

**ATTACHMENT 1**

Point Beach Units 1 and 2

License Amendment Request to Revise Technical Specifications  
to Adopt Risk Informed Completion Times TSTF-505, Revision 2,  
“Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b”

**Evaluation of the Proposed Changes**

<b>1.0</b>	<b>DESCRIPTION</b> .....	2
<b>2.0</b>	<b>ASSESSMENT</b> .....	2
2.1	Applicability of Published Safety Evaluation.....	2
2.2	Facility Description.....	2
2.3	Verifications and Regulatory Commitments .....	3
2.4	Optional Changes and Variations .....	3
2.5	Conclusion .....	9
<b>3.0</b>	<b>REGULATORY ANALYSIS</b> .....	10
3.1	No Significant Hazards Consideration .....	10
3.2	Conclusions .....	11
<b>4.0</b>	<b>ENVIRONMENTAL CONSIDERATION</b> .....	11
<b>5.0</b>	<b>REFERENCES</b> .....	11
	<b>Attachment 2</b> , Proposed Technical Specification Changes (Mark-Up) .....	12
	<b>Attachment 3</b> , Proposed Technical Specification Bases Changes (Mark-Up) .....	58
	<b>Attachment 4</b> , Cross-Reference of TSTF-505, Revision 2, and Point Beach Proposed Changes .....	92
	<b>Attachment 5</b> , Evaluation of Plant-Specific Variations .....	120
	<b>Attachment 6</b> , Point Beach RICT Program Pre-Implementation Items .....	135
	<b>Enclosures (12)</b>	

## **1.0 DESCRIPTION**

NextEra Energy Point Beach, LLC (NextEra) requests amendments to Renewed Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant Units 1 and 2 (Point Beach), respectively. The proposed amendments would modify the Point Beach Technical Specifications (TS) requirements related to Completion Times (CTs) to provide the option to calculate a longer, risk-informed CT (RICT) in accordance with TSTF-505, Revision 2, "Provide Risk-Informed Extend Completion Times - RITSTF Initiative 4b (Reference 5.1). On November 21, 2018, the NRC issued a final safety evaluation for TSTF-505, Revision 2 (Reference 5.2). This amendment request follows the model application provided by the NRC for TSTF-505, Revision 2 (Reference 5.3).

A new program, the Risk-Informed Completion Time Program, is proposed for addition to Point Beach TS Section 5.0, "Administrative Controls". The methodology for using the RICT Program is described in NEI 06-09-A, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines", Revision 0, which was approved by the NRC on May 17, 2007 (Reference 5.44). Adherence to NEI 06-09-A is required by the Point Beach RICT Program.

The changes proposed to the Point Beach TS are consistent with the TS changes described in TSTF-505, Revision 2, with the exception that TSTF-505, Revision 2, describes some TS changes that are not applicable to Point Beach and other, plant-specific TS changes are proposed that are not explicitly described in TSTF-505, Revision 2. Only the TS changes identified in this amendment request are being requested, as reflected in the TS mark-ups pages provided in Attachment 2.

## **2.0 ASSESSMENT**

### **2.1 Applicability of Published Safety Evaluation**

NextEra has reviewed TSTF-505, Revision 2, and the model safety evaluation dated November 21, 2018 (Reference 5.2). The review involved information supporting TSTF-505, Revision 2, and the safety evaluation for NEI 06-09-A (Reference 5.4). As described in this amendment request, NextEra concludes that the technical basis of TSTF-505, Revision 2, is applicable to Point Beach, Units 1 and 2, and supports the incorporation of these amendments into the Point Beach TS.

### **2.2 Facility Description**

NextEra Energy Point Beach, LLC (NextEra) owns and operates Point Beach Nuclear Plant Units 1 and 2 (Point Beach) which is located in the Town of Two Creeks, Manitowoc County, Wisconsin. The nuclear units incorporate a Westinghouse two-loop, closed cycle pressurized water steam supply system and a turbine-generator system utilizing dry and saturated steam.

