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2CAN050004

U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Proposed Technical Specification Change Revising The Action Requirements For
Inoperable Electrical Buses in Modes 5 and 6

Gentlemen:

Attached for your review and approval is the proposed change to the Arkansas Nuclear One – Unit 2 (ANO-2) Technical Specifications (TS). The proposed change affects the ANO-2 Limiting Condition for Operation (LCO) 3.8.2.2, A.C. Distribution – Shutdown, and LCO 3.8.2.4, D.C. Distribution – Shutdown. The actions associated with the aforementioned LCOs are not consistent with the original Combustion Engineering standards or the Revised Standard Technical Specifications (RSTS), nor are they consistent with the actions associated with inoperable offsite and emergency power sources in Modes 5 and 6 of Specification 3.8.1.2. Therefore, ANO-2 proposes a revision to these action statements to obtain greater consistency.

Requirements for equipment and system operabilities in shutdown Modes 5 and 6 provide a margin to safety for several lower mode accident events. Various shutdown-mode TSs address requirements to aid in preventing or mitigating events such as a loss of cooling, a loss of inventory, and the loss of important instrumentation. The control of containment penetrations, for example, is important during the movement of irradiated fuel since the probability of a fuel handling accident is increased during such an activity and is addressed in ANO-2 TS 3.9.4. The existing TS actions require, upon a loss of any required AC or DC bus in Modes 5 and 6, the establishment of containment integrity within 8 hours. This action was thought to *mitigate* the consequences of a fuel handling accident, should one occur during the period of bus inoperability. However, the actions provided within the RSTS for shutdown-mode AC and DC sources provide adequate controls to reduce the *probability* of an accident occurring with required AC or DC distribution buses inoperable. In addition, ANO-2 has demonstrated that the offsite dose consequences of a fuel handling accident within the containment building remain well within 10 CFR 100 limits without taking credit for the containment's fission product control function. The NRC accepted this conclusion for offsite dose consequences in Amendments 166 and 203 to the ANO-2 Operating License.

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The RSTS requires that core alterations, the handling of irradiated fuel, and any activities involving positive reactivity additions be suspended while any required AC or DC bus is inoperable. Suspending core alterations and the handling of irradiated fuel minimizes the likelihood of a fuel handling accident occurring. Suspending positive reactivity additions minimizes the possibility that such an addition would be undetected should the loss of a required AC or DC bus result in instrumentation necessary for core monitoring being rendered inoperable. Therefore, the proposed revisions to the shutdown-mode AC and DC Distribution buses will provide adequate controls to reduce the probability of an accident occurring with required AC or DC distribution components inoperable. This proposal is similar to that approved by the NRC in Amendments 155 and 138 to the North Anna Power Station, Units 1 and 2 respectively, dated April 21, 1992.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using the standards of 10 CFR 50.92(c) and it has been determined that the change involves no significant hazards considerations. The basis for this determination is included in the attached submittal.

Entergy Operations, Inc. requests prompt approval of the proposed change with an implementation period of 60 days.

Very truly yours,



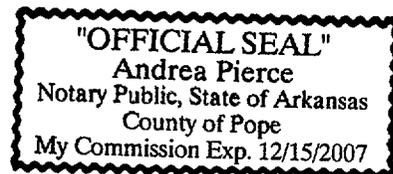
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Attachment

To the best of my knowledge and belief, the statements contained in this submittal are true.

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for Pope County and the State of Arkansas, this 25th day of May, 2000.



Notary Public
My Commission Expires 12/15/2007



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ATTACHMENT 1

TO

2CAN050004

PROPOSED TECHNICAL SPECIFICATION

AND

RESPECTIVE SAFETY ANALYSES

IN THE MATTER OF AMENDING

LICENSE NO. NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT TWO

DOCKET NO. 50-368

DESCRIPTION OF PROPOSED CHANGE

The proposed change to the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TS) is necessary to provide more appropriate actions upon loss of a required AC or DC bus while in operating Modes 5 or 6. The proposed revisions to the action statements associated with the aforementioned power sources provide greater consistency with that of the Revised Standard Technical Specifications (RSTS). The following revisions are proposed:

- Revise Limiting Condition for Operation (LCO) 3.8.2.2 Action on page 3/4 8-7 to require cessation of core alterations, the handling of irradiated fuel, and activities involving positive reactivity additions, if the minimum required AC buses are not available. The requirement to establish containment integrity within 8 hours is deleted.
- Revise LCO 3.8.2.4 Action on page 3/4 8-10 to require cessation of core alterations, the handling of irradiated fuel, and activities involving positive reactivity additions, if the minimum required DC buses are not available. The requirement to establish containment integrity within 8 hours is deleted.
- Provide additional information to the bases for AC and DC sources in shutdown modes on page B 3/4 8-1 for explanation of the proposed action requirements. Information is also added to ensure fuel assemblies are placed in a safe condition prior to completing the aforementioned LCO actions.

BACKGROUND

TS LCOs 3.8.2.2 and 3.8.2.4 require the operability of specific AC and DC power supply buses during operational Modes 5 and 6. By maintaining operability of these power sources, assurance is provided that the reactor can be maintained in a shutdown or refueling condition and that sufficient instrumentation and control capability is available for monitoring and maintaining the unit status. Although commercial nuclear reactors are analyzed against a wide array of postulated accidents, anticipated operational occurrences, and equipment failures, most of these scenarios are not credible in Modes 5 and 6 due to the low initial reactor coolant temperatures and pressures and the large amount of boron that is added to the coolant to achieve the aforementioned shutdown or refueling states. The events and conditions considered in Modes 5 and 6 include the uncontrolled boron dilution event, loss of reactor coolant inventory, loss of shutdown cooling (SDC), low temperature over-pressurization, and the fuel handling accident. Maintaining the operability of the required AC and DC power supplies help to ensure power is available to components that provide cooling, inventory control, and the monitoring of plant conditions.

Loss of any required AC or DC bus in Mode 5 or 6 requires an assessment of what components and/or systems have been impacted. Certain losses may not affect cooling or inventory makeup capabilities at all, but may result in a loss of instrumentation or redundancy. The TSs are arranged to address each of the associated failures that could result due to a loss

of a required AC or DC bus. In other words, the ANO-2 TSs provide LCOs and actions on subjects such as SDC, availability of makeup sources, Shutdown Margin, neutron flux indication, loss of inventory, ventilation systems, and the status of containment penetrations for shutdown modes of operation. Since the individual failures that could occur due to a loss of a required AC or DC bus are addressed in other specifications, such as in the case of SDC pumps above, it is not necessary for actions associated with LCO 3.8.2.2 and 3.8.2.4 to redundantly address appropriate actions. Greater benefit would be achieved if the actions associated with AC/DC LCOs provided guidance that would act to reduce the probability of an accident occurring while the affected power supply bus is inoperable. In addition, ANO-2 has demonstrated that the offsite dose consequences of a fuel handling accident within the containment building remain well within 10 CFR 100 limits without taking credit for the containment's fission product control function. The NRC accepted this assessment of offsite dose consequences in Amendments 166 and 203 to the ANO-2 Operating License. Therefore, it is unnecessary to establish containment integrity solely due to the loss of a required AC or DC bus in Modes 5 or 6 since other specifications provide appropriate actions for specific component inoperability that may result from the loss of the power source. However, it is both beneficial and consistent with the RSTS, to take action to reduce the likelihood of an accident resulting from fuel handling activities or positive reactivity changes during the time the required bus is inoperable. The following section will discuss the change proposed in order to gain better consistency with the RSTS and eliminate redundant actions.

