



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 83 TO FACILITY OPERATING LICENSE NO. DPR-3
YANKEE ATOMIC ELECTRIC COMPANY
YANKEE NUCLEAR POWER STATION
DOCKET NO. 50-29

Dated: July 1, 1985

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1.0 INTRODUCTION

Proposed Change No. 139 Supplements 4 and 5 dated May 26, 1981 and January 23, 1984, as revised February 26, 1985 from Yankee Atomic Electric Company (YAEC or the licensee) requested an amendment to the Appendix A Technical Specifications (TS) appended to Facility Operating License No. DPR-3 for the Yankee Nuclear Power Station (Yankee or the facility).

The proposed changes, which superseded or withdrew previously requested changes, would revise many items in the TS, as described in the sections that follow. Most, but not all, of the proposed changes are currently considered acceptable by the staff. Those changes that were not approved in this amendment are being addressed in separate correspondence.

A Notice of Consideration of Issuance of Amendment to License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on March 27, 1985 (50 FR 12168). No public comments or requests for hearing were received.

2.0 BACKGROUND

Proposed Change 139 Supplements 4 and 5 involve 98 changes to the Yankee TS. Tables 1 and 2 list the individual TS affected by the proposed change and also identify the corresponding supplement item number. At the request of the licensee in its letters of January 23, 1984 and February 26, 1985, 29 items of Supplements 4 and 5 have been deleted from evaluation. (Supplement 4: Items 10, 19 through 32, 36, 37, 41, 43, 46 through 51, 53 and 54; Supplement 5: Items 24 and 25.). These items were withdrawn or evaluated under other licensee submittals. Also, 3 items (Supplement 4: Items 12, 13, and 14) were approved by the NRC staff as part of Amendment Nos. 81 and 54. The remaining 66 items are NRC initiated or licensee requested changes under the following categories:

- Typographical corrections and clarifications
- Integrated Plant Safety Assessment changes
- NUREG-0737, Clarification of TMI Action Plan Requirements
- Additions, deletions, changes reflecting reanalysis or modifications to plant systems, components, or operating practices.

Where possible, the TS changes are analyzed as a group and are referred to by supplement item number. Each item has been reviewed for determination of no significant hazards consideration. Further, each change was evaluated for the effects of adding, removing or relaxing requirements to assure that the changes do not increase the likelihood of a malfunction of safety-related equipment, or increase the consequences of an accident.

previously analyzed or create the possibility of a malfunction different from those previously evaluated. In addition the proposals were compared to existing NPC guidance, where applicable.

3.0 TYPOGRAPHICAL CORRECTIONS AND CLARIFICATIONS

3.1 Introduction

Proposed Change 139 Supplement 4 Items 38 and 40 and Supplement 5, Items 1, 2, 3, 4, 5, 7, 8a, 9, 18, 29, 33, 41 and 42 have been identified as changes reflecting typographical corrections, clarification changes and/or correction and do not involve any significant safety requirements.

3.2 Evaluation

- b. Supplement 4 Items 38 and 40: This change requests the diesel fuel oil tank levels identified in TS 3.8.1.1.b.2. and TS 3.8.1.2.b.2. be corrected by changing the level from 4'-4" to 4'-6.5" and from 2'-2" to 2'-4.5". This change was requested to ensure that the minimum required 8000 gallons and 2000 gallons of fuel oil is available for use. The suction line in the fuel storage tank cannot utilize the bottom 4" of the tank. This was not taken into account when determining the original levels of 4'-4" and 2'-2", respectively. This change makes the TS consistent with the existing corresponding minimum requirements of 8000 gallons and 2000 gallons in the fuel oil tank.
- b. Supplement 5 Item 1: This item requests deletion of TS 4.1.1.2.2 since its deletion was not included as part of Proposed Change 178, Supplement 1 of October 15, 1982. TS 4.1.1.2.2 requires that during shutdown (Modes 4 and 5), and before any change in reactivity is made, a control rod group must be withdrawn to a height to provide a reactivity worth of 1%. If this is not possible, then the main coolant system must be bled to provide 5% $\Delta K/K$ shutdown margin with all control rods inserted. This specification is superfluous since the limiting condition for operation, TS 3.1.1.2, already requires that the shutdown margin with all rods inserted be maintained at 5% $\Delta K/K$ or more during shutdown (Modes 4 and 5). Deletion of this item is editorial only and does not reduce the margin of safety provided by TS.

