



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 29, 1986

MEMORANDUM FOR: H. Denton R. Houston G. Hulman
D. Eisenhut D. Crutchfield B. D. Liaw
J. Lyons J. Knight D. Vassallo
M. Thompson G. Laines W. Regan
F. Miraglia T. Speis V. Benaroya
R. Bernero W. Russell
T. Novak G. Holahan
F. Schroeder E. Adensam
W. Butler D. Muller

FROM: John A. Zwolinski, Director
BWR Project Directorate #1
Division of BWR Licensing

SUBJECT: DAILY HIGHLIGHT - MEETING NOTICE

Time & Date: Thursday
January 30, 1986
8:30 a.m. - 4:00 p.m.

Location: Room P-118
Phillips Building
Bethesda, Maryland

Purpose: Round table discussion of issues affecting the utilities
under BWD #1 and the NRC. Intended to be a working level
meeting between the NRC Project Managers and their counter-
parts in the utilities.

Requested
Participants: NRC Utilities

J. Zwolinski	Consumers Power
R. Gilbert	Commonwealth Edison
J. Stang	Dairyland Power
R. Auluck	Northern States
R. Hermann	Niagara Mohawk
J. Donohew	GPU Nuclear
P. Leech	Boston Edison
R. Bevan	
J. Kelly	

John A. Zwolinski

John A. Zwolinski, Director
BWR Project Directorate #1
Division of BWR Licensing

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PDR ADOCK 05000010
P PDR

**BWD1
COUNTERPARTS
MEETING**

1/30/88

THE SHOLLY PROCESS

- 1. LICENSEE SUBMITS TECH. SPEC. CHANGE DESCRIPTION, AND ADDRESSES THE THREE NHSC CRITERIA – 10CFR50.92(c)**
- 2. PROJECT MANAGER WRITES THE FEDERAL REGISTER NOTICE CONCERNING THE CHANGE; THUS PROVIDING A BASIS FOR THE PROPOSED NSHC CONCLUSION**

PROBLEMS

WITH THE SHOLLY PROCESS

- 1. LICENSEES TYPICALLY REFER TO THE COMMISSION'S EXAMPLES IN 48FR14870 RATHER THAN ADDRESSING THE THREE NSHC CRITERIA**
- 2. LICENSEES TYPICALLY STATE THAT THE CHANGE MEETS THE NHSC WITHOUT PROVIDING A BASIS FOR ITS CONCLUSIONS**
- 3. THE COMMISSION'S EXAMPLES WERE TO BE USED BY THE STAFF. HOWEVER, THE LICENSEES WERE PERMITTED TO USE THE EXAMPLES ONLY TO REDUCE THE INVENTORY OF CHANGE REQUESTS**

LICENSE AMENDMENT

NSHC CRITERIA (1)

**THE AMENDMENT WOULD NOT INVOLVE
A SIGNIFICANT INCREASE IN THE
PROBABILITY OR CONSEQUENCES OF
AN ACCIDENT PREVIOUSLY EVALUATED.**

LICENSE AMENDMENT

NSHC CRITERIA (2)

**THE AMENDMENT WOULD NOT CREATE
THE POSSIBILITY OF A NEW OR
DIFFERENT KIND OF ACCIDENT FROM
ANY ACCIDENT PREVIOUSLY EVALUATED.**

LICENSE AMENDMENT

NSHC CRITERIA (3)

**THE AMENDMENT WOULD NOT INVOLVE
A SIGNIFICANT REDUCTION IN THE
MARGIN OF SAFETY.**

COMMENTS ON FINAL REGULATIONS **FOR THE SHOLLY PROCESS**

1. PROVIDES TWO ADDITIONAL EXAMPLES
FOR PRELIMINARY CONCLUSION OF NHSC.
 - a. REPAIR OR REPLACEMENT OF A MAJOR
COMPONENT OR SYSTEM IMPORTANT TO
SAFETY IF TWO CONDITIONS ARE MET.
 - b. STORAGE CAPACITY EXPANSION OF
THE SPENT FUEL POOL WHEN FOUR
CONDITIONS ARE MET.