DISCUSSION OF CHANGE

Both the original Combustion Engineering (CE) standard TS and the RSTS require the cessation of the handling of irradiated fuel, including core alterations, and the cessation of positive reactivity additions while a required AC or DC bus is inoperable in Modes 5 and 6. By complying with the standard actions, the probability of a fuel handling accident is minimized and the possibility of an adverse reactivity excursion going undetected is also minimized. Should the loss of an AC or DC bus result in the loss of another important function (such as SDC), other TSs provide the appropriate actions to be applied in these cases. Therefore, the establishment of containment integrity, solely due to loss of a required AC or DC bus is unnecessary. The proposed revisions to the actions associated with LCO 3.8.2.2 and 3.8.2.4 delete the requirement to establish containment integrity in favor of those actions found within the original CE standards or the RSTS. By so doing, accident mitigation strategies are replaced with accident prevention strategies. Specifically, the associated actions will now require the suspension of core alterations, the handling of irradiated fuel, and any activities involving positive reactivity additions.

The bases for the affected TSs are revised to include discussion supporting the proposed actions. Additionally, a statement has also been placed in the bases to remind the user that fuel assemblies are to be placed in a safe condition before complete cessation of fuel handling activities is accomplished. These changes to the applicable bases provide greater consistency with the associated bases of the RSTS.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Entergy Operations, Inc. is proposing that the Arkansas Nuclear One, Unit 2 (ANO-2) Operating License be amended to delete the requirement to establish containment integrity upon loss of any required AC or DC bus in Modes 5 or 6. The affected action statements will be revised to require suspension of all activities involving positive reactivity additions, core alterations, or the movement of irradiated fuel. The proposed change affects the action statements for Technical Specification (TS) Limiting Condition for Operation (LCO) 3.8.2.2, A.C. Distribution – Shutdown, and LCO 3.8.2.4, D.C. Distribution – Shutdown. The proposed actions will aid in minimizing the possibility of a fuel handling accident or a positive reactivity excursion during periods when any required AC or DC bus is inoperable in Modes 5 and 6. The proposed change also provides greater consistency with the philosophies of the Revised Standard Technical Specifications (RSTS).

An evaluation of the proposed change has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards considerations using the standards in 10CFR50.92(c). A discussion of these standards as they relate to this amendment request follows:

Criterion 1 - Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated.

The existing requirement to establish containment integrity upon a loss of a required AC or DC bus in Mode 5 or 6 is not relied upon in any ANO-2 accident analysis. Other components that may be rendered inoperable upon the loss of a required AC or DC bus are governed by other TSs and associated action statements. Such functions include core cooling, reactor coolant makeup capabilities, the status of containment penetrations and openings, and reactor coolant inventory. The TSs that govern these functions provide appropriate actions to address the failure at hand. The proposed change act to minimize the possibility of a fuel handling accident when a required AC or DC bus is inoperable by requiring the suspension of the handling of irradiated fuel and core alterations. In addition, ANO-2 has demonstrated that the offsite dose consequences of a fuel handling accident within the containment building remain well within 10 CFR 100 limits without taking credit for the containment's fission product control function. Deleting the requirement to establish containment integrity is not relevant to the initiation of any accident previously evaluated, nor does it significantly increase the consequences of any accident previously evaluated. Other TS LCOs provide appropriate actions that address shutdown cooling (SDC), makeup capability and inventory, and other important functions. The proposed change deletes the requirement to establish containment integrity in favor of those actions that act to minimize the likelihood of a fuel handling accident or a positive reactivity excursion. The proposed change reduces unnecessary actions required upon the loss of an AC or DC bus and provide greater consistency with the philosophies of the RSTS.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

Criterion 2 - Does Not Create the Possibility of a New or Different Kind of Accident from any Previously Evaluated.

The existing actions associated with shutdown mode AC and DC TS sources are not considered accident initiators. The proposed revision does not present a physical change to plant systems or equipment. Deleting the requirement to establish containment integrity in favor of actions that aid in minimizing the likelihood of a fuel handling accident or positive reactivity excursion does not result in any new or different kind of accident from any previously evaluated.

