

YANKEE ATOMIC ELECTRIC COMPANY

Telephone (413) 424-5261



49 Yankee Road, Rowe, Massachusetts 01367

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BYR 2001-001

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- References:
- (a) License No. DPR-3 (Docket No. 50-29)
 - (b) Letter, Brian Wood (YAEC) to Document Control Desk (NRC),
BYR 00-064, Proposed Amendment to YNPS Security Plan, dated
September 28, 2000
 - (c) Letter, Brian Wood (YAEC) to Document Control Desk (NRC),
BYR 00-068, Proposed Amendment to YNPS Security Plan, dated
October 12, 2000

Subject: Significant Hazards Consideration in Support of the Proposed Amendment to the
Yankee Nuclear Power Station Security Plan Relating to Security/Safeguards
Measures for Dry Cask Storage

Pursuant to 10 CFR Section 50.90 of the Commission's Rules and Regulations, Yankee Atomic Electric Company (YAEC) requested Nuclear Regulatory Commission (NRC) review and approval of an amendment to the Yankee Nuclear Power Station (YNPS) Security Plan (References (b) and (c)). In support of this request, YAEC hereby submits, in accordance with 10 CFR Section 50.91, the corresponding significant hazards consideration.

SIGNIFICANT HAZARDS CONSIDERATION

The proposed amendment to the Security Plan provides the basis for establishing security functions necessary to implement appropriate security/safeguards measures for the YNPS Independent Spent Fuel Storage Installation (ISFSI). As such, the changes will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. Based on the details presented in Attachment A to Reference (b), the proposed amendment to the Security Plan, which incorporates ISFSI security

5003

functions, does not reduce the ability of the Security organization to prevent radiological sabotage and therefore does not increase the probability or consequences of a radiological release previously evaluated. The proposed Security Plan changes will not affect any important to safety systems or components, their mode of operation or operating strategies. The proposed Security Plan changes have no effect on accident initiators or mitigation. The physical protection systems described in the ISFSI Security Plan are designed to protect against the loss of control of the facility that could be sufficient to cause a radiation exposure exceeding the dose as described in 10 CFR 72.106. Therefore, the proposed amendment to the Security Plan will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different accident from any previously evaluated. Based on the details presented in Attachment A to Reference (b), the proposed amendment to the Security Plan incorporating ISFSI security functions does not affect the operation of systems important to safety. The Security Plan amendment does not affect any of the parameters or conditions that could contribute to the initiation of any accident. No new accident scenarios are created as a result of Security Plan changes requested to incorporate the ISFSI security functions. In addition, the design functions of equipment important to safety are not altered as a result of the proposed Security Plan changes. The physical protection systems described in the ISFSI Security Plan are designed to protect against the loss of control of the facility that could be sufficient to cause a radiation exposure exceeding the dose as described in 10 CFR 72.106. Therefore, the proposed Security Plan changes will not create the possibility of a new or different accident from any previously evaluated.
3. Involve a significant reduction in the margin of safety. Based on the details presented in Attachment A to Reference (b), implementation of the proposed amendment to the Security Plan incorporating ISFSI security functions will not reduce a margin of safety as detailed in the Technical Specifications as there are no Technical Specification requirements associated with the physical security system. Specifically, the proposed changes to the Security Plan do not represent a change in initial conditions, system response time, or in any other parameter affecting the course of an accident analysis supporting the Bases of any Technical Specification. The proposed amendment to the Security Plan does not reduce the effectiveness of any security/safeguards measures currently in place at YNPS. The physical protection systems described in the ISFSI Security Plan are designed to protect against the loss of control of the facility that could be sufficient to cause a radiation exposure exceeding the dose as described in 10 CFR 72.106. Therefore, the proposed Security Plan changes will not involve a significant reduction in the margin of safety.

Based on the considerations noted above, it is concluded that the proposed changes will not endanger the public health and safety.

ENVIRONMENTAL IMPACT DETERMINATION

This amendment request meets the criteria specified in 10 CFR 51.22 (c)(9) for categorical exclusion or otherwise not requiring environmental review. Specific criteria contained in this section of the regulations are discussed below:

1. The amendment involves no significant hazards consideration. As demonstrated above, the proposed amendment to the YNPS Security Plan does not involve any significant hazards considerations. The addition of the ISFSI scope to the existing Defueled Security Plan does not compromise or reduce the effectiveness of the existing program. The additional security plan scope has been developed to provide the physical protection required by regulation for the newly constructed ISFSI.
2. There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The NAC-MPC dry cask storage system is a welded and sealed leak tight system. The Commission has determined that these storage systems will not release significant effluents offsite in any credible accident or operational scenario. The Security Plan amendment does not reduce the ability of the security organization to prevent radiological sabotage of the storage system and therefore does not increase the amount or type of effluents that may be released. In addition, these changes do not create any new effluent pathways.
3. There is no significant increase in individual or cumulative occupational radiation exposure. The proposed security/safeguards measures included in the Security Plan amendment incorporates occupational radiation exposure ALARA. As a result, the Security Plan Amendment does not significantly increase individual or cumulative occupational radiation exposure.

Based on the foregoing, it is concluded that the proposed amendment meets the criteria for categorical exclusion set forth in 10 CFR 51.22 (c)(9) and therefore, no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

SCHEDULE OF CHANGE

The proposed changes will be implemented upon approval by the Commission. As indicated in the original submittal (Reference (a)), approval of the amendment request is requested by March 1, 2001 so that appropriate measures may be taken to support "dry runs" for fuel transfers and to train security personnel prior to commencing fuel transfer and ISFSI operations.

Please contact Mr. Jim Kay (978-568-2302) or Ms. Sandi Garvie (413-424-2241) if you have any questions, or need any additional information.

Very truly yours,
YANKEE ATOMIC ELECTRIC COMPANY



Brian Wood
Decommissioning Manager/Site Manager
Yankee Nuclear Power Station

C: P. Ray, USNRC, Project Manager
R.B. Bellamy, USNRC, Region I