

Technical Specifications that provide analytical methods used to determine core operating limits.

*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:

A.1. The proposed change does not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated.

The Updated Final Safety Analysis Report (UFSAR) does not consider any accidents involving the NFSV. The Fuel Handling Accidents that are analyzed (Section 15.7.4) include dropping of a spent fuel assembly onto the spent fuel pool floor and breaking of all fuel rods, and dropping of a fuel assembly inside containment onto the top of the core.

The proposed change to increase the NFSV fuel enrichment limit from 4.0 to 4.65 weight percent U-235 does not affect any of the initiators or precursors of any accident previously evaluated. The proposed change will not increase the likelihood that a transient initiating event will occur because transients are initiated by equipment malfunction and/or catastrophic system failure. Since the proposed change does not involve the introduction of new or redesigned plant equipment, failure mechanisms are not affected. As a result, the probability of occurrence of accidents previously evaluated is not significantly increased.

A new criticality analysis for the proposed change to increase the NFSV fuel enrichment limit from 4.0 to 4.65 weight percent U-235 was performed for the NFSV. It was determined that even in worst case conditions the acceptance criteria was met since the maximum  $K_{eff}$  was determined to be well below the 0.95 limit with a 95/95 probability/confidence level. The consequences of any accident, including a fuel handling accident involving the NFSV, are not significantly increased.

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

The proposed change to the Technical Specifications does 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 analysis. 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.

A.3. The proposed change does not involve a significant reduction in a margin of safety.

Plant safety margins are established through LCOs, limiting safety system settings, and safety limits specified in the Technical Specifications. There will be no changes to either the physical design of the plant or to any of these settings and limits as a result of increasing the NFSV fuel enrichment limit. The change does not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated or create the possibility of a new or different kind of accident from any previously analyzed. Additionally, the revised criticality analysis demonstrates that the maximum  $K_{eff}$  under all postulated conditions remains below the acceptance value of 0.95. Therefore, the change will not result in a significant reduction in a margin of safety.

B.1. The proposed change does not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated.

The proposed change to increase the reactor core fuel enrichment range discussed in the Design Features section of Technical Specifications from "between 2.2 to 4.0" to "up to 4.65" weight percent U-235 is administrative in nature and does not affect any of the initiators or precursors of any accident previously evaluated. The proposed change will not increase the likelihood that a transient initiating event will occur because transients are initiated by equipment malfunction and/or catastrophic system failure. Since the proposed change does not involve the introduction of new or redesigned plant equipment, failure mechanisms are not affected. As a result, the probability of occurrence of accidents previously evaluated is not significantly increased.

The fuel enrichment limit of each core is determined by the core specific design and is determined to be acceptable with respect to the accident analysis by the reload analysis and is not impacted by the value specified in the description in the Design Features section of Technical Specifications. This value is only provided as the highest expected core fuel enrichment in the Design Features section discussion of the reactor core. This change is

administrative in nature and does not affect the consequences of any accident previously evaluated.

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

The proposed change in the reactor core fuel enrichment description contained in the Design Features section of Technical Specifications does 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 analysis. No safety related equipment or function will be altered as a result of the proposed change. Also, the procedures governing normal plant operation and recovery from an accident are not changed by the proposed Technical Specification change. Since no new failure modes or mechanisms are added by the proposed change, the possibility of a new or different kind of accident is not created.

B.3. The proposed change does not involve a significant reduction in a margin of safety.

Plant safety margins are established through LCOs, limiting safety system settings, and safety limits specified in the Technical Specifications. There will be no changes to either the physical design of the plant or to any of these settings and limits as a result of increasing reactor core fuel enrichment value given in the Design Features section of Technical Specifications. The change does not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated or create the possibility of a new or different kind of accident from any previously analyzed.

Based on the above discussion, the ability to safely shutdown the operating unit and mitigate the consequences of all accidents previously evaluated will be maintained. Therefore, the margin of safety is not significantly affected.

C.1. The proposed change does not involve a significant increase in the probability of occurrence or consequences of any accident previously evaluated.

The proposed change to add three documents to the list of documents that provide the analytical methods to determine core operating limits is administrative in nature and does not affect any of the initiators or precursors of any accident previously evaluated. The proposed change will not increase the likelihood that a transient initiating event will occur because transients are initiated by equipment malfunction