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3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions except as provided in Specification 3.6.3;

for valves that are open under administrative control as permitted by

b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3; and

c. After each closing of each penetration subject to Type B testing, except the containment air locks, if opened following a Type A or B test, by leak rate testing the seal with gas at a pressure not less than P_a, 49.6 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Specification 4.6.1.2d for all other Type B and C penetrations, the combined leakage rate is less than 0.60 L_a.

*Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed, or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.

CONTAINMENT SYSTEMS

PRIMARY CONTAINMENT

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

a. An overall integrated leakage rate of:

Less than or equal to L_a, 0.15% by weight of the containment air per 24 hours at P_a, 49.6 psig;

b. A combined leakage rate of less than 0.60 L_a for all penetrations and valves subject to Type B and C tests, when pressurized to P_a. No individual penetration will be allowed to exceed 5% of the total allowed (0.05 L_a); and

c. A combined leakage rate of less than or equal to 0.60 L_a for all penetrations that are identified in Table 3.6-1 as secondary containment bypass leakage paths when pressurized to P_a.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With (a) the measured overall integrated containment leakage rate exceeding 0.75 L_a, or (b) the measured combined leakage rate for all penetrations and valves subject to Types B and C tests exceeding 0.60 L_a, or (c) the combined bypass leakage rate exceeding 0.60 L_a, restore the overall integrated leakage rate to less than or equal to 0.75 L_a the combined leakage rate for all penetrations and valves subject to Type B and C tests to less than 0.60 L_a, and the combined bypass leakage rate to less than 0.60 L_a prior to increasing the Reactor Coolant System temperature above 200°F.

TABLE 3.6-1

SECONDARY CONTAINMENT BYPASS LEAKAGE PATHS

PENETRATION NO.	FUNCTION	RELEASE LOCATION
X-16	Containment On-Line Purge (Exhaust)	Primary Auxiliary Building
X-17	Equipment Vent (RCDT)	Waste Processing Building
X-18	Containment On-Line Purge (Supply)	Primary Auxiliary Building
X-19	Post Accident Monitoring Sample	Primary Auxiliary Building
X-20	PCCW Loop A (Supply)	Primary Auxiliary Building
X-21	PCCW Loop A (Return)	Primary Auxiliary Building
X-22	PCCW Loop B (Return)	Primary Auxiliary Building
X-23	PCCW Loop B (Supply)	Primary Auxiliary Building
X-32	Equipment and Floor Drainage (RCDT)	Waste Processing Building
X-34	Equipment and Floor Drainage (RC Sump)	Waste Processing Building
X-35A	Safety Injection (Test Line)	Waste Processing Building
X-35B	Reactor Coolant (Pressurizer Steam/Liquid Sample)	Primary Auxiliary Building
X-35C	Reactor Coolant (RC Sample Loop I)	Primary Auxiliary Building
X-35D	Reactor Coolant (RC Sample Loop III)	Primary Auxiliary Building
X-36A	Demineralized Water	Demineralized Water Storage Tank (Outside)
X-36B	Nitrogen Gas (High Pressure)	Primary Auxiliary Building
X-36C	Reactor Makeup Water	Waste Processing Building (Tank Farm)
X-37A	Chemical and Volume Control (Letdown)	Primary Auxiliary Building

TABLE 3.6-1 (Continued)

SECONDARY CONTAINMENT BYPASS LEAKAGE PATHS

PENETRATION NO.	FUNCTION	RELEASE LOCATION
X-37B	Chemical and Volume Control (Excess Letdown)	Primary Auxiliary Building
X-38A/76A	Fire Protection	Fire Water Pumphouse/Fire Water Tanks
X-38B/76B	Combustible Gas Control	Main Steam and Feedwater Pipe Chase
X-39	Spent Fuel Pool Cooling and Cleanup	Fuel Storage Building
X-40A	Nitrogen Gas (Low Pressure)	Primary Auxiliary Building
X-40B	PRT Sample	Primary Auxiliary Building
X-62	Fuel Transfer Tube	Fuel Storage Building
X-67	Service Air	Main Steam and Feedwater Pipe Chase
X-71D/74D	Leak Detection	Main Steam and Feedwater Pipe Chase
HVAC-1	Containment Air Purge	Primary Auxiliary Building
HVAC-2	Containment Air Purge	Primary Auxiliary Building
N.A.	Equipment Hatch	Outside
N.A.	Personnel Hatch	Main Steam and Feedwater Pipe Chase
X-72/75	Combustible Gas Control	Main Steam and Feedwater Pipe Chase

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3 Each containment isolation valve shall be OPERABLE* with isolation times less than or equal to required isolation times.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one or more of the isolation valve(s) inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or

b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or

c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or

d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.3.1 Each containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit by performance of a cycling test and verification of isolation time.

