DCR 016

May 20, 1987

Docket No. 50-334

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Mr. J. D. Sieber, Vice President
Nuclear Operations
Duquesne Light Company
Post Office Box 4
Shippingport, PA 15077

Dear Mr. Sieber:

Subject: ISSUANCE OF AMENDMENT (LICENSING ACTION TAC 63184)

The Commission has issued the enclosed Amendment No. 109 to Facility Operating License No. DPR-66 for the Beaver Valley Power Station, Unit No. 1. The amendment consists of changes to the Technical Specifications in response to your application dated October 9, 1986 modified by revisions dated February 3, 1987 and April 16, 1987.

The amendment changes the Technical Specifications for Beaver Valley Unit No. 1 to provide operability requirements, limiting conditions of operation and surveillance requirements on the habitability systems for the combined Unit 1 and 2 control room.

A copy of the related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next regular bi-weekly Federal Register notice.

Sincerely,

Original signed by/

Peter S. Tam, Project Manager
Project Directorate I-4
Division of Reactor Projects I/II

Enclosures:
1. Amendment No. 109 to DPR-66
2. Safety Evaluation

cc w/enclosures:
See next page

PDI-4	PDI-4	PDI-4	PDI-4	OGC	AD:RPI/II	D:RPI/II
SNorris	RPedersen	PTam;eh	JStolz	M. Karman	BBoger	SVarga
5/18/87	5/18/87	5/18/87	5/18/87	5/19/87	5/19/87	5/20/87

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Duquesne Light Company

Beaver Valley 1 Power Station

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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. 109
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 October 9, 1986 modified by revisions dated February 3, 1987 and April 16, 1987, 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:

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(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 109, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This amendment is effective on issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Bruce A. Boger

Bruce A. Boger, Assistant Director
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 20, 1987

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 109 TO FACILITY OPERATING LICENSE NO. DPR-66

DOCKET NO. 50-334

Revise Appendix A as follows:

Remove Pages	Insert Pages
3/4 7-16	3/4 7-16
-	3/4 7-16a
3/4 7-17	3/4 7-17
3/4 7-18	3/4 7-18
-	3/4 7-18a
-	3/4 7-18b
-	3/4 9-16
-	3/4 9-17
-	B3/4 7-5
-	B3/4 9-4

3/4.7.7 CONTROL ROOM EMERGENCY HABITABILITY SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.7.1 The control room emergency habitability system is OPERABLE when:

a. Two out of three emergency ventilation subsystems, fans, associated filters and dampers are OPERABLE, and

b. Five bottled air pressurization subsystems consisting of two bottles per subsystem are OPERABLE, and

c. The series normal air intake and exhaust isolation dampers for both units are OPERABLE, and capable of automatic closure on a CIB, Control Room High Radiation and Chlorine isolation signal, or closed.

d. The control room air temperature is maintained $\leq$88°F.

APPLICABILITY: a. With either unit* in MODES 1, 2, 3 and 4, or

b. During irradiated fuel movement or movement of loads over irradiated fuel at either unit and a. above or

c. Refer to T.S. 3.9.15 when both units are in either MODES 5 or 6

ACTION:

a. With less than two emergency ventilation subsystems, fans, and associated filters OPERABLE, restore at least two subsystems to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

a.1 With an emergency ventilation subsystem inlet isolation damper open and not capable of being closed, the requirements of 3.0.3 are applicable.

b. With one bottled air pressurization subsystem inoperable, restore five bottled air pressurization subsystems to OPERABLE within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b.1 With less than four bottled air pressurization subsystems OPERABLE, the requirements of 3.0.3 are applicable and movement of irradiated fuel shall be suspended.

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* Emergency power for one train of dampers of the Unit in MODES 5 or 6 need not be available.

3/4.7.7 CONTROL ROOM EMERGENCY HABITABIITY SYSTEMS

LIMITING CONDITION FOR OPERATION

c. With one open series normal air intake or exhaust isolation damper inoperable and not capable of closing, restore all series dampers to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

c.1 With both series normal air intake or exhaust isolation dampers inoperable and not capable of being closed, the requirements of 3.0.3 are applicable and movement of irradiated fuel or movement of loads over irradiated fuel shall be suspended.

d. With the control room air temperature >88°F but ≤ 105°F, return the temperature to ≤88°F in 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

d.1 With the control room air temperature > 105°F, be in at least HOT STANDBY within the next 4 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.7.1.1 The BV-1 emergency ventilation subsystem shall be demonstrated OPERABLE:

a. At least once per 12 hours by verifying that the control room air temperature is ≤88°F.

