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Docket No. 50-334

Mr. C. N. Dunn, Vice President
Operations Division
Duquesne Light Company
435 Sixth Avenue
Pittsburgh, Pennsylvania 15219

Dear Mr. Dunn:

The Commission has issued the enclosed Amendment No. 35 to Facility Operating License No. DPR-66 for the Beaver Valley Nuclear Power Station, Unit No. 1. The amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated November 14, 1980.

The amendment revises the Technical Specifications relating to operation and surveillance of control rod indicator channels.

At the completion of our review of your application, we proposed that certain revisions be made in the wording of your application. These revisions were agreed to by representatives of Duquesne Light Company during a telephone conversation held on November 15, 1980 and have been included in this amendment.

Copies of the Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosures:
1. Amendment No. 35 to DPR-66
2. Safety Evaluation
3. Notice of Issuance

cc: w/enclosures
See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 15, 1980

Docket No. 50-334

Mr. C. N. Dunn, Vice President
Operations Division
Duquesne Light Company
435 Sixth Avenue
Pittsburgh, Pennsylvania 15219

Dear Mr. Dunn:

The Commission has issued the enclosed Amendment No. 35 to Facility Operating License No. DPR-66 for the Beaver Valley Nuclear Power Station, Unit No. 1. The amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated November 14, 1980.

The amendment revises the Technical Specifications relating to operation and surveillance of control rod indicator channels.

At the completion of our review of your application, we proposed that certain revisions be made in the wording of your application. These revisions were agreed to by representatives of Duquesne Light Company during a telephone conversation held on November 15, 1980 and have been included in this amendment.

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Sincerely,

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosures:
1. Amendment No. 35 to DPR-66
2. Safety Evaluation
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cc: w/enclosures
See next page

cc: Mr. Joseph H. Mills, Acting Commissioner
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DUQUESNE LIGHT COMPANY

OHIO EDISON COMPANY

PENNSYLVANIA POWER COMPANY

DOCKET NO. 50-334

BEAVER VALLEY POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 35
License No. DPR-66

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Duquesne Light Company, Ohio Edison Company, and Pennsylvania Power Company (the licensees) dated November 14, 1980, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-66 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 35, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 15, 1980

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 35 TO FACILITY OPERATING LICENSE NO. DPR-66

DOCKET NO. 50-334

Revise Appendix A as follows:

Remove Pages	Insert Pages
3/4 1-18	3/4 1-18
3/4 1-20	3/4 1-20
---	3/4 1-20A
B 3/4 1-4	B 3/4 1-4

SURVEILLANCE REQUIREMENTS (Continued)

a. At least once per 7 days by:

1. Verifying the boron concentration in each water source,

2. Verifying the water level in each water source, and

3. Verifying the boric acid storage system solution temperature.

b. At least once per 24 hours by verifying the RWST temperature when the RWST ambient air temperature is < 43°F.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

GROUP HEIGHT

LIMITING CONDITION FOR OPERATION

3.1.3.1 All full length (shutdown and control) rods which are inserted in the core shall be OPERABLE and positioned within ± 12 steps (determined in accordance with Specification 3.1.3.2 of their group step counter demand position.

APPLICABILITY: MODES 1* and 2*

ACTION:

a. With one or more full length rods inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable, determine that the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied within 1 hour and be in HOT STANDBY within 6 hours.

b. With more than one full length rod INOPERABLE or indicated to be misaligned from any other rod in its group by more than ± 12 steps (determined in accordance with Specification 3.1.3.2), be in HOT STANDBY within 6 hours.

c. With one full length rod inoperable or indicated to be misaligned from its group step counter demand height by more than ± 12 steps (determined in accordance with Specification 3.1.3.2), POWER OPERATION may continue provided that within one hour either:

   1. The rod is restored to OPERABLE status within the above alignment requirements, or

   2. The rod is declared inoperable and the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied. POWER OPERATION may then continue provided that:

      a) An analysis of the potential ejected rod worth is performed within 3 days and the rod worth is determined to be ≤ 0.95% Δk at zero power and ≤ 0.20% Δk at RATED THERMAL POWER for the remainder of the fuel cycle, and

      b) The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is determined at least once per 12 hours, and

