

Attachment 2

Specific Change Requested to WNP-2 Operating License NPF-21

Add the following paragraph to Section 2.B of Operating License NPF-21 as indicated below:

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- (3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source of special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

ADD

- (6) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to store byproduct, source, and special nuclear materials not intended for use at WPPSS Nuclear Project No. 2. The materials shall be in the form of 9 sealed neutron radiation sources designed for insertion into pressurized water reactors and 40 sealed beta radiation sources designed for use in area radiation monitors. The total inventory shall not exceed 24 microcuries of strontium-90, 20 microcuries of uranium-235, 30 curies of plutonium-238, and 3 curies of americium-241.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I. and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is authorized to operate the facility at reactor core power levels not in excess of full power (3486 megawatts thermal). Items in Attachment 1 shall be completed as specified. Attachment 1 is hereby incorporated into this license.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment 137 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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**REQUEST FOR AMENDMENT TO OPERATING LICENSE NPF-21
ADDITION OF SECTION 2B(6)**

Attachment 3

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No Significant Hazards Consideration Determination

In accordance with the criteria for a significant hazards consideration established in 10 CFR 50.92, the Supply System has evaluated the proposed amendment to the WNP-2 Operating License and determined that it does not represent a significant hazards consideration. The following discussion is provided in support of this conclusion.

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed amendment does not remove or modify existing requirements or safety limits. The requirements of the Act and 10 CFR Parts 30, 40, and 70 will govern storage of sealed byproduct and neutron sources. Operation of WNP-2 requires possession and use of similar materials, and control of such materials is currently being exercised pursuant to the requirements of the Act and 10 CFR Parts 30, 40, and 70. The additional inventory of radioactive materials is a very small percentage of that already being controlled under Operating License NPF-21. Stored materials such as those proposed are not assumed as an initiator of, or contributor to, a previously analyzed accident. Consequently, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

The requirements of the Act and 10 CFR Parts 30, 40, and 70 will govern storage of sealed byproduct and neutron sources. These materials will be stored indefinitely, and will not be put to active use. Operation of WNP-2 requires possession and use of similar materials, and control of such materials is currently being exercised pursuant to the requirements of the Act and 10 CFR Parts 30, 40, and 70. Consequently, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

The additional inventory of radioactive materials included in sealed byproduct and neutron sources to be stored is a very small percentage of that already being controlled under Operating License NPF-21. The storage of materials does not impact the normal or emergency operation of the plant. No change to the manner in which the plant is operated is proposed. No modification to the facility is proposed. Consequently, the proposed amendment does not involve a significant reduction in a margin of safety.