operable requirements per the current technical specifications. Overall TU Electric concludes (and WCAP-10271 with its associate SER from the NRC supports) that testing in bypass when all channel [s] are operable does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Testing in bypass with one channel inoperable will not introduce new configurations. The current Actions Statements for ESFAS already allow testing in bypass if one channel is inoperable. Under the current Technical Specifications for an RPS function, an inoperable channel is placed in bypass (via leads and jumpers) while surveillance testing another channel (the channel under test is placed in trip). Under the proposed changes, either the inoperable channel or the channel being tested may be bypassed.

In either case, the result is one channel in bypass and the other in trip, which leaves one-out-of-two operable channels to initiate the protective function (if the initial logic was two-out-of-four) or one-out-of-one operable channels to initiate the protective function (if the initial logic was two-out-ofthree). Thus, testing in bypass with one channel inoperable does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed technical specification changes will also allow certain ESFAS functions to be tested with an inoperable channel in bypass and the channel being tested in trip. The current technical specifications require that the inoperable channel be in trip and that the channel being tested be in bypass. Per the same logic provided above on testing in bypass with an inoperable channel, this change has no impact on the capability of the system to respond to plant conditions and does increase the potential for inadvertent actuation of a function.

In summary, the proposed changes to the technical specifications and testing in bypass do not increase the probability or consequences of an accident previously evaluated.

(2) Do the proposed changes create the possibility of a new or different type of accident from any accident previously evaluated?

No new operating configurations and no new failure modes are being introduced by testing in bypass or by the proposed technical specification changes; therefore, no new or different type of accident from any accident previously evaluated is being created.

(3) Do the proposed changes involve a significant reduction in the margin of safety?

Testing in bypass does not affect accident configurations, sequences, or response scenarios as modeled in the safety analyses. Testing or maintenance in a bypass configuration does not cause any design or analysis acceptance criteria to be exceeded, nor does it affect the integrity of the fission product barriers. The severity of any accident previously evaluated is not increased. Bypass testing does not affect the functional integrity of the Reactor Protection System (RPS) or the Engineered Safety Features Actuation System (ESFAS). Bypass testing and the proposed technical specification changes do not involve 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.

Local Public Document Room location: University of Texas at Arlington Library, Government Publications/Maps, 702 College, P.O. Box 19497, Arlington, Texas 76019.

Attorney for licensee: George L. Edgar, Esq., Newman and Holtzinger, 1615 L Street, N.W., Suite 1000, Washington, D.C. 20036.

NRC Project Director: William D. Beckner.

TU Electric Company, Docket Nos. 50– 445 and 50–446, Comanche Peak Steam Electric Station, Units 1 and 2, Somervell County, Texas

Date of amendment request: December 30, 1994

Brief description of amendments: The proposed amendments would revise the technical specification for fuel storage to authorize use of the high density fuel storage racks, to increase the spent fuel storage capacity, and to adopt the wording, content, and format of the Improved Standard Technical Specifications.

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. Do the proposed changes involve a significant increase in the probability or consequence of an accident previously evaluated?

This proposed license amendment includes changes which clarify the Technical Specifications, identify existing licensing basis criteria, revise the wording and format to be consistent with the Improved Standard Technical Specifications (NUREG–1431), and provide the criteria for acceptable fuel storage in high density racks. The clarification and the revised wording and format are purely administrative changes and have no impact on the probability or consequences of an accident. The criteria for acceptable fuel storage in the high density racks are discussed below.

The high density racks differ from the low density racks in that the center to center storage cell spacing is decreased from a nominal 16 inches to a nominal 9 inches and the high density racks are free standing whereas the low density racks are bolted to the pool. The allowed storage pattern in the high density racks results in a nominal 12.7 inch center to center spacing (measured diagonally) with a two out of four storage pattern (high density (2/4)). Administrative controls are used to maintain the specified storage patterns and to assure storage of a fuel assembly in a proper location based on initial U–235 enrichment and burnup. The increased storage capacity results in added weight in the pools and additional heat loads.

The only potential impact on the probability of an accident concerns the potential insertion of a fuel assembly in an incorrect location in the high density racks. TU Electric has used administrative controls to move fuel assemblies from location to location since the initial receipt of fuel on site. Through receipt of fuel for two initial core loads and four refueling outages (each of which includes a complete core offload), TU Electric has not inserted a fuel assembly into an improper location. This record demonstrates the adequacy of the administrative controls in place and confirms that the use of such administrative controls will not involve a significant increase in the probability of an accident previously evaluated.

The consequences of all of these changes have been assessed and the current acceptance criteria in the licensing basis of CPSES will continue to be met. The nuclear criticality, thermal-hydraulic, mechanical, material and structural designs will accommodate these changes. Potentially affected analyses, including a dropped spent fuel assembly, a loss of spent fuel pool cooling, a seismic event, and a fuel assembly placed in a location other than a prescribed location, continue to satisfy the CPSES licensing basis acceptance criteria. The analysis methods used by TU Electric are consistent with methods used by TU Electric in the past or methods used elsewhere in the industry and accepted by the NRC.

Based on the acceptability of the methodology used and compliance with the current CPSES licensing basis, TU Electric concludes that the use of the high density racks and the increase in storage capacity do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The administrative changes to the Technical Specifications have no impact on plant hardware or operations and therefore cannot create a new or different kind of an accident.

The spacing changes between fuel assemblies, the administrative controls, the storage limitations, and the increased storage capacity do not generate new failure modes that could create a new or different kind of an accident. The change from bolted low density racks to free standing high density racks will not create the possibility of a new or different kind of an accident. Free standing racks have been commonly used at nuclear power plants to provide for high density storage of spent fuel, and their use