c. Supplement 5, Item 2: TS 3.3.1 requires two operable main steam isolation channels with 1/2 logic. The current action statement may be interpreted to require an inoperable channel to be placed in the trip condition, thus tripping the plant. The proposed change states that, in the event of an inoperable channel, the plant be placed in Hot Standby within 6 hours. This action permits an orderly shutdown which is preferred over a plant trip. This change makes TS 3.3.1 Main Steam Isolation channels, consistent with other Reactor Protective System instruments that have a 1/2 logic. This change is in accordance with standard TS.

d. Supplement 5, Item 3: This change clarifies the criteria for removal and insertion of three reactor protective system startup trips. Current TS (TS 3.3.1 Table 3.3-1 Notes (1), (2) and (3)) utilize a " \geq " and " \leq " for describing the conditions for the removal/insertion of several trips. The use of these symbols implies the existence of an option in the decisionmaking process. Supplement 5, Item 3 removes the implied option on those items when it is unwarranted or does not exist. The clarifications are as follows:

- 1) The power range, neutron flux, low setpoint trip bypass shall be manually removed prior to decreasing below 15 MWe.
- 2) The intermediate range, neutron flux, high startup rate trip bypass is automatically removed prior to decreasing below 15 MWe.
- 3) Low main coolant flow trip bypass is automatically removed prior to increasing above 15 MWe.

Operation of the facility with the proposed change clarifies the TS and does not relax the existing requirement for safe operation.

e. Supplement 5, Item 4 and Item 5: TS 3.3.2 requires two operable channels for the following Engineering Safeguards Systems (ESS) instrumentation for main steam isolation: automatic trip logic, manual initiation and high containment pressure trip/containment isolation. The logic for initiation of each is 1/2. The current action statement may be interpreted to require that an inoperable channel be placed in the trip condition, thus initiating an ESS actuation. The proposed change (Item 4) states that, in the event of an inoperable channel, the plant be placed in Hot Standby within 6 hours. Consequently, an inadvertent ESS actuation does not occur. This makes TS 3.3.2 consistent with the other ESS instruments that have a 1/2 logic. This change is in accordance with standard TS. Item 5 adds the appropriate action statement to Table 3.3-2 to allow the above change.

- f. Supplement 5 Item 7: This item changes the numbering of the surveillance requirement for TS 3.3.3.5 from 4.3.3.6 to 4.3.3.5. No existing requirements are removed or relaxed.
- g. Supplement 5 Item 8a: This item requests TS 4.4.1.1.3.3.a be changed to "The main coolant system is closed and pressurized to >100 psi above saturation pressure". The ">" was inadvertently omitted. Safety is enhanced by an increased saturation margin. No existing requirements are removed or relaxed.
- h. Supplement 5 Item 9: Current TS 4.5.2.e.4 requires "...Two low pressure safety injection pumps develop a combined flow 2180 gpm". The proposed change rewrites the TS to require a combined flow of 2180 gpm or more. The ">" was inadvertently omitted in Proposed Change 156. The basis for this surveillance is to assure a minimum flow rate to meet accident analysis assumptions. Permitting a larger flow as proposed by this change does not change the basis for this specification. No reduction in plant safety will result by operating with the proposed surveillance requirement.
- i. Supplement 5, Item 18: This proposed change updates the off-site organization in Figure 6.2-1 to the current organization. This change 1) identifies the Quality Assurance group reporting directly to the President rather than to the Vice-President(s) Treasurer, 2) reflects the Movement of Project Management and Construction from reporting to the President to reporting to the Vice-President(s) Treasurer and 3) identifies the establishment of a Strategic Planning and Services group. This change does reflect the enhancing of the independence of the Quality Assurance group. No existing requirements are relaxed by this change.
- j. Supplement 5, Item 29: This item corrects the reference in TS 4.5.2.f from 4.5.e.7 to 4.5.2.e.7. TS 4.5.e.7 does not exist and is inconsistent with the TS numbering system. TS 4.5.2.e.7 is the appropriate reference for TS 4.5.2.f.
- k. Supplement 5, Item 33: Current specifications for shutdown margin surveillance 4.1.1.1.1.2 requires the overall core reactivity balance to compare to predicted values to within $\pm 0.8 \Delta K/K$ at least once per 31 Effective Full Power Days. This value contains a typographical error in that a percent sign was omitted. The specification has been corrected to state "... $\pm 0.8\% \Delta k/k$"

