



April 11, 2000

PG&E Letter DCL-00-056

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Supplement to License Amendment Request 00-01,  
Administrative Revisions to the Improved Technical Specifications

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Dear Commissioners and Staff:

Enclosed is a supplement to License Amendment Request (LAR) 00-01, submitted in DCL-00-041, dated March 16, 2000. This LAR proposed to change the Improved Technical Specifications (ITS), as approved under License Amendments 135 and 135 dated May 28, 1999, to correct errors made when incorporating final mark-ups to NUREG-1431 into the ITS.

This supplement provides additional detail regarding several proposed changes in Section D.3 as discussed with the NRC. The additional detail clarifies which changes are administrative and which changes require a supplemental NRC safety evaluation. This supplement is intended to entirely replace Enclosure 1 in the original application. The revised version of Enclosure 1 provides greater detail concerning proposed revisions and their classification. A revised copy of Enclosure 1 is enclosed.

Sincerely,

Gregory M. Rueger

cc: Edgar Bailey, DHS  
Steven D. Bloom  
Ellis W. Merschoff  
David Proulx  
Diablo Distribution

Enclosures

A001

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

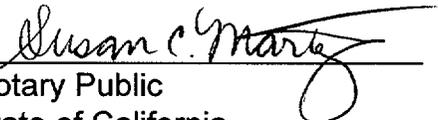
In the Matter of PACIFIC GAS AND ELECTRIC COMPANY	) Docket No. 50-275 ) Facility Operating License ) No. DPR-80
Diablo Canyon Power Plant Units 1 and 2	) Docket No. 50-323 ) Facility Operating License ) No. DPR-82

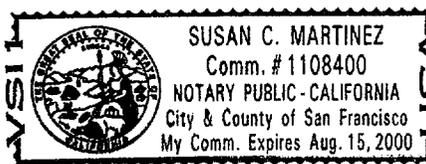
AFFIDAVIT

Gregory M. Rueger, of lawful age, first being duly sworn upon oath says that he is Senior Vice President - Nuclear Power Generation of Pacific Gas and Electric Company; that he is familiar with the content thereof; that he has executed the supplement to LAR 00-01 on behalf of said company with full power and authority to do so; and that the facts stated therein are true and correct to the best of his knowledge, information, and belief.

  
 \_\_\_\_\_  
 Gregory M. Rueger  
 Senior Vice President  
 Nuclear Power Generation

Subscribed and sworn to before me this 11<sup>th</sup> day of April, 2000.

  
 \_\_\_\_\_  
 Notary Public  
 State of California  
 County of San Francisco



## ADMINISTRATIVE REVISIONS TO THE IMPROVED TECHNICAL SPECIFICATIONS

### A. DESCRIPTION OF AMENDMENT REQUEST

This License Amendment Request (LAR) revises the Improved Technical Specifications (ITS) approved under License Amendment (LA) 135/135 dated May 28, 1999 as follows.

1. Typographical corrections listed below are corrections based upon errors in the certified copy of the ITS that was submitted by DCL 99-072, dated May 19, 1999 and revised by DCL 99-078, dated May 27, 1999.
  - a. Technical Specification (TS) 1.2, Example 1.2-2, Required Action A.2 - Correct the misalignment of the logical connector.
  - b. TS 2.1, Figure 2.1.1-1 - Correct spelling error and text misalignment.
  - c. TS 3.1.3, Figure 3.1.3-1 - Revise the legend to state MTC-PCM/°F rather than MTC-PCM.
  - d. Limiting Condition of Operation (LCO) 3.2.2, Required Action A 1.2.2. - Correct completion time misalignment.
  - e. LCO 3.3.1, Condition C - Correct spelling error.
  - f. LCO 3.3.1, Required Action E, Note - Note reads "Function 26" but should read "Function 2.b."
  - g. LCO 3.3.1, Table 3.3.1-1 - Correct table number in heading.
  - h. LCO 3.3.1, Table 3.3.1-1 Function 6 and 7 - Correct referenced page numbers.
  - i. TS 3.3.1, Table 3.3.1-1, Function 22 - The required surveillance tests is corrected by deleting SR 3.3.1.17 and replacing it with SR 3.3.1.5 (as provided by response to request for additional information item (RAI) number DC 3.3-006 in DCL 99-063).
  - j. LCO 3.3.2, Required Action O - Correct character from numerical "0" to a capital "O."
  - k. LCO 3.3.2, Required Action P, Note - Note will read; "One additional channel may be bypassed for up to 4 hours for

surveillance testing" (as provided in response to RAI Q 3.3-66 in DCL 98-167).

- l. TS 3.4.6, SR 3.4.6.3, Frequency - The frequency will be revised to 7 days (as shown in NUREG-1431 and the current Technical Specifications (CTS)).
  - m. LCO 3.4.8, Note 1 - Text should include the phrase "per 8 hour period" (as shown in the final markup of NUREG-1431 in description of change (DOC) 01-06-M).
  - n. LCO 3.4.14, Required Action, A.2.1 and A.2.2 - Correct the misalignment of logical connector.
  - o. TS 3.7.10, Surveillance Requirement (SR) 3.7.10.2 - Correct numbering of surveillance.
  - p. TS 3.7.13, SR 3.7.13.4 - The word "on" should be revised to "one."
  - q. TS 5.5.9.d.1.f.1) - Insert the word "being" between "are" and "applied."
  - r. TS 5.5.11.a, b, e - The phrase "operating cycle" will be revised to "24 months" consistent with the CTS Errata RAI, DC-ALL-001 (DCL 98-107, dated August 5, 1998, and DCL 98-144, dated October 16, 1998). These errata corrections incorporated LA 119/117 and LA 118/116 (24 Month Fuel Cycle) and were made to the CTS (4.7.5.1.c & d, 4.7.6.1.b, c, & d, 4.9.12.b & d) but were inadvertently overlooked in the relocated material in ITS 5.5.11. The relocated CTS material corrected by DC-ALL-001 uses the phrase "Refueling interval" which is defined in CTS Table 1-1 as 24 Months.
  - s. TS 5.7.2.d.1; Add word "dose" between "radiation" and "rates."
2. Editorial Change listed below reflects a change to a title applicable at the time LAs 135/135 was approved.
- a. TS 5.7.2.a.1 - The "Shift Supervisor" title is changed to "Shift Manager."
3. Corrections listed below reflect changes to the conversion application and it's associated supplements.

- a. TS 3.3.1, Table 3.3.1-1, Function 5 - SR 3.3.1.16 (Response Time Testing) will be added to both Mode 2 and Mode 3, 4, 5 (with Control Rods capable of withdrawal).
- b. TS 3.3.1, Table 3.3.1-1, Function 16 - SR 3.3.1.15 will be removed from Function 16.a and SR 3.3.1.10 will be removed from Function 16.b.
- c. TS 3.3.2, Table 3.3.2-1, Function 3.b.(3); SR 3.3.2.10 will be removed from Function 3.b.(3).
- d. TS 3.3.3, SR 3.3.3.2 - Restore the note excluding neutron detectors from Channel Calibration.
- e. TS 3.3.5, SR 3.3.5.2 and SR 3.3.5.3 - The frequency will be restored to the CTS value of 18 months.
- f. LCO 3.4.13.d - The 1 gpm value provided in LCO 3.4.13.d will be deleted from the LCO and the remaining items renumbered.
- g. TS 3.4.14, SR 3.4.14.1 - The exception list under Frequency will be expanded to include valves 8701 and 8702.
- h. TS 3.7.1, Table 3.7.1-1 - The CTS 3.7.1, Table 3.7-1 note which states "Unless the Reactor Trip System breakers are in the open position." will be added to Table 3.7.1-1.
- i. TS 5.1.2 - The phrase "(other than the Shift Technical Advisor)" will be deleted.
- j. TS 5.5.9.d.2 - The phrase "and all tubes containing through wall cracks" will be struck.
- k. TS 5.7.1.e - Add the phrase "or personnel continuously escorted by such individuals" after "protection procedures."