* See Special Test Exceptions 3.10.2 and 3.10.4

LIMITING CONDITION FOR OPERATION (Continued)

c) The THERMAL POWER level is reduced to ≤ 75% of RATED THERMAL POWER within one hour and within the next 4 hours the high neutron flux trip setpoint is reduced to ≤ 85% of RATED THERMAL POWER, or

d) The remainder of the rods in the group with the inoperable rod are aligned to within ± 12 steps of the inoperable rod within one hour while maintaining the rod sequence and insertion limits of Figures 3.1-1 and 3.1-2; the THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.5 during subsequent operation.

SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The position of each full length rod shall be determined to be within the group demand limit by verifying the individual rod positions at least once per 12 hours except during time intervals when the Rod Position Deviation Monitor is inoperable, then verify the group positions at least once per 4 hours.

4.1.3.1.2 Each full length rod not fully inserted shall be determined to be OPERABLE by movement of at least 10 steps in any one direction at least once per 31 days.

POSITION INDICATOR CHANNELS

LIMITING CONDITION FOR OPERATION

3.1.3.2 For Cycle 2 operation, all shutdown and control rod position indicator channels and the demand position indication system shall be OPERABLE and capable of determining the control rod positions within ± 12 steps by direct analog indication or as a backup by measurement of channel detector primary voltages. If a rod position indicator analog channel indicates 12 steps or more deviation from the group demand indicator, rod positions for the affected rods shall be determined by measuring detector primary voltages, as follows:

a. immediately,

b. if associated rods move greater than 6 steps (greater than 12 steps if all rods in the group have been determined to be within 6 steps of the group demand indicator by primary voltage measurements within the previous 4 hours),

c. at 4 hour intervals if the affected rod(s) are not fully inserted or fully withdrawn,

d. at 24 hour intervals if the affected rod(s) are fully inserted or fully withdrawn.

When the rod position indicator channel is INOPERABLE, the position of not more than three control rods per bank which are not fully inserted or fully withdrawn may be determined by use of the detector primary voltage measurements.*

APPLICABILITY: Modes 1 and 2*

ACTION:

a. If greater than 3 rod position indicators per bank, for banks not fully withdrawn or fully inserted, are INOPERABLE, then declare the rod position indicator system to be INOPERABLE and be in HOT STANDBY within 1 hour after the allowed 1 hour stabilization period and in COLD SHUTDOWN in the following 30 hours. Submit a Special Report to the NRC by telephone and in writing within 24 hours or by the close of the next business day, whichever is later. Restore all affected Rod Position Indicators to OPERABLE status prior to entry to Mode 2.

b. If the position of a maximum of one rod cannot be determined by either the direct reading of the rod position indicators or by reading primary detector voltage measurements, either:

1. Determine the position of the non-indicating rod indirectly by the movable incore detectors immediately and at least once per 8 hours and immediately after any motion of the non-indicating rod which exceeds 24 steps in one direction since the last determination of the rod's position, or

2. Reduce THERMAL POWER TO < 50% of RATED THERMAL POWER within 8 hours.

ACTION: (Continued)

c. With a maximum of one demand position indicator per bank inoperable, either:

1. Verify that all rod position indicators for the affected bank are OPERABLE and that the most withdrawn rod and the least withdrawn rod of the bank are within a maximum of 12 steps of each other immediately after rod motion greater than 6 steps (greater than 12 steps if all rods in the group have been determined to be within 6 steps of the group demand indicator by voltage measurements within the previous 4 hours) and at least once per 8 hours, or

2. Reduce THERMAL POWER TO < 50% of RATED THERMAL POWER within 8 hours.

d. If the position of more than one rod cannot be determined by either the direct reading of the rod position indicators or by reading primary detector voltage measurements, then Specification 3.0.3 is applicable.

