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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261  
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 CUTTER, A. B. Carolina Power & Light Co.  
 RECIP. NAME: RECIPIENT AFFILIATION  
 VARGA, S. A. Operating Reactors Branch 1

SUBJECT: Application for amend to License DPR-23, revising Tech Specs for Cycle 10 operation. SAR, large break LOCA-ECCS analysis & proprietary Unit 2 radiological assessment of postulated accidents encl. Proprietary repts withheld (ref 10CFR2.790).

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Carolina Power & Light Company

SERIAL: NLS-84-325

JUL 23 1984

Director of Nuclear Reactor Regulation  
Attention: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
REQUEST FOR LICENSE AMENIMENT  
CYCLE 10 OPERATION

Dear Mr. Varga:

SUMMARY AND BACKGROUND

The purpose of this letter is to provide the NRC with Carolina Power & Light Company's (CP&L) plans for operation of the H. B. Robinson Steam Electric Plant Unit No. 2 (HBR2) during Cycle 10 and request revisions to the HBR2 Technical Specifications (TS). Carolina Power & Light Company began discussing Cycle 10 operation with your staff in March 1983, and initial submittals were made in July 1983. A series of meetings were held on April 26, May 10, June 7, and most recently July 12, 1984, in which CP&L and Exxon Nuclear Company (ENC) met with members of the NRC Staff to review the schedule and content of submittals required for Cycle 10. The Staff was informed that criticality for Cycle 10 was scheduled for October 20, 1984, that the status of steam generator repairs indicated that an even earlier criticality may be achievable, and that requested revisions to the Technical Specifications would be submitted on July 20, 1984.

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, CP&L hereby requests revisions to the TS for Cycle 10 operation. Specifically, the following revisions are being requested: (1) Margin Improvement Program, (2) Power Distribution Control (PDC) II, (3) Reactor Coolant Pump Operability Requirements, (4) Core Description Updates, and (5) General Updates of the TS.

DISCUSSION

General

Following completion of the current steam generator repair and refueling outage, CP&L intends to return to full power (2300 MWt) operation for Cycle 10. Since the latter part of Cycle 8, HBR has been operating at reduced power (reduced  $T_{avg}$ ) in an attempt to extend the life of the old steam generators. During this refueling, CP&L intends to install a very low leakage

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core using Part Length Shielding Assemblies (PLSA), described in our letter of October 5, 1983. This core is designed to preclude the HBR2 reactor vessel from reaching the pressurized thermal shock (PTS) screening criteria prior to expiration of the operating license in 2007. In order to reach these full power goals, CP&L is requesting thermal margin relief. Under these plans for Cycle 10,  $F_Q$  and  $F_{\Delta H}$  are 2.32 and 1.65, respectively, and certain reactor protection system setpoints will be revised. In addition, the peak discharge exposure for fuel assemblies will be 44,000 MWD/MTU.

#### Technical Specifications

The technical specification changes required for Cycle 10 are listed in Attachment 1 with deletion/insertion instructions included as Attachment 2. Attachments 3 through 7 provide a summary of each change and its safety analysis and include a significant hazards determination. It was determined that no unreviewed safety questions or significant hazards exist in the requested changes. Based on the safety analyses, operation of the facility with these changes would not involve a significant increase in the probability or consequences of an accident previously evaluated, would not create the possibility of a new or different kind of accident from any previously evaluated, and would not involve a significant reduction in the margin of safety.

The proposed TS pages are enclosed as Attachment 8 with the changes denoted by a vertical bar in the right margin. In accordance with 10CFR170.12, a check in the amount of one hundred and fifty dollars (\$150) in payment of a license amendment application fee is attached.

#### Licensing Methodologies

ENC and CP&L are revising the ECCS and Plant Transient Analyses as necessary, and will incorporate these revisions in Chapter 15 of the FSAR in the next annual update, July 1985. Attachments 9 and 10 to this letter are the Cycle 10 Safety Analysis Report and the Large Break LOCA-ECCS Analysis, respectively. These reports are based on the revised methodology which has been submitted for your approval. The LOCA-ECCS Analysis in Attachment 10 is performed for the limiting break size previously determined. Confirmation that the proper limiting break size was chosen will be provided by August 17, 1984 as previously discussed. Confirmatory analyses for the Disposition of Chapter 15 events are being performed and will be submitted by August 17, 1984 as agreed upon in previous meetings with you. The Radiological Assessment of Postulated Accidents is included as Attachment 12.

#### Single-Failure Analysis

As a result of further discussions with personnel from RSB, CP&L agreed to perform a single active failure analysis (SAFA) for the specific transients that will be analyzed for Cycle 10 of HBR2.

The basic objectives of this analysis were:

- Independently identify the worst single active failure for the specific transients,

- Review the results of the single failure analysis against the assumptions utilized in the FSAR, and
- Confirm that the worst single active failure is assumed for the transient analyzed.

To ensure the appropriate events were analyzed, Chapter 15 events were reviewed. Since the Robinson Plant was licensed prior to the General Design Criteria (GDC) being adopted in its present form and prior to the Standard Review Plan (NUREG-0800) being formulated this analysis was performed in accordance with the original design basis.

The basic approach taken by CP&L to perform the SAFA, was to identify the individual components and related systems required for the Engineered Safety Features (ESF) to perform their intended function. Each system was evaluated individually to determine the possible single failures. The specific transient and accident events that will be analyzed for Cycle 10 of HBR2 were evaluated to determine the worst failure mode for that particular transient or accident. The results of the SAFA are summarized in Attachment 11. This table shows the events analyzed with the worst single active failure for each event. The table also provides the list of events that were not analyzed because they are bounded by the other transients. Additional information on transients not analyzed will be provided in the Disposition of Chapter 15 events, which will be submitted under separate cover.

A comparison of the results of the SAFA with the assumptions of the FSAR was performed. This analysis showed that the basic assumptions utilized in the transient and accident analyses of the FSAR are conservative.

#### Resolution of Potential Unreviewed Safety Questions

During these meetings with the NRC and other Cycle 10 review activities, three potential unreviewed safety questions were raised. Reviews performed to date indicate that these three issues are not a problem for Cycle 10 and future cycles for Robinson pending approval of the technical specification changes referenced below and completion of certain confirmatory analyses as discussed below. The first issue, raised by Westinghouse, is resolved by the technical specification changes discussed in Attachment 5 which ensure consistency between the safety analyses and technical specifications regarding the number of reactor coolant pumps and residual heat removal pumps in operation between cold shutdown and hot zero power. For the concern of dropped rod on turbine runback plants raised by the NRC Staff, confirmatory analyses will be completed with the plant transient analyses, to be submitted later, which verify this concern does not impact Robinson. The final issue, raised by Westinghouse, which is not reload specific and is, therefore, separable from the decisions to be made for Cycle 10 involves the question of the possibility of superheated steam exiting from a high energy line break outside containment which results in exceeding the environmental qualification (EQ) envelope for an area. This concern will be addressed in the context of the overall EQ issue at HBR2. Evaluations to date indicate that the Robinson piping configurations preclude this concern from impacting HBR2.

ADMINISTRATIVE

Exxon Nuclear Company considers the information in Attachment 12 to be proprietary. In accordance with the Commission's regulation 10CFR2.790(b), the attached affidavit provides the necessary information to support the withholding of the subject document from public disclosure.

CONCLUSIONS AND SCHEDULE

The documentation for Cycle 10 has already been submitted or is attached with the exception of confirmatory plant transient and LOCA-ECCS analyses documentation as discussed above. Carolina Power & Light Company and ENC will continue to make every effort to be responsive to resolving any further NRC concerns. It is CP&L's understanding from our meetings with the NRC Staff that the staff will make every possible effort to support timely approval. Our current schedule is for criticality to be achieved on October 20, 1984; however, the present status of critical-path activities indicates we may achieve criticality as early as October 10, 1984. We will keep you informed of any schedular changes; however, we request an expedited review and approval of this submittal to support a possible October 10, 1984 start-up.

Should you have any further questions regarding these matters, please call Mr. Sherwood Zimmerman at (919) 836-6242 as they arise.

Yours very truly,



A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

ONH/mf (3590NH)

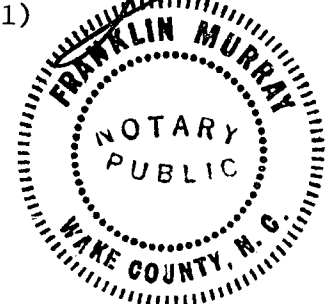
Attachments

cc: Mr. J. P. O'Reilly (NRC-RII)  
Mr. G. Requa (NRC)  
Mr. Heyward G. Shealy (SC)  
Resident Inspector (NRC-HBR)  
Attorney General (SC)

A. B. Cutter, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

  
Notary (Seal)

My commission expires: **OCT 04 1986**



CYCLE 10 TECHNICAL SPECIFICATIONS

| <u>PAGE</u> | <u>CHANGE</u>  |
|-------------|--|
| 2.1-1       | Deleted N-1 Loop Operation (See Attachment 7)  |
| 2.1-2       | New DNB, Deleted reference to old FSAR (See Attachments 3 and 7)   |
| 2.1-3       | New DNB, Delete N-1 Loop Operation, Update References (See Attachments 3 and 7)                            |
| 2.1-4       | Delete N-1 Loop Operation, Update References (See Attachment 7)  |
| 2.1-5       | Change Core Protection Boundary (See Attachment 3)   |
| 2.3-1       | Return to 2300 Mwt, Change OTAT (See Attachments 7 and 3)  |
| 2.3-2       | Return to 2300 Mwt, Change OTAT (See Attachments 7 and 3)  |
| 2.3-3       | Return to 2300 Mwt, Change OPAT (See Attachments 7 and 3)  |
| 2.3-4       | Update FSAR Reference (See Attachment 7)   |
| 2.3-5       | Delete N-1 Loop Operation, Update References, Revise OTAT and OPAT (See Attachments 7 and 3)               |
| 2.3-6       | Update References, New DNB (See Attachments 7 and 3)   |
| 3.1-1       | Revise RCP Operability Requirements (See Attachment 5)   |
| 3.1-2       | Revise RCP Operability Requirements (See Attachment 5)   |
| 3.1-3       | Revise RCP Operability Requirements, New DNB (See Attachments 5 and 3)                                     |
| 3.1-3a      | Supplement Basis, Update References (See Attachment 7)   |
| 3.1-3b      | Supplement Basis, Update References (See Attachment 7)   |
| 3.1-11      | Change Moderator Temperature Coefficient (See Attachment 3)  |
| 3.1-12      | Update References (See Attachment 7)   |
| 3.5-7       | Return to 2300 Mwt (See Attachment 7)  |
| 3.5-7a      | Return to 2300 Mwt (See Attachment 7)  |
| 3.5-10a     | Return to 2300 Mwt (See Attachment 7)  |
| 3.6-1       | Delete Reference to Part-Length Rods (See Attachment 6)  |
| 3.6-3       | Update References (See Attachment 7)   |
| 3.8-6       | Update References (See Attachment 7)   |
| 3.10-2      | Return to 2300 Mwt, Delete N-1 Loop Operation, Revise Power Distribution Control (See Attachments 7 and 4) |
| 3.10-3      | Revise Power Distribution Control (See Attachment 4)   |
| 3.10-4      | Revise Power Distribution Control (See Attachment 4)   |
| 3.10-5      | Revise Power Distribution Control (See Attachment 4)   |
| 3.10-6      | Revise Power Distribution Control (See Attachment 4)   |
| 3.10-7      | Revise Power Distribution Control (See Attachment 4)   |
| 3.10-7a     | Revise Power Distribution Control, Return to 2300 Mwt (See Attachments 4 and 7)                            |
| 3.10-7b     | Return to 2300 Mwt (See Attachment 7)  |
| 3.10-12     | New DNB (See Attachment 3)   |
| 3.10-14     | Revise Power Distribution Control (See Attachment 4)   |
| 3.10-15     | Revise Power Distribution Control, Return to 2300 Mwt (See Attachments 4 and 7)                            |
| 3.10-16     | New DNB, Update References, Return to 2300 Mwt (See Attachments 3 and 7)                                   |
| 3.10-17     | Delete reference to part length rods (See Attachment 6)  |
| 3.10-18     | Repagination   |
| 3.10-19     | Update References (See Attachment 7)   |
| 3.10-20     | Return to 2300 Mwt (See Attachment 7)  |

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| 3.10-22 | Revise Power Distribution Control (See Attachment 4)  |
| 3.10-23 | Revise Power Distribution Control (See Attachment 4)  |
| 3.10-24 | Revise Power Distribution Control (See Attachment 4)  |
| 3.11-1  | Change # Thimbles in Core, Return to 2300 Mwt, Delete N-1 Loop<br>Operation (See Attachments 6 and 7) |
| 3.11-2  | Update References, Return to 2300 Mwt, Delete N-1 loop operation<br>(See Attachment 7)                |
| 4.11-1  | Return to 2300 Mwt, Change # Thimbles in Core (See Attachments 7<br>and 6)                            |
| 4.11-2  | Power Distribution Control (See Attachment 4)   |
| 4.11-3  | Repagination  |
| 5.3-1   | Fuel Assembly Reconstitution, PLSAs, Update References (See<br>Attachment 6)                          |
| 5.3-2   | Update References (See Attachment 7)  |

DELETION/INSERTION INSTRUCTIONSDELETE

2.1-1 → 2.1-8  
2.3-1 → 2.3-6  
3.1-1 → 3.1-3a  
3.1-11 → 3.1-12  
3.5-7 and 3.5-7a  
3.5-10a  
3.6-1  
3.6-2a  
3.8-6  
3.10-2 → 3.10-7  
3.10-12  
3.10-14 → 3.10-20  
3.10-22  
3.11-1 → 3.11-2  
4.11-1 → 4.11-3  
5.3-1 → 5.3-2

INSERT

2.1-1 → 2.1-5  
2.3-1 → 2.3-6  
3.1-1 → 3.1-3b  
3.1-11 → 3.1-12  
3.5-7 and 3.5-7a  
3.5-10a  
3.6-1  
3.6-3  
3.8-6  
3.10-2 → 3.10-7b  
3.10-12  
3.10-14 → 3.10-20  
3.10-22 → 3.10-24  
3.11-1 → 3.11-2  
4.11-1 → 4.11-3  
5.3-1 → 5.3-2



MARGIN IMPROVEMENT PROGRAMDescription of Changes

As a result of changes to the core such as the addition of the Part Length Shielded Assemblies (PLSAs) as part of the pressurized thermal shock program and extending the length of the cycle, it is necessary to seek improved thermal margins to avoid power reductions. Specifically,  $F_Q$  and  $F_{\Delta H}$  limits are being increased, as well as the beginning of cycle (BOC) moderator temperature coefficient. In addition, the overtemperature and overpower  $\Delta T$  setpoints require revision.

Safety Analysis

Analyses have been performed to justify increasing the  $F_Q$  and  $F_{\Delta H}$  Technical Specification limits, and justify an increase in the BOC moderator temperature coefficient below full power. In justifying these changes, re-analyses of the bounding Chapter 15 analyses have been performed which requires changes to various plant setpoints, namely overtemperature and overpower  $\Delta T$ .

The re-analyses of the Chapter 15 events have been performed utilizing the new ENC XNB DNB correlation which justifies a limiting DNB value of 1.17 as opposed to the W-3 correlation value of 1.30. The following documents contain the results of the analysis needed to support the requested Technical Specification changes.

- (1) H. B. Robinson Unit No. 2 Large Break LOCA-ECCS Analysis with Increased Enthalpy Rise Factor, XN-NF-84-72 (Attachment 10).
- (2) Plant Transient Analysis for H. B. Robinson Unit 2 at 2300 Mwt with Increased  $F_{\Delta H}$ , XN-NF-84-74 (to be submitted by August 17, 1984).
- (3) H. B. Robinson Unit 2, Cycle 10 Safety Analysis Report, XN-NF-83-72, Revision 2 (Attachment 9).

Significant Hazards Determination

Carolina Power & Light Company has reviewed this request and has determined that the proposed TS revisions involve no significant hazards considerations because the proposed changes are clearly within the acceptable criteria as discussed in the safety analysis and referenced documentation. The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards consideration by providing certain examples published in the Federal Register on April 6, 1983 (48 FR 14864). One of the examples of an amendment which will likely be found to involve no significant hazards considerations is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. The attached proposed changes fall within the Commission's example (vi) of a change not likely to involve a significant hazards consideration.

POWER DISTRIBUTION CONTROL (PDC) IIDescription of Change

The methodology for control of power distribution is being revised in order to preclude the continuous use of APDMS for Cycle 10 and future cycles. HBR2 will now utilize an improved approach to power distribution control specifically with respect to axial offset control.

Safety Analysis

H. B. Robinson Unit 2 will utilize the generically approved PDC-II procedures with respect to axial offset control. The PDC-II philosophy is generically approved for all Westinghouse reactors per NRC letter dated March 18, 1981 (Robert L. Tedesco to G. F. Owsley). The generic safety analysis of this methodology is contained in the following documents: XN-NF-77-57, Supplements 1 and 2(P), and 2(P) Addendum 1. PDC-II represents a new and improved approach to power distribution control with respect to the previously utilized PDC-I.

Significant Hazards Determination

Carolina Power & Light Company has reviewed this request and has determined that the proposed TS revisions involve no significant hazards considerations because the proposed changes involve the application of a refinement of a previously used methodology. The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards considerations by providing certain examples published in the Federal Register on April 6, 1983 (48 FR 14864). One of the examples of an amendment which will likely be found to involve no significant hazards considerations is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method. The attached proposed changes fall within the Commission's example (vi) of a change not likely to involve a significant hazards consideration.

