

**ATTACHMENT 6**

**PNP 2018-025**

**No Significant Hazards Consideration**

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**NO SIGNIFICANT HAZARDS CONSIDERATION**

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**1.0 DESCRIPTION OF AMENDMENT REQUEST**

The proposed change requests the adoption of an approved change to the standard technical specifications (STS) for Combustion Engineering Plants (NUREG-1432), to allow relocation of specific technical specification surveillance frequencies to a licensee controlled program. The proposed change is described in Technical Specification Task Force (TSTF) Traveler TSTF-425, Revision 3 (ADAMS Accession No. ML090850642) related to the Relocation of Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b and was described in the Notice of Availability published in the Federal Register on July 6, 2009 (74 FR 31996).

The proposed changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Traveler TSTF-425, Revision 3, *Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b*. The proposed change relocates surveillance frequencies to a licensee-controlled program, the Surveillance Frequency Control Program (SFCP). This change is applicable to licensees using probabilistic risk guidelines contained in NRC-approved NEI 04-10, *Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies* (ADAMS Accession Number ML071360456).

**2.0 BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION**

As required by 10 CFR 50.91(a), Entergy Nuclear Operations, Inc. (ENO) analysis of the issue of no significant hazards consideration is presented below:

1. Does the proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

**Response: No**

The proposed change relocates the specified frequencies for periodic surveillance requirements to licensee control under a new Surveillance Frequency Control Program. Surveillance frequencies are not an initiator to any accident previously evaluated. As a result, the probability of any accident previously evaluated is not significantly increased. The systems and components required by the technical specifications for which the surveillance frequencies are relocated are still required to be operable, meet the acceptance criteria for the surveillance requirements, and be capable of performing any mitigation function assumed in the accident analysis. As a result, the consequences of any accident previously evaluated are not significantly increased.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any previously evaluated?

**Response: No**

No new or different accidents result from utilizing the proposed change. The changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. In addition, the changes do not impose any new or different requirements. The changes do

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not alter assumptions made in the safety analysis. The proposed changes are consistent with the safety analysis assumptions and current plant operating practice.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in the margin of safety?

**Response: No**

The design, operation, testing methods, and acceptance criteria for systems, structures, and components (SSCs), specified in applicable codes and standards (or alternatives approved for use by the NRC) will continue to be met as described in the plant licensing basis (including the Final Safety Analysis Report and Bases to TS), since these are not affected by changes to the surveillance frequencies. Similarly, there is no impact to safety analysis acceptance criteria as described in the plant licensing basis. To evaluate a change in the relocated surveillance frequency, ENO will perform a probabilistic risk evaluation using the guidance contained in NRC approved NEI 04-10, Rev. 1 in accordance with the TS SFCP. NEI 04-10, Rev. 1, methodology provides reasonable acceptance guidelines and methods for evaluating the risk increase of proposed changes to surveillance frequencies consistent with Regulatory Guide 1.177.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based upon the reasoning presented above, ENO concludes that the requested change does not involve a significant hazards consideration as set forth in Title 10 of the Code of Federal Regulations, Part 50, Section 92 (10 CFR 50.92), *Issuance of Amendment*, paragraph (c).