SURVEILLANCE REQUIREMENTS

4.1.3.2 Each rod position indicator channel shall be determined to be OPERABLE by verifying the demand position indication system and the rod position indicator channels agree within 12 steps at least once per 12 hours (except during time intervals when the Rod Position Deviation Monitor is INOPERABLE or is in a continuous state of alarm), then compare the demand position indication system and the rod position indicator channels at approximately 4 hour intervals, as follows:

a. If an individual rod position indicator analog channel does not settle to within ± 12 steps within 1 hour, then declare that channel INOPERABLE.

b. For any INOPERABLE channel, no repairs or adjustments shall be permitted without being followed immediately by a full range calibration.

* For Core PHYSICS TESTING in Mode 2, primary detector voltage measurements may be used to determine the position of rods in shutdown banks A and B and control banks A and B for the purpose of satisfying Specification 3.1.3.2. During Mode 2 operations, rod position indicators for shutdown banks A and B and control banks A and B may deviate from the group demand indicators by greater than ± 12 steps during reactor startup and shutdown operations, while rods are being withdrawn or inserted. If the rod position indicators for shutdown banks A and B and control banks A and B deviate by greater than ± 12 steps from the group demand indicator, rod withdrawal or insertion may continue until the desired group height is achieved.

3/4.1.2 BORATION SYSTEMS (Continued)

The boration capability of either system is sufficient to provide a SHUTDOWN MARGIN from all operating conditions of 1.0% Δk/k after xenon decay and cooldown to 200°F. The maximum boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires 11,336 gallons of 7000 ppm borated water from the boric acid storage tanks or 49,917 gallons of 2000 ppm borated water from the refueling water storage tank.

With the RCS temperature below 200°F, one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity change in the event the single injection system becomes inoperable.

The boron capability required below 200°F is sufficient to provide a SHUTDOWN MARGIN of 1% Δk/k after xenon decay and cooldown from 200°F to 140°F. This condition requires either 5000 gallons of 7000 ppm borated water from the boric acid storage tanks or 175,000 gallons of 2000 ppm borated water from the refueling water storage tank.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

The specifications of this section ensure that (1) acceptable power distribution limits are maintained, (2) the minimum SHUTDOWN MARGIN is maintained, and (3) limit the potential effects of a rod ejection accident. OPERABILITY of the control rod position indicators is required to determine control rod positions and thereby ensure compliance with the control rod alignment and insertion limits.

The ACTION statements which permit limited variations from the basic requirements are accompanied by additional restrictions which ensure that the original criteria are met. Misalignment of a rod requires measurement of peaking factors or a restriction in THERMAL POWER; either of these restrictions provide assurance of fuel rod integrity during continued operation. The reactivity worth of a misaligned rod is limited for the remainder of the fuel cycle to prevent exceeding the assumptions used in the accident analysis for a rod ejection accident.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES (Continued)

The maximum rod drop time restriction is consistent with the assumed rod drop time used in the accident analyses. Measurement with $T_{avg} \geq 541°F$ and with all reactor coolant pumps operating ensures that the measured drop times will be representative of insertion times experienced during a reactor trip at operating conditions.

Control rod positions and OPERABILITY of the rod position indicators are required to be verified on a nominal basis of once per 12 hours with more frequent verifications required if an automatic monitoring channel is inoperable. These verification frequencies are adequate for assuring that the applicable LCO's are satisfied.

Flexibility in the methods of determination of rod position by using primary voltage measurement is provided in this specification to allow for known drifts which are characteristic of the rod position indication system. Use of detector primary voltage measurements for rod position determination for up to 3 rods is allowed for extended periods provided that increased surveillance is maintained. This flexibility does not alter the basic accuracy assumptions of the rod position indication system.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 35 TO FACILITY OPERATING LICENSE NO. DPR-66

DUQUESNE LIGHT COMPANY

OHIO EDISON COMPANY

PENNSYLVANIA POWER COMPANY

BEAVER VALLEY POWER STATION, UNIT NO. 1

DOCKET NO. 50-334

INTRODUCTION

By letter dated 11/14/80, Duquesne Light Company (the licensee) has requested a change in the license for Beaver Valley Unit #1. The request involves a change to Technical Specification 3.1.3.2 to allow the use of alternate means of determining rod positions, under certain conditions.

