Entergy

**Entergy Nuclear Generation Co.**
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ENGC Ltr. 2.01.024

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Docket No. 50-293
License No. DPR-35

**REQUEST FOR TECHNICAL SPECIFICATION CHANGE CONCERNING TABLE 4.2.F**

Entergy Nuclear Generation Company (ENGC)-Pilgrim requests NRC review and approval of a proposed change to the surveillance interval for certain radiation monitors identified on Pilgrim Technical Specification Table 4.2.F. The attached "No Significant Hazards Considerations" evaluation is provided with the proposed change.

The proposed change substitutes "Once/Operating Cycle" for the current surveillance interval of "Each Refueling Outage." The change is proposed for the following process monitoring instruments:

- Containment High Radiation Monitor
- Reactor Building Vent Radiation Monitor
- Main Stack Vent Radiation Monitor
- Turbine Building Vent Radiation Monitor

These process monitors are installed to monitor radioactive levels in the process systems and provide information to plant operators. In addition, these instruments monitor and record radioactive levels of station effluents released to the environs during planned operations.

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The proposed change to the calibration interval of the subject process monitors potentially reduces personnel radiation exposure from the calibration source by allowing the calibration during periods when site population is less. The proposed change provides greater scheduling flexibility by allowing calibration both on-line and off-line. The proposed change reduces the potential impact of the calibration on other refueling outage activities.

The proposed change does not alter the nominal 24-month calibration interval. The proposed change does not have a significant impact on plant safety, as discussed in the attached "No Significant Hazards Considerations" evaluation.

Pilgrim requests NRC approval of the proposed change such as to support Refueling Outage 13, which is currently scheduled to start on April 14, 2001. Please contact P.M. Kahler at (508) 830-7939 if you require further information on this issue.

Sincerely,

Mike Bellamy

Commonwealth of Massachusetts)
County of Plymouth )

Then personally appeared before me, Mike Bellamy, who being duly sworn, did state that he is Site Vice President, Entergy Nuclear Generation Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Entergy Nuclear Generation Company and that under the penalty of perjury the foregoing is true and correct.

My commission expires: September 20, 2002 Peter M Kahler
Date Notary Public

Attachments:

1) Narrative on Proposed Change and "No Significant Hazards Consideration"
2) Proposed Changed Pilgrim Technical Specification Table 4.2.F
3) Marked-up Current Pilgrim Technical Specification Table 4.2.F

RMB/PMK/

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## ATTACHMENT 1 TO PILGRIM REQUEST FOR TECHNICAL SPECIFICATION CHANGE CONCERNING TABLE 4.2.F

### Description of Proposed Change

The proposed amendment revises the Table 4.2.F surveillance interval for the following instruments: Containment High Radiation Monitor; Reactor Building Vent Radiation Monitor; Main Stack Vent Radiation Monitor; and Turbine Building Vent Radiation Monitor. The proposed change replaces the current surveillance interval of "Each Refueling Outage" with "Once/Operating Cycle." No change to the existing definitions is proposed.

### Reason for Change

The current Table 4.2.F wording requires performing this calibration, which uses a high-intensity radioactive source, during refueling outages. The proposed change to the calibration interval of the subject process monitors potentially reduces personnel radiation exposure from the calibration source by allowing the calibration during periods when site population is less.

The proposed change provides greater scheduling flexibility by allowing calibration both on-line and off-line.

The proposed change may also reduce the impact on refueling outage activities by allowing the calibration to be performed in periods other than refuelings. Refueling outages involve large increases in the number of personnel working in areas that may be impacted by the calibration source. To ensure minimum exposure, personnel working in the calibration area are removed. Such personnel removal reduces the efficient execution of work those personnel are engaged in, potentially lengthening the refueling outage activity schedule.

This change is proposed to reduce personnel exposure potential, to potentially reduce refueling outage activity duration, and to increase calibration scheduling flexibility without impacting the nominal 24 month length of the surveillance/calibration interval.

### Safety Evaluation

The proposed change revises the Table 4.2.F surveillance interval for the following instruments: Containment High Radiation Monitor; Reactor Building Vent Radiation Monitor; Main Stack Vent Radiation Monitor; and Turbine Building Vent Radiation Monitor. This proposed change substitutes a surveillance interval of "Once/Operating Cycle" for the current "Each Refueling Outage." The proposed change allows calibration at different and less prescriptive times than the current wording. The proposed change does not impact plant safety, operations, or accident assessments or consequences; therefore, it has no adverse impact on plant or public safety.

## No Significant Hazards Considerations

The proposed amendment revises the Table 4.2.F surveillance interval for the following instruments: the Containment High Radiation Monitor; the Reactor Building Vent Radiation Monitor; the Main Stack Vent Radiation Monitor; and the Turbine Building Vent Radiation Monitor. The proposed change replaces the current "Each Refueling Outage" with "Once/Operating Cycle."