Therefore, the proposed change does 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 existing requirement to establish containment integrity upon a loss of any required AC or DC bus in Modes 5 or 6 acts to limit offsite release consequences should an accident occur during the period of inoperability. The proposed change acts to address the source, that is, aids in minimizing the likelihood of a fuel handling accident or an undetected positive reactivity addition while in Modes 5 and 6. By suspending all handling of irradiated fuel and core alterations, the likelihood of a fuel handling accident occurring is minimized. Since the loss of a required AC or DC bus could impact plant instrumentation, the suspension of all activities involving positive reactivity additions aids in preventing the impact of a positive reactivity addition from being undetected. Other possible Mode 5 and 6 conditions (loss of inventory, loss of shutdown cooling, etc.) are addressed in other shutdown mode TSs. In addition, ANO-2 has demonstrated that the offsite dose consequences of a fuel handling accident within the containment building remain well within 10 CFR 100 limits without taking credit for the containment's fission product control function. Since the proposed change exchanges accident mitigation strategy in favor of accident prevention strategy, no significant reduction in the margin to safety is evident.

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

Therefore, based on the reasoning presented above and the previous discussion of the amendment request, Entergy Operations, Inc. has determined that the requested change does not involve a significant hazards consideration.

ENVIRONMENTAL IMPACT EVALUATION

10 CFR 51.22(c) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site, or (3) result in a significant increase in individual or cumulative occupational radiation exposure. Entergy Operations, Inc. has reviewed this license amendment and has determined that it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the proposed license amendment. The bases for this determination is as follows:

1. The proposed license amendment does not involve a significant hazards consideration as described previously in the evaluation.
2. As discussed in the significant hazards evaluation, the proposed license amendment does not result in a significant change or significant increase in the radiological doses for any Design Bases Accident. The proposed license amendment does not result in a significant change in the types or a significant increase in the amounts of any effluents that may be released off-site.
3. The proposed license amendment does not result in a significant increase to the individual or cumulative occupational radiation exposure because this does not modify the method of operation of systems and components necessary to prevent a radioactive release.

PROPOSED ANO-2 TECHNICAL SPECIFICATION CHANGES

ELECTRICAL POWER SYSTEMS

A.C. DISTRIBUTION - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.2.2 As a minimum, the following A.C. electrical busses shall be OPERABLE:

- 1 - 4160 volt Emergency Bus
- 1 - 480 volt Emergency Load Center Bus
- 4 - 480 volt Motor Control Center Busses
- 2 - 120 volt A.C. Vital Busses

APPLICABILITY: MODES 5 and 6

ACTION:

With less than the above complement of A.C. busses OPERABLE and energized, immediately suspend core alterations, the movement of irradiated fuel assemblies, and any operations involving positive reactivity additions.

SURVEILLANCE REQUIREMENTS

4.8.2.2 The specified A.C. busses shall be determined OPERABLE at least once per 7 days by verifying correct breaker alignment and indicated power availability.

ELECTICAL POWER SYSTEMS

D.C. DISTRIBUTION - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.2.4 As a minimum, the following D.C. electrical equipment and bus shall be energized and OPERABLE:

1 - 125-volt D.C. bus, and

1 - 125-volt battery bank and charger supplying the above D.C. bus.

APPLICABILITY: MODES 5 and 6.

ACTION:

With less than the above complement of D.C. equipment and bus OPERABLE, immediately suspend core alterations, the movement of irradiated fuel assemblies, and any operations involving positive reactivity additions.

SURVEILLANCE REQUIREMENTS

4.8.2.4.1 The above required 125-volt D.C. bus shall be determined OPERABLE and energized at least once per 7 days by verifying correct breaker alignment and indicated power availability.

4.8.2.4.2 The above required 125-volt battery bank and charger shall be demonstrated OPERABLE per Surveillance Requirement 4.8.2.3.

BASES

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety-related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source. ACTION requirements are consistent with Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability."

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status. Upon loss of a required power source, suspension of core alterations, the handling of irradiated fuel, and activities involving positive reactivity additions act to minimize the probability of the occurrence of postulated events. Suspension of these activities shall not preclude placing fuel assemblies in a safe position.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9 "Selection of Diesel Generator Set Capacity for Standby Power Supplies", March 10, 1971, and 1.108 "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants", Revision 1, August 1977 and Generic Letter 84-15. Load Ranges provided in surveillances are allowed to avoid routine overloading of diesel generators. Load in excess of these load ranges for special testing, momentary variation due to changing bus loads, or short term variations shall not invalidate surveillance tests. For the purpose of surveillance testing, the term "standby condition" is defined as the approximate temperature range of the jacket cooling water and engine lube oil sump normally maintained by the engine keep warm system. An exception to this definition is the engine conditions that exist when performing the hot restart test following the 24 hour EDG endurance run. When performing this test, the engine is near normal operating temperature when in a "standby condition". Additionally, this definition includes the allowance to perform engine prelubrication prior to all planned test starts.