Point Beach Unit 1 achieved commercial operation in December 1970. Point Beach Unit 2 achieved commercial operation in October 1972. Point Beach Renewed Facility Operating Licenses DPR-24 and DPR-27 expire October 5, 2030 and March 8, 2033, for Point Beach Units 1 and 2, respectively.

In 1967, the Atomic Energy Commission (AEC) published proposed general design criteria (GDC) for nuclear power plants for public comment. The Atomic Industrial Forum (AIF) reviewed the proposed criteria and recommended changes. The Point Beach GDCs documented in the FSAR are similar in content to the Atomic Industrial Forum (AIF) version of the Proposed 1967 GDCs.

### 2.3 Verifications and Regulatory Commitments

In accordance with Section 4.0, Limitations and Conditions, of the safety evaluation for NEI 06-09-A (Reference 5.4), the enclosures listed below are provided as indicated. There are no new or revised regulatory commitments associated with this amendment request.

1. Enclosure 1 identifies each of the TS Required Actions to which the RICT Program will apply and provides a comparison of the structures, systems and components (SSCs) functions subject to those TS actions to the functions modeled in the Point Beach probabilistic risk assessment (PRA). Enclosure 1 also provides additional supporting information requested in Reference 5.2 and Reference 5.3.
2. Enclosure 2 provides a discussion of the results of peer reviews and self-assessments conducted for the plant-specific PRA models which support the RICT Program, as discussed in Regulatory Guide (RG) 1.200, Section 4.2.
3. Enclosure 3 provides information supporting the technical adequacy of PRA models without PRA standards endorsed by RG 1.200, Revision 2.
4. Enclosure 4 provides appropriate justification for excluding sources of risk not addressed by the PRA models.
5. Enclosure 5 provides the plant-specific baseline core damage frequency (CDF) and large early release frequency (LERF) to confirm that the potential risk increases allowed under the RICT Program are acceptable.
6. Enclosure 6 provides a statement regarding the applicability of the Point Beach at-power PRA models to the plant shutdown modes.
7. Enclosure 7 provides a discussion of the licensee's programs and procedures that assure the PRA models that support the RICT Program are maintained consistent with the as-built, as-operated plant.
8. Enclosure 8 provides a description of how the baseline PRA model, which calculates average annual risk, is evaluated and modified to assess real-time configuration risk, and describes the scope of, and quality controls applied to the real-time model.
9. Enclosure 9 provides a discussion of how the key assumptions and sources of uncertainty in the PRA models were identified, and how their impact on the RICT Program was assessed and dispositioned.
10. Enclosure 10 provides a description of the implementing programs and procedures regarding the plant staff responsibilities for the RICT Program implementation, including risk management action (RMA) implementation.
11. Enclosure 11 provides a description of the implementation and monitoring program as described in NEI 06-09-A, Section 2.3.2, Step 7.
12. Enclosure 12 provides a description of the process to identify and provide Risk Management Actions.

### 2.4 Optional Changes and Variations

Attachment 4 of this amendment request provides a cross-reference of the proposed Point Beach TS changes in comparison to TSTF-505, Revision 2, including the administrative and plant-specific variations proposed in this amendment request. Attachment 4 is provided for information only and is not intended to represent a comprehensive assessment of the proposed variations.

#### 2.4.1 Administrative Variations

NextEra proposes the following administrative variations to the TS changes described in TSTF-505, Revision 2:

1. The NRC's model application for adopting TSTF-505, Revision 2 (Reference 5.3), includes as an attachment, the retyped (clean) TS pages. NextEra will instead provide the retyped TS pages upon the NRC's request following finalization of the scope of the proposed TS changes. This variation is administrative with no impact on the applicability of TSTF-505, Revision 2, or the NRC's model safety evaluation (Reference 5.2 to Point Beach).
2. Application of the Point Beach RICT Program shall only apply in MODES 1 and 2. No changes are proposed to the Point Beach TS which authorize RICT in plant MODES other than MODES 1 and 2. This variation is administrative with no impact on the applicability of TSTF-505, Revision 2, or the NRC's model safety evaluation.
3. For Required Actions in the Westinghouse Standard Technical Specifications (STS) of NUREG-1431 (Reference 5.5) that are not included in the Point Beach TS, the corresponding changes proposed in TSTF-505, Revision 2, are not applicable and will not be incorporated into the Point Beach TS. This variation is administrative with no impact on the applicability of TSTF-505, Revision 2, or the NRC's model safety evaluation.
4. In some instances, the Point Beach TS Required Actions are numbered and formatted differently from NUREG-1431, Revision 4 the Standard Technical Specifications (STS) upon which TSTF-505, Revision 2, is based. The Point Beach TS are based on NUREG-1431, Revision 1 (Reference 5.6), and subsequent changes to NUREG, Revision 1, that revised Required Action numbering and formatting were not all adopted and incorporated into the Point Beach TS. This variation is administrative with no impact on the applicability of TSTF-505, Revision 2, or the NRC's model safety evaluation.
5. The Point Beach TS conversion to NUREG-1431, Revision 1, retained elements of an earlier Point Beach TS that were consistent with the licensing basis but in some cases differed from NUREG-1431, Revision 1, and thereby NUREG-1431, Revision 4, and TSTF-505, Revision 2. These differences include editorial variations in the corresponding provisions or passages describing the LCOs and/or Required Actions. Except where noted in Section 2.4.2 of this amendment request as comprising a technical difference between the Point Beach TS and TSTF-505, Revision 2, these variations are administrative with no impact on the applicability of TSTF-505, Revision 2, or the NRC's model safety evaluation.
6. TSTF-505, Revision 2, modifies several Required Action 'Conditions' for the RPS and ESFAS instrumentation by relocating the Required Action and associated Completion Time 'not met' requirements (aka default Condition requirements) to newly created Conditions. For example, TSTF-505, Revision 2, splits STS 3.3.1, Condition B, into Conditions B and (new) Z, where Condition Z requires MODE 3 entry within 6-hours if the RICT of Condition B is not met. The proposed Point Beach TS similarly relocates default requirements to newly created Conditions but only for the TS Conditions proposed for RICT. No changes are proposed to Required Action Conditions that will not be subject to RICT. In addition, the lettering of the new Conditions proposed for the Point Beach TS may differ from the lettering of TSTF-505, Revision 2. These variations are administrative with no impact on the applicability of TSTF-505, Revision 2, or the NRC's model safety evaluation. The locations of the current and proposed Completion Time (CT) default requirements are listed in the table below for the subject RPS and ESFAS functional units (FUs). Any plant-specific variations associated with these FUs are evaluated in latter sections of this amendment request.