b. At least once per 31 days by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for 15 minutes.

c. At least once per 18 months or after every 720 hours of system operation or (1) after each complete or partial replacement of a HEPA filter or charcoal adsorber bank, or (2) after any structural maintenance on the HEPA filter or charcoal adsorber housing or (3) following painting, fire or chemical release in any ventilation zone communicating with the system by:

1. Verifying that the filtration system satisfies the in-place penetration and by-pass leakage testing acceptance criteria of less than 1% when tested in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 800 - 1000 cfm.

2. Subjecting the carbon contained in at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers to a laboratory carbon sample analysis and verifying a removal efficiency of ≥ 99% for radioactive methyl iodine at an air flow velocity of .68 ft/sec ±20% with an inlet methyl iodide concentration of 1.5 to 2.0 mg/m³, ≥70% relative humidity, and 30°C ±1/2°C; other test conditions shall be in accordance with ANSI N510-1980. The carbon samples not obtained from test canisters shall be prepared by either:

a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining a sample volume equivalent to at least two inches in diameter and with a length equal to the thickness of the bed, or

b) Removing a longitudinal sample from an adsorber tray using a slotted-tube sampler, mixing the adsorbent thoroughly, and obtaining a sample volume equivalent to at least two inches in diameter and with length equal to the thickness of the bed.

3. Verifying a system flow rate of 800 - 1000 cfm during system operation.

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is <6 inches Water Gauge while operating the ventilation system at a flow rate of 800 - 1000 cfm .

2. Verifying that on a chlorine/control room high radiation/containment phase B isolation test signal from either Unit*, the system automatically closes all the series isolation ventilation system dampers which isolate the combined control room from the outside atmosphere.

3. Verifying that one emergency ventilation subsystem maintains the combined control room at a positive pressure of ≥1/8 inch Water Gauge relative to the outside atmosphere during system operation.

4. Verifying that the heaters dissipate 5 ± 0.5 kw when tested in accordance with ANSI N510-1980.

4.7.7.1.2 The BV-2 emergency ventilation subsystems shall be demonstrated OPERABLE:

a. At least once per 12 hours by verifying that the control room air temperature is ≤88°F.

b. At least once per 31 days by initiating flow through each HEPA filter and charcoal adsorber train and by verifying that each train operates for 15 minutes.

c. At least once per 18 months, or after every 720 hours of system operation and (1) after each complete or partial replacement of a HEPA filter or charcoal adsorber bank, or (2) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (3) following painting, fire or chemical release in any ventilation zone communicating with the system by:

1. Verifying that the filtration system satisfies the in-place penetration and by-pass leakage testing acceptance criteria of less than 1% when tested in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 800-1000 cfm.

* Input from Unit 2 is not applicable until prior to initial entry into MODE 4.

2. Subjecting the carbon contained in at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers to a laboratory carbon sample analysis and verifying a removal efficiency of ≥99% for radioactive methyl iodine at an air flow velocity of 0.70 ft/sec ±20% with an inlet methyl iodine concentration of 1.5 to 2.0 mg/m3, ≥70% relative humidity, and 30°C ±1/2°C; other test conditions shall be in accordance with ANSI N510-1980. The carbon samples not obtained from test canisters shall be prepared by either:

   a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining a sample volume equivalent to at least two inches in diameter and with a length equal to the thickness of the bed, or

   b) Removing a longitudinal sample from an adsorber tray using a slotted-tube sampler, mixing the adsorbent thoroughly, and obtaining a sample volume equivalent to at least two inches in diameter and with a length equal to the thickness of the bed.

3. Verifying a system flow rate of 800 to 1000 cfm during system operation.

d. At least once per 18 months by:

1. Verifying that the pressure drop for each filter assembly is <3.0 inches Water Gauge across each HEPA filter and <0.9 inches Water Gauge across each charcoal filter while operating the ventilation system at a flow rate of 800 to 1000 cfm.

2. Verifying that on a Containment Isolation Phase B/Control Room High Radiation test signal from either Unit*, the system automatically closes all the series isolation ventilation system dampers which isolate the combined control room from the outside atmosphere and the system automatically starts 60 minutes later and supplies air to the control room through the HEPA filters and charcoal adsorber banks.