As required by 10 CFR 50.91(a), Pilgrim has provided its analysis of the issue of no significant hazards consideration, which is presented below:

- **The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated**.

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. There are no physical changes to Pilgrim being introduced by the proposed changes to the specified instruments. The proposed changes do not modify Pilgrim, i.e., there are no changes in operating pressure, materials or seismic loading. No plant safety limits, setpoints, or design parameters are adversely affected by the proposed changes. The proposed changes do not adversely affect the integrity of the reactor coolant pressure boundary such that its function in the control of radiological consequences is affected. The proposed changes do enlarge the opportunity-period for performing the subject calibrations by substituting one established Technical Specification definition for another; hence, the proposed changes are administrative in nature because they do not change any methodology, interval, configuration or equipment at Pilgrim.

Thus, the proposed changes do not affect any significant parameter associated with the instruments or calibration interval; therefore, the ability of the instruments to perform their designed safety function is maintained. The change does not impact plant operation. Consequently, operating Pilgrim in conformance with the proposed changes does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- **The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.**

The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change substitutes one Technical Specification definition for another concerning certain radiation-monitoring instruments. The ability of these instruments to perform their designed-function is not affected by this change, and the surveillance interval remains nominally 24 months. No new modes of operation are introduced by the proposed changes. No plant safety limits, setpoints, or design parameters are herein proposed, nor is any adverse consequence introduced by the proposed changes. The proposed changes will not create any failure mode not bounded by previously evaluated accidents. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

- **The proposed changes do not involve a significant reduction in a margin of safety.**

The proposed changes do not involve a significant reduction in a margin of safety. The proposed changes entail the substitution of one Technical Specification definition for another concerning radiation-monitoring instruments. This is an administrative change because such substitution does not modify the operation, configuration, or processes of Pilgrim, nor does the change modify the nominal 24-month surveillance/calibration interval currently in force for these instruments.

The substitution of one Technical Specification definition for another concerning radiation monitoring instruments potentially reduces personnel exposure from calibration-source radiation because site population is less during non-refueling periods. No plant safety limits, setpoints, or design parameters are changed, nor is any adverse consequence introduced by the proposed changes. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

These changes have been reviewed and recommended for approval by the Operations Review Committee and the Nuclear Safety Review and Audit Committee.

## Environmental Consideration

The proposed changes concern a surveillance requirement for facility components located within the restricted area as defined in 10 CFR Part 20. Pilgrim has determined that the changes 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. No plant safety limits, setpoints, or design parameters are adversely affected by the proposed changes. Pilgrim also finds that the proposed amendment involves no significant hazards consideration. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Hence, pursuant to 10CFR51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

## Schedule of Change

Pilgrim will implement this change within 30 days following receipt of the Commission's approval.

# ATTACHMENT 2 TO PILGRIM REQUEST FOR TECHNICAL SPECIFICATION CHANGE CONCERNING TABLE 4.2.F

## Proposed Changed Pilgrim Technical Specification Table 4.2.F

## MINIMUM TEST AND CALIBRATION FREQUENCY FOR SURVEILLANCE INSTRUMENTATION

| | Instrument Channel | Calibration Frequency | Instrument Check |
|---|---|---|---|
| 13) | Torus Water Level (Wide Range) | Each refueling outage | Once every 30 days |
| 14) | Containment Pressure | Each refueling outage | Once every 30 days |
| 15) | Containment High Radiation Monitor | Once/Operating Cycle | Once every 30 days |
| 16) | Reactor Building Vent Radiation Monitor | Once/Operating Cycle | Once every 30 days |
| 17) | Main Stack Vent Radiation Monitor | Once/Operating Cycle | Once every 30 days |
| 18) | Turbine Building Vent Radiation Monitor | Once/Operating Cycle | Once every 30 days |

# ATTACHMENT 3 TO PILGRIM REQUEST FOR TECHNICAL SPECIFICATION CHANGE CONCERNING TABLE 4.2.F

## Marked-up Current Pilgrim Technical Specification Table 4.2.F

**PNPS**
**TABLE 4.2.F (Cont.)**

**MINIMUM TEST AND CALIBRATION FREQUENCY FOR SURVEILLANCE INSTRUMENTATION**

| | Instrument Channel | Calibration Frequency | Instrument Check |
|---|---|---|---|
| 13) | Torus Water Level (Wide Range) | Each refueling outage | Once every 30 days |
| 14) | Containment Pressure | Each refueling outage | Once every 30 days |
| 15) | Containment High Radiation Monitor | ~~Each refueling outage~~ | Once every 30 days |
| 16) | Reactor Building Vent Radiation Monitor | ~~Each refueling outage~~ | Once every 30 days |
| 17) | Main Stack Vent Radiation Monitor | ~~Each refueling outage~~ | Once every 30 days |
| 18) | Turbine Building Vent Radiation Monitor | ~~Each refueling outage~~ | Once every 30 days |

**Once/Operating Cycle**