Point Beach TS	FU#	Instrumentation	Current CT Default Condition	Relocated CT Default Condition
TS 3.3.1, Table 3.3-1	FU1	Manual Rx Trip (Modes 1,2)	B	Y
	FU2a	Power Range Neutron Flux High	D	Y
	FU2b	Power Range Neutron Flux Low	D	Y
	FU5	Overtemperature ΔT	D	Y
	FU6	Overpower ΔT	D	Y
	FU7a	Pressurizer Pressure - Low	K	Z
	FU7b	Pressurizer Pressure - High	D	Y
	FU8	Pressurizer Water Level - High	K	Z
	FU9a	RCS Flow - Low (single loop)	L	AA
	FU9b	RCS Flow - Low (2 loops)	K	Z
	FU10a	RCP breaker position one loop	M	AA
	FU10b	RCP breaker position 2 loops	N	Z
	FU11	Undervoltage Bus A01, A02	K	Z
	FU12	Underfrequency Bus A01, A02	E	Z
	FU13	SG water level low-low	D	Y
	FU14	SG water level low; coincident w/ steam flow/ feed flow mismatch	D	Y
	FU15a	Turbine trip on low oil pressure	O	BB
	FU15b	Turbine trip on stop valve closure	O	BB
	FU16	SI input from ESFAS	P	Y
	FU18	Reactor Trip Breakers (RTBs) (Modes 1,2)	Q	Y
FU19	RTB undervoltage and shunt trip (Modes 1, 2)	U	Y	
FU21	Auto trip logic (Modes 1, 2)	P	Y	
TS 3.3.2, Table 3.3-2	FU1b	Automatic Actuation Logic and Actuation Relays	C	L
	FU1c	Containment Pressure - High	D	M
	FU1d	Pressurizer Pressure - Low	D	M
	FU1e	Steam Line Pressure - Low	D	M
	FU3a	Containment Isolation - Manual	B	L
	FU3b	Containment Isolation - Automatic Actuation Logic and Actuation Relays	C	L
	FU4a	Manual Initiation	F	M
	FU4b	Automatic Actuation Logic and Actuation Relays	G	M
	FU4c	Containment Pressure - High, High	D	M
	FU4d	High Steam Flow Coincident with Safety Injection and Coincident with T <sub>avg</sub> - Low, Low	D	M
	FU4e	High, High Steam Flow, Coincident with Safety Injection	D	M
	FU5a	Automatic Actuation Logic and Actuation Relays	G	M
	FU5b	SG Water Level - High, High (P-14)	D	M
	FU6a	Automatic Actuation Logic and Actuation Relays	G	M
	FU6b	SG Water Level - Low, Low	D	M
FU6d	Undervoltage A01 and A02	H	K	

7. In many instances, the CTs specified in the Point Beach TS differ from the CTs of the STS of NUREG 1431, Revision 4 (Reference 5.5) for the same plant equipment or system. NextEra is not proposing changes to these “front-stop” CTs . Maintaining the front-stop CTs is conservative in cases where the STS Completion Times are longer and are otherwise consistent with the Point

Beach licensing basis. Moreover, application of the Point Beach RICT Program may render the front-stop CTs inconsequential except in cases of emergent failures where an existing RICT must be updated within the front-stop CT of the new inoperability, not to exceed 12 hours, as required by NEI 06-09A (Reference 5.4). These variations are administrative and do not affect the applicability of TSTF-505, Revision 2, or the NRC’s model safety evaluation. The variations in front-stop CTs for the applicable plant equipment/systems are tabulated below:

Point Beach TS	SSC	Instrumentation / System Description	Front Stop CTs	
			Point Beach TS	STS
TS 3.3.1 Table 3.3-1	FU2a	Power Range Neutron Flux High	1-hour	72-hours
	FU2b	Power Range Neutron Flux Low	1-hour	72-hours
	FU5	Overtemperature $\Delta T$	1-hour	72-hours
	FU6	Overpower $\Delta T$	1-hour	72-hours
	FU7a	Pressurizer Pressure - Low	1-hour	72-hours
	FU7b	Pressurizer Pressure - High	1-hour	72-hours
	FU8	Pressurizer Water Level - High	1-hour	72-hours
	FU9a	RCS Flow - Low (single loop)	1-hour	72-hours
	FU9b	RCS Flow - Low (2 loops)	1-hour	72-hours
	FU11	Undervoltage Bus A01, A02	1-hour	72-hours
	FU12	Underfrequency Bus A01, A02	6-hours	72-hours
	FU13	SG Water Level Low-Low	1-hour	72-hours
	FU14	SG Water Level Low; Coincident w/ Steam Flow/ Feed Flow Mismatch	1-hour	72-hours
	FU15a	Turbine trip on low oil pressure	1-hour	72-hours
	FU15b	Turbine trip on stop valve closure	1-hour	72-hours
TS 3.3.2 Table 3.3-2	FU16	SI input from ESFAS	6-hours	72-hour
	FU18	RTBs (Modes 1,2)	1-hour	24-hours
	FU21	Auto trip logic (Modes 1, 2)	6-hours	24-hours
	FU1b	Automatic Actuation Logic and Actuation Relays	6-hours	24-hours
	FU1c	Containment Pressure - High	1-hour	72-hours
	FU1d	Pressurizer Pressure - Low	1-hour	72-hours
	FU1e	Steam Line Pressure - Low	1-hour	72-hours
	FU4a	Manual initiation	1-hour	48-hours
	FU4b	Automatic Actuation Logic and Actuation Relays	6-hours	24-hours
	FU4c	Containment Pressure - High, High	1-hour	72-hours
	FU4d	High Steam Flow Coincident with Safety Injection and Coincident with $T_{avg}$ - Low, Low	1-hour	72-hours
	FU4e	High, High Steam Flow; Coincident with Safety Injection	1-hour	72-hours
FU5a	Automatic Actuation Logic and Actuation Relays	6-hours	24-hours	
FU5b	SG Water Level - High, High (P-14)	1-hour	72-hours	
FU6a	Automatic Actuation Logic and Actuation Relays	6-hours	24-hours	
FU6b	SG Water Level - Low, Low	1-hour	72-hours	

