To facilitate the development of individual ITSs, each reactor vendor owners group (OG) and the NRC staff developed Standard TSs. For General Electric (GE) plants, the Standard TSs (STS) are NUREG–1433 for BWR/4 reactor facilities and NUREG–1434 for BWR/6 facilities. NUREG–1434 formed the basis of the GGNS ITSs.

Description of the Proposed Change

The proposed revision to the TSs is based on NUREG–1434 and on guidance provided in the Policy Statement. Its objective is to completely rewrite, reformat, and streamline the existing TSs. Emphasis is placed on human factors principles to improve clarity and understanding. The Bases section has been significantly expanded to clarify and better explain the purpose and foundation of each specification. In addition to NUREG–1434, portions of the existing TSs were also used as the basis for the ITSs. Plant-specific issues (unique design features, requirements, and operating practices) were discussed at length with the licensee, and generic matters with the GE and other OGs.

The proposed changes from the existing TSs can be grouped into four general categories, as follows:

1. Non-technical (administrative) changes, which were intended to make the ITSs easier to use for plant operations personnel. They are purely editorial in nature or involve the movement or reformat of requirements without affecting technical content. Every section of the GGNS TSs has undergone these types of changes. In order to ensure consistency, the NRC staff and the licensee have used NUREG–1434 as guidance to reformat and make other administrative changes.

2. Relocation of requirements, which includes items that were in the existing GGNS TSs but did not meet the criteria set forth in the Policy Statement for inclusion in the TSs. In general, the proposed relocation of items in the GGNS TSs to the Updated Final Safety Analysis Report (UFSAR), appropriate plant-specific programs procedures and ITS Bases follows the guidance of the BWR/6 STS, NUREG–1434. Once these items have been relocated by removing them from the TSs to other licensee-controlled documents, the licensee may revise them under the provisions of 10 CFR 50.59 or other NRC staff-approved control mechanisms which provide appropriate procedural means to control changes.

3. More restrictive requirements, which consist of proposed GGNS ITS items that are either more conservative than corresponding requirements in the existing GGNS TSs, or are additional restrictions which are not in the existing GGNS TSs but are contained in NUREG–1434. Examples of more restrictive requirements include: placing a Limiting Condition of Operation (LCO) on plant equipment, which is not required by the present TSs to be operable; more restrictive requirements to restore inoperable equipment; and more restrictive surveillance requirements.

4. Less restrictive requirements, which are relaxations of corresponding requirements in the existing GGNS TSs which provided little or no safety benefit and placed unnecessary burden on the licensee. These relaxations were the result of generic NRC action or other analyses. They have been justified on a case-by-case basis for GGNS as described in the safety evaluation to be issued with the license amendment, which will be noticed in the **Federal Register.**

Environmental Impacts of the Proposed Action

The Commission has completed its evaluation of the proposed revision to the TSs. Changes which are administrative in nature have been found to have no effect on technical content of the TSs, and are acceptable. The increased clarity and understanding these changes bring to the TSs are expected to improve the operator's control of the plant in normal and accident conditions.

Relocation of requirements to other licensee-controlled documents does not change the requirements themselves. Future changes to these requirements may be made by the licensee under 10 CFR 50.59 or other NRC-approved control mechanisms, which assures continued maintenance of adequate requirements. All such relocations have been found to be in conformance with the guidelines of NUREG–1434 and the Policy Statement, and, therefore, to be acceptable.

Changes involving more restrictive requirements have been found to be acceptable.

Changes involving less restrictive requirements have been reviewed individually. When requirements have been shown to provide little or no safety benefit or to place unnecessary burden on the licensee, their removal from the TSs was justified. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of a generic NRC action, or of agreements reached during discussions with the OG and found to be acceptable for GGNS. Generic relaxations contained in NUREG–1434 have also been reviewed by the NRC staff and have been found to be acceptable.

In summary, the proposed revision to the TSs was found to provide control of plant operations such that reasonable assurance will be provided that the health and safety of the public will be adequately protected.

These TS changes will not increase the probability or consequences of accidents, no changes are being made in the types of any effluent that may be released offsite, and there is not significant increase in the allowable individual or cumulative occupational radiation exposure. Accordingly, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed TS amendment.

With regard to potential non-radiological impacts, the proposed amendment involves features located entirely within the restricted areas as defined in 10 CFR Part 20. It does not affect nonradiological plant effluents and has no other environmental impact. Accordingly, the Commission concludes that there are no significant nonradiological impacts associated with the proposed amendment.

Alternatives to the Proposed Action

Since the Commission has concluded there is no measurable environmental impact associated with the proposed amendment, any alternatives with equal or greater environmental impact need not be evaluated. As an alternative to the proposed amendment, the staff considered denial of the amendment. Denial of the amendment would result in no change in current environmental impacts. The environmental impacts of the proposed amendment and the alternative action are similar.

Alternative Use of Resources

This action does not involve the use of resources not previously considered in the Final Environmental Statement for the Grand Gulf Nuclear Station, Unit 1.

Agencies and Persons Consulted

In accordance with its stated policy, the staff consulted with the Mississippi State official regarding the environmental impact of the proposed action. The State official had no comments.

Finding of No Significant Impact

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a signficant effect on the quality of the human environment. Accordingly, the Commission has determined not to