REACTOR COOLANT PUMPSDescription of Change

As a result of an inconsistency between the FSAR analyzed uncontrolled rod withdrawal transient at low power or subcritical conditions and the TS, a requirement for the number of reactor coolant pumps operating at less than 2% power is being added in response to a potential unreviewed safety question raised by Westinghouse. In order to allow flexibility and cooldown of the plant, the specification allows operation with less than two pumps under one of three conditions which preclude the potential for the transient.

Safety Analysis

The revised requirements concerning reactor coolant pump and residual heat removal pump operability provide consistency between the technical specifications and the limiting transients analyzed for Rod Ejection, Steam Line Break, and Uncontrolled Bank Withdrawal at Low Power or Subcritical Conditions. The changes place tighter restrictions on pump operability for various core conditions assuring that the above analyzed transients are bounding in their respective categories. The results of these transients will be contained in the document, XN-NF-84-74, "Plant Transient Analysis for H. B. Robinson Unit 2 at 2300 Mwt with Increased  $F_{\Delta H}^N$ " (to be submitted in August 1984).

Significant Hazards Determination

Carolina Power & Light Company has reviewed this request and has determined that the proposed TS revision involves no significant hazards considerations because the proposed change provides additional restrictions on the number of reactor coolant pumps required to be operable. The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards considerations by providing certain examples published in the Federal Register on April 6, 1983 (48 FR 14864). One of the examples of an amendment which will likely be found to involve no significant hazards considerations is a change that constitutes an additional limitation, restriction or control not presently included in the TS. The attached proposed change falls within the Commission's example (ii) of a change not likely to involve a significant hazards consideration.

CORE DESCRIPTIONDescription of Changes

The details describing the core are changing to reflect the configuration of the core following the reload. Twelve part length shielding assemblies (PLSAs) are being inserted in the core as discussed in our submittal of October 5, 1983. Two fuel assemblies have been modified by replacing a leaking fuel pin in one assembly and a potentially susceptible fuel pin in another assembly with inert zircaloy pins. In some areas, natural uranium will be utilized. In addition, all references to part length rods are being deleted since there are no longer any part length rods at HBR2, and the number of flux thimbles in the core is being corrected to more accurately describe the core.

Safety Analysis

The PLSAs are discussed in the mechanical design report (XN-NF-83-71(P)) submitted by letter dated October 5, 1983. The remainder of the core changes are discussed in the Cycle 10 Safety Analysis Report, XN-NF-83-72, Revision 2 (Attachment 9).

Significant Hazards Determination

Carolina Power & Light Company has reviewed this request and has determined that the proposed TS revisions involve no significant hazards considerations because the proposed changes are clearly within the acceptable criteria as discussed in the safety analysis and referenced documentation. The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards considerations by providing certain examples published in the Federal Register on April 6, 1983 (48 FR 14864). One of the examples of an amendment which will likely be found to involve no significant hazards considerations is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. The attached proposed changes fall within the Commission's example (vi) of a change not likely to involve a significant hazards consideration.

GENERAL UPDATINGDescription of Changes

In order to achieve consistency within the TS and with current operating practices, all references to N-1 loop operation are being deleted.

During the last cycle, HBR2 was operating under a reduced  $T_{avg}$  program due to steam generator concerns. Since the steam generators are being replaced during this outage and HBR2 will return to full power operation, all references to the reduced  $T_{avg}$  program are being deleted.

The Final Safety Analysis Report (FSAR) for HBR2 was updated in 1982 and is being updated annually. Many of the references in the current TS still refer to the original FSAR. These references are being updated as appropriate.

Safety Analysis

The deletion of N-1 loop operation requires a more conservative mode of operation and provides consistency within the existing TS. The remaining proposed revisions enhance the TS since they include purely administrative changes to achieve consistency and update the TS.

Significant Hazards Determination

Carolina Power & Light Company has reviewed this request and has determined that the proposed TS revisions involve no significant hazards considerations because the proposed changes achieve consistency within the TS and update references and footnotes. The Commission has provided guidance concerning the application of its standards set forth in 10 CFR 50.92 for no significant hazards considerations by providing certain examples published in the Federal Register on April 6, 1983 (48 FR 14864). One of the examples of an amendment which will likely be found to involve no significant hazards considerations is a purely administrative change to the technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. The attached proposed changes fall within the Commission's example (i) of a change not likely to involve a significant hazards consideration.