

1 DRAFT MODEL SAFETY EVALUATION

2 BY THE OFFICE OF NUCLEAR REACTOR REGULATION

3 TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER

4 TSTF-551, REVISION 3,

5 “REVISE SECONDARY CONTAINMENT SURVEILLANCE REQUIREMENTS”

6
7 **1.0 INTRODUCTION**

8
9 By application dated [enter date], (Agencywide Documents Access and Management System
10 (ADAMS) Accession No. [MLXXXXXXXXXX], [name of licensee] (the licensee) requested
11 changes to the technical specifications (TS) for [name of facility]. Specifically, the licensee
12 requested changes to the TSs to adopt Technical Specifications Task Force (TSTF) traveler,
13 TSTF-551, Revision 3, “Revise Secondary Containment Surveillance Requirements,” dated
14 October 3, 2016 (ADAMS Accession No. ML16277A226). The NRC approved the traveler on
15 **Month, Day, 2017 (ADAMS Accession No. MLXXXX).**

16
17 The proposed changes would allow the [secondary] containment vacuum limit to not be met
18 provided that the standby gas treatment (SGT) system remains capable of establishing the
19 required [secondary] containment vacuum within the [specified time] and revises the TS to
20 permit [secondary] containment access opening to be open to permit ingress and egress.

21
22 **2.0 REGULATORY EVALUATION**

23
24 **2.1 SYSTEM DESCRIPTION**

25
26 The [secondary] containment is a structure that encloses the primary containment, including
27 components that may contain primary system fluid. The safety function of the [secondary]
28 containment is to contain, dilute, and hold up fission products that may leak from primary
29 containment following a design basis accident (DBA) to ensure the control room operator and
30 offsite doses are within the regulatory limits. There is no redundant train or system that can
31 perform the [secondary] containment function should the [secondary] containment be
32 inoperable.

33
34 The [secondary] containment boundary is the combination of walls, floor, roof, ducting, doors,
35 hatches, penetrations and equipment that physically form the [secondary] containment.
36 Routinely used [secondary] containment access openings contain at least one inner and one
37 outer door in an airlock configuration. In some cases, [secondary] containment access
38 openings are shared such that there are multiple inner or outer doors. All [secondary]
39 containment access doors are normally kept closed, except when the access opening is being
40 used for entry and exit of personnel, equipment, or material.

41
42 [Secondary] containment operability is based on its ability to contain, dilute, and hold up fission
43 products that may leak from primary containment following a DBA. To prevent ground level

1 exfiltration of radioactive material while allowing the **[secondary]** containment to be designed
2 as a mostly conventional structure, the **[secondary]** containment requires support systems to
3 maintain the pressure at less than atmospheric pressure. During normal operation, non-safety
4 related systems are used to maintain the **[secondary]** containment at a slight negative pressure
5 to ensure any leakage is into the building and that any **[secondary]** containment atmosphere
6 exiting is via a pathway monitored for radioactive material. However, during normal operation it
7 is possible for the **[secondary]** containment vacuum to be momentarily less than the required
8 vacuum for a number of reasons, such as during wind gusts or swapping of the normal
9 ventilation subsystems.

10
11 During emergency conditions, the SGT system is designed to be capable of drawing down the
12 **[secondary]** containment to a required vacuum within a prescribed time and continue to
13 maintain the negative pressure as assumed in the accident analysis. For **[name of facility]**, the
14 SGT must be able to establish the required vacuum within **[insert time requirement]**. The leak
15 tightness of the **[secondary]** containment together with the SGT system ensure that radioactive
16 material is either contained in the **[secondary]** containment or filtered through the SGT system
17 filter trains before being discharged to the outside environment via the elevated release point.

18 19 2.2 PROPOSED TECHNICAL SPECIFICATION CHANGES

20
21 The proposed changes would allow the **[secondary]** containment vacuum limit to not be met
22 provided the SGT system remains capable of establishing the required **[secondary]**
23 containment vacuum. The proposed changes would also allow for the temporary opening of the
24 inner and outer doors of **[secondary]** containment for the purpose of ingress and egress (i.e.,
25 normal opening and prompt closure of a door for transit).