* Locked or sealed closed valves may be opened on an intermittent basis under administrative control.

SURVEILLANCE REQUIREMENTS

4.6.3.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

a. Verifying that on a Phase "A" Isolation test signal, each Phase "A" Isolation valve actuates to its isolation position,

b. Verifying that on a Phase "B" Isolation test signal, each Phase "B" Isolation valve actuates to its isolation position, and

c. Verifying that on a Containment Purge and Exhaust Isolation test signal, each purge and exhaust valve actuates to its isolation position.

4.6.3.3 The isolation time of each power-operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the Containment Spray System ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the safety analyses.

The two independent Containment Spray Systems provide post-accident cooling of the containment atmosphere. The Containment Spray Systems also provide a mechanism for removing iodine from the containment atmosphere, and, therefore, the time requirements for restoring an inoperable Spray System to OPERABLE status have been maintained consistent with those assigned other inoperable ESF equipment.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the Spray Additive System ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a pH value of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. The contained solution volume limit includes an allowance for solution not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the safety analyses.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment and is consistent with the requirements of General Design Criteria 54 through 57 of Appendix A to 10 CFR Part 50.

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Containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with: (1) zirconium-water

INSERT (A)

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

III. Retype of Proposed Changes

See attached retype of proposed changes to Technical Specifications. The attached retype reflects the currently issued version of Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

Revision bars are provided in the right hand margin to designate a change in the text. No revision bars are utilized when the page is changed solely to accommodate the shifting of text due to additions or deletions.

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions except for valves that are open under administrative control as permitted by Specification 3.6.3;

b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3; and

c. After each closing of each penetration subject to Type B testing, except the containment air locks, if opened following a Type A or B test, by leak rate testing the seal with gas at a pressure not less than P_a, 49.6 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Specification 4.6.1.2d. for all other Type B and C penetrations, the combined leakage rate is less than 0.60 L_a.

*Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed, or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.

LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

a. An overall integrated leakage rate of:

Less than or equal to L_a, 0.15% by weight of the containment air per 24 hours at P_a, 49.6 psig;

b. A combined leakage rate of less than 0.60 L_a for all penetrations and valves subject to Type B and C tests, when pressurized to P_a. No individual penetration will be allowed to exceed 5% of the total allowed (0.05 L_a); and

c. A combined leakage rate of less than or equal to 0.60 L_a for all penetrations that are secondary containment bypass leakage paths when pressurized to P_a.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With (a) the measured overall integrated containment leakage rate exceeding 0.75 L_a, or (b) the measured combined leakage rate for all penetrations and valves subject to Types B and C tests exceeding 0.60 L_a or (c) the combined bypass leakage rate exceeding 0.60 L_a, restore the overall integrated leakage rate to less than or equal to 0.75 L_a the combined leakage rate for all penetrations and valves subject to Type B and C tests to less than 0.60 L_a, and the combined bypass leakage rate to less than 0.60 L_a prior to increasing the Reactor Coolant System temperature above 200°F.

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3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3 Each containment isolation valve shall be OPERABLE*.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one or more of the isolation valve(s) inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or

b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or

c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or

d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.3.1 Each containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit by performance of a cycling test and verification of isolation time.

*Locked or sealed closed valves may be opened on an intermittent basis under administrative control.

CONTAINMENT ISOLATION VALVES

SURVEILLANCE REQUIREMENTS

4.6.3.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

a. Verifying that on a Phase "A" Isolation test signal, each Phase "A" Isolation valve actuates to its isolation position,

b. Verifying that on a Phase "B" Isolation test signal, each Phase "B" Isolation valve actuates to its isolation position, and

c. Verifying that on a Containment Purge and Exhaust Isolation test signal, each purge and exhaust valve actuates to its isolation position.

4.6.3.3 The isolation time of each power-operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the Containment Spray System ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the safety analyses.