3. Verifying that on a chlorine test signal from either Unit*, the system automatically closes all the series isolation ventilation system dampers which isolate the combined control room from the outside atmosphere.

* Input from Unit 2 is not applicable until prior to initial entry into MODE 4.

4. Verifying that one emergency ventilation subsystem maintains the control room at a positive pressure of ≥1/8 inch Water Gauge relative to the outside atmosphere during system operation.

5. Verifying that the heaters dissipate 5 ± 0.5 kw when tested in accordance with ANSI N510-1980.

4.7.7.2 The bottled air pressurization system shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that the system contains a minimum of 10 bottles of air each pressurized to at least 1825 psig and by verifying that the system solenoid operated valves are powered from an operable emergency bus.

b. At least once per 18 months be verifying that:

1. A chlorine/control room high radiation/containment phase B isolation test signal from either Unit* will initiate system operation.

2. Upon a partial discharge test using four out of five bottled air subsystems the system will supply ≤ 1000 cfm of air and pressurize the control room to ≥1/8 inch Water Gauge relative to the outside atmosphere during system operation.**

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* Input from Unit 2 is not applicable until prior to initial entry into MODE 4.

** A one-time one-hour discharge test has been performed utilizing four out of five bottled air subsystems demonstrating the bottled air pressurization system will maintain the combined control room at a positive pressure of ≥1/8 inch Water Gauge relative to the outside atmosphere.

3/4.9.15 CONTROL ROOM EMERGENCY HABITABILITY SYSTEMS

LIMITING CONDITION FOR OPERATION

3.9.15.1 The control room emergency habitability system is OPERABLE when:

a. Two out of three emergency ventilation subsystems, fans and associated filters and dampers are OPERABLE, and

b. Five bottled air pressurization subsystems consisting of two bottles per subsystem are OPERABLE, and

c. The series normal air intake and exhaust isolation dampers for both units are OPERABLE, and capable of automatic closure on a Control Room High Radiation and Chlorine isolation signal*, or closed.

APPLICABILITY: When both units are in either MODE 5 or 6.

ACTION:

a. With less than two emergency ventilation subsystems, fans and associated filters OPERABLE and irradiated fuel being moved or movement of loads over irradiated fuel, restore at least two subsystems to OPERABLE status within 7 days or close at least one series normal air intake and exhaust isolation damper on each intake and exhaust to the control room.

b. With one bottled air pressurization subsystem inoperable, restore five bottled air pressurization subsystems to OPERABLE within 7 days or suspend all operations involving movement of irradiated fuel or movement of loads over irradiated fuel.

b.1 With less than four bottled air pressurization subsystems OPERABLE or no emergency ventilation subsystems OPERABLE, suspend all operations involving movement of irradiated fuel or movement of loads over irradiated fuel.

c. With one open series normal air intake or exhaust isolation damper inoperable# and not capable of closing and irradiated fuel being moved or movement of loads over irradiated fuel, restore all series dampers to OPERABLE status within 7 days or close at least one series normal air intake and exhaust isolation damper on each intake and exhaust to the control room.

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* Not applicable when output relay fuses are removed to prevent inadvertant ESF actuation for a single unit.

\# Emergency backup power not required for any 1 of 2 series dampers.

LIMITING CONDITION FOR OPERATION

c.1 With both series normal air intake or exhaust isolation dampers inoperable# and not capable of being closed, suspend all operations involving movement of irradiated fuel or movement of loads over irradiated fuel.

SURVEILLANCE REQUIREMENTS

4.9.15.1 The emergency ventilation subsystems and the bottled air pressurization system shall be demonstrated OPERABLE in accordance with Specifications 4.7.7.1.1, 4.7.7.1.2 and 4.7.7.2 with the following exception:

a. Automatic operation upon receipt of a containment phase B isolation signal is not required.

Emergency backup power not required for any 1 of 2 series dampers.

3/4.7.7 CONTROL ROOM EMERGENCY HABITABILITY SYSTEM

The OPERABILITY of the control room emergency habitability system ensures that the control room will remain habitable for operations personnel during and following all credible accident conditions. The ambient air temperature is controlled to prevent exceeding the allowable equipment qualification temperature for the equipment and instrumentation in the control room. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR 50.

