

change does not involve a significant increase in the probability of a previously evaluated accident.

Type A tests are capable of detecting both local leak paths and gross containment failure paths. Experience at South Texas Project Unit 2 demonstrates that excessive containment leakage paths are local leakage detected by Type B and C Local Leak Rate Tests.

Administrative controls govern maintenance and testing of containment penetrations such that the probability of excessive penetration leakage due to improper maintenance or valve misalignment is very low. Following maintenance on any containment penetration, a Local Leak Rate Test is performed to ensure acceptable leakage levels. Following a Local Leak Rate Test on a containment isolation valve, an independent valve alignment check is performed. Therefore, Type A testing is not necessary to ensure acceptable leakage rates through containment penetrations.

While Type A testing is not necessary to ensure acceptable leakage rates through containment penetrations, Type A testing is necessary to demonstrate that there are no gross containment failures. Structural failure of the containment is considered to be a very unlikely event, and in fact, since South Texas Project Unit 2 has been in operation, it has successfully passed each Type A Integrated Leak Rate Test. Therefore, a one-time exemption increasing the interval for performing an Integrated Leak Rate Test results [sic] in a significant decrease in the confidence in the leak tightness of the containment structure. Therefore, this change does not involve a significant increase in the consequences of an accident previously evaluated.

The proposed amendment revised Technical Specification 4.6.1.2 to reference the testing frequency requirements of 10 CFR 50, Appendix J, and to state that Nuclear Regulatory Commission approved exemptions to the applicable regulatory requirements are permitted. This portion of the proposed change is applicable to Unit 1 and Unit 2. The current language of Technical Specification 4.6.1.2 paraphrases the requirements of Section III.D.1.(a) [sic] of Appendix J. The proposed administrative revision simply deletes the paraphrased language and directly references Appendix J. No new requirements are added, nor are any existing requirements deleted. Any specific changes to the requirements of Section III.D.1.(a) will require a submittal from Houston Lighting & Power under 10 CFR 50.12 and subsequent review and approval by the Nuclear Regulatory Commission prior to implementation.

The proposed amendment, in itself, does not affect reactor operations or accident analysis and has no radiological consequences. The change provides clarification so that future Technical Specification changes will not be necessary to correspond to applicable Nuclear Regulatory Commission-approved exemptions from the requirements of Appendix J.

Therefore, this proposed amendment does not involve a significant increase in the

probability or consequences of any accident previously evaluated.

**Criterion 2—Does Not Create the Possibility of a New or Different Kind of Accident From Any Previously Evaluated**

The proposed Unit 2 exemption request does not affect normal plant operations or configuration, nor does it affect leak rate test methods. The proposed change allows a one-time test interval of approximately 66 months for the Integrated Leak Rate Test. Because the test history of South Texas Project Unit 2 demonstrates no Type A test failures during plant lifetime, the relaxation in schedule should not significantly decrease the confidence in the leak tightness of the containment.

The proposed Technical Specification amendment for Units 1 and 2 provides clarification to a specification that paraphrases a codified requirement.

Since the proposed change and amendment would not change the design, configuration or method of operation of the plant, they would not create the possibility of a new or different kind of accident from any previously evaluated.

**Criterion 3—Does Not Involve a Significant Reduction in the Margin of Safety**

The purpose of the existing schedule for Integrated Leak Rate Tests is to ensure that release of radioactive materials will be restricted to those leak paths and leak rates assumed in accident analyses. The relaxed schedule for Integrated Leak Rate Tests does not allow for relaxation of Type B and C Local Leak Rate Tests. Therefore, methods for detecting local containment leak paths and leak rates are unaffected by this proposed change. A one-time increase of the South Texas Project Unit 2 test interval does not lead to a significant probability of creating a new leakage path or increased leakage rates because the test history for Integrated Leak Rate Tests shows no failure during plant life. The margin of safety inherent in existing accident analyses is maintained.

The proposed Technical Specification amendment for Units 1 and 2 is administrative and clarifies the relationship between the requirements of Technical Specification 4.6.1.2, Appendix J, and any approved exemptions to Appendix J. It does not, in itself, change a safety limit, a Limiting Condition of Operation, or a surveillance requirement on equipment required to operate the plant. Nuclear Regulatory Commission approval of any proposed change or exemption to III.D.1.(a) of Appendix J will be required prior to implementation.

Therefore, this change and amendment 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 standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the request for amendments involves no significant hazards consideration.

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*IES Utilities Inc., Docket No. 50-331, Duane Arnold Energy Center, Linn County, Iowa*

*Date of amendment request:* March 10, 1995.

*Description of amendment request:* The proposed amendment would remove redundant Limiting Conditions of Operation and Surveillance Requirements for the containment hydrogen and oxygen monitors in the Technical Specifications (TS).

*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 or consequences of an accident previously evaluated. No physical changes will result from this amendment. This change deletes requirements that are redundant and unduly restrictive. The annual surveillance deleted by this amendment is redundant to the semi-annual surveillance required in Table 4.2-H. The Limiting Conditions for Operation are not changed by the proposed amendment.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. No physical changes will result from this amendment. Functional tests are performed on the hydrogen and oxygen analyzers semiannually as required in TS Table 4.2-H. Deleting the annual requirement for a functional test of the same equipment will not reduce the amount of testing performed or increase the possibility of degraded equipment being undetected.

3. The proposed amendment does not involve a significant reduction in a margin of safety. No physical changes will result from this amendment. The existing requirement for a semi-annual test of the hydrogen and oxygen analyzer in Table 4.2-H exceeds the requirements to be deleted in Section 3.7/4.7-H. The frequency of testing of the hydrogen and oxygen analyzers will not be reduced as a result of this amendment.

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.