The two independent Containment Spray Systems provide post-accident cooling of the containment atmosphere. The Containment Spray Systems also provide a mechanism for removing iodine from the containment atmosphere, and, therefore, the time requirements for restoring an inoperable Spray System to OPERABLE status have been maintained consistent with those assigned other inoperable ESF equipment.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the Spray Additive System ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a pH value of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. The contained solution volume limit includes an allowance for solution not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the safety analyses.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment and is consistent with the requirements of General Design Criteria 54 through 57 of Appendix A to 10 CFR Part 50.

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

Containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with: (1) zirconium-water

IV. Safety Assessment of Proposed Changes

The proposed Technical Specification changes included in License Amendment Request 91-06 implement the guidance of NRC Generic Letter 91-08 "Removal of Component Lists From Technical Specifications." Generic Letter 91-08 is intended to improve Technical Specifications as it provides an acceptable alternative means to identifying every component by its plant identification number as it is currently listed in the tables of Technical Specifications. The Technical Specification changes proposed herein by NHY implement the guidance of Generic Letter 91-08 by removing the listing of Secondary Containment Bypass Leakage Paths (Technical Specification Table 3.6-1). Additionally, NHY proposes herein to revise Technical Specification 3.6.3, Containment Isolation Valves, to add a footnote that specifies that locked or sealed closed containment isolation valves may be opened on an intermittent basis under administrative control. As discussed below, the list of containment isolation valves has already been removed from Technical Specifications and is currently located in the NHY Technical Requirements Manual. The proposed addition of this footnote to Technical Specification 3.6.3 is recommended by Generic Letter 91-08 for the purpose of clarifying that locked or sealed closed containment isolation valves are to be considered OPERABLE when they are opened on an intermittent basis under administrative control. The NRC requirements for administrative control have been reiterated in Generic Letter 91-08. New Hampshire Yankee has specified these administrative control requirements in its proposed changes to the Bases for Technical Specification 3.6.3. Technical Specification 3.6.3 is also revised to delete the current requirement regarding isolation times as the inservice testing requirements referenced by Technical Specification 4.0.5 include the verification of valve stroke times for containment isolation valves. New Hampshire Yankee has also proposed revisions to Technical Specification Surveillance Requirement 4.6.1.1 as recommended by Generic Letter 91-08 to reflect that Primary Containment Integrity continues to be maintained although a locked or sealed closed containment isolation valve is opened under administrative control.

The proposed Technical Specification changes included in License Amendment Request 91-06 are administrative in nature and do not involve the elimination or reduction of any current requirements. The changes merely serve to improve Technical Specifications by relocating unnecessary detail to another NHY document which is subject to the change control provisions of the Administrative Controls (Section 6) of the Seabrook Station Technical Specifications. The list of Secondary Containment Bypass Leakage Paths, upon removal from the Technical Specifications, will be located in the NHY Technical Requirements Manual which is duplicated in the Updated Final Safety Analysis Report (Section 16.3) The removal of the list of Secondary Containment Bypass Leakage Paths does not affect the requirement that the leakage from these containment penetrations be less than or equal to 0.6 La when pressurized to Pa (49.6 psig) as provided in Technical Specification 3.6.1.2. The NHY Technical Requirements Manual currently includes numerous plant-specific lists which were previously removed from the Technical Specifications in association with NHY's Technical Specification Improvement Program. The NHY Technical Requirements Manual currently contains three lists addressed by Generic Letter 91-08 including the listing of Containment Isolation Valves, Containment Penetration Conductor Overcurrent Protection Devices and Motor-Operated Valve Thermal Overload Protection. All changes to the NHY Technical Requirements Manual are evaluated pursuant to 10CFR50.59 and are reviewed and approved by the Station Operation Review Committee (SORC), the Nuclear Safety Audit Review Committee

(NSARC) and the NHY Executive Director - Nuclear Production prior to implementation.

