# UNITED STATES NUCLEAR REGULATORY COMMISSION GEORGIA POWER COMPANY, ET AL. DOCKET NOS. 50-424 AND 50-425 VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 and 2 ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of amendments to Facility Operating License Nos. NPF-68 and NPF-81, issued to Georgia Power Company, et al. (the licensee) for operation of the Vogtle Electric Generating Plant (Vogtle), Units 1 and 2, located at the licensee's site in Burke County, Georgia.

## ENVIRONMENTAL ASSESSMENT

#### Identification of Proposed Action:

This Environmental Assessment has been prepared to address potential environmental issues related to the licensee's application dated May 1, 1995, as supplemented by letters dated August 3 and 9, September 22, November 20, and December 21, 1995, and January 26 and 30, 1996. The proposed action will replace the existing Vogtle Technical Specifications (TS) in their entirety with a new set of TS based on Revision 1 to NUREG-1431, "Standard Technical Specifications Westinghouse Plants," and the existing VEGP TS.

### 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,"

7590-01

(52 FR 3788, February 6, 1987), and later the Final Policy Statement (58 FR 39132, July 22, 1993), formalized this need. To facilitate the development of individual improved TS, each reactor vendor owners group (OG) and the NRC staff developed standard TS (STS). For Westinghouse plants, the STS are published as NUREG-1431, and this document was the basis for the new Vogtle TS. The NRC Committee to Review Generic Requirements (CRGR) reviewed the STS and made note of the safety merits of the STS and indicated its support of conversion to the STS by operating plants.

# Description of the Proposed Change:

The proposed revision to the TS is based on NUREG-1431 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-1431, portions of the existing TS were also used as the basis for the improved TS (ITS). Plant-specific issues (unique design features, requirements, and operating practices) were discussed at length with the licensee, and generic matters with the OG.

The proposed changes from the existing TS can be grouped into four general categories, as follows:

1. Non-technical (administrative) changes, which were intended to make the ITS easier to use for plant operations personnel. They are purely editorial in nature or involve the movement or reformatting of requirements without affecting technical content. Every section of the Vogtle TS has undergone

-?-

these types of changes. In order to ensure consistency, the NRC staff and the licensee have used NUREG-1431 as guidance to reformat and make other administrative changes.

2. Relocation of requirements, which includes items that were in the existing Vogtle TS but did not meet the criteria set forth in the Final Policy Statement for inclusion in the TS. In general, the proposed relocation of items in the Vogtle TS to the Final Safety Analysis Report (FSAR), appropriate plant-specific programs, procedures and ITS Bases follows the guidance of the Westinghouse STS (NUREG-1431). Once these items have been relocated by removing them from the TS to licensee-controlled documents, the licensee may revise them under the provisions of 10 CFR 50.59 or other NRC staff-approved control mechanisms, which provide appropriate procedural means to control changes.

3. More restrictive requirements, which consist of proposed Vogtle ITS items that are either more conservative than corresponding requirements in the existing Vogtle TS, or are additional restrictions that are not in the existing Vogtle TS but are contained in NUREG-1431. Examples of more restrictive requirements include: placing a Limiting Condition of Operation (LCO) on plant equipment that is not required by the present TS to be operable; more restrictive requirements to restore inoperable equipment; and more restrictive surveillance requirements.

4. Less restrictive requirements, which are relaxations of corresponding requirements in the existing Vogtle TS that provide little or no safety benefit and place unnecessary burdens on the licensee. These relaxations were the result of generic NRC actions or other analyses. They have been justified

-3-

on a case-by-case basis for Vogtle as will be described in the staff's Safety Evaluation to be issued with the license amendments, which will be noticed in the FEDERAL REGISTER.

In addition to the changes described above, the licensee proposed certain changes to the existing TS that deviated from the STS in NUREG-1431. Each of these additional proposed changes is described in the licensee's application and in the staff's Notice of Consideration of Issuance of Amendments to Facility Operating Licenses and Opportunity for a Hearing (60 FR 46633). These changes have been justified on a case-by-case basis for Vogtle as will be described in the staff's Safety Evaluation to be issued with the license amendments.

#### Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed action and concludes that the proposed TS conversion would not increase the probability or consequences of accidents previously analyzed and would not affect facility radiation levels or facility radiological effluents.

Changes that 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 operator's control of the plant in normal and accident conditions.

Relocation of requirements to 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

-4-

such relocations have been found to be in conformance with the guidelines of NUREG-1431 and the Final Policy Statement, and, therefore, are acceptable.

Changes involving more restrictive requirements have been found to be acceptable and are likely to enhance the safety of plant operations.

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 burdens 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 NRC action, or of agreements reached during discussions with the OG and found to be acceptable for Vogtle. Generic relaxations contained in NUREG-1431 as well as proposed deviations from NUREG-1431 have also been reviewed by the NRC staff and have been found to be acceptable.

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

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 action.

With regard to potential nonradiological impacts, the proposed action involves features located entirely within the restricted area as defined in 10 CFR Part 20. It does not affect nonradiological plant effluents and has no

-5-

other environmental impact. Accordingly, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed action.

## Alternatives to the Proposed Action:

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 request for amendments. Such action would not reduce the environmental impacts of plant operations.

## Alternative Use of Resources:

This action did not involve the use of any resources not previously considered in the Final Environmental Statement related to the operation of the Vogtle Electric Generating Plant.

# Agencies and Persons Consulted:

In accordance with its stated policy, on February 8, 1996, the staff consulted with the Georgia State official, Mr. James Hardeman of the Environmental Protection Division, Georgia Department of Natural Resources, 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 amendments.

-6-

For further details with respect to this action, see the licensee's letter dated May 1, 1995, and supplemental letters dated August 3 and 9, September 22, November 20, and December 21, 1995, and January 26 and 30, 1996, which are available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document room located at the Burke County Library, 412 Fourth Street, Waynesboro, Georgia.

Dated at Rockville, Maryland, this 27th day of February 1996.

FOR THE NUCLEAR REGULATORY COMMISSION

Leonard A. Wiens, Acting Director Project Directorate II-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation