

performed. Therefore, the proposed change does not involve a significant 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:* Cameron Village Regional Library, 1930 Clark Avenue, Raleigh, North Carolina 27605.

*Attorney for licensee:* R. E. Jones, General Counsel, Carolina Power & Light Company, Post Office Box 1551, Raleigh, North Carolina 27602.

*NRC Project Director:* David B. Matthews.

*Commonwealth Edison Company, Docket Nos. 50-295 and 50-304, Zion Nuclear Power Station, Units 1 and 2, Lake County, Illinois*

*Date of amendment request:* March 24, 1995.

*Description of amendment request:* The proposed amendments would acknowledge the acceptability of performing containment leakage rate testing in accordance with 10 CFR Part 50, Appendix J, and all approved exemptions.

*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 proposed amendment does not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated.

The proposed changes to Technical Specifications to add an allowance to test in accordance with approved exemptions to 10 CFR 50 Appendix J are administrative in nature and will not affect any accident initiators or precursors. 10 CFR 50 Appendix J provides the requirements to periodically test the primary reactor containment. The objective of these requirements is to ensure that leakage from the primary reactor containment structure and systems and components that penetrate the containment is maintained below the limits established for containment leakage. The performance of periodic integrated leakage rate testing (Type A) and local penetration testing (Type B and C) during containment life provides a current assessment of potential leakage from containment during accident conditions.

10 CFR 50.12 allows the Commission to grant specific exemptions to the requirements of 10 CFR 50 Appendix J when those exemptions are authorized by law, will not present undue risk to the public, and are consistent with the common defense and

security. In addition, special circumstances must exist as described in Section 50.12. Since all exemptions to 10 CFR 50 Appendix J receive NRC review and approval prior to being implemented, all containment leakage rate testing will continue to be performed in accordance with NRC approved methodologies when relying upon the allowance that is added to the Technical Specifications by the proposed amendment. The proposed changes are consistent with the requirements provided in NUREG-1431, "Standardized Technical Specifications, Westinghouse Plants" which has been approved by the NRC.

The proposed changes will not affect any accident initiators or precursors and will not change or alter the design assumptions for the systems used to mitigate the consequences of an accident. The proposed changes do not involve the addition of any new or different type of equipment, nor do they involve the operation of equipment required for safe operation of the facility in a manner different from those addressed in the UFSAR. There are no changes to parameters governing plant operation as a result of the proposed changes. The results and conclusions in the Zion Updated Final Safety Analysis Report (UFSAR) are unaffected by this proposed License Amendment.

Based on the previous discussion, the proposed changes do not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes to Technical Specifications to add an allowance to perform containment leakage rate testing in accordance with approved exemptions to 10 CFR 50 Appendix J are administrative in nature and do not involve the addition of any new or different types of safety related equipment, nor does it involve the operation of equipment required for safe operation of the facility in a manner different from those addressed in the safety analyses. The proposed changes may only affect the methods used to perform containment leakage rate testing while in a shutdown condition. No safety related equipment or function will be altered as a result of the proposed changes. Also, the procedures governing normal plant operation and recovery from an accident are not changed by the proposed Technical Specification changes. Since no new failure modes or mechanisms are added by the proposed changes, the possibility of a new or different kind of accident is not created.

3. The proposed changes do not involve a significant reduction in a margin of safety.

Given the proposed changes to Technical Specifications, testing would be allowed in accordance with approved exemptions to Appendix J. Exemptions are allowed by the Commission in accordance with 10 CFR 50.12 when it is shown that the exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense

and security. In addition, special circumstances must exist.

The proposed changes will not impact any margin of safety and testing in accordance with approved exemptions will not involve a significant reduction in a level of safety since containment leakage testing is performed while in a shutdown condition. In addition, it is likely that any test methodology that significantly reduces a margin of safety would not be approved by the NRC.

The ability to safely shut down the operating unit and mitigate the consequences of all accidents previously evaluated will be maintained. Therefore, the margin of safety is not significantly affected.

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 requested amendments involve no significant hazards consideration.

*Local Public Document Room*

*location:* Waukegan Public Library, 128 N. County Street, Waukegan, Illinois 60085.

*Attorney for licensee:* Michael I. Miller, Esquire; Sidley and Austin, One First National Plaza, Chicago, Illinois 60690.

*NRC Project Director:* Robert A. Capra.

*Consumers Power Company, Docket No. 50-155, Big Rock Point Plant, Charlevoix County, Michigan*

*Date of amendment request:* December 15, 1994.

*Description of amendment request:* The proposed amendment would revise Technical Specification 11.3.1.5 ACTION a. to eliminate the need to demonstrate that the actuation circuitry of the unaffected reactor depressurization system channels is operable. In addition, an editorial change correcting a typographical error is also proposed.

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

The proposed change will eliminate the probability of a subsystem failure caused by additional testing (which unnecessarily introduces the potential for human and equipment problems), therefore eliminating the probability that the facility would have to be challenged and brought to the SHUTDOWN condition within 12 hours and to the COLD SHUTDOWN condition within the following 24 hours.