Point Beach TS	SSC	Instrumentation / System Description	Front Stop CTs	
			Point Beach TS	STS
TS 3.6.2	Cont. Air Locks	Condition C - One or more containment air locks inoperable for reasons other than Condition A or B.	36-hours	24-hours
TS 3.7.8	Service Water System	Condition A - One SW pump inoperable AND both units in Modes 1, 2, 3, or 4.	7-days	72-hours
		Condition C - SW ring header continuous flowpath interrupted.	7-days	72-hours
TS 3.8.1	AC Sources Operating	Condition A - Associated unit 345/13.8 kV (X03) transformer inoperable OR Gas turbine not in operation when utilizing opposite unit's 345/13.8 kV (X03) transformer.	24-hours	72-hours
		Condition B - Associated unit's 13.8/4.16 kV (X04) transformer inoperable.	24-hours	72-hours
		Condition C - Associated unit's required offsite power source to buses A05 and A06 inoperable OR Required offsite power source to buses 1A05 and 2A06 inoperable.	24-hours	72-hours
		Condition D - One or more required offsite power source(s) to one or more required Class 1E 4.16 kV bus(es) inoperable.	7-days	72-hours
TS 3.8.4	DC Sources Operating	Condition A - One DC electrical power subsystem inoperable.	2-hours	2-hours 7-days*
TS 3.8.7	Inverters Operating	Condition A - One required inverter inoperable.	8-hours	24-hours

\* 7-days applies to battery charger restoration only

8. Several Point Beach Required Actions include “second” CTs that are proposed for removal. Historically, second CTs were imposed for certain Required Actions to establish a limit on the maximum allowable time for any combination of Conditions that would result in continuous failure to meet an LCO. TSTF-439-A, Revision 2 (Reference 5.8), removed the second CTs from the STS of NUREG 1431. In approving the TSTF, the NRC Staff noted that second CTs complicate the implementation of RICT Program, and that the TS controls coupled with licensee configuration risk management programs provide adequate assurance against inappropriate use of combinations of Conditions that result in a single contiguous occurrence of failing to meet the LCO. Resolving these plant-specific variations by removal of the second CTs where inconsistent with the Required Actions of TSTF-505, Revision 2, does not affect the applicability of TSTF-505, Revision 2, or the NRC’s model safety evaluation (Reference 5.2). The subject Required Actions are listed below:

Point Beach TS	Applicable TS Condition / Required Action	CT	Second CT
TS 3.7.5	Condition A - Turbine driven AFW pump system inoperable due to one inoperable steam supply.	7 days	10 days
	Action A.1 - Restore affected equipment to OPERABLE status. Condition B - One AFW pump system inoperable in Modes 1, 2 or 3 for reasons other than Condition A.	72 hours	10 days
	Action B.1 - Restore AFW pump system to OPERABLE status.		