1. Supplement 5, Item 41 and Item 42: TS 6.10.2.m on Page 6-24 was improperly labeled item "m" vice "n" as a sequential lettering would require. Item 42 requests this correction be made. Re-numbering this TS also requires all references to it also be changed. TS 4.7.9.c, surveillance on snubber life monitoring, refers to TS 6.10.2.m and is changed by Item 42 to the proper reference, i.e. TS 6.10.2.n. No existing requirement is relaxed or removed by this change.

3.3 Conclusions

Proposed Change 139 Supplement 4 Items 38 and 40 Supplement 5, Items 1, 2, 3, 4, 5, 7, 8a, 9, 18, 29, 33, 41 and 42 are typographical corrections, clarification changes and/or corrections and do not involve unreviewed safety questions. These proposed changes are administrative in nature and will not remove or relax any existing requirement needed to provide reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner. These changes are therefore acceptable.

4.0 REMOVAL OF REFERENCES TO 3 LOOP OPERATION

4.1 Introduction

Yankee, a four loop plant, was designed and analyzed for three loop operation up to 75% of full power (Ref 2). At present, three loop operation is not permitted until further analysis is performed. Supplement 4, Items 1, 2, 3, 4, 5, 8, 33, 34, 35, 39 and 44 request that references to three loop operation be removed from the TS.

4.2 Evaluation

- a. Supplement 4, Item 1: Removes references to 3 loop operation from TS 2.1, Safety Limits.
- b. Supplement 4, Item 2: Removes Figure 2.1-2 from TS. Figure 2.1-2 defines the acceptable combination of thermal power, main coolant system pressure and highest operating loop cold leg coolant temperature for 3 loop operation.
- c. Supplement 4, Item 3: Removes the acceptable trip setpoints for the Reactor Protective System Instrumentation for three loop operation.
- d. Supplement 4, Item 4: Removes all reference and discussion to 3 Loop operation from the basis of TS 2.1, Safety Limits.

- e. Supplement 4, Item 5: Removes all reference and discussion to 3 Loop operation from the basis of TS 2.2, Limiting Safety System Settings.
- f. Supplement 4, Item 8: Removes footnote from TS 3.2.1 stating operation in the 3 Loop mode is not permitted until appropriate LOCA analysis for this mode is approved by the NRC.
- g. Supplement 4, Item 33 and 34: Removes reference to three loop operation from the action statement for TS 3.7.1.1 and the footnote for this TS referring to 3 loop operation.
- h. Supplement 4, Item 35: Removes Table 3.7-2, "Maximum Allowable Power Range Neutron Flux High Setpoint With Inoperable Steam Line Safety Valves During 3 Loop Operation" from the TS.
- i. Supplement 4, Item 39: TS 3/4 8.1, AC Sources, requires two independent circuits between the offsite transmission network and the onsite Class 1E distribution, and also requires three separate and independent diesel generators. The licensee has requested that the action statement requiring reduction of power to less than 75% of rated thermal power in the event one offsite circuit becomes inoperable be removed from TS. The original TS was based on the loss of one offsite circuit and assumed loss of RCP resulting in 3 loop operation at less than 75% of rated thermal power. Since the 3 loop mode of operation is not currently permitted, the operating condition requiring this TS is no longer applicable. The remaining Action statements have been relettered to reflect the deleted Action statement.
- j. Supplement 4, Item 44: Removes reference to 3 loop operation from the TS basis for TS 3/4.7.1, Turbine Cycle.

