

February 23, 2001

Mr. James A. Hutton
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SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - ISSUANCE OF
AMENDMENT RE: REVISED EXCESS FLOW CHECK VALVE
SURVEILLANCE REQUIREMENTS (TAC NOS. MA9927 AND MA9928))

Dear Mr. Hutton:

The Commission has issued the enclosed Amendment No. 148 to Facility Operating License No. NPF-39 and Amendment No. 110 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Unit Nos. 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 5, 2000, as supplemented January 17, 2001.

These amendments revise Surveillance Requirement 4.6.3.4 to allow a representative sample of reactor instrumentation line excess flow check valves (EFCVs) to be tested every 24 months, instead of testing each EFCV every 24 months.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Christopher Gratton, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures: 1. Amendment No. 148 to
License No. NPF-39
2. Amendment No. 110 to
License No. NPF-85
3. Safety Evaluation

cc w/encls: See next page

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3. Safety Evaluation

cc w/encls: See next page

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JClifford	GHill (4)	TLee, RTSB
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** See previous concurrence

ACCESSION NUMBER: ML010190215

*No major changes made

OFFICE	PDI-2/PM	PDI-2/LA	OGC **	RTSB*	PDI-2/SC
NAME	CGratton	MO'Brien	CMarco	RBarrett	JClifford
DATE	2/15/01	2/15/01	02/06/01	SE dated 12/19/00	2/22/01

Official Record Copy

EXELON GENERATION COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 148
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by PECO Energy Company (the then-licensee) dated September 5, 2000, as supplemented January 17, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 148 , are hereby incorporated into this license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: February 23, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 148

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 6-18
B 3/4 6-4
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Insert

3/4 6-18
B 3/4 6-4
B 3/4 6-4a

EXELON GENERATION COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 110
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by PECO Energy Company (the then-licensee) dated September 5, 2000, as supplemented January 17, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 110 , are hereby incorporated in the license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: February 23, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 110

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 6-18
B 3/4 6-4
--

Insert

3/4 6-18
B 3/4 6-4
B 3/4 6-4a

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 148 AND 110 TO FACILITY OPERATING
LICENSE NOS. NPF-39 AND NPF-85
EXELON GENERATION COMPANY
LIMERICK GENERATING STATION, UNITS 1 AND 2
DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated September 5, 2000, as supplemented by letter dated January 17, 2001, PECO Energy Company (PECO, the licensee at the time), submitted a technical specification (TS) change request to revise excess flow check valve (EFCV) surveillance testing for Limerick Generating Station (LGS), Units 1 and 2. By letter dated January 30, 2001, Exelon Generation Company (Exelon), successor to PECO, has adopted this license amendment request. Currently, the LGS Units 1 and 2 TSs require verification that each reactor instrumentation line EFCV shown in TS Table 3.6.3-1 be demonstrated OPERABLE at least once per 24 months by verifying that the valve checks flow. The proposed change revises TS Surveillance Requirement (SR) 4.6.3.4 to relax the 24-month EFCV surveillance frequency by limiting the number of tests to a "representative sample," such that each EFCV will be tested at least once every 120 months. The proposed change adopts the Nuclear Regulatory Commission (NRC) staff's approved Technical Specifications Task Force (TSTF) Traveler TSTF-334, Revision 2, "Relaxed Surveillance Frequency for Excess Flow Check Valve Testing," dated October 31, 2000. The basis for the request is the high degree of reliability shown by the EFCV's and the low consequences of an EFCV failure. The letter of January 17, 2001, provided clarifying information that did not change the initial no significant hazards consideration determination.

The supporting analysis for the licensee's conclusion is based on General Electric Nuclear Energy (GENE) Topical Report NEDO-32977-A, B21-00658-01, "Excess Flow Check Valve Testing Relaxation," dated November 1998. The NRC staff accepted the generic applicability of the topical report by safety evaluation (SE) dated March 14, 2000. This report provided (1) an estimate of steam release frequency (into the reactor building) due to a break in an instrument line concurrent with an EFCV failure to close, and (2) an assessment of the radiological consequences of such a release.