## B. BACKGROUND

On June 2, 1997, PG&E submitted LAR 97-09, "Technical Specification Conversion License Amendment Request," which proposed an improved set of TS for Diablo Canyon Power Plant (DCPP), Units 1 and 2. Between June 1997 and May 1999, PG&E and the NRC resolved comments and questions from the NRC on the proposed ITS. On May 28, 1999, the NRC issued the ITS in LA 135/135, for Units 1 and 2, respectively, to be implemented no later than May 31, 2000.

As part of the development of the LAR and the ITS, numerous reviews of the markups and the ITS were performed. However, due to the size of the document and the number of changes, it was recognized that some errors would occur. As such, PG&E planned on this LAR to resolve any errors that were identified during preparation for implementation following issuance of the ITS. The proposed LAR will provide assurance that the ITS, when implemented in May 2000, is accurate and correct.

The largest percentage of the errors identified occurred in ITS Section 3.3. This was the last section reviewed by the NRC, and was completed just prior to the final submittal of the ITS. Consequently, the least number of extra reviews were performed on this section. To assure no other errors are in Section 3.3, additional Engineering and Regulatory Services reviews were performed. These reviews identified no additional items.

#### C. JUSTIFICATION

The proposed changes will provide clarification of the ITS and assure their correct interpretation and implementation.

The proposed change to the Shift Supervisor title is an administrative change that will eliminate confusion between DCPD procedures and the ITS.

#### D. SAFETY EVALUATION

The proposed corrections are administrative in nature. They will provide no changes to the intent of LA 135/135 or the intended operation of the plant. The changes will clarify the specifications and assure that misinterpretations will not occur during plant operation.

##### 1. Typographical Corrections

The proposed changes are administrative changes. They have no impact on the requirements of the TS. The proposed changes make the final version of the ITS consistent with the mark-ups of NUREG-1431 provided to the NRC from June 2, 1997, to May 27, 1999, and approved as part LA 135/135 dated May 28, 1999.

These revisions are acceptable because they bring the ITS into conformance with the final NUREG-1431 mark-ups submitted to the NRC. These errors occurred during the incorporation of comments and creation of the final clean copy of the ITS.

##### 2. Editorial Revision

The proposed change is an administrative change. It will have no impact on the requirements of the TS. The proposed change is consistent with the final version of the ITS and with the mark-ups of NUREG-1431 provided to the NRC from June 2, 1997, to May 27, 1999, and approved as part LAs 135/135 dated May 28, 1999.

This change is acceptable because there is no reduction in responsibility or qualifications for the new title of "Shift Manager." The work functions and responsibilities of the individual previously identified as "Shift Supervisor" remain unchanged.

3. Corrections

Several instances of incorrect incorporation of the CTS into the ITS have been identified. The basis for the acceptability of each change is identified below:

a. TS 3.3.1, Table 3.3.1-1, Function 5 - SR 3.3.1.16 (Response Time Testing)

The restoration of response time testing is acceptable because it is consistent with the CTS Table 3.3-2 and the approved safety analysis for plants without upper head injection (such as DCP) as described in WCAP-9500, "Reference Core Report - 17X17 Optimized Fuel Assembly," May 1982.

The deletion of the response time testing in the ITS was inappropriate. The CTS requires response time testing because the source range neutron flux (high setpoint) and power range neutron flux (high and low setpoints) are credited for mitigation of an inadvertent rod withdrawal accident in Mode 3. As such, it is appropriate that the requirement be in the TS.

The deletion of response time testing from the CTS was never proposed nor justified. The removal of response time testing (SR 3.3.1.16) from the source range neutron flux requirement was inadvertent. Since this change was never reviewed or approved as a part of LA 135/135, its restoration is considered an administrative change.

b. TS 3.3.1, Table 3.3.1-1, Function 16

SR 3.3.1.15 will be removed from Function 16.a, "Low Auto-Stop Oil Pressure," and SR 3.3.1.10 will be removed from Function 16.b, "Turbine Stop Valve Closure." This would result in Function 16.a requiring a Channel Calibration and Function 16.b requiring a trip

actuation device operational test (TADOT) (without verification of setpoint). As discussed in ITS Section 3.3, No Significant Hazards Consideration LS-53, the auto-stop oil pressure switches are subject to drift and a channel calibration would assure proper setpoint as well as function. The valve position switches on the turbine stop valves are not subject to setpoint drift since they are fixed in location when installed. The setpoint value is not used in any safety analysis. The valve position switches have no instrumentation features but rather only provide actuation. A channel calibration is not applicable to this type of equipment. A TADOT without requiring verification of setpoint will properly verify this actuation function. This was the original intent of the conversion.

