

approximately 70 months for the ILRT. Given the test history of IP-2 of 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 provides clarification to a specification that paraphrases a codified requirement.

Since the proposed change would not change the design, configuration or method of operation of the plant, it 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 ILRTs is to ensure that the release of radioactive materials will be restricted to those leak paths and leak rates assumed in accident analyses. The relaxed schedule for ILRTs does not allow for relaxation of Type B and C LLRTs. Therefore, methods for detecting local containment leak paths and leak rates are unaffected by this proposed change. Given that the test history for ILRTs shows no failure during plant life, a one-time increase of the test interval does not lead to a significant probability of creating a new leakage path or increased leakage rates, and the margin of safety inherent in existing accident analyses is maintained.

The proposed Technical Specification change is administrative and clarifies the relationship between the requirements of TS 4.4.A.3, Appendix J and any approved exemptions to Appendix J. It does not, in itself, change a safety limit, an LCO [limiting condition for operation], or a surveillance requirement on equipment required to operate the plant. The NRC will directly approve any proposed change or exemption to [Section] III.D.1.(a) of Appendix J prior to implementation.

Therefore, this change does not involve a significant reduction in the margin of safety.

Based on the Safety Analysis, it is concluded that: (1) The proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92 and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change. Moreover, because this action does not involve a significant hazards consideration, it will also not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

Although the licensee has included an evaluation of a proposed exemption to 10 CFR part 50, Appendix J requirements in the above determination of no significant hazards consideration, only the part related to the amendment is pertinent to this notice of proposed amendment. The exemption request will be considered as a separate matter on its own merits. The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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*Duke Power Company, et al., Docket Nos. 50-413 and 50-414, Catawba Nuclear Station, Units 1 and 2, York County, South Carolina*

*Date of amendment request:* October 31, 1994

*Description of amendment request:* The requested amendments would remove the stroke times for the steam generator power operated relief valves (PORVs) from Technical Specification (TS) Tables 3.6-2a and 3.6-2b. The PORVs are part of the main steam vent to atmosphere system. The PORV actuators have difficulty developing enough closing thrust to adequately overcome all of the friction loads within the valves; therefore, difficulty exists in consistently meeting the present 5-second closing stroke time requirement. The licensee requests the proposed change on the basis that the PORVs do not receive an actual containment isolation signal; therefore, it is justified to remove the stroke times from TS Tables 3.6-2a and 3.6-2b.

*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:

In 48 FR 14870, the Commission has set forth examples of amendments that are considered not likely to involve significant hazards considerations. Example (vi) describes a change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but

where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. In this case, the proposed amendment is similar to example (vi) in that it removes the required isolation time of the steam generator PORVs from TS Tables 3.6-2a and 3.6-2b; however, no adverse impact upon accident analyses is created as a result.

#### Criterion 1

The requested amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated. The effects of the delays in isolation times on the various transients affected have been analyzed and found to be acceptable. Since these valves do not receive a containment isolation signal, and no credit is taken for operation of these valves in the dose analysis for a containment isolation function, a maximum stroke time does not apply for containment isolation.

#### Criterion 2

The requested amendments will not create the possibility of a new or different kind of accident from any accident previously evaluated. SV PORV closure (provided the valves are not already closed at the start of the transient) is a response to a transient already in progress. The possibility of a spurious SV PORV opening will not be affected by the requested amendments. No equipment or component reconfiguration will occur as a result of this change. Finally, no changes to plant procedures are being made which would affect any accident causal mechanisms.

#### Criterion 3

The requested amendments will not involve a significant reduction in a margin of safety. The isolation times which are applicable to these valves are specified in TS Table 3.3-5, Engineered Safety Features Response Times. The effects of the isolation of these valves were evaluated based on their ESF function, not a containment isolation function, and determined to be acceptable.

Based upon the preceding analyses, Duke Power Company concludes that the requested amendments do not involve a significant hazards consideration.

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