4.3 Conclusions

The above changes to TS involve additional restrictions and clarification of TS to make them more consistent with the existing prohibition of three loop operation. These changes do not reduce or remove any requirement needed to provide a reasonable assurance of safe operation. The removal of references to 3 loop operations increases the clarity of TS and involves no unreviewed safety question.

5.0 NUREG 0737, CLARIFICATION OF TMI ACTION PLAN REQUIREMENTS

5.1 Introduction

Implementation of NUREG 0737, "Clarification of TMI Action Plan Requirements" (Ref 3) required the Licensee to submit several TS changes. Generic Letter 82-16, "NUREG 0737 Technical Specifications" (Ref 4) provided further guidance for implementing NUREG 0737. Supplement 5 Items 6, 19, 21 and 22 are changes submitted to meet several NUREG 0737 requirements.

5.2 Evaluation

Supplement 5 Item 6: NUREG 0737 II.B.2 required a design review of plant shielding and environmental qualification of equipment for spaces/systems which may be used in post accident operations. As a result of this review, modifications were made to permit the operation of essential equipment from within shielded areas. Part of this modification included the construction of a new building to contain added switch gear for new safety-related loads. This new building, designated as the Post Incident Cooling System (PICS) Building, has been provided with fire detection instruments. In addition, the Non Return Valve (NRV) Enclosure which contains safety-related equipment has also been provided with fire detection equipment. This change (Item 6) adds the fire detection instruments of the PICS Building and NRV Enclosure to Table 3.3-6. Table 3.3-6 lists the minimum required number of operable fire detection instruments. This change constitutes an additional limitation and restriction not presently included in the TS.

Supplement 5 Item 19: NUREG 0737 I.A.1.3 defined shift manning requirements for normal operations. Generic Letter 82-16 provided model TS to limit the amount of overtime worked by plant staff members performing safety-related functions. The TS change proposed by Item 19 is in accordance with the model TS provided in Generic Letter 82-16. This change constitutes an additional limitation not presently included in the TS.

Supplement 5 Item 21 and 22: NUREG 0737 II.K.3.3 required that safety and relief valve failures be reported promptly and challenges be reported annually, and Generic Letter No. 82-16 provided model TS. Item 21 changes TS 6.9.2 to require documentation on an annual basis of all challenges to the pressurizer power-operated relief valves (PORVs) or safety valves. Item 22 changes TS 6.9.4 to require prompt reporting of failures of the PORV or safety valves. These changes are in accordance with the model TS provided in Generic Letter 82-16 and constitute an additional limitation, restriction or control not presently included in the TS.

5.3 Conclusion

The Supplement 5 Items 6, 19, 21 and 22 are in accordance with the appropriate NRC model TS. These changes are additional restrictions and controls, do not remove or relax any existing requirements and involve no significant hazards consideration. Operation with these changes will continue to provide reasonable assurance that the health and safety of the public will not be endangered. These changes are acceptable.

6.0 INTEGRATED PLANT SAFETY ASSESSMENT TECHNICAL SPECIFICATION CHANGES

6.1 Introduction

The Systematic Evaluation Program (SEP) was initiated in February 1977 by the U.S. Nuclear Regulatory Commission to review the designs of older operating nuclear reactor plants to confirm and document their safety. The review provides (1) an assessment of how these plants compare with current licensing safety requirements relating to selected issues, (2) a basis for deciding on how these differences should be resolved in an integrated plant review, and (3) a documented evaluation of plant safety. This review identified equipment and procedural changes necessary as a result of this review. Supplement 5 Items 10, 21, 31, and 32 are TS change requests for compliance with NUREG 0825, Integrated Plant Safety Assessment Systematic Evaluation Program for the Yankee Nuclear Power Station.

6.2 Evaluation

Supplement 5 Item 10 (SEP, Topic III-6)

Current TS 3/4.7.9 Table 3.7-4 allows the addition of snubbers to safety-related systems without prior license amendment to Table 3.7-4 provided that a revision to Table 3.7-4 is included with the next license amendment request. The Licensee has performed an analysis of responses to seismic loading for structures, equipment and piping systems as part of the SEP. As a result of this analysis, 21 new mechanical snubbers are to be added to Table 3.7-4. In addition a new numbering system is incorporated. The current 12 snubbers (4 pressure relief valve snubbers and 8 steam generator snubbers) are retained and renumbered in accordance with the new system. Current TS allow the addition of new snubbers. This is an additional limitation not presently included. The renumbering of snubbers is an administrative change. These changes do not remove or relax any existing requirements and involve no significant hazards consideration. This change is acceptable.