The proposed Technical Specification changes included in License Amendment Request 91-06 will not reduce or eliminate any current requirement. The general requirements for Secondary Containment Bypass Leakage Paths and for Containment Isolation Valves will continue to reside in the Technical Specifications while unnecessary plant-specific detail will be placed in the NHY Technical Requirements Manual which is duplicated in the Updated Final Safety Analysis Report Section 16.3. The benefit of removing unnecessary plant-specific detail from the Technical Specifications has been previously recognized by the NRC and NHY and has been previously implemented by NHY's Technical Specification Improvement Program. New Hampshire Yankee has several years of experience with its Technical Requirements Manual and has shown it to be an effective, well-controlled method to reduce unnecessary plant-specific detail from the Technical Specifications. NRC approval of License Amendment Request 91-06 will further enhance the Seabrook Station Technical Specifications.

V. **Determination of Significant Hazards for License Amendment Request 91-06 Proposed Changes**

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

The proposed Technical Specification changes included in License Amendment Request 91-06 are administrative in nature and do not involve the elimination or reduction of any current requirements. The changes merely serve to improve Technical Specifications by relocating unnecessary plant-specific detail to another NHY document which is subject to the change control provisions of the Administrative Controls (Section 6) of the Seabrook Station Technical Specifications. The proposed removal of Technical Specification Table 3.6-1, Secondary Containment Bypass Leakage Paths, and the proposed revisions to Technical Specification 3.6.3, Containment Isolation Valves, and Surveillance Requirement 4.6.1.1 implement the guidance of NRC Generic Letter 91-08. The proposed changes have no relationship to the probability or consequences of an accident previously evaluated.

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

The proposed Technical Specification changes included in License Amendment Request 91-06 implement the guidance of NRC Generic Letter 91-08 by removing the listing of Secondary Containment Bypass Leakage Paths (Technical Specification Table 3.6-1) and by revising Technical Specification 3.6.3, Containment Isolation Valves and Surveillance Requirement 4.6.1.1. The proposed changes are administrative in nature and do not involve the elimination or reduction of any current requirements. The general requirements associated with these Technical Specifications are unaffected by the proposed changes. For example, the removal of the list of Secondary Containment Bypass Leakage Paths does not affect the requirement that the leakage from these containment penetrations be less than or equal to 0.6 La when pressurized to Pa (49.6 psig) as provided in Technical Specification 3.6.1.2. Although the list of Secondary Containment Bypass Leakage Paths will no longer be located in the Technical Specifications, it will be located in a NHY document which is subject to the change control provisions of the Administrative Controls (Section 6) of the Seabrook Station Technical Specifications. Changes to this document require the performance of an evaluation pursuant to 10CFR50.59 to ensure that the proposed change does not introduce an unreviewed safety question and review and approval by the Station Operation Review Committee, the Nuclear Safety Audit Review Committee and the Executive Director-Nuclear Production. The Technical Specification changes proposed in License Amendment Request 91-06 have no relationship to plant accidents and therefore have no potential to create a new or different kind of accident from any accident previously evaluated.

(3) The proposed changes do not result in a significant reduction in the margin of safety.

The proposed Technical Specification changes included in License Amendment Request 91-06 do not reduce or eliminate any current requirements. The proposed changes merely eliminate unnecessary plant-specific detail in the interest of improving the Seabrook Station Technical Specifications. The margin of safety associated with the affected Technical Specifications is not reduced in any way because the general requirements of the affected Technical Specifications remain intact.

VI. Proposed Schedule for License Amendment Issuance and Effectiveness

New Hampshire Yankee requests NRC review of License Amendment Request 91-06 and issuance of a licence amendment having immediate effectiveness by September 7, 1992.

As specified in Section I, the Technical Specification changes proposed herein have been developed based on the NRC guidance contained in Generic Letter 91-08. The proposed Technical Specification changes are intended to improve Technical Specifications by removing unnecessary details. Such detailed information will be located in a NHY manual which is subject to the change control provisions of the Administrative Controls section of the Technical Specifications. The proposed Technical Specification changes will in no way involve a significant hazards consideration pursuant to 10CFR50.92.

NRC review and approval of License Amendment Request 91-06 is requested by September 7, 1992. New Hampshire Yankee is developing a plant modification to allow the Containment Compressed Air System to be cross-connected to the Plant Compressed Air System in order to improve safety and reliability. It is intended that the modification, which would require updating Technical Specification Table 3.6-1, be implemented after approval of this License Amendment Request, thereby reducing the number of License Amendments sought by NHY and freeing NRC resources for other activities.

VII. Environmental Impact Assessmeat

New Hampshire Yankee (NHY) has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NHY concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.