26 27 2.2.1 Revision to Surveillance Requirement 3.6.4.1.1

28
29 *[NOTE: This change is applicable to NUREGs-1433 and -1434.]*

30
31 Surveillance requirement (SR) 3.6.4.1.1 requires verification that **[secondary]** containment
32 vacuum is \geq **[0.25]** inch of vacuum water gauge. This SR would be modified by a note that
33 states:

34
35 Not required to be met for 4 hours if analysis demonstrates one
36 standby gas treatment (SGT) subsystem is capable of establishing
37 the required **[secondary]** containment vacuum.

38 39 2.2.2 Revision to Surveillance Requirement 3.6.4.1.3

40
41 *[NOTE: This change is applicable to NUREG-1433 only.]*

42
43 SR 3.6.4.1.3 requires verification that one **[secondary]** containment access door in each
44 access opening is closed. This SR would be modified by adding the following phrase to the end
45 of the SR statement, "...except when the access opening is being used for entry and exit."

46 47 2.2.3 Revision to Surveillance Requirement 3.6.4.1.4

48

1 An editorial change is made to SR 3.6.4.1.4 in which the words “standby gas treatment” are
2 replaced with the initialism “SGT.”

3 4 2.3 REGULATORY REQUIREMENTS AND GUIDANCE

5
6 The regulation at Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(a)(1)
7 requires an applicant for an operating license to include in the application proposed TS in
8 accordance with the requirements of 10 CFR 50.36. The applicant must include in the
9 application, a “summary statement of the bases or reasons for such specifications, other than
10 those covering administrative controls.” However, per 10 CFR 50.36(a)(1), these technical
11 specification bases “shall not become part of the technical specifications.”

12
13 Additionally, 10 CFR 50.36(b) requires:

14
15 Each license authorizing operation of a ... utilization facility ... will
16 include technical specifications. The technical specifications will
17 be derived from the analyses and evaluation included in the safety
18 analysis report, and amendments thereto, submitted pursuant to
19 10 CFR 50.34 [“Contents of applications; technical information”].
20 The Commission may include such additional technical
21 specifications as the Commission finds appropriate.
22

23 The categories of items required to be in the TSs are provided in 10 CFR 50.36(c). As required
24 by 10 CFR 50.36(c)(2)(i), the TSs will include limiting conditions for operation (LCOs), which are
25 the lowest functional capability or performance levels of equipment required for safe operation
26 of the facility. Per 10 CFR 50.36(c)(2)(i), when an LCO of a nuclear reactor is not met, the
27 licensee shall shut down the reactor or follow any remedial action permitted by the TSs until the
28 condition can be met.

29
30 The regulation at 10 CFR 50.36(c)(3) requires TSs to include items in the category of SRs,
31 which are requirements relating to test, calibration, or inspection to assure that the necessary
32 quality of systems and components is maintained, that facility operation will be within safety
33 limits, and that the LCOs will be met.
34

35 The NRC staff’s guidance for review of TSs is in Chapter 16, *Technical Specifications*, of
36 NUREG-0800, Revision 3, “Standard Review Plan for the Review of Safety Analysis Reports for
37 Nuclear Power Plants” (SRP), dated March 2010 (ADAMS Accession No. ML100351425).

38
39 NUREG-0800, SRP Section 15.0.1, “Radiological Consequence Analyses Using Alternative
40 Source Terms,” Revision 0, dated July 2000 (ADAMS Accession No. ML003734190), provides
41 guidance to the NRC staff for the review of alternate source term (AST) amendment requests.
42 SRP 15.0.1 states that the NRC reviewer should evaluate the proposed change against the
43 guidance in Regulatory Guide (RG) 1.183, “Alternative Radiological Source Terms for
44 Evaluating Design Basis Accidents at Nuclear Power Reactors,” Revision 0, dated July 2000
45 (ADAMS Accession No. ML003716792).
46

47 RG 1.183 provides acceptable methodology for analyzing the radiological consequences of
48 several design basis accidents to show compliance with 10 CFR 50.67. RG 1.183 provides
49 guidance to licensees on acceptable application of AST (also known as the accident source

1 term) submittals, including acceptable radiological analysis assumptions for use in conjunction
2 with the accepted AST.