2.0 BACKGROUND

EFCVs are installed in boiling water reactor (BWR) instrument lines to limit the release of fluid in the event of an instrument line break. Examples of EFCV installations include reactor pressure vessel level and pressure instrumentation, main steam line flow instrumentation, recirculation pump suction pressure, and reactor core isolation cooling steam line flow

instrumentation. EFCVs are not required to close in response to a containment isolation signal and are not required to operate under post loss-of-coolant accident (LOCA) conditions. In the topical report, the Boiling Water Reactor Owners Group (BWROG) stated that EFCVs are not needed to mitigate the consequences of an accident because an instrument line break coincident with the design basis LOCA would be of a sufficiently low probability to be outside of the design basis.

The Standard Technical Specifications (STS) surveillance requirements currently require verification of the actuation (closing) capability of each reactor instrumentation line EFCV every 18 months or 24 months depending on the plant refueling schedule. This is typical for most BWR plants. The proposed change by the licensee revises the surveillance frequency by allowing a "representative sample" of EFCVs to be tested every 24 months. The "representative sample" consists of approximately an equal number of EFCVs being tested every 24 months such that each EFCV is tested at least once every 120 months.

3.0 EVALUATION

The postulated break of an instrument line attached to the reactor coolant boundary is discussed and evaluated in the LGS Units 1 and 2, Final Safety Analysis Report, Subsection 15.6.2, "INSTRUMENT LINE PIPE BREAK." The analysis assumes the break occurs at a point where the instrument line may not be able to be isolated, where immediate detection is not automatic or apparent, and there is a continuous discharge of reactor water through the instrument line until the primary system is depressurized. The failure is assumed to occur outside the primary containment but inside secondary containment. The line size and the restricting orifice in the line minimize leakage from a break postulated to occur upstream of the EFCV. Previous licensee evaluation of such an instrument line rupture did not take credit for the mitigating action of the EFCVs and is bounded by the steam line break analysis. The integrity and functional performance of the secondary containment and standby gas treatment system are not impaired by this event, and the calculated potential offsite exposures are substantially below the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 100. Therefore, a failure of a reactor instrument line EFCV, though not expected as a result of this TS change, is bounded by the previous evaluation of an instrument line break. The radiation dose consequences of such a break are not impacted by the proposed change.

The LGS Units 1 and 2 TS SR 4.6.3.4 currently requires verification that each reactor instrumentation line EFCV be demonstrated OPERABLE at least once every 24 months by verifying the valve checks flow. The sentence in TS SR 4.6.3.4 will be revised to read, "A representative sample of reactor instrumentation line excess flow check valves shown in Table 3.6.3-1 shall be demonstrated OPERABLE at least once per 24 months, such that each valve is tested at least once every 120 months verifying the valve checks flow."

The term "representative sample" as proposed by the topical report and TSTF-334 is not defined in the TS itself. However, the BWROG in response to the NRC staff's request for additional information (RAI) stated that the term "representative sample" with an accompanying explanation in the TS Bases, is identical to the current usage in the STS, NUREG-1433, Revision 1. Specifically, NUREG-1433 uses the term "representative" in TS SR 3.8.6.3 in reference to battery cell testing, and "representative sample" in SR 3.1.4.2 for verification of control rod scram times. The criterion for "representative sample" and the basis for the nominal 10-year testing interval are provided in the licensee submittal, which are similar to Insert 1 and Insert 2 stated in the NRC staff's approved TSTF-334, Revision 2. Therefore, the application of

a "representative sample" for the EFCV testing surveillance requirement (SR), with its accompanying explanation in the TS Bases, is consistent with TSTF-334, Revision 2 to the STS usage and is, therefore, acceptable to the NRC staff.

Licensees make changes to their bases without need for prior NRC review or approval, unless it involves a decrease in a margin of safety as defined in the bases for the TS. Nevertheless, the licensee included in its submittal, for information, a revised Bases for SR 4.6.3.4. The revised Bases for SR 4.6.3.4 includes the following insert:

This Surveillance Requirement requires a demonstration that representative sample of reactor instrument line excess flow check valves (EFCVs) is OPERABLE by verifying that the valve actuates to the isolation position on a simulated instrument line break signal. The representative sample consists of an approximately equal number of EFCVs, such that each EFCV is tested at least once every 10 years. In addition, the EFCVs in the sample are representative of the various plant configurations, models, sizes, and operating environments. This ensures that any potentially common problem with a specific type or application of EFCV is detected at the earliest possible time. This Surveillance Requirement provides assurance that the instrumentation line EFCVs will perform so that predicted radiological consequences will not be exceeded during a postulated instrument line break event. The 10 year interval is based on other performance-based testing programs. Furthermore, any EFCV failures will be evaluated to determine if additional testing in the test interval is warranted to ensure overall reliability is maintained. Operating experience has demonstrated that these components are highly reliable and that failures to isolate are very infrequent. Therefore, testing of a representative sample was concluded to be acceptable from a reliability standpoint. For some EFCVs, this Surveillance can be performed with the reactor at power.

