.45 is also discussed in FSAR Section 7.6.2.4, "Conformance to Regulatory Guides."

Note that CGS is not committed to RG 1.45, Revision 1, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage," issued in May 2008.

3.0 TECHNICAL EVALUATION

3.1. Proposed TS Changes

In adopting the changes to TSs included in TSTF-514, Revision 3, the licensee proposed to revise TS 3.4.7, "RCS Leakage Detection Instrumentation," Conditions and Required Actions. The licensee proposed adding new Condition C to TS 3.4.7, which would state:

Only applicable when the drywell atmospheric gaseous monitoring system is the only OPERABLE monitor.

C. Drywell floor drain sump monitoring system inoperable.

The Required Actions for new Condition C would state:

- C.1 Analyze grab samples of the drywell atmosphere.
- AND
- C.2 Monitor RCS LEAKAGE by administrative means.
- AND
- C.3 Restore drywell floor drain sump monitoring system to OPERABLE status.

In addition, the licensee proposed minor changes in TS 3.4.7 to ensure continuity of the TS format. These changes include re-lettering current Condition C, which applies when the required action and the associated Completion Time are not satisfied, to Condition D, and current Condition D, which applies when all required leakage detection systems are inoperable, to Condition E. Similar changes were made to the associated Required Actions.

New Condition C would be applicable when the drywell atmospheric gaseous monitoring system is the only operable RCS leakage detection system. This new Condition is necessary because improved fuel integrity and the resulting lower primary coolant radioactivity concentration affect the response of a plant's drywell atmospheric gaseous monitoring system to a greater extent than the response of other RCS leakage detection monitors to leakage radioactivity. The Completion Time proposed for Required Actions for new Condition C requires the licensee to analyze grab samples of the drywell atmosphere once per 12 hours, restore the drywell floor drain sump flow 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. Energy Northwest will utilize the following methods considering the current plant conditions and historical or expected sources of unidentified leakage, as their TS administrative means: drywell pressure, drywell temperature, reactor building floor drain sump level alarm and fill-up and pump-out rates, reactor building closed cooling water system differential temperatures, drywell cooling fan inlet and outlet temperatures, and/or safety relief valve tailpipe temperature.

3.2 NRC Staff Evaluation

The NRC staff determined that the proposed Condition C is more restrictive than the current requirement, because there is no current TS condition for the plant condition of the drywell atmospheric gaseous monitoring system being the only operable RCS leakage detection system. The associated proposed Actions and Completion Times are adequate because monitoring the RCS by administrative means, coupled with drywell atmospheric grab samples, are sufficient to alert the operating staff to an unexpected increase in unidentified leakage. The drywell atmospheric grab samples provide a method of detecting particulate and gaseous radioactive material in the drywell atmosphere. 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 drywell atmospheric gaseous monitoring system. 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 C 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. Based on the above, the NRC staff concludes that proposed Condition C provides an adequate assurance of safety when judged against current regulatory standards and is, therefore, acceptable.

The licensee proposes minor changes to ensure continuity of the TS format. These changes re-letter current Condition C, which applies when the required action and the associated Completion Time are not satisfied, to Condition D, and current Condition D, which applies when all required leakage detection systems are inoperable, to Condition E. Similar changes were made to the associated Required Actions. The NRC staff concludes that these changes are editorial and are, therefore, acceptable.

In adopting TSTF-514, Revision 3, the licensee proposed changes that would revise the Bases for TS 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 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 has no objection to the proposed TS Bases.

The NRC staff evaluated the licensee's proposed changes against the applicable regulatory requirements listed in Section 2.0 of this safety evaluation. The NRC staff also compared the proposed changes to the changes made to STS by TSTF-514, Revision 3. Based on the above,

the NRC staff concludes that the proposed TS changes provide reasonable assurance of safety and are, therefore, acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Washington State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding published in the *Federal Register* on May 31, 2011 (76 FR 31373). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 <u>CONCLUSION</u>

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: K. Bucholtz

Date: April 23, 2012

M. Reddemann

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A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/**r**a/

Mohan C. Thadani, Senior Project Manager Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures:

1. Amendment No. 224 to NPF-21

2. Safety Evaluation

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