The proposed TS change will remove the minimum flow rate requirement for the Standby Liquid Control System (SLCS) pumps from Technical Specifications Section 3/4.1.5. The proposed TS change does not involve any physical change in the plant configuration or the SLCS pumps operation. The SLCS is not used during normal plant operation; therefore, there is no impact on any accident initiators. The proposed TS change does not change the plant response to transients in any way that could increase the likelihood of an accident. The consequences of previously evaluated accidents are not affected since the SLCS pumps and the balance of the SLCS will continue to perform as designed, in accordance with the Anticipated Transient Without Scram (ATWS) Rule specified in 10CFR50.62. The SLCS pumps will continue to be tested periodically for operability in accordance with TS 4.0.5 Surveillance Requirements for American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B & PV) Code Class 2 pumps, and the testing frequency remains unchanged.

Therefore, the proposed TS change does not involve an increase in the probability or consequences of an accident previously evaluated.

2. The proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS change will remove the minimum flow rate requirement for the Standby Liquid Control System (SLCS) pumps from Technical Specifications Section 3/4.1.5. The SLCS and the SLCS pumps will continue to function as currently designed. There are no physical changes being performed to the SLCS or plant configuration. The proposed TS change does not introduce a new failure mode for the SLCS pumps. Physical and electrical redundancy and separation criteria are not impacted by this proposed TS change. There is no change to the Redundant Reactivity Control System (RRCS) logic which could create an accident or transient of a different type.

Therefore, the proposed TS change does not create the possibility of a new or different kind of accident, from any accident previously evaluated.

3. The proposed TS change does not involve a significant reduction in a margin of safety.

The following TS Bases were reviewed for potential reduction in the margin of safety:

3/4.1.5 Standby Liquid Control System 4.0.5 Surveillance Requirements

The margin of safety as defined in the TS Bases will remain the same. The specific flow rate requirement for the Standby Liquid Control System (SLCS) pumps is being removed from the TS since the Anticipated Transient Without Scram (ATWS) equation ensures acceptable flow rates. The SLCS pumps, which are safety-related, are not physically modified or impacted by the proposed TS change. The pumps will continue to be tested for operability, in accordance with TS 4.0.5 Surveillance Requirements for ASME B & PV Code Class 2 pumps, and the testing frequency remains unchanged. This testing will ensure that the SLCS pumps operate in accordance with the existing design basis for the SLCS.

Therefore, the proposed TS change does not involve a reduction in a 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.

Local Public Document Room location: Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 19464

Attorney for licensee: J. W. Durham, Sr., Esquire, Sr. V. P. and General Counsel, Philadelphia Electric Company, 2301 Market Street, Philadelphia, Pennsylvania 19101 NRC Project Director: John F. Stolz

## Sacramento Municipal Utility District (SMUD), Docket No. 50-312, Rancho Seco Nuclear Station, Sacramento County, California

Date of amendment request: June 20, 1995

Description of amendment request: The proposed amendment (PA-190) would permit SMUD to change the reviewer qualifications of the Permanently Defueled Technical Specification (PDTS) D6.5.3 from those required by ANSI N18.1-1971, Section 4.4 to those of Section 4. In addition, PDTS D6.9.6b, Environmental Reports, would be changed to permit annual reporting instead of the current semiannual schedule.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a) the licensee has reviewed the proposed changes against each of the no significant hazards consideration criteria in 10 CFR 50.92, and, based on their safety analysis, concludes:

A significant increase in the probability or consequences of an accident previously evaluated will not be created, because the proposed PDTS changes (1) are administrative in nature, (2) have no effect on any credible accidents previously evaluated in the Rancho Seco Defueled Safety Analysis Report (DSAR) (i.e., the dropped fuel assembly accident, the loss of off-site power condition, or a radwaste tank rupture), (3) will not reduce the effectiveness of the reviews conducted because the Rancho Seco Qualified Reviewer training program ensures Qualified Reviewers have adequate skills to competently perform the required reviews and the Plant Review Committee will continue to conduct their second level review function, and (4) will only affect the timing and management of the required Environmental Reports submittals to the NRC.

PA-190 will not create the possibility of a new or different type of accident than previously evaluated, because the proposed PDTS changes (1) do not modify the configuration of the facility or affect facility operation during the PDM [permanently defueled mode], (2) are administrative in nature, and (3) do not provide any new mechanisms by which an accident can occur.

The proposed PDTS amendment will not involve a significant reduction in the margin of safety, because the proposed changes do not affect the operation of Rancho Seco or any plant systems. Also, The PDTS bases do not rely on (1) Qualified Reviewer qualification requirements or (2) submittal of PDTS D6.9.6b Environmental Reports to the NRC to provide a margin of safety for plant operation during the PDM. The Rancho Seco Qualified Reviewer program relies on training and not the ANSI N18.1 qualification requirements to ensure the PDTS D6.5.3 required reviews are competently performed. Therefore, the proposed changes will not involve a reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis, and based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration. Local Public Document Room location: Central Library, Government Documents, 828 I Street, Sacramento, CA 95814

Attorney for licensee: Dana Appling, Esq., Sacramento Municipal Utility District, P. O. Box 15830, Sacramento, CA 95852-1830

NRC Project Director: Seymour H. Weiss

## South Carolina Electric & Gas Company, South Carolina Public ServiceAuthority, Docket No. 50-395, Virgil C. Summer Nuclear Station, Unit No. 1, Fairfield County, South Carolina

Date of amendment request: June 19, 1995

Description of amendment request: The proposed amendment would revise the Technical Specifications (TS) to delete the scheduler requirements for Type A testing (Overall Integrated Containment Leakage Rate) to be performed at 40 plus or minus 10 month intervals and to delete the schedular requirements for Type B and C tests to be performed at 24 month intervals.

*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. The probability or consequences of an accident previously evaluated is not significantly increased.

There is no increase in the probability of an accident since there is no work planned that would affect containment integrity. The testing of containment isolation valves and