The NRC staff noted that the topical report does not provide a specific failure feedback mechanism, but does state that a plant's corrective action program must evaluate equipment failures and establish appropriate corrective actions. The BWROG responded to the NRC staff's RAI concerning failure feedback by stating that each licensee who adopts the relaxed surveillance intervals recommended by the topical report should ensure that an appropriate feedback mechanism responsive to EFCV failures is in place.

The licensee stated that the LGS Units 1 and 2, 10 CFR 50.65, "Maintenance Rule Program," will be revised to provide a means to track the performance of the EFCVs. To ensure EFCV performance remains consistent with the extended test interval, the licensee has established a minimum acceptance criterion. The criterion for reactor instrument line EFCVs has been established for each unit as less than or equal to 2 failures on a 24-month rolling average to ensure that the EFCV performance remains consistent with the extended surveillance interval assumptions and adverse trends in EFCV performance are identified. The NRC staff considers the licensee-proposed EFCV performance criteria and basis to be in conformance with TSTF-334, Revision 2, and, therefore, will provide meaningful feedback for appropriate corrective actions.

To estimate the release frequency initiated by an instrument line break, two factors are considered: (1) the instrument line break frequency downstream of the EFCV, and (2) the probability of the EFCV failing to close. The topical report calculated an instrument line break frequency based on a WASH-1400 small pipe break failure rate of $6.1E-12$ per hour/per foot of line. The topical report assumed 100 feet for each instrument line which resulted in a frequency

of $5.34\text{E-}06$ breaks per year for a single instrument line. The topical report provided an EFCV composite failure rate based on BWR plant data. The data represented 12,424.5 valve-years of operation with a total of 11 failures noted. The EFCV composite failure rate was $1.67\text{E-}07/\text{hour}$ and was referenced as the "upper limit" failure rate in the topical report.

In the review of the topical report, the NRC staff noted the BWROG assumed the EFCV failure rate was constant over time and did not account for potential age-related degradation in the EFCV failure rate. Additionally, the NRC staff questioned the use of an instrument line break frequency based on WASH-1400 and not on more current data. The BWROG RAI response included an updated instrument line failure frequency of $3.52\text{E-}06$ failures/year based on the Electric Power Research Institute's (EPRI) Technical Report No. 100380, "Pipe Failures in U.S. Commercial Nuclear Power Plants," July 1992. This value is 6.6 times greater than the value calculated in the topical report using WASH-1400 data. The BWROG RAI response also assumed the observed EFCV failures were five times the actual observed number (55 vs. 11) listed in the topical report. The additional impact of an increase in instrument line failure frequency and a five-fold increase in EFCV failures assumed by the BWROG response demonstrated that the topical report EFCV release frequency remained low with limited impact on release frequencies.

The LGS Units 1 and 2 EFCV data were consistent both in the time sampled and reliability when compared with the individual topical report plant data (one EFCV failure, 113 valves per unit, and $1.57\text{E+}07$ hours operating time). Employing the updated EPRI instrument line failure rate to the LGS Units 1 and 2 plant-specific data, the 24-month and 10-year total plant release frequency is estimated at $1.05\text{E-}05$ release per year and $5.25\text{E-}05$ release per year, respectively. The 10-year release frequency shows an increase of $4.2\text{E-}05$ release per year over the 24-month value. This represents the increase in the total plant release frequency for a random break of the instrument lines in LGS Units 1 and 2 with a concurrent failure of the EFCV to isolate the break. The LGS Units 1 and 2 release frequencies compare favorably with the adjusted topical report total plant composite release frequencies. Additionally, if the topical report composite industry EFCV failure/operating times are applied to the EFCVs installed at LGS Units 1 and 2, the resulting release frequencies are consistent with the adjusted release frequency results of the topical report and NRC staff SE. Based on the above, the NRC staff considers the increase in estimated EFCV release frequency for a 10-year surveillance interval to be low enough not to be considered significant. This is based on the qualitative analysis that an instrument line break with a concurrent failure of an EFCV to close is not a significant contributor to core damage accidents. Based on the above, the estimated increase in the 10-year release frequency is not considered significant, and is, therefore, acceptable to the NRC staff.

The methodology used by the licensee for assessing the impact of an EFCV surveillance test interval increase to 10 years is consistent with industry practice, accounts for potentially unknown changes in EFCV failure rates, is in agreement with the topical report, and is, therefore, acceptable to the NRC staff. The NRC staff notes that the use of observed industry data for instrument line break and plant-specific EFCV failure data is adequate for assessing the proposed surveillance interval revisions. The LGS Units 1 and 2 EFCV failure rates are consistent with the industry data and with the results noted by the NRC staff in the topical report. Based on the above the NRC staff does not consider the estimated increase in release frequency for LGS Units 1 and 2 to be significant.

The operational impact of an EFCV failing to close during the rupture of an instrument line connected to the reactor pressure vessel (RPV) boundary is based on environmental effects of a steam release in the vicinity of the instrument racks. The environmental impact of the failure of instrument lines connected to the RPV pressure boundary is the released steam into the reactor building. The topical report stated that the magnitude of release through an instrument line would be within the pressure control capacity of reactor building ventilation systems and that the integrity and functional performance of secondary containment following an instrument line break would be met. The licensee's analysis confirmed that an instrument line rupture outside primary containment will not result in overpressurizing the secondary containment. The separation of instrument lines and equipment in the reactor building is expected to minimize the operational impact of an instrument line break on other equipment due to jet impingement. The licensee's analysis assumes plant shutdown, depressurization, and cooldown occur after the line break.

The radiological consequences for an instrument line break evaluated by the licensee do not credit the EFCVs for isolating the break. The evaluation assumed a discharge of reactor water through an instrument line with a 1/4-inch restricting orifice during the detection and cooldown sequence. The assumptions of the accident analysis do not change as a result of the licensee's proposed EFCV surveillance intervals. As a result, a failure of an EFCV is bounded by the licensee's previous analysis and is consistent with the topical report results.

4.0 SUMMARY

As demonstrated in GENE Topical Report NEDO-32977-A, B21-00658-01, the impact of an increase in the EFCV surveillance test interval to 10 years results in an instrument line release frequency considered by the NRC staff to be low, especially since the consequences of an EFCV failure are bounded by previous licensee analysis and, therefore, are highly unlikely to lead to core damage. Additionally, the licensee's evaluation results, including the plant-specific EFCV failure data and release frequency, are consistent with the topical report composite results. The NRC staff concludes that the release frequency associated with the LGS Units 1 and 2 request for relaxation of ECFV surveillance testing is low enough not to be considered significant, and is therefore, acceptable.

The consequences of steam release from the failure of the EFCVs is not significant, as shown by the topical report, and previous licensee analysis. Based on the acceptability of the methods applied to estimate the release frequency, the licensee's relatively low release frequency estimate, the negligible consequence of a release in the reactor building, in conjunction with a highly unlikely impact on core damage, the NRC staff concludes that the impact on risk associated with the LGS Units 1 and 2 request for relaxation of ECFV surveillance testing is acceptable.

The topical report established that each plant's corrective action program must evaluate equipment failures and establish appropriate corrective actions. These programs ensure that meaningful feedback data is acquired so that appropriate corrective action may be taken with regard to EFCV performance. The licensee provided a discussion of its EFCV performance criteria and the EFCV corrective action program. The licensee's program is in conformance with the NRC staff-approved TSTF-334, Revision 2, and thus, the NRC staff finds the program acceptable.

Based on the above, the NRC staff finds the change to relaxation of LGS Units 1 and 2 reactor vessel instrument line EFCV surveillance frequency by allowing a representative sample of EFCVs to be tested every 24 months, with all EFCVs being tested at least once every 120 months, to be acceptable.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change the surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (66 FR 2021). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: C. Douth
T. Lee

Date: February 23, 2001