

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. \_\_\_\_ TO

FACILITY OPERATING LICENSE NO. \_\_\_\_

[LICENSEE].

[PLANT NAME(S)]

DOCKET NOS. 50- \_\_\_\_ AND 50- \_\_\_\_

1.0 INTRODUCTION

By letter dated [DATE] (Agencywide Documents Access and Management System (ADAMS) Accession No. MLxxxxxxxxxx), [as supplemented by letter dated [DATE]] (ADAMS Accession No. MLxxxxxxxxxx), [LICENSEE] (the licensee) requested changes to the Technical Specifications (TSs) for [PLANT NAME]. [ *INCLUDE FOR SUPPLEMENTAL SUBMITTAL:* The supplement dated [DATE] provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on [DATE] ([ ] FR [ ] ).]

2.0 REGULATORY EVALUATION

The background, description, and applicability of the proposed changes associated with the SG tube integrity issue and the applicable regulatory requirements were included in the NRC staff's model safety evaluation (SE) published in the *Federal Register* on March 2, 2005 (70 FR 10298). The "Notice of Availability of Model Application Concerning Technical Specification Improvement To Modify Requirements Regarding Steam Generator Tube Integrity Using the Consolidated Line Item Improvement Process" was published in the *Federal Register* on May 6, 2005 (70 FR 24126), and made the model SE available for licensees to

reference.

### 3.0 TECHNICAL EVALUATION

#### 3.1 Overview

In its [DATE], application [and [DATE], supplement], the licensee proposed changes to the TSs that are modeled after TSTF-449. [*SAMPLE WORDING, INSERT PLANT-SPECIFIC WORDS:* There were minor differences between TSTF-449 and the licensee's application. These included differences in the facility licensing basis (than that discussed in TSTF-449) and differences in TS numbering and format (than that assumed in TSTF-449).]

[With respect to the differences in the facility licensing basis, the differences did not invalidate the technical evaluation of TSTF-449; rather they resulted in the licensee having to slightly deviate from some of the modifications discussed in TSTF-449. For example [*INSERT PLANT-SPECIFIC EXAMPLES IF APPLICABLE*]. Since these differences were minor in nature, they were consistent with the plant's licensing basis, and they were consistent with the intent of TSTF-449, the NRC staff determined they were acceptable.]

[*FOR USE WITH NON-ITS PLANTS:* With respect to the differences in the format of the technical specifications, this resulted in the licensee having to relocate many of the TSTF-449 requirements into the appropriate sections of their technical specifications. *INCLUDE ADDITIONAL DESCRIPTION FOR BASES CHANGES IF APPLICABLE.* Since these differences were administrative in nature and did not affect the technical adequacy of the submittal, the NRC staff determined they were acceptable.]

The remainder of the application was generally consistent with TSTF-449. As a result, the staff determined that the model SE is applicable to this review and finds the proposed changes acceptable.

Consistent with TSTF-449, the proposed TS changes include: (1) a revised definition of LEAKAGE in TS [1.1], (2) a revised TS [3.4.13], "RCS [Reactor Coolant System] Operational Leakage," (3) a new TS [3.4.18], "Steam Generator (SG) Tube Integrity," (4) a revised TS [5.5.9], "Steam Generator (SG) Program," (5) a revised TS [5.6.9], "Steam Generator Tube Inspection Report," and (6) revised Table of Content pages to reflect the proposed changes.

### 3.2 Conclusion

The proposed TS changes establish a programmatic, largely performance-based regulatory framework for ensuring SG tube integrity is maintained. The NRC staff finds that it addresses key shortcomings of the current framework by ensuring that SG programs are focused on accomplishing the overall objective of maintaining tube integrity. It incorporates performance criteria for evaluating tube integrity that the NRC staff finds consistent with the structural margins and the degree of leak tightness assumed in the current plant licensing basis. The NRC staff finds that maintaining these performance criteria provides reasonable assurance that the SGs can be operated safely without increase in risk.

The revised TSs will contain limited specific details concerning how the SG Program is to achieve the required objective of maintaining tube integrity; the intent being that the licensee will have the flexibility to determine the specific strategy for meeting this objective. However, the NRC staff finds that the revised TSs include sufficient regulatory constraints on the

establishment and implementation of the SG Program such as to provide reasonable assurance that tube integrity will be maintained.

Failure to meet the performance criteria will be reportable pursuant to the requirements in 10 CFR Parts 50.72 and 50.73. The NRC reactor oversight process provides a process by which the NRC staff can verify that the licensee has identified any SG Program deficiencies that may have contributed to such an occurrence and that appropriate corrective actions have been implemented.

In conclusion, the NRC staff finds that the TS changes proposed by the licensee in its [DATE], application [and [DATE] supplement] conform to the requirements of 10 CFR 50.36 and establish a TS framework that will provide reasonable assurance that SG tube integrity is maintained without undue risk to public health and safety.

The licensee included in its application the revised TS Bases to be implemented with the TS change. The NRC staff finds that the TS Bases Control Program is the appropriate process for updating the affected TS Bases pages and has, therefore, not included the affected Bases pages with this amendment.

#### 4.0 STATE CONSULTATION

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

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment[s] 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. The NRC staff has determined that the amendment[s] 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 ([ ] FR [ ]). Accordingly, the amendment[s] 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.

## 6.0 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.

## 7.0 REFERENCES

A complete list of references used to complete this review can be found in the NRC's model SE published in the *Federal Register* on March 2, 2005 (70 FR 10298).

Principal Contributor: [NAME]

Date: [DATE]