The CTS requires only a TADOT (without verification of setpoint) for both Function 16.a and Function 16.b. The markups for the ITS inadvertently retained both the channel calibration and the TADOT (without verification of setpoint) for each function. As discussed above, these tests are essentially redundant in intent yet both would be required every 24 months during a refueling outage. This change will eliminate this redundancy as well as inappropriate test elements. This change is acceptable since it would assure that each function is appropriately verified.

c. TS 3.3.2, Table 3.3.2-1, Function 3.b.(3)

The response time test, SR 3.3.2.10, will be removed from Function 3.b.(3). This test is not required in CTS markup of Table 3.3-5, Function 7.b, Phase "B" Isolation. There are no change numbers which document this change. This is an inadvertent change. The Phase "A" containment high pressure is the credited response time for containment isolation (See CTS Table 3.3-5, Function 2.a.3).

The addition of SR 3.3.2.10 to Phase "B" Containment Isolation of Containment High-High pressure is not included in the CTS markup nor documented by any DOC issued to the CTS and no justification has been provided for this addition. The addition was inadvertent. Since this change was never reviewed or approved as a part of LA 135/135, its removal is considered an administrative change.

d. TS 3.3.3, SR 3.3.3.2

The Note stating "Neutron detectors are excluded from CHANNEL CALIBRATION" included in NUREG-1431 for SR 3.3.3.2 will be restored. Implementation reviews showed that the exemption provided in NUREG-1431 for the neutron detectors is required to perform the channel calibration.

The neutron wide range detectors were added to the CTS by DOC 08-11-M to make the CTS consistent with NUREG-1431. However, the note for SR 3.3.3.2 that excluded these detectors from calibration was incorrectly deleted via JFD 3.3-109 per RAI Q 8-11 in DCL 98-167.

Since these neutron detectors are fission chamber type detectors (different from the normal NIS detectors), it was believed at the time of submittal that the calibration requirements of the PAMS neutron wide range detectors would be less restrictive. However, like all other neutron detectors only a functional check can be made on the detector since a calibration would require a set of high intensity check sources. Calibration is verified through cross correlation similar to the Power Range Detectors. The cross correlation is based upon the calorimetric heat balance and the incore detectors and comparison with the Power Range Detectors. Therefore, the note will be restored in accordance with NUREG-1431.

e. TS 3.3.5, SR 3.3.5.2 and SR 3.3.5.3

The frequency will be restored to the CTS value of 18 months shown in Table 4.3-2, Functional Unit 7 a and 7b. Justification for a 24 month frequency was never provided to the NRC.

The CTS was never marked up to show a change in frequency to 24 months nor has any justification been provided for this change by PG&E or approved by the NRC. This change was inadvertent. Since this change was never reviewed or approved as a part of LA 135/135, its restoration to 18 months is considered an administrative change.

f. LCO 3.4.13.d

This item will be deleted from the LCO. The 1 gpm limit for all steam generator (SG) leakage was removed per LAs 124/122, dated March 12, 1998. The 1 gpm value for all SGs provided in LCO 3.4.13.d was replaced by the more restrictive requirement of no more than "150 gallon per day primary to secondary LEAKAGE through any one steam generator" requirement of LCO 3.4.13.e. LCO 3.4.13.d should be renumbered as LCO 3.4.13.e.

The CTS does not have the 1 gpm limit for all SGs. No justification was included for restoring this change to the CTS. During the incorporation LA 124/122 into the submittal (RAI DC 3.4-003), LCO

3.4.13.d was inadvertently retained in the ITS markup. Since this change was never reviewed or approved as a part of LA 135/135, its removal from the ITS is considered an administrative change.

g. TS 3.4.14, SR 3.4.14.1

The exception list identifying those valves to which the SR does not apply will be expanded to include valves 8701 and 8702. These motor-operated valves are residual heat removal suction valves and are equipped with control room position indication, inadvertent opening interlocks, and system high pressure alarms. These valves are part of the CTS exception list but were inadvertently overlooked during the conversion mark-ups of CTS Table 3.4-1, Note \* into the ITS markup of SR 3.4.14.1. Since this deletion was never reviewed or approved as a part of LA 135/135, its restoration is considered an administrative change.

h. TS 3.7.1, Table 3.7.1-1

The CTS 3.7.1, Table 3.7.1, contains a note which states "Unless the Reactor Trip System breakers are in the open position." This note was removed by DOC 01-04-LS3 as part of TSTF-235. NRC RAI Q-3.7.1-4 questioned the status of this TSTF (likelihood of approval prior to issuance of LA 135/135) and as part of PG&E's response, this change was withdrawn and the CTS adopted for the conversion (see DCL 98-144). The withdrawal of TSTF-235 restored this note to the table but the RAI marked-up pages of the ITS inadvertently omitted restoration of this note. This note is a necessary part of the CTS and will be added to ITS Table 3.7.1-1 at this time.

This note is part of the CTS and was inadvertently omitted from the ITS markup. Since this change was never reviewed or approved as a part of LA 135/135, its restoration is considered an administrative change.

i. TS 5.1.2

The phrase "(other than the Shift Technical Advisor)" will be removed since LAs 135/135, DOC 01-15-A removed the term, "Shift Technical Advisor," from the TS. This occurrence of the term was inadvertently left in the TS. Removal of the term is administrative and does not change the engineering expertise on shift requirement which is still intended in the ITS.

The removal of the term "Shift Technical Advisor" was approved by the NRC in DOC 01-15-A but was inadvertently retained in this one

location. Since this change was reviewed and approved as a part of LA 135/135, its removal from the ITS is considered an administrative change.

j. TS 5.5.9.d.2

The phrase "and all tubes containing through wall cracks" will be removed. This phrase was deleted by LA 124/122, dated March 12, 1998. This phrase was shown removed by RAI DC-3.4-003 in the CTS markup but inadvertently overlooked in the ITS markup and final copy of the ITS.

The CTS does not have the phrase "and all tubes containing through wall cracks". During the incorporation LA 124/122 into the submittal (RAI DC 3.4-003), this phrase was inadvertently retained in the ITS markup of TS 5.5.9.d. Since the removal of this phrase has already been reviewed and approved by the NRC, its removal from the ITS is considered an administrative change.

k. TS 5.7.1.e

The phrase "or personnel continuously escorted by such individuals" after "protection procedures" was added to TS 5.7.2.e, but was inadvertently omitted from TS 5.7.1.e (see RAI Q 5.2-1, Difference 5.7-2, DCL 98-134). This phrase is applicable to both CTS 6.12.1 (ITS 5.7.1.e) and CTS 6.12.2 (ITS 5.7.2.e).

This phrase is part of the CTS and was to be retained in the ITS under Justification for Difference 5.7-2. It was inadvertently omitted from the ITS markup of TS 5.7.1.e. Since this deletion was never reviewed or approved as a part of LA 135/135, its restoration is considered an administrative change.

These corrections are acceptable since they assure that the TS will be consistent with the accident analysis and the change justifications provided with the conversion to the ITS.

## E. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant hazards considerations (NSHC) involved with the proposed amendment, focusing on the three standards set forth in 10 CFR 50.92(c) as set forth below:

*"The commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an*

*operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or for a testing facility involves no significant hazards considerations, if operation of the facility in accordance with the proposed amendment would not:*

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or*
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or*
- (3) Involve a significant reduction in a margin of safety.”*

The following evaluation is provided for the NSHC.