Point Beach TS	Applicable TS Condition / Required Action	CT	Second CT
TS 3.7.7	Condition A - One CC pump inoperable Action A.1 - Restore affected equipment to OPERABLE status.	72 hours	144 hours
	Condition B - One required CC heat exchanger inoperable. Action B.1 - Restore required CC heat exchanger to OPERABLE status.	72 hours	144 hours
TS 3.7.8	Condition A - One SW pump inoperable AND Both units in Modes 1, 2, 3, or 4. Action A.1 - Restore SW pump to OPERABLE status.	7 days	14 days
	Condition C - SW ring header continuous flowpath interrupted. Action C.2 - Restore the SW ring header continuous flowpath.	7 days	14 days
	Condition D - One or more non-essential -SW-load flowpath(s) with one required automatic isolation valve inoperable AND Affected non-essential flowpath(s) not isolated. Action D.2 - Isolated the affected non-essential flowpath(s).	72 hours	14 days
TS 3.8.1	Condition D - One or more required offsite power source(s) to one or more required Class 1E 4.16 kV bus(es) inoperable. Action D.2 - Restore required offsite power source(s) to OPERABLE status.	7 days	14 days

2.4.2 Plant-Specific Variations

NextEra proposes plant-specific changes to the Point Beach TS Required Actions that are variations from TSTF-505, Revision 2, as identified below. Each of the plant-specific variations are described and evaluated in Attachment 5 of this amendment request.

1. TS 3.3.1, Reactor Protection System (RPS) Instrumentation Variations
  - i. Condition D - Power Range Neutron Flux High (FU 2a)
  - ii. Condition L - Reactor Coolant Flow - Low, Single Loop (FU9a)  
Condition K - Reactor Coolant Flow - Low, Two Loops (FU9b)
  - iii. Condition Q - Reactor Trip Breakers (RTBs), (FU 18, Modes 1,2)
2. TS 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation Variations
  - i. Condition G - Feedwater Isolation; Automatic Actuation Logic and Actuation Relays (FU5a)
  - ii. Condition D - Feedwater Isolation; SG Water Level - High (FU5b)
3. TS 3.6, Containment Systems Variations
  - i. Condition C - Containment Isolation Valves



4. TS 3.7, Plant Systems Variations
  - i. TS 3.7.2, Condition A - MSIVs and Non-Return Check Valves
  - ii. TS 3.7.7, Component Cooling (CC) System
    - Condition A - CC pumps
    - Condition B - CC heat exchangers
  - iii. TS 3.7.8, Service Water (SW) System
    - Condition A - SW pumps
    - Condition C - SW ring header
    - Condition D - SW non-essential flowpath(s)
5. TS 3.8, Electrical Power Systems Variations
  - i. TS 3.8.1, AC Sources -Operating
    - Conditions A, B and C - Offsite Power Sources
    - Condition D - Offsite Power Sources
    - Condition F - Offsite Power Sources
  - ii. TS 3.8.4, DC Sources Operating
    - Condition A - DC electrical power subsystem

## 2.5 Conclusion

NextEra has reviewed the above variations and has determined that they do not affect the applicability of TSTF505, Revision 2, to the Point Beach TS. The application of the RICT for these Point Beach plant-specific LCOs is consistent with TSTF-505, Revision 2, and with the NRC's model safety evaluation (Reference 5.2). Application of a RICT for these plant specific LCOs will be controlled under the RICT Program. The RICT Program provides the necessary administrative controls to permit extension of CTs and thereby delaying reactor shutdown or remedial actions when the risk is assessed and managed within specified limits and programmatic requirements. The safety functions and performance levels of TS required structures, systems or components (SSCs) are unchanged, and the remedial actions, including the requirement to shut down the reactor, are also unchanged; only the CTs are extended by the RICT Program.

Application of a RICT will be evaluated using the methodology and probabilistic risk guidelines contained in NEI 06-09A, Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines, which was approved by the NRC (Reference 5.4). The NEI 06-09A methodology includes a requirement to perform a quantitative assessment of the potential impact of the application of a RICT on risk, to reassess risk due to plant configuration changes, and to implement compensatory measures and risk management actions (RMAs) to maintain the risk below acceptable regulatory risk thresholds. In addition, the NEI 06-09-A methodology satisfies the five key safety principles specified in Regulatory Guide 1.177, An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications, Revision 0, (Reference 5.7), relative to the risk impact due to the application of a RICT.

Therefore, the proposed application of a RICT in the Point Beach plant-specific Required Actions is consistent with TSTF-505, Revision 2, and with the NRC's model safety evaluation (Reference 5.2).

### 3.0 REGULATORY ANALYSIS

#### 3.1 No Significant Hazards Consideration

The proposed amendments would modify the Point Beach Technical Specifications (TS) requirements related to Completion Times (CTs) to provide the option to calculate a longer, risk-informed CT (RICT) in accordance with TSTF-505, Revision 2, "Provide Risk-Informed Extend Completion Times - RITSTF Initiative 4b (Reference 5.1). The allowance is described in a new program in Chapter 5, "Administrative Controls", entitled the "Risk-Informed Completion Time Program". As required by 10 CFR 50.91(a), NextEra evaluated the proposed changes using the criteria in 10 CFR 50.92 and determined that the proposed changes do not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below:

- 1) Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change permits the extension of Completion Times provided the associated risk is assessed and managed in accordance with the NRC approved Risk - Informed Completion Time Program. The proposed change does not involve a significant increase in the probability of an accident previously evaluated because the change involves no change to the plant or its modes of operation. The proposed change does not increase the consequences of an accident because the design-basis mitigation function of the affected systems is not changed and the consequences of an accident during the extended CT are no different from those during the existing CT.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not change the design, configuration, or method of operation of the plant. The proposed change does not involve a physical alteration of the plant (no new or different kind of equipment will be installed).

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change permits the extension of Completion Times provided risk is assessed and managed in accordance with the NRC approved Risk-Informed Completion Time Program. The proposed change implements a risk-informed configuration management program to assure that adequate margins of safety are maintained. Application of these new specifications and the configuration management program considers cumulative effects of multiple systems or components being out of service and does so more effectively than the current TS.

Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based upon the above, NextEra concludes that the proposed presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of no significant hazards consideration is justified.

### 3.2 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

## 4.0 ENVIRONMENTAL CONSIDERATION

The proposed change would change a requirement with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

## 5.0 REFERENCES

- 5.1 Letter from the Technical Specification Task Force (TSTF) to the NRC, "TSTF Comments on Draft Safety Evaluation for Traveler TSTF-505, 'Provide Risk-Informed Extended Completion Times' and Submittal of TSTF-505, Revision 2", Revision 2, dated July 2, 2018 (ADAMS Accession No. ML18183A493)
- 5.2 NRC Safety Evaluation, "Final Revised Model Safety Evaluation of Traveler TSTF-505, Revision 2, 'Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b'", dated November 21, 2018 (ADAMS Accession No. ML18269A041)
- 5.3 NRC Revised TSTF 505, Revision 2, Model Application, (ADAMS Accession No. ML18115A482)
- 5.4 NRC letter to NEI, "Final Safety Evaluation for Nuclear Energy Institute (NEI) Topical Report (TR) NEI 06-09, 'Risk-Informed Technical Specifications Initiative 4B, Risk-Managed Technical Specifications (RMTS) Guidelines' (TAC No. MD4995)", dated May 17, 2007 (ADAMS Accession No. ML071200238)
- 5.5 NRC NUREG-1431, Volume 1, "Standard Technical Specifications Westinghouse Plants", Revision 4, dated April 3, 2012 (ADAMS Accession No. ML12100A222)
- 5.6 NRC NUREG-1431, Volume 1, "Standard Technical Specifications Westinghouse Plants", Revision 1, dated April 30, 1995 (ADAMS Accession No. ML13196A405)
- 5.7 NRC Regulatory Guide 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications", Revision 0, dated August 1998 (ADAMS Accession No. ML003740176)
- 5.8 Letter from Thomas H. Boyce, Technical Specifications Branch Chief (U.S Nuclear Regulatory Commission) to the Technical Specifications Task Force, "Status of TSTF 439, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO," January 11, 2006 (ADAMS Accession No. ML060120272)