Supplement 5 Item 23 (SEP, Topic VI-7.A.3)

10 CFR Part 50, Appendix A General Design Criteria (GDC) 37, as implemented by Standard Review Plan (SRP) Section 7.1, Appendix B, Branch Technical Position (BTP) Instrumentation and Control Systems Branch (ICSB-25) and Regulatory Guide 1.22, and 10 CFR 50.55a(h), as implemented by Institute of Electrical and Electronics Engineers (IEEE) Std. 279-1971, require that equipment important to safety be tested periodically to ensure the operability of the system as a whole and to verify, under conditions as close to design as practical, the performance of the full operational sequence that brings the system into operation, including the operation of the associated cooling water system.

During the staff review (NUREG-0825), it was found that the Yankee TS provide for the exclusion of testing automatic valves in the flow path of the ECCS. This exclusion did not meet current criteria.

Therefore, the licensee requested deletion of the phrase "(excluding automatic)" from TS 4.5.2.e.1 to satisfactorily meet current criteria. This change constitutes an additional limitation not presently included in TS.

Supplement 5 Items 31 and 32 (SEP, Topic VI-10.A)

10 CFR 50 (GDC 21), as implemented by IEEE Stds. 279-1971 and 338-1877 and Regulatory Guide 1.22, requires that the reactor protection system be designed to permit periodic testing of its functioning, including a capability to test channels independently.

The staff's evaluation of the testing of Reactor Trip System and Engineered Safety Features, including response-time testing concluded that the design of systems that are required for safety should include provisions for periodic verification that the minimum performance of instruments and controls is not less than that which was assumed in the safety analysis.

In the Yankee SEP Integrated Assessment, the licensee states that response-time testing on some components at Yankee is currently being performed. This testing is performed on components (such as diesel generator startup and sequencing, time-delay relays, containment isolation valves, and control rod drop times) whose timing is essential to validate analysis assumptions. Other components whose timing is not essential are not now tested.

The staff's evaluation concluded (Ref 5) that the amount of response-time testing currently performed at Yankee was sufficient and that additional testing to meet the current licensing requirements is not warranted. However, the staff recommended that the present response-time-testing program be included in the Yankee TS.

Item 31 adds a maximum response time limit of ≤ 500 msec to the "Low Main Coolant Flow" in Table 2.2-1 and Item 32 adds the requirement that each diesel generator voltage reaches ≥ 432 volts within 14 seconds on starting from ambient conditions (TS 4.8.1.1.2.a.3 and 4.8.1.1.2.d.3.b). These proposed changes are in accordance with the SEP and constitute an additional limitation not currently present in TS.

6.3 Conclusion

Supplement 5 Items 10, 23, 31 and 32 are submitted to satisfy SEP requirements and are in accordance with those requirements. These changes do not remove or relax any existing requirements and place additional limitations, restrictions or controls not presently included in TS. Operations with these changes provide reasonable assurance that the health and safety of the public will not be endangered. These changes are acceptable.

7.0 RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS

- 7.1 Licensee submittal, Supplement 5 Items 14, 37, 38, 39 and 40 are TS changes which would modify specifications issued as part of the Radiological Effluent Technical Specifications in Amendment 80 to license No. DPR-3.

These proposed changes correct typographical errors, clarify TS, or make TS more consistent. None of these changes to the Radiological Effluent TS remove or relaxes any requirements. The changes also make the Yankee TS more consistent with NRC staff Standard TS.

