

Attachment 1
PY-CEI/NR...313 L

PROPOSED PNPP TECHNICAL SPECIFICATION CHANGES
FOR
GENERIC LETTER 91-01 IMPLEMENTATION

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REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

4.4.6.1.2 The reactor coolant system temperature and pressure shall be determined to be to the right of the criticality limit line of Figure 3.4.6.1-1 curves C and C' within 15 minutes prior to the withdrawal of control rods to bring the reactor to criticality and at least once per 30 minutes during system heatup.

4.4.6.1.3 The reactor vessel material surveillance specimens shall be removed and examined, to determine changes in reactor pressure vessel material properties as required by 10 CFR 50, Appendix R, in accordance with the schedule in Table 4.4.6.1-3-1. The results of these examinations shall be used to update the curves of Figure 3.4.6.1-1.

4.4.6.1.4 The reactor vessel flange and head flange temperature shall be verified to be greater than or equal to 70°F:

- a. In OPERATIONAL CONDITION 4 when reactor coolant system temperature is:
 1. $\leq 100^{\circ}\text{F}$, at least once per 12 hours.
 2. $\leq 80^{\circ}\text{F}$, at least once per 30 minutes.
- b. within 30 minutes prior to and at least once per 30 minutes during tensioning of the reactor vessel head bolting studs.

PERRY - UNIT 1

TABLE 4.4.6.1.3-1

REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM-WITHDRAWAL SCHEDULE

<u>CAPSULE NUMBER</u>	<u>VESSEL LOCATION</u>	<u>LEAD FACTOR @ 1/4 T</u>	<u>WITHDRAWAL TIME (EFPY)</u>
131C8981G1	3°	0.58	10
131C8981G1	177°	0.58	30
131C8981G1	183°	0.58	Spare

3/4 4-22

Technical Specification Change to Remove
The Reactor Vessel Material Surveillance Program Withdrawal Schedule
(Table 4.4.6.1.3-1)

Description of Change

Generic Letter 91-01 advised licensees that the subject schedule, Table 4.4.6.1.3-1 (p. 3/4 4-22) in the Perry Technical Specifications, could be removed pursuant to the Commission Policy Statement on Technical Specification Improvements. The subject Change Request removes this Table and reference to it from the Technical Specifications (see Attachment 1 page markings). This proposed change is a supplement to a previous Technical Specification change request regarding the Pressure-Temperature Limits Specification (3.4.6.1). Other changes described in our previous change request letter PY-CEI/NRR-1188L, dated 9/14/90, also omit Table references.

This change does not affect plant design or operations as described in the Perry USAR, and does not represent a reduction in regulatory control. 10CFR50 Appendix H/41.8.3 requires prior NRC approval of any changes to the subject schedule and technical justification. A companion letter to this change request, PY-CEI/NRR-1314L (dated 3/15/91) provides this information for NRC approval, and the withdrawal schedule will be retained in the Perry USAR (Section 5.3.1.6.1) as a matter of docketed record.

Significant Hazards Consideration

The standards used to arrive at a determination that a request for amendment involves no significant hazards considerations are included in the Commission's Regulations, 10CFR50.92, which state that the operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any previously evaluated, or (3) involve a significant reduction in a margin of safety.

CEI has reviewed the proposed amendment with respect to these three factors and has determined that the proposed changes do not involve a significant hazard because:

- (1) The proposed change does not involve a significant increase in the probability or consequences of a previously evaluated accident; the proposed change remains consistent with the provisions of 10CFR50 Appendices G and H, and its references. Removal of this table from the Technical Specifications and inclusion of the withdrawal schedule in the USAR will not impact material surveillance activities and resulting updates to the minimum reactor vessel metal temperature versus pressure curve (Specification 3.4.6.1).

The reactor vessel surveillance program will continue to incorporate newly derived lead factors, vessel fluence, and temperature shift to revise the withdrawal schedule for the surveillance capsules in accordance with ASTM E185-82. This is merely an administrative program change regarding which document is used to identify the withdrawal schedule. The withdrawal schedule will still exist and receive prior NRC approval before change. Therefore this proposed change cannot affect either the probability or consequences of any previously evaluated accidents.

- (2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change does not involve any new modes of operation. This is purely an administrative change regarding which document is used to identify the withdrawal schedule. Therefore, no new failure mode or accident sequence is introduced.
- (3) The proposed change does not involve a significant reduction in the margin of safety because the change in the withdrawal schedule documentation is administrative in nature, and will not result in any change to the reactor vessel material surveillance program itself. Therefore, the proposed change cannot impact any margins of safety.

Environmental Impact Considerations

The proposed Technical Specification change has been reviewed against the criteria of 10CFR51.22 for environmental considerations. As shown above, the proposed change does not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, CEI concludes that the proposed Technical Specification changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.