The Diesel Generator Test Schedule, Table 4.8-1 has been developed for the purpose of determining testing requirements based on the number of failures and valid tests using the example provided in Generic Letter 84-15 using a per diesel generator unit basis. The criteria of R.G.1.108 position C.2.e is used for criterial determination.

MARKUP OF CURRENT ANO-2 TECHNICAL SPECIFICATIONS

(FOR INFO ONLY)

ELECTRICAL POWER SYSTEMS

A.C. DISTRIBUTION - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.2.2 As a minimum, the following A.C. electrical busses shall be OPERABLE:

- 1 - 4160 volt Emergency Bus
- 1 - 480 volt Emergency Load Center Bus
- 4 - 480 volt Motor Control Center Busses
- 2 - 120 volt A.C. Vital Busses

APPLICABILITY: MODES 5 and 6

ACTION:

With less than the above complement of A.C. busses OPERABLE and energized, establish CONTAINMENT INTEGRITY within 8 hours immediately suspend core alterations, the movement of irradiated fuel assemblies, and any operations involving positive reactivity additions.

SURVEILLANCE REQUIREMENTS

4.8.2.2 The specified A.C. busses shall be determined OPERABLE at least once per 7 days by verifying correct breaker alignment and indicated power availability.

ELECTICAL POWER SYSTEMS

D.C. DISTRIBUTION - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.2.4 As a minimum, the following D.C. electrical equipment and bus shall be energized and OPERABLE:

1 - 125-volt D.C. bus, and

1 - 125-volt battery bank and charger supplying the above D.C. bus.

APPLICABILITY: MODES 5 and 6.

ACTION:

With less than the above complement of D.C. equipment and bus OPERABLE, immediately suspend core alterations, the movement of irradiated fuel assemblies, and any operations involving positive reactivity additions ~~establish CONTAINMENT INTEGRITY within 8 hours.~~

SURVEILLANCE REQUIREMENTS

4.8.2.4.1 The above required 125-volt D.C. bus shall be determined OPERABLE and energized at least once per 7 days by verifying correct breaker alignment and indicated power availability.

4.8.2.4.2 The above required 125-volt battery bank and charger shall be demonstrated OPERABLE per Surveillance Requirement 4.8.2.3.

BASES

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety-related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source. ACTION requirements are consistent with Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability."

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status. Upon loss of a required power source, suspension of core alterations, the handling of irradiated fuel, and activities involving positive reactivity additions act to minimize the probability of the occurrence of postulated events. Suspension of these activities shall not preclude placing fuel assemblies in a safe position.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9 "Selection of Diesel Generator Set Capacity for Standby Power Supplies", March 10, 1971, and 1.108 "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants", Revision 1, August 1977 and Generic Letter 84-15. Load Ranges provided in surveillances are allowed to avoid routine overloading of diesel generators. Load in excess of these load ranges for special testing, momentary variation due to changing bus loads, or short term variations shall not invalidate surveillance tests. For the purpose of surveillance testing, the term "standby condition" is defined as the approximate temperature range of the jacket cooling water and engine lube oil sump normally maintained by the engine keep warm system. An exception to this definition is the engine conditions that exist when performing the hot restart test following the 24 hour EDG endurance run. When performing this test, the engine is near normal operating temperature when in a "standby condition". Additionally, this definition includes the allowance to perform engine prelubrication prior to all planned test starts.

The Diesel Generator Test Schedule, Table 4.8-1 has been developed for the purpose of determining testing requirements based on the number of failures and valid tests using the example provided in Generic Letter 84-15 using a per diesel generator unit basis. The criteria of R.G.1.108 position C.2.e is used for criterial determination.