1. *Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?*

The proposed elimination of the channel calibration for the turbine stop valve position switches will not change the probability or consequences of an accident previously evaluated since they are not subject to drift. Since the limit switches do not drift and therefore do not have a setpoint that can potentially change, the remaining verification of the trip actuation device operational test (TADOT) will provide all necessary assurances of Operability.

The proposed elimination of the TADOT for the auto stop oil pressure will not change the probability or consequences of an accident previously evaluated since the TADOT verifies the same requirements as the required channel calibration.

The proposed elimination of the requirement to calibrate the neutron wide range detectors will not change the probability or consequences of an accident previously evaluated since they are only used to monitor power following an accident. They provide no automatic control or actuation functions. Since an accident must first occur before these channels are used, this change can not increase the probability or consequences of an accident. Further, the necessary elements of the calibration for the channel and the detector will be accomplished through cross correlation similar to the power range detectors.

The remaining proposed changes are administrative in nature. They correct errors made while incorporating the current Technical Specifications (CTS) into the improved Technical Specifications (ITS), or errors made while creating the final copy of the ITS from the NRC reviewed mark-up of NUREG-1431. The proposed change of the Shift Supervisor title to Shift Manager is administrative since it does not decrease the responsibilities of the individual.

There are no hardware changes nor are there any changes in the method by which any safety-related plant system performs its safety function. The proposed changes are administrative.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?*

The proposed elimination of the calibration for the turbine stop valve position switches will not create the possibility of a new or different kind of accident since they are not subject to drift. The remaining verification of the TADOT will provide all necessary assurances of operability.

The proposed elimination of the TADOT for the auto stop oil pressure will not create the possibility of a new or different kind of accident since this test will not evaluate anything not already verified by the required channel calibration.

The proposed elimination of the requirement to calibrate the neutron wide range detectors will not create the possibility of a new or different kind of accident since they are only used to monitor power following an accident. They provide no automatic control or actuation functions. Since an accident must first occur before these channels are used, this change can not cause a new or different type of an accident. Further, the necessary elements of the calibration for the channel and the detector will be accomplished through cross correlation similar to the power range detectors.

The remaining proposed changes are administrative in nature. They correct errors made while incorporating the CTS into the ITS, or errors made while creating the final copy of the ITS from the NRC reviewed mark-up of NUREG-1431. The proposed change of the Shift Supervisor title to Shift Manager is administrative since it does not decrease the responsibilities of the individual.

There are no hardware changes nor are there any changes in the method by which any safety-related plant system performs its safety function. The changes are administrative in nature so there are no new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. *Does the change involve a significant reduction in a margin of safety?*

The proposed elimination of the calibration for the turbine stop valve position switches will not reduce the margin of safety since they are not subject to drift. The remaining verification of the TADOT will provide all necessary assurances of operability.

The proposed elimination of the TADOT for the auto stop oil pressure will not reduce the margin of safety since this test will not evaluate anything not already verified by the channel calibration.

The proposed elimination of the requirement to calibrate the neutron wide range detectors will not reduce the margin of safety since they are only used to monitor power following an accident. They provide no automatic control or actuation functions. Since an accident must first occur before these channels are used, this change can not decrease the margin of safety. Further the necessary elements of the calibration for the channel and the detectors will be accomplished through cross correlation similar to the power range detectors.

The remaining proposed changes are administrative in nature. They correct errors made while incorporating the CTS into the ITS, or errors made while creating the final copy of the ITS from the NRC reviewed mark-up of NUREG-1431. The proposed change of the Shift Supervisor title to Shift Manager is administrative since it does not decrease the responsibilities of the individual.

The proposed changes do not affect the acceptance criteria for any analyzed event. There will be no effect on the manner in which safety limits or limiting safety system settings are determined nor will there be any effect on those plant systems necessary to assure the accomplishment of protection functions.

Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above safety evaluation, PG&E concludes that the changes proposed by this LAR satisfy the NSHC standards of 10 CFR 50.92(c), and accordingly a no significant hazards finding is justified.

G. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed change and determined the change does not involve: (i) a significant hazards consideration, (ii) a significant change in

the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.