BACKGROUND

The present Technical Specification requires that the installed rod position indicator channels (RPI) (one per shutdown and control rod) be operable and capable of indicating the positions within ±12 steps. An Action Statement provides that when one RPI channel per rod group is inoperable, reactor operation may continue if other methods are used to periodically determine the rod's position, specifically by use of moveable in-core detectors. A letter dated October 27, 1979 to all licensees from the NRC states that voltage measurements at the rod position detector is also an acceptable alternate method.

The rod position detector is a linear variable transformer consisting of primary and secondary coils alternately stacked on a stainless steel cylindrical tube. An extension shaft from the rod drive mechanism extends up into the tube and serves as the variable "core" for the transformer. With an a.c. current source (200 mA) applied to the primary windings, the position of the rod drive extension shaft changes the primary to secondary coupling and produces a secondary voltage that is directly related to rod position. The secondary voltage (8.0-12.5 VAC) is sent to an electronic module which converts the a.c. signal into an appropriate d.c. voltage to drive the indicator mounted on the main control board. This module contains "Zero" and "Span" adjustments plus an output voltage test point (0-3.45 Vdc). A built-in set of test points facilitates measurements of the primary voltage of the detector transformers. A test signal generator is provided to adjust the "rod bottom" bistables.

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EVALUATION

During testing in November 1980 in preparation for Cycle 2 operations, the licensee found that a significant number of rod position indicator channels (RPI's) were not indicating within the specified accuracy of ±12 steps. The licensee has conducted an investigation of this matter and has obtained technical assistance from Westinghouse (W). The NRC Senior Resident Inspector, the regional office, and NRR/Division of Licensing have closely monitored the actions taken and proposed by the licensee. Technically, the RPI's are not in a state of malfunction or failure but rather are manifesting characteristics inherent in the instrumentation. The characteristics of interest are of two general types. First, the channels have a degree of non-linearity in the steady-state response. Second, the channels display a time-dependent (transient) response which is due to thermal effects in the detector assembly.

A typical steady-state calibration curve is an arc-shaped curve, with the indicated position low at the near full-in and near full-out extremities and the indicated position high in the mid-travel region. The steady-state response also depends to some degree upon whether the last rod motion was a withdrawal or insertion. For most rods, but not all, the Zero and Span adjustments allow the steady-state calibration curve to be fitted within the ±12 step acceptance band. The Zero and Span adjustments are interdependent. Changes in either of these adjustments invalidates any previous output voltage-to-position calibration, necessitating a re-calibration by rod full-stroke movement. Once calibrated, however, voltage measurements can be used to determine rod position.

The transient response for the RPI's is typically of the "over shoot" type. That is, if the rod is being pulled out, the RPI indication will show a greater withdrawal and later settle (at thermal equilibrium) back to the steady-state value; if the rod is being inserted the initial indication is greater insertion than actual. The magnitude of this thermal transient response appears empirically to be insignificant in the region of the lowest one-third of rod travel. However, near the fully withdrawn positions, this transient response can be of a magnitude as great as 25 steps. The time constant of the thermal recovery toward the steady-state value varies with rod location radially across the core and has values between 10 and 15 minutes. "Setting Times" of 20 to 45 minutes have been observed before steady-state is reached.

It has been found that a measure of the primary voltage of the detector transformer provides a better indication of rod position than does the secondary (output) voltage. While all the same characteristics are evident, the magnitude is substantially less. Our on-site review of the data (curves) found that, including all the variations discussed above, the primary voltage is accurate to values of ± (3-6) steps. Therefore, the primary voltage is technically an acceptable point to determine rod position.

From a human factors engineering viewpoint, the use of primary voltage measurements has certain limitations. Unlike the installed RPI's, the voltage measurements are presently not available in the control room, the measurements require operator use of a calibration curve (voltage-to-position), and the measurements are not continuously displayed. To accomodate these and other considerations, voltage measurements, as an alternate indication, should be limited to a small number of rods (such as 1-3 rods).

