

1993, as supplemented November 7, 1994.

#### *The Need for the Proposed Action*

It has been recognized that nuclear safety in all plants would benefit from improvement and standardization of TS. The "NRC Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (**Federal Register** 52 FR 3788, February 6, 1987) and later the Final Policy Statement, formalized this need. To facilitate the development of individual ITS, each reactor vendor owners' group (OG) and the NRC staff, developed standard Technical Specifications. For General Electric (GE) plants, the standard TS (STS) are NUREG-1433 for BWR/4 reactor facilities and NUREG-1434 for BWR/6 facilities. NUREG-1434 formed the basis of the Perry ITS. The NRC Committee to Review Generic Requirements (CRGR) reviewed the STS and made note of the safety merits of the STS and indicated its support of conversion by operating plants to the STS.

#### *Description of the Proposed Change*

The proposed revision to the TS is based on NUREG-1434, and on guidance provided in the Policy Statement. Its objective is to completely rewrite, reformat, and streamline the existing TS. 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 TS were also used as the basis for the ITS. 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 TS can be grouped into four general categories, as follows:

1. Non-technical (administrative) changes, which were intended to make the ITS 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 Perry TS 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 Perry TS, but did not meet the criteria set forth in the Policy Statement for

inclusion in TS. In general, the proposed relocation of items in the Perry TS to the Updated Safety Analysis report (USAR), 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 TS 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 Perry ITS items that are either more conservative than corresponding requirements in the existing Perry TS, or are additional restrictions, which are not in the existing Perry TS, but are contained in NUREG-1434. Examples of more restrictive requirements include: placing a Limiting Conditions for Operation (LCO) on plant equipment, which is not required by the present TS 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 Perry TS, 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 Perry, 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 TS. Changes which are administrative in nature have been found to have no effect on technical content of the TS, and are acceptable. The increased clarity and understanding these changes bring to the TS, 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 TS 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 Perry. 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 TS has been 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 consequences of accidents, no changes are being made in the types of any effluent that may be released offsite, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure.

Therefore, 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 20. It does not affect non-radiological plant effluents and has no other environmental impact.

Therefore, the Commission concludes that there are no significant non-radiological 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. The principal alternative to the amendment would be to deny the amendment request. Such action would not enhance the protection of the environment.

#### *Alternative Use of Resources*

This action does not involve the use of resources not considered previously in the Final Environmental Statement for the Perry Nuclear Power Plant, Unit 1.