3
4 10 CFR 50.67, "Accident source term," states that:

- 5
6 (i) An individual located at any point on the boundary of the
7 exclusion area for any 2-hour period following the onset of
8 the postulated fission product release, would not receive a
9 radiation dose in excess of 0.25 Sv (25 rem) total effective
10 dose equivalent (TEDE),
11 (ii) An individual located at any point on the outer boundary of
12 the low population zone, who is exposed to the radioactive
13 cloud resulting from the postulated fission product release
14 (during the entire period of its passage), would not receive
15 a radiation dose in excess of 0.25 Sv (25 rem) TEDE, and
16 (iii) Adequate radiation protection is provided to permit access
17 to and occupancy of the control room under accident
18 conditions without personnel receiving radiation exposures
19 in excess of 0.05 Sv (5 rem) TEDE for the duration of the
20 accident.
21

22 **3.0 TECHNICAL EVALUATION**

23
24 The NRC staff evaluated the licensee's application to determine if the proposed changes are
25 consistent with the guidance, regulations, and licensing information discussed in Section 2.3 of
26 this safety evaluation (SE). In determining whether an amendment to a license will be issued,
27 the Commission is guided by the considerations that govern the issuance of initial licenses to
28 the extent applicable and appropriate. In making its determination as to whether to amend the
29 license, the NRC staff considered those regulatory requirements that are automatically
30 conditions of the license through 10 CFR 50.54.
31

32 The regulation at 10 CFR 50.36(a)(1) states, in part: "A summary statement of the bases or
33 reasons for such specifications ... shall also be included in the application, but shall not become
34 part of the technical specifications." Accordingly, along with the proposed TS changes, the
35 licensee also submitted TS Bases changes that correspond to the proposed STS changes for
36 information only.
37

38 **3.1 PROPOSED CHANGE TO SURVEILLANCE REQUIREMENT 3.6.4.1.1**

39
40 A note is being added to SR 3.6.4.1.1. The note allows the SR to not be met for up to 4 hours if
41 an analysis demonstrates that one SGT subsystem is capable of establishing the required
42 **[secondary]** containment vacuum. During normal operation, conditions may occur that result in
43 SR 3.6.4.1.1 not being met for short durations. For example, wind gusts that lower external
44 pressure or loss of the normal ventilation system that maintains **[secondary]** containment
45 vacuum may affect **[secondary]** containment vacuum. These conditions may not be indicative
46 of degradations of the **[secondary]** containment boundary or of the ability of the SGT system to
47 perform its specified safety function.
48

1 The note provides an allowance for the licensee to confirm **[secondary]** containment operability
2 by confirming that one SGT subsystem is capable of performing its specified safety function.
3 This confirmation is necessary to apply the exception to meeting the SR acceptance criterion.
4 While the duration of these occurrences is anticipated to be very brief, the allowance is
5 permitted for a maximum of 4 hours, [which is consistent with the time permitted for
6 **[secondary]** containment to be inoperable per [Condition A of LCO 3.6.4.1 or the corresponding
7 Condition for the plant-specific TS].
8

9 The NRC staff has evaluated the impact of this note on the licensee's design basis radiological
10 consequence analyses to ensure that the proposed change will not result in an increase in the
11 dose consequences and that the resulting calculated doses remain within the design criteria
12 specified in 10 CFR 50.67 and the accident specific design criteria outlined in RG 1.183.
13