7.2 Evaluation

- a) Supplement 5, Item 14: Specifies minimum requirements for radiation protection manager which is an additional limitation in TS 6.3.1. These requirements are added to be consistent with Regulatory Guide 1.8 Revision 1: this item also corrects a typographical error in TS 6.4.2 of Radiological Effluent TS, changing "1076 to "1975".
- b) Supplement 5 Item 37: Proposed change to TS table 4.3-6 adds a column titled "Modes In Which Surveillance Required" to clarify the times in which surveillance of radioactive liquid effluent monitoring instrumentation surveillance must be done.
- c) Supplement 5 Item 38: This proposed change adds an additional limitation to TS action statement No. 16 in Table 3.3-8 to require determination of "I-131" concentrations in secondary coolant rather than "Dose Equivalent I-131". This constitutes a clarification of the TS and makes them more consistent with the NRC staffs model TS.
- d) Supplement 5 Item 39: Proposed change to Item c of the TS in Table 4.11-2 is an editorial change which changes the wording to a more common terminology but does not change requirements.

- e) Supplement 5 Item 40: Proposed editorial change to notations c and d of Table 4.11.2 to clarify requirements of these notations.

8.0 INDIVIDUAL TECHNICAL SPECIFICATION CHANGES

The following items are individual changes reflecting additions, deletions or changes as a result of modifications or changes to plant systems or components. Each change has been reviewed for:

- 1) Removing/relaxing existing requirements related to the probability or consequence of accidents previously considered;
- 2) Involvement of significant hazards;
- 3) Introduction of a new, unanalyzed mode of failure.

Supplement 4 Item 45: This change requests that the existing basis for TS 3/4.7.6, Sealed Source Contamination, be modified to include the basis for exempting sealed sources contained within radiation monitoring or boron measuring devices from leak testing requirements. This proposed change is in conformance with Standard TS (Ref 1). Since this is a change to the Basis only, it does not remove or relax any existing requirement needed to provide assurance that the health and safety of the public is not endangered or introduce an unanalyzed safety concern. This change is acceptable.

Supplement 5 Item 17: Current TS commit YAEC to ANSI N18.7-1972 and Regulatory Guide 1.33, November 1972. The Yankee Operational Quality Assurance Program (YOQAP-1-A, Revision 11), approved by the NRC commits Yankee to ANSI N18.7-1976 and Regulatory Guide 1.33, Revision 2. This change revises TS 6.8.1 from committing the licensee to ANSI N18.7-1972 and Regulatory Guide 1.33, Nov. 1972 to the more current standards, ANSI 18.7-1976 and Regulatory Guide 1.33 Revision 2. This will make the TS conform to the Yankee Operational Quality Assurance Program. The proposed change will not remove or relax any existing requirement related to the probability or consequence of accidents previously considered and does not involve significant hazards consideration. This change is acceptable.

Supplement 5, Item 20: Yankee TS currently require the facility Emergency Plan (TS 6.5.2.9.e) and the facility Security Plan (TS 6.5.2.9.f) and their associated implementing procedures be audited by the Nuclear Safety Audit and Review Committee (NSAR) at least every 24 months. Generic Letters 82-17 (Ref 6) and 82-23 (Ref 7) requested licensees to submit changes to their TS requiring the audits be performed every 12 months. These changes would then bring their TS into conformance with 10 CFR 50.54 (t) and 10 CFR 73.40(d). Item 20 requests the appropriate required TS change. This change is in accordance with requirements and constitutes additional control not presently included in the TS and is acceptable.

9.0 ENVIRONMENTAL CONSIDERATION

This amendment involve changes to requirements with respect to installation or use of facility components located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The staff has determined that the amendment involves 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 this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets 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 this amendment.

10.0 CONCLUSION

The staff 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

11.0 ACKNOWLEDGEMENT

This Safety Evaluation has been prepared by K. Ferlic and P. Erickson.

12.0 REFERENCES

1. NUREG-0452, Revision 4, Standard Technical Specifications for Westinghouse Pressurized Water Reactors, November 1981.
2. Yankee Nuclear Power Station Final Safety Analysis Report.
3. NUREG-0737, Clarification of TMI Action Plan Requirements, November 1980.
4. Generic Letter 82-16: NUREG-0737, Technical Specifications, September 20, 1982.
5. NUREG-0825, Integrated Plant Safety Assessment Systematic Evaluation Program, Yankee Nuclear Power Station, June 1983.
6. Generic Letter 82-17: Inconsistency Between Requirements of 10 CFR 50.54 (t) and Standard Technical Specifications for Performing Audits of Emergency Preparedness Programs, October 1, 1982.