3/4.7.8 SUPPLEMENTAL LEAK COLLECTION AND RELEASE SYSTEM (SLCRS)

The OPERABILITY of the SLCRS provides for the filtering of postulated radioactive effluents resulting from a Fuel Handling Accident (FHA) and from leakage of LOSS of COOLANT ACCIDENT (LOCA) activity from systems outside of the Reactor Containment building, such as Engineered Safeguards Features (ESF) equipment, prior to their release to the environment. This system also collects potential leakage of LOCA activity from the Reactor Containment building penetrations into the contiguous areas ventilated by the SLCRS except for the Main Steam Valve Room and Emergency Air Lock. The operation of this system was assumed in calculating the postulated offsite doses in the analysis for a FHA. System operation was also assumed in that portion of the Design Basis Accident (DBA) LOCA analysis which addressed ESF leakage following the LOCA, however, no credit for SLCRS operation was taken in the DBA LOCA analysis for collection and filtration of Reactor Containment building leakage even though an unquantifiable amount of contiguous area penetration leakage would in fact be collected and filtered. Based on the results of the analyses, the SLCRS must be OPERABLE to ensure that ESF leakage following the postulated DBA LOCA and leakage resulting from a FHA will not exceed 10 CFR 100 limits.

3/4.7.9 SEALED SOURCE CONTAMINATION

The limitations on sealed source removable contamination ensure that the total body or individual organ irradiation does not exceed allowable limits in the event of ingestion or inhalation of the source material. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 79.39(c) limits for plutonium. Leakage of sources excluded from the requirements of this specification represent less than one maximum permissible body burden for total body irradiation if the source material is inhaled or ingested.

3/4.7.10 and 3/4.7.11 RESIDUAL HEAT REMOVAL SYSTEM (RHR)

Deleted

BASES

3/4.9.15 CONTROL ROOM EMERGENCY HABITABILITY SYSTEMS

The OPERABILITY of the control room emergency habitability system ensures that the control room will remain habitable for operations personnel during and following all credible accident conditions. The ambient air temperature is controlled to prevent exceeding the allowable equipment qualification temperature for the equipment and instrumentation in the control room. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR 50.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 109 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

1.0 INTRODUCTION

By letters dated October 9, 1986 and January 8 and 15, February 3, 9 and 10, April 10, 16 and 20, and May 12, 13 (two letters), and 14, 1987, and meetings on March 18 and April 2, 1987, Duquesne Light Company (licensee)proposed amendments to the Beaver Valley Unit 1 Technical Specifications, described related design modifications, and provided additional information to the staff on the combined Beaver Valley Units 1 and 2 control room emergency habitability system. The proposed Technical Specifications (TS 3/4.7.7 and TS 3/4.9.15) address all pertinent portions of the ventilation systems associated with both the Unit 1 design and the Unit 2 design. The licensee stated that the proposed Technical Specifications were developed for both Unit 1 and Unit 2.

The staff's previous evaluation of Unit 1 compliance with NUREG-0737, Item III.D.3.4 requirements is contained in the February 9, 1982 letter from Dennis A. Chaney, NRC, to J. J. Carey, Duquesne Light Company. In this previous evaluation, conducted prior to the modifications described in the current licensee submittals, the staff concluded that the control room systems will provide safe, habitable conditions under both toxic gas and radiological releases and the design meets the NUREG-0737, Item III.D.3.4 criteria including GDC 19 and is, therefore, acceptable.

The staff's initial evaluation of the habitability system for the combined Units 1 and 2 control room is contained in NUREG-1057 issued for the licensing of Beaver Valley Unit 2 and based on the Unit 2 FSAR. In this previous evaluation, conducted prior to the modifications described in the current licensee submittals, the staff concluded that the control room habitability system is acceptable and meets GDC 19 with respect to maintaining the control room in a safe and habitable condition under accident conditions by providing adequate protection against radiation and toxic gas accidents. In meeting the guidance and positions of SRP Section 6.4 and RGs 1.78 and 1.95, the licensee has demonstrated that the control room will adequately protect the control room operators and remain habitable in accordance with NUREG-0737 Item III.D.3.4. The staff also concluded, on the basis of its evaluation with respect to SRP Section 6.5.1, that the ESF atmosphere cleanup systems including the control room habitability, containment, and associated systems are acceptable.

