

ATTACHMENT B

ZION NUCLEAR GENERATING STATION

**MARKED UP ANNOTATED COPY OF
CURRENT TECHNICAL SPECIFICATIONS
FOR PROPOSED CHANGES TO**

**APPENDIX A TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSES
DPR-39 AND DPR-48**

10CFR50 APPENDIX J EXEMPTION ALLOWANCE

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LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p>3.10 <u>CONTAINMENT STRUCTURAL INTEGRITY</u> (per unit)</p> <p><u>OBJECTIVE:</u></p> <p>To insure that the containment structure meets its design requirements throughout plant life.</p> <p><u>SPECIFICATION:</u></p> <ol style="list-style-type: none"> 1. Containment Leakage Rate Testing <ol style="list-style-type: none"> A. Containment Leakage Rate shall be limited to: <ol style="list-style-type: none"> 1. An overall integrated leakage rate of: <ol style="list-style-type: none"> a. Less than or equal to L_a, 0.10 percent by weight of the containment air per 24 hours at P_a (47 psig), or b. Less than or equal to L_t, where L_t is as computed in 10CFR 50 Appendix J, is the maximum allowable leakage rate at pressure P_t (25 psig) 2.* A combined leakage rate of less than or equal to 0.60 L_a, for all penetrations and valves subject to Type B and C tests, when pressurized to P_a. <p><u>APPLICABILITY:</u> Modes 1, 2, 3, 4 and 7</p> <p>*Refer to note on page 214.</p>	<p>4.10 <u>CONTAINMENT STRUCTURAL INTEGRITY</u> (per unit)</p> <p><u>OBJECTIVE:</u></p> <p>To establish the testing requirements to assure containment structural integrity.</p> <ol style="list-style-type: none"> 1. Containment Leakage Rate Testing <ol style="list-style-type: none"> A. Surveillance and testing of the containment shall be performed as follows: <ol style="list-style-type: none"> 1. The containment Type A leakage rate shall be determined in conformance with 10CFR50 Appendix J, <div data-bbox="1078 768 1466 867" style="border: 1px solid black; border-radius: 50%; padding: 5px; display: inline-block; margin: 5px;">and approved exemptions</div> <ol style="list-style-type: none"> a. The leakage rate test shall be performed at or above the design basis accident pressure P_a (47 psig), or at or above the reduced pressure P_t (25 psig). b. Deleted

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p>3.10.1.A (Continued)</p> <p><u>ACTION:</u></p> <p>* With either (a) the measured overall integrated containment leakage rate exceeding $0.75 L_a$ or $0.75 L_t$, as applicable, or (b) with the measured combined leakage rate for all penetrations and valves subject to Type B and C tests exceeding $0.60 L_a$, restore the overall integrated leakage rate to less than or equal to $0.75 L_a$ or less than or equal to $0.75 L_t$, as applicable, and the combined leakage rate for all penetrations subject to Type B and C tests to less than or equal to $0.6 L_a$ prior to entering MODE 4.</p>	<p>4.10.1.A.1. c. The maximum allowable leakage rate L_a or L_t, as applicable, shall be computed in accordance with the appropriate paragraphs of 10CFR50 Appendix J</p> <p><i>and approved exemptions</i></p> <p>2.* Type B and C tests (except air lock tests) shall be performed at P_a or above in accordance with the provisions of the appropriate Section of 10CFR50 Appendix J <i>and approved exemptions</i></p> <p>3. Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.10.2.</p> <p>4.* Type A, B, and C leakage rate tests shall be considered to be satisfactory if the acceptance criteria delineated in 10CFR50 Appendix J are met.</p> <p>5. Leakage from containment isolation valves sealed by the Isolation Valve Seal Water system may be excluded from the combined Type B and C leakage rate.</p> <p><i>and approved exemptions</i></p>

*Refer to note on page 214.

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LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10.1.A (Continued)	<p>4.10.1.A. 6.* The retest schedules for Type A, B, and C tests shall be in accordance with the appropriate Section of 10CFR50 Appendix J. <i>and approved exemptions</i></p> <p>7. Inspection and reporting of tests shall be in accordance with the appropriate Section of 10CFR50 Appendix J. <i>and approved exemptions</i></p>

*The following exceptions *apply*: *applies*

1) Prior to entering Mode 5 for refueling outage Z1R14, the Type C leak rate testing requirements of this specification are not applicable to Unit 1 valve 1MOV-CC685.

~~2) Prior to entering Mode 5 for refueling outage Z2R13, the Type C leak rate testing requirements of this specification are not applicable to Unit 2 valve 2MOV-CC685.~~

ATTACHMENT C

ZION NUCLEAR GENERATING STATION

EVALUATION OF SIGNIFICANT HAZARD CONSIDERATIONS
FOR PROPOSED CHANGES TO

APPENDIX A TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSES
DPR-39 AND DPR-48

10CFR50 APPENDIX J EXEMPTION ALLOWANCE

ComEd has evaluated this proposed license amendment and determined that it involves no significant hazard considerations. According to 10CFR50.92(c), a proposed amendment to an operating license involves no significant hazard considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;
2. Create the possibility of a new or different kind of accident from any previously analyzed; or,
3. Involve a significant reduction in a margin of safety.

ComEd proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses DPR-39 and DPR-48 to add allowances to perform testing in accordance with 10CFR50 Appendix J and approved exemptions.

1. **The proposed amendment does not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated.**

The proposed changes to Technical Specifications to add an allowance to test in accordance with approved exemptions to 10CFR50 Appendix J are administrative in nature and will not affect any accident initiators or precursors. 10CFR50 Appendix J provides the requirements to periodically test the primary reactor containment. The objective of these requirements is to ensure that leakage from the primary reactor containment structure and systems and components that penetrate the containment is maintained below the limits established for containment leakage. The performance of periodic integrated leakage rate testing (Type A) and local penetration testing (Type B and C) during containment life provides a current assessment of potential leakage from containment during accident conditions.

10CFR50.12 allows the Commission to grant specific exemptions to the requirements of 10CFR50 Appendix J when those exemptions are authorized by law, will not present undue risk to the public, and are consistent with the common defense and security. In addition, special circumstances must exist as described in Section 50.12. Since all exemptions to 10CFR50 Appendix J receive NRC review and approval prior to being implemented, all containment leakage rate testing will continue to be performed in accordance with NRC approved methodologies when relying upon the allowance that is added to the Technical Specifications by the proposed amendment. The proposed changes are consistent with the requirements provided in NUREG-1431, "Standardized Technical Specifications, Westinghouse Plants" which has been approved by the NRC.

The proposed changes will not affect any accident initiators or precursors and will not change or alter the design assumptions for the systems used to mitigate the consequences of an accident. The proposed changes do not involve the addition of any new or different type of equipment, nor do they involve the operation of equipment required for safe operation of the facility in a manner different from those addressed in the UFSAR. There are no changes to parameters governing plant operation as a result of the proposed changes. The results and conclusions in the Zion Updated Final Safety Analysis Report (UFSAR) are unaffected by this proposed License Amendment.

Based on the previous discussion, the proposed changes do not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes to Technical Specifications to add an allowance to perform containment leakage rate testing in accordance with approved exemptions to 10CFR50 Appendix J are administrative in nature and do not involve the addition of any new or different types of safety related equipment, nor does it involve the operation of equipment required for safe operation of the facility in a manner different from those addressed in the safety analyses. The proposed changes may only affect the methods used to perform containment leakage rate testing while in a shutdown condition. No safety related equipment or function will be altered as a result of the proposed changes. Also, the procedures governing normal plant operation and recovery from an accident are not changed by the proposed Technical Specification changes. Since no new failure modes or mechanisms are added by the proposed changes, the possibility of a new or different kind of accident is not created.

3. The proposed changes do not involve a significant reduction in the margin of safety.

Given the proposed changes to Technical Specifications, testing would be allowed in accordance with approved exemptions to Appendix J. Exemptions are allowed by the Commission in accordance with 10CFR50.12 when it is shown that the exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. In addition, special circumstances must exist.

The proposed changes will not impact any margin of safety and testing in accordance with approved exemptions will not involve a significant reduction in a level of safety since containment leakage testing is performed while in a shutdown condition. In addition, it is likely that any test methodology that significantly reduces a margin of safety would not be approved by the NRC.

The ability to safely shutdown the operating unit and mitigate the consequences of all accidents previously evaluated will be maintained. Therefore, the margin of safety is not significantly affected.

ATTACHMENT D

ZION NUCLEAR GENERATING STATION

ENVIRONMENTAL ASSESSMENT STATEMENT
FOR PROPOSED CHANGES TO

APPENDIX A TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSES
DPR-39 AND DPR-48

10CFR50 APPENDIX J EXEMPTION ALLOWANCE

The proposed changes of this license amendment request have been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10CFR51.22(c)(9). The following is a discussion of how the proposed changes meet the criteria for categorical exclusion:

10CFR 51.22(c)(9): Although the proposed changes involve changes to Limiting Conditions for Operation, and Surveillance Requirements associated with Limiting Conditions for Operation,

- (i) The proposed changes involve no significant hazards considerations (refer to Attachment C of this license amendment request).
- (ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, since the proposed changes do not affect the generation of any radioactive effluent nor do they affect any of the permitted release paths.
- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Based on the forementioned and pursuant to 10CFR51.22(b), no environmental assessment or environmental impact statement need be prepared in connection with issuance of a license amendment incorporating these proposed changes.