7. Generic Letter 82-23: Inconsistency Between Requirements of 10 CFR 73.40 (d) and Standard Technical Specifications for Performing Audits of Safeguards Contingency Plans (Security Plan), October 30, 1982.

TABLE 1

Proposed Change 139 Supplement 4

<u>Item</u>	<u>Page</u>	<u>Technical Specification</u>	<u>Section Evaluated</u>	<u>Status</u>
1	2-1	2.1.1	4	Approved
2	2-3	Figure 2.1-2	4	Approved
3	2-5	Table 2.2-1 Items 2 and 3	4	Approved
4	P2-1	2.1.1	4	Approved
5	B2-3	2.2.1	2	Approved
6	3/4 1-21	3.1.2.11.b.3	-	Not Approved
7	3/4 1-22	4.1.2.11.b	-	Not Approved
8	3/4 2-1	3.2.1	4	Approved
9	3/4 3-19	Table 3.3-4, Item 2.c	-	Not Approved
10	3/4 3-19	Table 3.3-4, Item 3.a	2	Withdrawn
11	3/4 4-5a	4.4.2.2.b	-	Not Approved
12	3/4 4-28	4.4.9.2	2	Approved by Amendment No. 81
13	3/4 4-28	4.4.9.4	2	Approved by Amendment No. 81
14	3/4 5-1	3.5.1.g	2	Approved by Amendment No. 54
15	3/4 5-4	4.5.2.b.1(Footnote)	-	Not Approved
16	3/4 5-4	4.5.2.b.1	-	Not Approved
17	3/4 5-12	3.5.4.c	-	Not Approved
18	3/4 5-12	4.5.4.b	-	Not Approved

Table 1 (Continued)

<u>Item</u>	<u>Page</u>	<u>Technical Specification</u>	<u>Section Evaluated</u>	<u>Status</u>
19	3/4 6-6	4.6.1.5	2	Withdrawn
20	3/4 6-8	3.6.1.7.b	2	Withdrawn
21	3/4 6-11	Table 3.6-1	2	Withdrawn
22	3/4 6-11	Table 3.6-1	2	Withdrawn
23	3/4 6-13	Table 3.6-1	2	Withdrawn
24	3/4 6-13	Table 3.6-11	2	Withdrawn
25	3/4 6-13	Table 3.6-1	2	Withdrawn
26	3/4 6-13	Table 3.6-1	2	Withdrawn
27	3/4 6-14	Table 3.6-1	2	Withdrawn
28	3/4 6-14	Table 3.6-1	2	Withdrawn
29	3/4 6-14	Table 3.6.1	2	Withdrawn
30	3/4 6-14	Table 3.6-1	2	Withdrawn
31	3/4 6-15	Table 3.6-1	2	Withdrawn
32	3/4 6-15	Table 3.6-1	2	Withdrawn
33	3/4 7-1	3.7.1.1 Action a	4	Approved
34	3/4 7-1	3.7.1.1 Note	4	Approved
35	3/4 7-3	Table 3.7-2	4	Approved
36	3/4 7-28	Table 3.7-4	2	Approved by Amendment 71
37	3/4 7.28	Table 3.7-4	2	Approved by Amendment 71
38	3/4 8-1	3.8.1.1.b.2	3	Approved
39	3/4 8-1	3.8.1.1 Action b	4	Approved
40	3/4 8-5	3.8.1.2.b.2	3	Approved
41	3/4 8-8	3.8.2.2.b	2	Approved by Amendment 77

Table 1 (Continued)

