

the definition for logic system functional test and revise the surveillance interval for emergency core cooling system logic system functional testing from 6 months to 18 months.

**Basis for proposed no significant hazards consideration determination:** As required by 10 CFR 50.91(a) the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

The proposed revisions to change the Cooper Nuclear Station (CNS) Emergency Core Cooling System (ECCS) logic system functional testing surveillance intervals from once/6 months to once/18 months do not involve a significant increase in the probability or consequences of an accident previously evaluated. The change in surveillance interval to once/18 months is necessary to coincide with scheduled refueling outages. The expansion of the scope of the logic system functional tests will ensure that once/18 months all contacts providing an automatic safety function in the ECCS logic systems will be tested. Revising the test frequency to once/18 months will prevent CNS from being required to install jumpers and/or test blocks during power operation, temporarily rendering various safety functions inoperable, and potentially challenging safety systems.

This proposed change will not result in any hardware changes to the facility, nor will it introduce any new mode of operation. Conversely, not changing the surveillance frequency would contribute to a slight, but measurable increase in the probability of an accident. Therefore, this change will not result in a significant increase in the probability of any accident previously evaluated.

This change will not result in a significant increase in the consequences of any accident previously evaluated. The District has evaluated the change in logic system reliability due to the increased proposed surveillance interval and determined it to be negligible. This conclusion is supported by a review of the surveillance history associated with the ECCS logic system functional tests which demonstrates that the logic systems perform reliably. Therefore, this change will not result in a significant reduction in the reliability or performance of the ECCS, and therefore, will not result in a significant increase in the consequences of any accident previously evaluated.

The change to the definition for "Logic System Functional Test" will not result in an increase in the probability or consequences of any accident previously evaluated. This change will only provide clarification of the definition for performing these tests.

These changes are also consistent with the NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," dated September, 1992. Therefore, these changes have been previously reviewed and accepted by the NRC, and have been implemented at other plants.

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

The proposed changes revise the ECCS logic system functional testing surveillance intervals and the definition of that testing to be consistent with the Standard Technical Specifications, and therefore reflect current NRC guidance. The proposed changes do not involve any plant design changes nor any new mode of operation. Therefore, these proposed changes do not create the possibility for a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change create a significant reduction in the margin of safety?

The proposed changes to the CNS ECCS logic system functional testing surveillance intervals do not create a significant reduction in the margin of safety. As discussed above, the District has revised its logic system functional testing to ensure that all contacts providing an automatic safety function in the ECCS logic systems are tested during this surveillance; thus, this change in testing scope will ensure that all essential functions in these logic systems are periodically tested.

The proposed changes will extend the ECCS logic system functional testing intervals to coincide with refueling outages. This will prevent CNS from being required to install jumpers and/or test blocks during power operation which would temporarily defeat safety system capability, and have the potential of challenging plant safety systems and/or degrading logic system reliability. The District has also determined that the change in test frequency will have a negligible impact on logic system reliability. Therefore, since these changes will continue to ensure the reliability of the ECCS logic systems, and thereby the capability of those systems to respond to accidents, these proposed changes do not create a significant reduction in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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**Northeast Nuclear Energy Company (NNECO), Docket No. 50-245, Millstone Nuclear Power Station, Unit 1, New London County, Connecticut**

**Date of amendment request:** June 15, 1995

**Description of amendment request:** The proposed amendment would

change the definition for an alteration of the reactor core to one that is consistent with the intent of the improved standard technical specifications. The proposed amendment also makes administrative changes to several technical specification pages.

**Basis for proposed no significant hazards consideration determination:** As required by 10 CFR 50.91(a) the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

NNECO has reviewed the proposed changes in accordance with 10CFR50.92 and concluded that the changes do not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve an SHC because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously analyzed.

Revising the definition of core alteration would not affect the probability or consequences of a fuel handling accident, since the movement of fuel within the reactor vessel would still be considered a CORE ALTERATION. Additionally, movement of a fuel assembly continues to be performed under the supervision of a senior licensed operator. Therefore, the potential for inadvertent positioning of a fuel assembly would not be affected by the change to the definition of a core alteration.

Other activities which were not specifically excluded as core alterations in the existing technical specifications are now excluded. These activities do not affect the reactivity of the core.

Based upon the above, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any previously analyzed.

All required systems will continue to operate as before. Therefore, there is no possibility of a new or different kind of accident. The change in definition of a core alteration cannot create the possibility of a new type of accident since those activities which affect reactivity and could affect the initiating events for accidents will remain classified as core alterations.

3. Involve a significant reduction in the margin of safety.

Refueling operations which have the potential to alter the reactivity potential of the core will continue to be defined as core alterations. The margin of safety associated with those evolutions will not be altered as a result of the revised definition. As a result of the revised definition, evolutions which take place within the reactor vessel core region with the vessel head installed, or with the reactor vessel completely defueled, will not be considered core alterations. This does not constitute a reduction in the margin of safety since there is no impact on core reactivity potential during these conditions.