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1.1 Unit 2 FSAR Description of the Control Room Habitability Systems

Unit 2 FSAR Amendment 10, May 1985, describes the control room envelope as consisting of the Unit 2 control room (including shift supervisor's office), computer room, and air-conditioning equipment room; and the Unit 1 control room (including the office), computer room, kitchen, medical, and sanitary facilities, heating ventilating, and air-conditioning equipment room, communication equipment and relay panel room, and process instrument and rod position room. The FSAR states that the habitability system for the control room envelope is designed in accordance with GDC 2,3, 4, 5 and 19 and RGs 1.26, 1.29, 1.52, 1.76, 1.78, 1.95 and 1.117, and that the system meets the intent of NUREG-0737 Item III.D.3.4. Breathing quality compressed air is supplied from high pressure bottles installed in Unit 1 to maintain positive pressure in the control room envelope for the first hour after a design basis accident (radiological release) or an accidental release of chlorine. Self-contained breathing apparatus sufficient for 10 operators for 6 hours is provided in Unit 1 with provisions for offsite replenishment.

The control room envelope air-conditioning system is safety-related and maintains the main control room ambient air temperature at 75°F under normal conditions. The emergency diesel generators supply power to the redundant air-conditioning and filtration systems in the event of the loss of normal power. The emergency 125 volt system provides power for emergency lighting in the control room. Fresh air normally is supplied to the control room envelope at a rate of 200 cfm. Two redundant standby charcoal filtration units (capacity 1,000 cfm each) provide filtered fresh air for pressurization and breathing after an accident. The filter units each consists of a moisture separator and an electric heater to maintain low relative humidity, a HEPA filter and an impregnated charcoal filter (2 inches thick) for removal of radioiodine. The design, testing, and maintenance of the control room envelope filtration unit is in accordance with RG 1.52. The intent of NUREG-0737, Item III.D.3.4, is met in that toxic gas detection is provided in accordance with the control room habitability study for Unit 1 and Unit 2 (NRC 1982). Control room envelope ventilation parameter values associated with Unit 1 and Unit 2 are as follows:

1. Net free volume (ft^3)
   Unit 1, 114,000 Unit 2, 59,000

2. Post-accident air makeup rate (cfm)
   Unit 1, 400 Unit 2, 1,000

Essential air filtration units are of the same type and filter bed depth in both Units 1 and 2.

Upon receipt of a containment isolation Phase B signal, the normal outside air supply and exhaust dampers automatically close, thus isolating the control room envelope. This signal also initiates the bottled air supply system, which is capable of providing sufficient air to meet pressurization requirements. The system is capable of maintaining the ambient pressure slightly above atmospheric pressure, thus preventing inleakage, for approximately 1 hour. Following the first hour after an accident, the control room envelope is maintained at a positive pressure for an indefinite period of time due to the operation of the redundant emergency air supply systems. Each system can draw outside air through a filter assembly with an effective iodine removal efficiency of 95 percent. For the air recirculation mode, an iodine removal efficiency of 90 percent is used.

The effects of accidents were evaluated to determine the doses that the main control room personnel might receive. The limiting design basis accident (DBA) for these doses is the loss-of-coolant-accident (LOCA). The dose was calculated to be less than the limit specified in GDC 19, 5 rem to the whole body or its equivalent to any part of the body for the duration of the accident postulated.

In the event of a toxic gas release, main control room habitability is maintained by isolating the air intake, recirculating filtered air, and by maintaining a positive pressure using compressed air for 1 hour, after which the main control room will remain isolated for the duration of the accident. Redundant, sensitive, and automatic detection and isolation equipment is provided for the detection of chlorine gas.

1.2 Design Modifications

Design modifications described in the licensee's submittals for Unit 1 are summarized as follows:

A wall between the Unit 1 and Unit 2 control rooms that serves as a ventilation, fire protection and security barrier has been removed to provide a common control room area for Units 1 and 2. The Control Room Emergency Bottled Air Pressurization System (CREBAPS), which formerly served only the Unit 1 control room area, has been increased (doubled) in capacity to be sufficient to maintain the larger common control room area pressurized to no less than 1/8 inch water gauge with respect to the outside atmosphere for the required 1-hour time period. This is the time during which this system is relied on for pressurization to maintain control room habitability after a design basis accident (radiological release) or an accidental release of chlorine. The Unit 1 protection signals required to operate this system remain the same and the Unit 2 protection signals perform the same function. The licensee stated that a protection signal from either unit will initiate control room protection actions, therefore, the habitability of the control room is assured to the same level of protection as previously evaluated.

