

of operation of any plant equipment used to mitigate the consequences of an accident. The changes to the surveillance requirements will result in an overall improvement in plant safety by reducing the likelihood of plant trips and subsequent challenges to safety systems, decreasing equipment degradation due to excessive testing, reducing radiation exposure to plant personnel, increasing the availability of safety related equipment, and eliminating an unnecessary burden on plant personnel. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve any change to the configuration or method of operation of any plant equipment used to mitigate the consequences of an accident. The relaxation of surveillance tests curtails the excessive amount of testing that increases wear on the equipment and reduces the likelihood of plant trips and subsequent challenges to safety systems. The relaxation also increases the availability of safety related equipment. Accordingly, no new failure modes have been defined for any plant system or component important to safety nor has any new limiting failure been identified as a result of the proposed changes. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed changes do not involve a significant reduction in a margin of safety. The proposed changes eliminate an unnecessary burden without compromising protection for public health and safety. The proposed changes were generically analyzed by the NRC as part of a comprehensive study and presented in NUREG-1366 "Improvement to Technical Specifications (sic) Surveillance Requirements." The NRC concluded that while some testing at power is essential to verify equipment and system operability, safety can be improved, equipment degradation decreased, and unnecessary personnel burden relaxed by reducing the amount of testing at power. SNC has analyzed plant operations and made a comparison with the criteria stated in NUREG-1366 for the line-item improvements contained in this request and has found the NUREG-1366 basis to be consistent with the Farley design and operation experience. Therefore, the

proposed changes do 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.

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*Date of amendment request:* December 6, 1994.

*Description of amendment request:* The proposed change to Technical Specification 3/4.1.3.2 will delete Surveillance Requirement (SR) 4.1.3.2.2, that presently requires, every 31 days, the movement of at least 2% of its height for each Axial Power Shaping Rod not fully withdrawn. The proposed amendment would also change the surveillance intervals for the following Technical Specifications (TS) in accordance with the guidance of Generic Letter 93-05, "Line Item Technical Specifications Improvements to Reduce Surveillance Requirements For Testing During Power Operation," and NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements:"

1. TS 4.1.3.2 for the Movable Control Assemblies "Group Height—Safety and Regulating Rod Groups," will relax testing requirements from at least once every 31 days to every 92 days.

2. TS 4.4.6.2, for "Operational Leakage," relaxes the requirement to leakage test RCS pressure isolation valves prior to MODE 2 whenever the plant has been in COLD SHUTDOWN for 72 hours to whenever the plant has been in COLD SHUTDOWN for 7 days.

3. SR 4.5.2.c.2 for TS 4.5.2, "ECCS Subsystems—Tavg equal to or greater than 280° F," relaxes the inspection requirements for ensuring no debris in containment from "at the completion of each containment entry" to "at least once daily."

4. TS 4.6.2.1.d, for the "Containment Spray System," relaxes the SR to perform an air or smoke flow test through the spray header and nozzles from once per 5 years to once per 10 years.

5. TS 4.10.4.2 for "Special Test Exceptions Shutdown Margin" relaxes the SR interval for testing rod insertion capability prior to reducing shutdown margin from 24 hours to 7 days.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the NRC has provided its analysis of the issue of no significant hazards consideration, which is presented below:

(1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The change does not involve a significant increase in the probability of an accident previously evaluated nor does it involve a significant increase in the consequences of an accident previously evaluated because no change is being made to any accident initiator and no accident conditions or assumptions used in evaluating the radiological consequences of an accident are changed. Relaxation of surveillance requirements is in accordance with GL 93-05, NUREG-1366, and is compatible with plant operating experience. Deletion of SR 4.1.3.2 is consistent with NUREG-1430, "Improved Standard Technical Specifications for B&W Plants." No credit is taken in any accident analysis or mitigation requirements for the Axial Power Shaping Rod Group.

(2) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not create the possibility of any new or different kind of accident from any accident previously evaluated because no new accident initiators or assumptions are introduced by these proposed changes. Relaxation of SRs as discussed in GL 93-05 was evaluated as reducing equipment degradation with no increase in safety consequences consistent with the maintenance of plant specific reliability of the equipment and systems affected. Deletion of the SR to move the Axial Power Shaping Rod Group does not affect the requirement to verify rod position, and there is no credit taken for movement of these rods to mitigate an accident.

(3) The proposed changes do not result in a significant reduction in the margin of safety.