<u>Item</u>	<u>Page</u>	<u>Technical Specification</u>	<u>Section Evaluated</u>	<u>Status</u>
42	B3/4 5-2	Basis 3/4.5.4	---	Not Approved
43	B3/4 6-2	Basis 3/4.6.1.5	2	Withdrawn
44	B3/4 7-1	Basis 3/4.7.1.1	4	Approved
45	B3/4 7-4	Basis 3/4.7.6	8	Approved
46	6-3	Figure 6.2-1	2	Approved by Amendment 70
47	6-4	Figure 6.2.2	2	Approved by Amendment 74
48	6-6	6.4-1	2	Approved by Amendment 70
49	6-16	6.9.4	2	Approved by Amendment 70
50	6-6	6.3.1	2	Approved by Amendment 70
51	6-7	6.5.1.2	2	Approved by Amendment 70
52	B3/4 4-9	Basis Figure B3/4.4-1	-	Not Approved
53	3/4 6-8	3.6.1.7.d	2	Withdrawn
54	3/4 6-8	4.6.1.7.h	2	Withdrawn

TABLE 2

Proposed Change 139 Supplement 5

<u>Item</u>	<u>Page</u>	<u>Technical Specification</u>	<u>Section Evaluated</u>	<u>Status</u>
1	3/4 1-4	4.1.1.2.2	3	Approved
2	3/4 3-3	Table 3.3-1, Item 15	3	Approved
3	3/4, 3-d	Table 3.3-1 Notations (1), (2) and (3)	3	Approved
4	3/4 3-12A	Table 3.3-2 Items 3.b, c and d	3	Approved
5	3/4 3-13	Action Statement	3	Approved
6	3/4 3-28	Table 3.3-6	5	Approved
7	3/4 3-29	4.3.3.5	3	Approved
8	3/4 4-2c	4.4.1.1.3.1	-	Not Approved
8a	3/4 4-2c	4.4.1.1.3.3.a	3	Approved
9	3/4 5-8	4.5.2.e, d	3	Approved
10	3/4 7-29b 7-29c 7-29d	Table 3.7-4 Table 3.7-4 Table 3.7-4	6	Approved
11	3/4 7-35	3.7.10.3	-	Not Approved
12	3/4 8-8	3.8.2.2 Action	-	Not Approved
13	3/4 8-11	3.8.2.4 Action	-	Not Approved
14	6-6	6.3.1 and 6.4.2	7	Approved
15	6-7	6.5.1.2	-	Not Approved
16	6-7	6.5.1.5	-	Not Approved
17	6-13	6.8.1	8	Approved
18	6-3	Figure 6.2-1	3	Approved
19	6-2	6.2.2	5	Approved
20	6-11 6-12	6.5.2.9.e and f 6.5.2.9.e and f	8	Approved

Table 2 (Continued)

<u>Item</u>	<u>Page</u>	<u>Technical Specification</u>	<u>Section Evaluated</u>	<u>Status</u>
21	6-15	6.9.2	5	Approved
22	6-18	6.9.4	5	Approved
23	3/4 5-7	4.5.2.e.1	6	Approved
24	3/4 5-13	3.5.5 and 4.5.5	2	Withdrawn
25	B3/4 5-3	Basis 3.5.5	2	Withdrawn
26	3/4 7-18	3.7.5	-	Not Approved
27	3/4 7-18a	3.7.5	-	Not Approved
28	B3/4 7-4	Basis 3/4 7.5	-	Not Approved
29	3/4 5-8	4.5.2.f	3	Approved
30	3/4 9-5	3.9.4.b	-	Not Approved
31	2-5	Table 2.2.1	6	Approved
32	3/4 8-3 3/4 8-4	4.8.1.1.2.a.3 4.8.1.1.2.d.3.b	6	Approved
33	3/4 1-2	4.1.1.1.1.2	3	Approved
34	3/4 3-32	3.3.3.6	-	Not Approved
35	3/4 3-33	Table 3.3-8	-	Not Approved
36	3/4 3-33	Table 3.3-8	-	Not Approved
37	3/4 3-35	Table 4.3-6	7	Approved
38	3/4 3-34	Table 3.3-8	7	Approved
38a	3/4 11-8	Table 4.11-2	-	Not Approved
39	3/4 11-8	Table 4.11-2	7	Approved
40	3/4 11-9	Table 4.11-2	7	Approved
41	3/4 7-29a	4.7.9.e	3	Approved
42	6-24	6.10.2	3	Approved