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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON PUBLIC POWER SUPPLY SYSTEM DOCKET NO. 50-397 WPPSS NUCLEAR PROJECT NO. 2

ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to the technical specifications (TSs) for Facility Operating License No. NPF-21, issued to Washington Public Power Supply System (the Supply System or the licensee) for operation of the WPPSS Nuclear Project No. 2 (WNP-2), located in Benton County, Washington.

ENVIRONMENTAL ASSESSMENT

Identification of the Proposed Action:

The proposed amendment will revise the existing Technical Specifications (TS) in its entirety and incorporate the guidance provided in NUREG-1434, "Improved BWR/6 Technical Specifications," Revision 1, April 1995. The proposed action is in accordance with the licensee's amendment request dated December 8, 1996, as supplemented by letter dated July 9, 1996.

The Need for the Proposed Action:

It has been recognized that nuclear safety in all plants would benefit from improvement and standardization of TS. The "NRC Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," 52 FR 3788) contained proposed criteria for defining the scope of technical specifications. Later, the "NRC Final Policy Statement on TS Improvement for Nuclear Power Reactors," (58 FR 39132) incorporated lessons learned since publication of the interim policy statement and formed the basis for recent revisions to 10 CFR 50.36. The "Final Rule" (60 FR 36953) codified criteria for determining the content of technical specifications. To facilitate the development of standard TS, each reactor vendor owners' group (OG) and the NRC staff developed standard TS. For WNP-2, the Standard Technical Specifications (STS) are NUREG-1434, "Improved BWR/6 Technical Specifications," Revision 1. This document formed the basis for the WNP-2 Improved TS (ITS) conversion. The NRC Committee to Review Generic Requirements (CRGR) reviewed the STS, made note of its safety merits, and indicated its support of conversion by operating plants to the STS.

Description of the Proposed Change:

The proposed revision to the TS is based on NUREG-1434 and on guidance provided in the Final Policy Statement. Its objective is to completely rewrite, reformat, and streamline the existing TS. Emphasis is placed on human factors principles to improve clarity and understanding. The Bases section has been significantly expanded to clarify and better explain the purpose and foundation of each specification. In addition to NUREG-1434, portions of the existing TS were also used as the basis for the development of the WNP-2 ITS. Plant specific issues (unique design features, requirements, and operating practices) were discussed at length with the licensee and generic matters with General Electric Company and other OGs.

The proposed changes from the existing TS can be grouped into four general categories. These groupings are characterized as relocated requirements, administrative changes, less restrictive changes involving deletion of requirements, and more restrictive changes, and are as follows:

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Relocated requirements are items which are in the existing WNP-2 TS, 1. but do not meet the criteria set forth in the Final Policy Statement. The Final Policy Statement establishes a specific set of objective criteria for determining which regulatory requirements and operating restrictions should be included in TS. Relocation of requirements to documents with an established control program allows the TS to be reserved only for those conditions or limitations upon reactor operation which are necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, thereby focusing the scope of the TS. In general, the proposed relocation of items from the WNP-2 TS to the Updated Final Safety Analysis Report (UFSAR), appropriate plant specific programs, procedures and ITS Bases follows the guidance of NUREG-1434. Once these items have been relocated to other licensee controlled documents, the licensee may revise them under the provisions of 10 CFR 50.59 or other NRC approved control mechanisms which provide appropriate procedural means to control changes.

2. Administrative changes involve the reformatting and rewording of requirements, consistent with the style of the General Electric STS in NUREG-1434, to make the TS more readily understandable to plant operators and other users. These changes are purely editorial in nature or involve the movement or reformatting of requirements without affecting technical content. Application of a standardized format and style will also help ensure consistency is achieved among specifications. During this reformatting and rewording process, no technical changes (either actual or interpretational) to the TS were made unless they were identified and justified.

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3. Less restrictive changes and the deletion of requirements involves portions of the-existing specifications which provide information that is descriptive in nature regarding the equipment, systems, actions or surveillances, provide little or no safety benefit, and place an unnecessary burden on the licensee. This information is proposed to be deleted from the specifications and, in some instances, moved to the proposed Bases, UFSAR, or procedures. The removal of descriptive information to the Bases of the TS, UFSAR, or procedures is permissible, because the Bases, UFSAR or procedures will be controlled through a process which utilizes 10 CFR 50.59 and other NRC staff approved control mechanisms. The relaxations of requirements were the result of generic NRC action or other analyses. They have been justified on a case-by-case basis for WNP-2 as described in the safety evaluation to be issued with the license amendment.

4. More restrictive requirements are proposed to be implemented in some areas to impose more stringent requirements than presently exist. These more restrictive requirements are being imposed to be consistent with the General Electric STS. Such changes have been made after ensuring the previously evaluated safety analysis was not affected. Also, other more restrictive technical changes have been made to achieve consistency, correct discrepancies, and remove ambiguities from the specification. Examples of more restrictive requirements include: placing a Limiting Condition for Operation (LCO) on plant equipment which is not required by the present TS to be operable; more restrictive requirements to restore inoperable equipment; and more restrictive surveillance requirements.

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Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed revision to the TS. Changes which are administrative in nature have been found to have no effect on the technical content of the TS and are acceptable. The increased clarity and understanding these changes bring to the TS are expected to improve the operators' control of the plant in normal and accident conditions.

Relocation of requirements to other licensee controlled documents does not change the requirements themselves. Future changes to these requirements may be made by the licensee under 10 CFR 50.59 or other NRC approved control mechanisms, which ensures continued maintenance of adequate requirements. All such relocations have been found to be in conformance with the guidelines of NUREG-1434 and the Final Policy Statement, and are, therefore, acceptable.

Changes involving more restrictive requirements have been found to enhance plant safety and to be acceptable.

Changes involving less restrictive requirements have been reviewed individually. When requirements have been shown to provide little or no safety benefit or to place unnecessary burden on the licensee, their removal from the TS was justified. In most cases, relaxations previously granted to individual plants on a plant specific basis were the result of a generic action, or of agreements reached during discussions with the OG and found to be acceptable for WNP-2. Generic relaxations contained in NUREG-1434 have also been reviewed by the NRC staff and have been found to be acceptable.

In summary, the proposed revisions to the TS were found to provide control of plant operations such that reasonable assurance will be provided that the health and safety of the public will be adequately protected.

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These TS changes will not increase the probability or consequences of accidents, no changes are being made in the types of any effluent that may be released offsite, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure. Therefore, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed TS amendment.

With regard to potential nonradiological impacts, the proposed amendment involves features located entirely within the restricted area as defined in 10 CFR Part 20. They do not affect nonradiological plant effluents and have no other environmental impact. Therefore, the Commission concludes that there are no significant nonradiological impacts associated with the proposed amendments.

<u>Alternatives to the Proposed Action:</u>

Since the Commission has concluded there is no measurable environmental impact associated with the proposed amendments, any alternatives with equal or greater environmental impact need not be evaluated. The principal alternative to this action would be to deny the amendment request. Such action would not reduce the environmental impacts of plant operations.

Alternative Use of Resources:

This action does not involve the use of resources not previously considered in the Final Environmental Statement for WNP-2.

Agencies and Persons Consulted:

In accordance with its stated policy, on August 22, 1996, the Commission consulted with the Washington State official, Mr. R. R. Cowley of the Department of Health, State of Washington Energy Facility Site Evaluation

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Council, regarding the environmental impact of the proposed action. The State official had no comments.

FINDING OF NO SIGNIFICANT IMPACT:

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's letter dated December 8, 1995, as supplemented by letter dated July 9, 1996, which are available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, N.W., Washington, D.C. 20555, and at the local public document room located at the Richland Public Library, 955 Northgate Street, Richland, Washington 99352.

Dated at Rockville, Maryland, this 18th day of September 1996.

FOR THE NUCLEAR REGULATORY COMMISSION

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