*** EXEMPTIONS**

*** ENVIRONMENTAL
ASSESSMENTS**

*** FEE RECOVERY**

• ROLE OF BACKUP PROJECT MANAGER

*** IMPLEMENTATION OF THE FINAL
RULE AMENDING 10CFR 50.12(a),
SPECIFIC EXEMPTIONS.**

**"THE REVISED CRITERIA WOULD
AUTHORIZE THE COMMISSION TO GRANT
EXEMPTIONS WHICH, ARE AUTHORIZED
BY LAW, WILL NOT PRESENT AN UNDUE
RISK TO PUBLIC HEALTH AND SAFETY, ARE
CONSISTENT WITH THE COMMON DEFENSE
AND SECURITY, AND ARE JUSTIFIED BY
SPECIAL CIRCUMSTANCES."**

BACKFITTING

PLANT SPECIFIC BACKFITTING

- **NEW RULE — PUBLISHED FR SEPTEMBER 20, 1985
EFFECTIVE OCTOBER 21, 1985**
- **IMPLEMENTATION VIA NRC
MANUAL CHAPTER 514**
 - **SECY-85-142 — APRIL 19, 1985**
 - **NOVEMBER 1985**
- **ESTABLISHMENT OF REQUIREMENT DATES**
- **NEED FOR REGULATORY ANALYSIS**
- **BACKFIT VS. TECHNICAL APPEAL**

**EMERGENCY
LICENSE
AUTHORIZATION**

EMERGENCY LICENSE AUTHORIZATION

- TO AVOID PLANT SHUTDOWN, DERATING OR EXTENDED OUTAGE
- LESS THAN 15 DAYS AVAILABLE FOR NRC APPROVAL
- FORMAL SUBMITTAL NEEDED FROM LICENSEE

ACTIONS TO BE DONE BY NRC STAFF

- **VERIFY NEED FOR EMERGENCY LICENSE AUTHORIZATION**
- **PREPARE SAFETY EVALUATION (SE)**
- **CONSULT STATE, AND MODIFY SE IF NECESSARY**
- **ADVISE LICENSEE OF AUTHORIZATION OR DENIAL**
- **ISSUE FOLLOW-UP LICENSE AMMENDMENT AND POST NOTICE IN FEDERAL REGISTER**

CONTENT OF LICENSEE'S SUBMITTAL

- **STATEMENT OF ACTION REQUESTED**
- **DISCUSSION OF THE CIRCUMSTANCES**
- **SCHEDULED DATE FOR RETURNING COMPONENT OR SYSTEM TO OPERATION, OR ACCOMPLISHING A REQUIRED SURVEILLANCE**
- **DISCUSSION OF INTERIM COMPENSATORY MEASURES**
- **SAFETY EVALUATION WITH NO SIGNIFICANT HAZARDS DETERMINATION**
- **REVISED TECHNICAL SPECIFICATIONS PAGES**
- **INFORMATION FOR NRC TO PREPARE ENVIRONMENTAL ASSESSMENT OR DETERMINE CATEGORICAL EXCLUSION**
- **STATEMENT REGARDING NOTIFICATION OF STATE**

TEMPORARY WAIVER OF COMPLIANCE WITH AN LCO

- TO AVOID PLANT SHUTDOWN OR STARTUP DELAY
- TO ALLOW TIME FOR PROCESSING EMERGENCY AMENDMENT
- WHEN A LICENSE AMENDMENT IS INAPPROPRIATE
- NORMALLY NOT TO EXCEED TWO WORKING DAYS

**PLANT
LIFE
EXTENSION**

EXTENDING THE OPERATING LICENSE DURATION

- **FACILITY LICENSE CAN BE AMENDED TO ALLOW OPERATION FOR 40 YEARS FROM THE DATE OF THE INITIAL OPERATING LICENSE.**
- **LICENSEE MUST SHOW THAT THE EXTENDED OPERATING LIFE WOULD POSE NO SIGNIFICANT SAFETY PROBLEMS.**
- **LICENSEE MUST SUPPLEMENT ITS ENVIRONMENTAL REPORT AS NECESSARY FOR THE STAFF'S ENVIRONMENTAL ASSESSMENT.**
- **CALVERT CLIFFS' REVIEW PROVIDES AN EXAMPLE**

**PRIORITIZATION
OF
LICENSING
ACTIVITY**

PRIORITIZATION **OF LICENSING ACTIVITIES**

- **LICENSEE ESTABLISH PRIORITY FOR YOUR LICENSING ACTIONS**
- **HIGH, MEDIUM, LOW**
- **NUMERICAL**

**PLANT
TECHNICAL
SPECIFICATIONS
UPGRADE**

**PLANT
PERFORMANCE
INDICATORS**

PLANT PERFORMANCE INDICATORS

- **INPO PROGRAM**
 - **REPORT FROM AD HOC UTILITY GROUP, NSSS REPS AND OUTSIDE GROUP (HENDRIE, PIGFORD, RASMUSSEN AND REMICK)**

- **BASELINE GOALS ESTABLISHED FOR FIVE OVERALL INDICATORS**
 - **EQUIVALENT AVAILABILITY FACTOR**
 - **UNPLANNED AUTOMATIC SCRAMS WHILE CRITICAL**
 - **COLLECTIVE RADIATION EXPOSURE**
 - **VOLUME OF LOW LEVEL SOLID RADIOACTIVE WASTE**
 - **INDUSTRIAL SAFETY (LOST TIME ACCIDENT RATE)**

PLANT PERFORMANCE INDICATORS, CON'T.

- **ADDITIONAL SIGNIFICANT INDICATORS**
 - **SAFETY SYSTEM UNAVAILABILITY**
 - **UNPLANNED SAFETY SYSTEM ACTUATIONS**
 - **FORCED (OR UNPLANNED) OUTAGE RATE**
 - **THERMAL PERFORMANCE (HEAT RATE)**
 - **FUEL RELIABILITY**

- **REVISION TO SALP**
 - **INTERACTION WITH PERFORMANCE INDICATORS**

ATTACHMENT B

LICENSE

DOCKET NO.

Supporting Information and No Significant Hazards Conditions Analysis

The proposed amendment of Figure 3.1.7(f) and Section 3.1.7 to the Technical Specifications reflects the addition of Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) limits for the General Electric fuel bundle, type PBDRB299 (Reference 1). These limits were calculated by using the same approved General Electric methods (Reference 2) used for the present fuel type PBDRB277. This proposed amendment change will allow for the use of type PBDRB299 fuel in future reloads.

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis using the standards in 10CFR50.92, about the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92, the following analysis has been performed.

1. The proposed amendment in accordance with the operation of
will not involve a significant increase in the probability or
consequences of an accident previously evaluated.

The methods used to analyze the Loss of Coolant Accident response of the PBDRB299 fuel conform to Appendix K requirements and are identical to those previously used. Results for the type PBDRB299 fuel analysis are included as Figure 3.1.7(f). The peak cladding temperature and maximum oxidation fraction limits are approximately the same as for previous fuel types. Therefore, the proposed amendment will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment in accordance with the operation of
will not create the possibility of a new or different kind of
accident from any accident previously evaluated.

Results for the type PBDRB299 fuel analysis demonstrate that the Loss of Coolant Accident response is approximately the same as for the fuel currently used. The peak cladding temperature and maximum oxidation fraction limits are insignificantly different, and therefore, constitute a one-for-one replacement with the currently used fuel. Therefore, the proposed amendment will not create the possibility of a new or different kind of accident from any previously evaluated.

ATTACHMENT B (Continued)

3. The proposed amendment in accordance with the operation of
will not involve a significant reduction in the margin of safety.

An analysis of the Loss of Coolant Accident response of proposed fuel bundle type P8DPB299 has been completed in accordance with methods previously used. The results of the analysis show that the peak cladding temperature and the maximum oxidation fraction limits are within the limits set by Appendix K and are approximately the same as those previously accepted. Therefore, the proposed amendment in accordance with the operation of will not involve a significant reduction in the margin of safety.

As determined by the analysis above, this proposed amendment has no significant hazards consideration.