14 The proposed addition of the note to SR 3.6.4.1.1 does not change the TS requirement to meet
15 SR 3.6.4.1.4 and SR 3.6.4.1.5. SR 3.6.4.1.4 requires verification that the **[secondary]**
16 containment can be drawn down to $\geq [0.25]$ inch of vacuum water gauge in $\leq [120]$ seconds
17 using one SGT subsystem. SR 3.6.4.1.5 requires verification that the **[secondary]** containment
18 can be maintained $\geq [0.25]$ inch of vacuum water gauge for 1 hour using one SGT subsystem at
19 a flow rate $\leq [4000]$ cubic feet per minute. In addition, TS LCO 3.6.4.3, "Standby Gas Treatment
20 (SGT) System," must be met; otherwise the licensee shall shut down the reactor or follow any
21 remedial action permitted by TSs until the condition can be met.
22

23 As discussed above, **[secondary]** containment operability is based on its ability to contain,
24 dilute, and hold up fission products that may leak from primary containment following a DBA.
25 To prevent ground level exfiltration of radioactive material the **[secondary]** containment
26 pressure must be maintained at a pressure that is less than atmospheric pressure. The
27 **[secondary]** containment requires support systems to maintain the control volume pressure
28 less than atmospheric pressure. Following an accident, the SGT system ensures the
29 **[secondary]** containment pressure is less than the external atmospheric pressure. During
30 normal operation, non-safety related systems are used to maintain the **[secondary]**
31 containment at a negative pressure. However, during normal operation it is possible for the
32 **[secondary]** containment vacuum to be momentarily less than the required vacuum for a
33 number of reasons. These conditions may not be indicative of degradations of the **[secondary]**
34 containment boundary or of the ability of the SGT system to perform its specified safety
35 function. Since the licensee meets the requirements of SR 3.6.4.1.4, SR 3.6.4.1.5, meets the
36 LCO or is following the Actions of TS LCO 3.6.4.3, and the licensee's analysis confirms
37 **[secondary]** containment operability by confirming that one SGT subsystem is capable of
38 performing its specified safety function, then there is reasonable assurance that the
39 **[secondary]** containment and SGT subsystem will maintain the vacuum requirements during a
40 DBA.
41

42 Therefore, the NRC staff has determined that: if the conditions do not affect (1) the ability to
43 maintain the **[secondary]** containment pressure during an accident, at a pressure that is less
44 than atmospheric, and (2) the time assumed in the accident analyses to draw down the
45 **[secondary]** containment pressure, then the **[secondary]** containment can perform its safety
46 function and may be considered TS operable. This is evident by being able to successfully
47 perform and meet SR 3.6.4.1.4 and SR 3.6.4.1.5. These SRs require the SGT system to
48 establish and maintain the required vacuum in the **[secondary]** containment as assumed in the
49 accident analyses.

1
2 Furthermore, because the specified safety functions of the **[secondary]** containment and SGT
3 subsystem can be performed in the time assumed in the licensee's accident analysis, then the
4 fission products that bypass or leak from primary containment, or are released from the reactor
5 coolant pressure boundary components located in **[secondary]** containment prior to release to
6 the environment, will be contained and processed as assumed in the licensee's design basis
7 radiological consequence dose analyses. The NRC staff finds that the proposed change does
8 not affect the current radiological consequence analyses and concludes that the proposed
9 change is acceptable with respect to the radiological consequences of DBAs.

10
11 **3.2 PROPOSED CHANGE TO SURVEILLANCE REQUIREMENT 3.6.4.1.3**

12
13 *[NOTE: The proposed change is not applicable if the radiological dose consequence analysis*
14 *assumes the [secondary] containment pressure is below atmospheric pressure prior to or*
15 *coincident with the time at which the accident or event occurs. Such an analysis assumption*
16 *would require a revised radiological dose consequence analysis considering the new release*
17 *point (the open [secondary] containment doors), with appropriate atmospheric dispersion*
18 *factors, and any other necessary revisions to the accident or event analysis.]*

19
20 The NRC staff review was limited to the licensee's request to provide an allowance for the brief,
21 inadvertent, simultaneous opening of redundant **[secondary]** containment access doors during
22 normal entry and exit conditions. Planned activities that could result in the simultaneous
23 opening of redundant **[secondary]** containment access openings, such as maintenance of a
24 **[secondary]** containment personnel access door or movement of large equipment through the
25 openings that would take longer than the normal transit time, will be considered outside the
26 scope of the NRC staff's review.

27
28 The NRC staff reviewed the changes to SR 3.6.4.1.3. The NRC staff determined that the SR
29 continues to provide appropriate confirmation that **[secondary]** containment boundary doors
30 are properly positioned and capable of performing their function in preserving the **[secondary]**
31 containment boundary. The NRC staff determined that the SRs continue to appropriately verify
32 the operability of the **[secondary]** containment and provide assurance that the necessary
33 quality of systems and components are maintained in accordance with 10 CFR 50.36(c)(3).

34
35 Additionally, the NRC staff evaluated the impact of modifying the TS to allow **[secondary]**
36 containment access openings to be open for entry and exit on the licensee's design basis
37 radiological consequence dose analyses to ensure that the modification will not result in an
38 increase in the radiation dose consequences and that the resulting calculated radiation doses
39 will remain within the design criteria specified in 10 CFR 50.67 and the accident specific design
40 criteria outlined in RG 1.183. The NRC staff review of these DBAs determined that there are
41 two DBAs that take credit for the **[secondary]** containment, and are possibly impacted by the
42 brief, inadvertent, simultaneous opening of both an inner and outer access door during normal
43 entry and exit conditions, the loss of coolant accident (LOCA) and the fuel handling accident
44 (FHA) in **[secondary]** containment.

45
46 **3.2.1 LOCA**

47
48 Following a LOCA, the **[secondary]** containment structure is maintained at a negative pressure
49 ensuring that leakage from primary containment to **[secondary]** containment can be collected

1 and filtered prior to release to the environment. The SGT system performs the function of
2 maintaining a negative pressure within the **[secondary]** containment, as well as collecting and
3 filtering the leakage from primary containment. The licensee credits the SGT system for
4 mitigation of the radiological releases from the **[secondary]** containment. In the LOCA
5 analysis, the **[secondary]** containment draw down analysis assumes that SGT system can
6 draw down the **[secondary]** containment within **[5 minutes]**. TS SR 3.6.4.1.4 requires one
7 SGT subsystem to draw down the **[secondary]** containment, to greater than or equal to **[0.25]**
8 inches of vacuum water gauge in a maximum allowable time of **[120]** seconds.
9

10 Conservatively, the DBA LOCA radiological consequence analysis in **[Updated Final Safety**
11 **Analysis Report (UFSAR) Chapter 15]** assumes that following the start of a DBA LOCA the
12 **[secondary]** containment pressure of **[0.25]** inches of vacuum water gauge is achieved at
13 approximately **[10]** minutes. The license assumes that releases into the **[secondary]**
14 containment prior to the **[10]**-minute draw down time leak directly to the environment as a
15 ground level release with no filtration. After the assumed **[10]**-minute draw down these releases
16 are filtered by the SGT system and released via the SGT system exhaust vent.
17

18 Based on this information, the NRC staff concludes that the licensee's DBA LOCA analysis has
19 sufficient conservatism by assuming a draw down time of **[10]** minutes from the start of the DBA
20 LOCA. Margin exists to ensure that the **[secondary]** containment can be reestablished during
21 a brief, inadvertent, simultaneous opening of the inner and outer doors, and there is reasonable
22 assurance that a failure of a safety system needed to control the release of radioactive material
23 to the environment will not result. The brief, inadvertent, simultaneous opening of the
24 **[secondary]** containment access doors does not impact the design bases and will not result in
25 an increase in any on-site or off-site dose.
26

27 Based on the above discussion, the NRC staff finds that the licensee's proposed change to the
28 TSs does not impact the licensee's design basis LOCA radiological consequence analysis and
29 will not result in an increase in any onsite or offsite dose. Therefore, the NRC staff concludes that
30 this change is acceptable with respect to the radiological consequences of the DBAs.
31

32 [The licensee was approved for AST methodology and the radiological dose consequences
33 analyses for DBAs via license amendment[s] **[insert license amendment number]** for **[name**
34 **of facility]**.] The NRC staff reviewed the impact of the proposed changes to **[name of facility]**
35 TS, on all DBAs currently analyzed in the **[name of facility]** Updated Final Safety Analysis
36 Report (UFSAR) that could have the potential for significant dose consequences. **[Chapter 15]**
37 of the **[name of facility]** UFSAR describes the DBAs and their radiological consequence
38 analysis results.]
39

40 3.2.2 FHA in **[Secondary]** Containment 41

42 During normal operation, non-safety related systems are used to maintain the **[secondary]**
43 containment at **[0.25]** inches of vacuum water gauge to ensure that any leakage is into the
44 building and that any **[secondary]** containment atmosphere exiting the building is via a
45 monitored pathway. The refuel floor, which is inside the **[secondary]** containment, is
46 maintained at a negative **[0.25]** inches of vacuum water gauge by normal operating ventilation
47 systems. The refueling floor exhaust ductwork in the **[secondary]** containment is equipped with
48 radiation monitors to detect a fuel handling accident. When a radiological release is sensed by
49 the radiation monitors, a **[secondary]** containment isolation signal is generated. This initiates

1 the SGT system and the normal ventilation system isolates. The radiation monitor is positioned
2 such that it will detect the release and send a closure signal to the **[secondary]** containment
3 isolation dampers.

4
5 Following a FHA, the **[secondary]** containment structure is maintained at a negative pressure
6 by the SGT system ensuring that fission products released from the spent fuel pool to
7 **[secondary]** containment can be collected and filtered prior to release to the environment. In
8 the FHA analysis, the **[secondary]** containment draw down analysis demonstrates that SGT
9 system can draw down the **[secondary]** containment within **[5 minutes]**. The licensee credits
10 the SGT system for mitigation of the radiological releases from the **[secondary]** containment.
11 TS SR 3.6.4.1.4 requires one SGT subsystem to draw down the **[secondary]** containment, to
12 greater than or equal to **[0.25]** inches of vacuum water gauge in a maximum allowable time of
13 **[120]** seconds.

14
15 Conservatively, the DBA FHA radiological consequence analysis in **[UFSAR Chapter 15]**
16 assumes that following the start of a DBA FHA the **[secondary]** containment pressure of
17 **[0.25]** inches of vacuum water gauge is achieved at approximately **[10]** minutes. The license
18 assumes that releases into the **[secondary]** containment prior to the **[10]**-minute draw down
19 time leak directly to the environment as a ground level release with no filtration. After the
20 assumed **[10]**-minute draw down these releases are filtered by the SGT system and released
21 via the SGT system exhaust vent.

22
23 Based on this information, the NRC staff concludes that the licensee's DBA FHA analysis has
24 sufficient conservatism by assuming a draw down time of **[10]** minutes from the start of the DBA
25 FHA. Margin exists to ensure that the **[secondary]** containment can be reestablished during
26 brief, inadvertent, simultaneous opening of the inner and outer doors, and there is reasonable
27 assurance that a failure of a safety system needed to control the release of radioactive material
28 to the environment will not result. The brief, inadvertent, simultaneous opening of the
29 **[secondary]** containment access doors does not impact the design bases and will not result in
30 an increase in any on-site or off-site dose.

31
32 Based on the above discussion, the NRC staff finds that the licensee's proposed change to the
33 TSs does not impact the licensee's design basis FHA radiological consequence analysis and will
34 not result in an increase in any onsite or offsite dose. Therefore, the NRC staff concludes that this
35 change is acceptable with respect to the radiological consequences of the DBAs.

36
37 The NRC staff review was limited to the licensee's request to provide an allowance for the brief,
38 inadvertent, simultaneous opening of redundant **[secondary]** containment access doors during
39 normal entry and exit conditions. Planned activities that could result in the simultaneous
40 opening of redundant **[secondary]** containment access openings, such as maintenance of a
41 **[secondary]** containment personnel access door or movement of large equipment through the
42 openings that would take longer than the normal transit time, will be considered outside the
43 scope of the NRC staff's review.

44 45 3.2.3 Conclusion

46
47 As described above, the NRC staff reviewed the technical basis provided by the licensee to
48 assess the radiological impacts of the changes to the **[secondary]** containment in the licensee's
49 TSs. The NRC staff finds that the licensee proposed change to SR 3.6.4.1.3 is consistent with

1 regulatory requirements and guidance identified in Section 2.3 of this SE. The NRC staff finds,
2 with reasonable assurance that the licensee's change to the TSs will continue to comply with
3 these criteria and that that the licensee's estimates of the dose consequences of a design basis
4 LOCA and FHA will comply with the requirements of 10 CFR 50.67 and the accident specific
5 dose guidelines specified in RG 1.183. Therefore, the proposed changes are acceptable with
6 regard to the radiological consequences of the postulated DBAs.

7 8 3.3 PROPOSED CHANGE TO SURVEILLANCE REQUIREMENT 3.6.4.1.4

9
10 The changes to SR 3.6.4.1.4 are editorial only and do not change any technical aspects of
11 SR 3.6.4.1.4. The NRC staff determined that the change is acceptable.

12 13 3.4 SUMMARY

14
15 The NRC staff reviewed the proposed changes and determined that changes to the TS meet the
16 standards for TS in 10 CFR 50.36(b). The proposed SRs assure that the necessary quality of
17 systems and components is maintained, that facility operation will be within safety limits, and
18 that the LCOs will be met, and satisfy 10 CFR 50.36(c)(3). Additionally, the changes to the TS
19 were reviewed for technical clarity and consistency with customary terminology and format in
20 accordance with SRP Chapter 16.

21
22 Additionally, the NRC staff has evaluated the impact of the proposed changes on the design
23 basis radiological consequence analyses against the regulatory requirements and guidance
24 identified in Section 2.3 of this SE. The NRC staff finds, with reasonable assurance that the
25 licensee's change to the TSs will continue to comply with the requirements of 10 CFR 50.67 and
26 the guidelines specified in RG 1.183. Therefore, the proposed changes are acceptable with
27 regard to the radiological consequences of the postulated DBAs.

28 29 4.0 STATE CONSULTATION

30
31 In accordance with the Commission's regulations, the **[Name of State]** State official was notified
32 of the proposed issuance of the amendment on **[enter date]**. The State official had **[no]**
33 comments. **[If comments were provided, they should be addressed here]**.

34 35 5.0 ENVIRONMENTAL CONSIDERATION

36
37 *[Note: This section is to be prepared by the PM. As needed, the PM should coordinate with*
38 *NRR's Environmental Review and Projects Branch (RERP) to determine the need for an EA.*
39 *Specific guidance on preparing EAs and considering environmental issues is contained in NRR*
40 *Office Instruction LIC-203, "Procedural Guidance for Preparing Categorical Exclusions,*
41 *Environmental Assessments, and Considering Environmental Issues."]*

42
43 The amendment changes requirements with respect to the installation or use of facility
44 components located within the restricted area as defined in 10 CFR Part 20 and changes SRs.
45 The NRC staff has determined that the amendment involves no significant increase in the
46 amounts and no significant change in the types of any effluents that may be released offsite,
47 and that there is no significant increase in individual or cumulative occupational radiation
48 exposure. The Commission has previously issued a proposed finding that the amendment
49 involves no significant hazards consideration, and there has been no public comment on such

1 finding published in the *Federal Register* on **[DATE (XX FR XXX)]**. Accordingly, the
2 amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).
3 Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment
4 need be prepared in connection with the issuance of the amendment.
5

6 **6.0 CONCLUSION**
7

8 The Commission has concluded, based on the considerations discussed above, that: (1) there
9 is reasonable assurance that the health and safety of the public will not be endangered by
10 operation in the proposed manner, (2) there is reasonable assurance that such activities will be
11 conducted in compliance with the Commission's regulations, and (3) the issuance of the
12 amendment will not be inimical to the common defense and security or to the health and safety
13 of the public
14

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18

19 Date:
20