The licensee has proposed a revised Technical Specification that has the following characteristics:

1. When an RPI is found to deviate by more than 12 steps from the position demand step counter, a primary voltage measurement will be made immediately (10-20 minutes) to determine the rod position. This initial measurement will be repeated immediately following movement of 6 or more steps for the affected rod.

2. If the voltage indicates the rod more than 12 steps different from the demand counter, the rod will be declared "mis-aligned" and appropriate Technical Specification Action Statements will be entered.

3. If the voltage measurement indicates that rod is within 12 steps and the RPI channel stabilizes within one hour of the rod movement, no further special action is required.

4. If up to three RPI's per bank do not stabilize to within ±12 steps, voltage measurements will be made periodically (i.e., every four hours for rods not fully withdrawn) as a substitute method to confirm rod position.

5. If more than three RPI's per bank are not stabilized within one hour and are for rods that are not fully withdrawn, the instrumentation system will be declared INOPERABLE. A shutdown will be initiated immediately and the reactor will be in Hot Standby within the next hour.

To assure an overall ± 12 step instrumentation accuracy, the 6-step accuracy of the voltage method directly infers an immediate remeasurement after an intentional change of another 6 steps. The accident analysis is based on a maximum rod position deviation of 24 steps, i.e., 12 steps actual known position deviation (T.S. 3.1.3.1) plus 12 steps instrumentation inaccuracy in rod position indication (T.S. 3.1.3.2). The licensee has proposed that, if the position of each rod in bank has been shown by voltage measurement to be within 6 steps of each other within the past 4 hours, then immediate confirmation of rod position by

voltage measurements would be made following intentional rod movements of 12 steps or greater. The proposal maintains the overall 24-step limit (i.e., 6-step instrumentation inaccuracy, re-check after 12-step movement, and 6-step actual measured deviation). The present Technical Specification allows that when an RPI channel is totally inoperable, operation may continue if the actual position is confirmed to be within 24 steps by moveable in-core detectors every 8 hours. In that the overall 24-step limit is being maintained by voltage measurement and that such measurements will be made more often than the 8-hour in-core measurement, this proposal is acceptable for Cycle 2 operation.

In consideration of our understanding of the technical aspects of this matter and being aware that W has concurred with the method, we conclude that the voltage measurement method is an acceptable backup alternate means for rod position indication for this reactor operating cycle. We plan to discuss this matter further with W to determine what long-term fixes may be needed.

SUMMARY

Based on information provided by the licensee, our site visit, discussions with W, the Senior Resident Inspector, et al, we conclude that W had previously recognized and has partially quantified the observed phenomena and the licensee understands this also. The licensee has developed calibration curves of primary detector voltage vs. rod position and understands the technical limits of their validity. The measurement of primary detector voltage is therefore an acceptable backup alternative method for determining rod position for this reactor operating cycle. A long term solution will be developed later.

Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: November 15, 1980

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-334

DUQUESNE LIGHT COMPANY

OHIO EDISON COMPANY

PENNSYLVANIA POWER COMPANY

NOTICE OF ISSUANCE OF AMENDMENT TO FACILITY OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 35 to Facility Operating License No. DPR-66 issued to Duquesne Light Company, Ohio Edison Company, and Pennsylvania Power Company (the licensees), which revised Technical Specifications for operation of the Beaver Valley Power Station, Unit No. 1 (the facility) located in Beaver County, Pennsylvania. The amendment is effective as of the date of issuance.

The amendment revises the Technical Specifications related to operation and surveillance of control rod indicator channels.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since this amendment does not involve a significant hazards consideration.

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The Commission has determined that the issuance of this amendment will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of this amendment.

For further details with respect to this action, see (1) the application for amendment dated November 14, 1980, (2) Amendment No. 35 to License No. DPR-66 and (3) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C. and at the B. F. Jones Memorial Library, 663 Franklin Avenue, Aliquippa, Pennsylvania 15001. A copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Director, Division of Licensing.

Dated at Bethesda, Maryland, this 15th day of November, 1980.

FOR THE NUCLEAR REGULATORY COMMISSION

Steven A. Varga

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing