

3/5/84

Note to: G. Gears

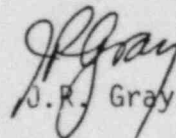
From: J. Gray

SUBJECT: PEACH BOTTOM AMENDMENT CHANGING LCO ACTION STATEMENT FOR
REACTOR WATER CLEANUP (RWCU) SYSTEM

OELD has been asked to concur in a notice and proposed NSHC finding for certain license amendments for Peach Bottom. While the notice and stated bases for the NSHC findings for most of the changes appear to be adequate, I have problems with the basis for the NSHC finding for the change involving the RWCU System. That change would relax an LCO on the inoperability of a high temperature instrument switch.

The problems I have with the basis you propose for finding NSHC is that you have not provided an affirmative basis for NSHC (either by showing that one of the Commission's examples of an action involving NSHC applies or by showing that the change does not significantly increase the probability or consequences of an accident, does not create a new accident, and does not significantly reduce a safety margin). Rather, you show that one of the examples of actions that would involve significant hazards considerations may not apply. That is not good enough. We must make an affirmative showing that the change involves no significant hazards considerations.

Because I believe that, for the RWCU change, we have not provided an adequate basis for the proposed NSHC finding, I am not prepared to concur in the notice as presently constituted.


J.R. Gray

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March 9, 1984

Note to: G. Dick

From: J. Gray

SUBJECT: FUEL CHANGE AMENDMENT FOR GINNA

OELD has been asked to concur in a proposed notice and proposed no significant hazards consideration finding (NSHC) for an amendment to the Ginna license which would authorize the use of a new and different kind of fuel and modify various technical specifications to accommodate the new fuel. I don't believe that there is adequate support or basis for the proposed NSHC finding.

Rather than show that one of the Commission's examples of actions not likely to involve SHC applies to the amendment, it is stated that NSHC is involved because the amendment will not significantly increase the probability or consequences of accidents, significantly decrease a safety margin or create a new accident. While statements are made on pages 2 and 3 of the proposed notice about how the new fuel and core was analyzed and how Westinghouse criteria are satisfied, there is no apparent relationship between these various statements and the criteria for finding NSHC. I believe that you must show how each proposed change to the technical specifications meets the NSHC criteria. For example, demonstrate that the positive moderator temperature coefficient which these changes would authorize would not result in a significant increase in the consequences of accident and would not create the possibility of a new accident not previously considered.

The present notice does not provide a rational basis for concluding that the proposed amendment involves NSHC. Because of that, I am not prepared to concur in it.

J. R. Gray
J. R. Gray

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