The Unit 1 Control Room Emergency Ventilation System (CREVS) Supply Fans have been replaced with larger fans capable of supplying the additional flow rate of filtered outside air required to maintain the common control room area pressurized. Larger capacity ducting, dampers and a duct heater have been installed in the CREVS in accordance with the additional flow requirements. An additional charcoal filter adsorber cell has been installed in the filter housing. Radiation monitors will be added to the ventilation system associated with the Unit 1 design to initiate control room isolation and pressurization in the event of radioactive inleakage. The licensee stated that they intend to submit changes to the Unit 1 Technical Specifications, incorporating these radiation monitors, by July 1, 1987. The ventilation system associated with the Unit 2 design contains this instrumentation. Control room ventilation isolation and actuation of the bottled air pressurization system will occur on receipt of high control room radiation, chlorine isolation and CIB actuating signals from either Unit 1 or Unit 2.

The chlorine detectors associated with the Unit 1 design are being replaced with a design similar to those associated with the Unit 2 design, with the the detectors being relocated closer to the air inlet for improved time response. The licensee stated that they expect to complete the replacement of the Unit 1 chlorine detectors by June 16, 1987 and will revise the Bases to the chlorine detector TS by September 1, 1987 in that it will assure the toxicity limit in the control room is not exceeded within the first 2 minutes following detection. In the interim, the control room operators will be protected by either the Unit 2 chlorine detectors or the isolation of the control room from the outside atmosphere and monitoring oxygen content within the control room pressure envelope. During any necessary periodic purging of the control room either the normal air intake will be monitored for chlorine using a portable detector or a watch will be provided at the chlorine storage area, each with communications to the control room.

The actuating circuits for Control Room Ventilation Isolation CIB, Control Room Radiation and Chlorine Isolation were modified so that these signals would isolate all eight intake and exhaust dampers on the combined Unit 1 and Unit 2 systems.

A change proposed by the licensee compared to the design described in the Unit 2 FSAR is the reliance on the modified emergency ventilation subsystem associated with the Unit 1 design in addition to the two 100% redundant emergency ventilation subsystems associated with the Unit 2 design to maintain control room habitability during the time following the end of the 1-hour period after a design basis (radiological) accident when the CREBAPS is relied on for pressurization of the control room area. The licensee stated that this results in the operators having additional equipment to utilize for meeting the minimum subsystems required to be operable to provide habitability during accident conditions. The equipment is supported by equivalent support systems associated with the respective unit's design and is capable of protecting the operators in accordance with 10 CFR Part 50, Appendix A, GDC 19.

A further modification of the design associated with Unit 1 is the removal of the connecting duct work between the primary intake source and the emergency ventilation system and the installation of a removable seal near the maximum flow damper to eliminate damper leakage. The purpose of this modification is to eliminate the possibility of bypass flow around the emergency ventilation system. As a result of this the control wiring was modified to remove the auto open signal for the series intake and exhaust dampers following a 60 minute time delay. Also the auto start capability of the emergency ventilation systems fans was removed by placing their control switches in the stop position to require manual operator action to initiate system operation.

The licensee has also stated, based on the Unit 1 UFSAR and the Unit 2 FSAR that the control room and components of the control room ventilation system are designed in accordance with GDC 4; and that the as-modified design of the Unit 1 emergency habitability systems continue to meet the same criteria. The licensee has also provided relevant rationale and concluded that, as shared safety systems, the emergency ventilation subsystems of each unit are totally

independent of each other and satisfy the GDC 5 criteria for not impacting the ability of the other unit to achieve a safe shutdown condition.

The proposed bases for the proposed Technical Specifications state that the control room habitability system is intended to ensure the control room will remain habitable for operations personnel during and following credible accidents and to prevent exceeding the allowable qualification temperature for the equipment and instrumentation in the control room. The design provisions and operability of this system are based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less to the whole body, or its equivalent, which is consistent with the requirements of GDC 19. Unit 2 FSAR Section 6.4 defines the radiological and non-radiological accidents the control room habitability systems have been designed to protect against. As a result of the modifications to the systems associated with the Unit 1 design, an equivalent evaluation of accidents, as defined by the Standard Review Plan, has been performed. The conclusions are that a Unit 2 small primary coolant line break outside of containment remains the limiting accident with respect to control room operator doses, as described in the Unit 2 FSAR, Amendment 13, issued in January 1987.

With respect to protecting control room operators from toxic gas releases, the licensee stated that the previous Unit 1 response to NUREG-0737, "Clarification of TMI Action Plan Requirements," Item III.D.3.4, "Control Room Habitability Requirements," is unaffected by the modifications, and that the Unit 2 FSAR, Section 6.4, describes the combined control room protection from toxic gases. The on-site release of chlorine gas remains the only toxic gas for which protection of control room operators is required. The effect of a chlorine gas release has been reevaluated and the licensee has concluded that Regulatory Guide 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," and Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release," can be met with respect to demonstrating that the toxicity limit will not be reached within the first 2 minutes after the gas is detected thereby providing the operators sufficient time to don self-contained breathing apparatus. The Unit 2 FSAR states that in the event of a toxic gas release, control room habitability is maintained by isolating the air intake, recirculating filtered air, and maintaining a positive pressure using compressed air for 1 hour, after which the control room will remain isolated for the duration of the incident.

1.3 Conformance With Regulatory Guides

The licensee has stated that the testing criteria for the post accident engineered safety feature air filtration and adsorption unit associated with the Unit 1 design meets the intent of Regulatory Guide 1.52, "Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Coolant Nuclear Power Plants," Rev. 2, Positions C.5 and C.6, with certain identified deviations as follows:

Paragraph C.5.b - The airflow capacity and flow distribution test procedure will be developed based on ANSI N510-1980, "Testing of Nuclear Air Cleaning Systems," Section 8, except that:

1. To avoid damage to system components, an artificial resistance may be used in lieu of the recommendations of Paragraph 8.3.1.1;

2. The Paragraph 8.3.1.6 airflow capacity test will be performed with the filter bank at 100 percent of design dirty pressure drop, since the system design and surveillances preclude inadvertent operation of the filter banks with the pressure or flow rate outside of the allowable limits;

3. The Paragraph 8.3.1.7 airflow capacity test will be performed at a point between the design dirty and design clean pressure drops; and

4. The airflow distribution through the HEPA filters will not be tested since the design employs a single HEPA filter located downstream of the charcoal adsorber.

Paragraph C.5.c - The air-aerosol mixing uniformity test in Section 9 of ANSI N510-1980 will not be performed since the Unit 1 emergency ventilation subsystem contains only one HEPA filter.

The in-place leak test of the HEPA filters will be performed in accordance with Section 10 of ANSI N510-1980 to confirm a penetration of less than 1.0% at rated flow, which is consistent with NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors."

Paragraph C.5.d -The in-place leak test of the carbon adsorber will be performed in accordance with Section 12 of ANSI N510-1980 to ensure that bypass leakage is less than 1%, which is consistent with NUREG-0452.

Paragraph C.6.b -The laboratory testing for the carbon adsorbent will meet the recommended minimum test frequency of Table 1 of ANSI N510-1980. The carbon samples not obtained from test canisters will be obtained with a slotted-tube sampler.

The licensee has further stated that the assumptions for evaluating the habitability of the control room during a postulated hazardous chemical release meet the intent of RG 1.78, Rev. 0 with the following clarifications and alternatives:

General - The licensee evaluation has been performed using the methodology outlined in NUREG-0570, "Toxic Vapor Concentrations in the Control Room Following a Postulated Accidental Release," which is similar to that presented in Appendix B of RG 1.78 but at a greater level of detail. This evaluation was submitted to the NRC in response to NUREG-0737, Item III.D.3.4 by the licensee's letter dated December 28, 1981. The NRC safety evaluation was issued on February 9, 1982. Protection of the control room during a chlorine release was also addressed in the licensee's statement concerning RG 1.95.

Paragraph C.9 - The CREBAPS will provide a minimum positive pressure of 1/8 inch water gauge in the control room relative to the outside atmosphere.

Paragraph C.12 -A chlorine release concurrent with an earthquake, tornado or flood and coincident with the radiological consequences of a design basis accident as described in Paragraph C.12 is interpreted as events simultaneously occurring.

Paragraph C.13 -Operators will be instructed to don self-contained breathing apparatus on receipt of a chlorine signal. The self-contained breathing apparatus has an air supply of 6 to 8 hours.

The licensee further stated that provisions for protection of the control room operators against an accidental chlorine release meet the intent of RG 1.95 with the following deviations and clarifications:

Paragraph C.3 - The evaluation of control room habitability is performed using the general design considerations of RG 1.78 in lieu of Paragraph C.3 of RG 1.95. Specific design features and procedures are defined, as necessary, to assure that the chlorine concentration inside the control room could not exceed 15 ppm by volume (45 mg/m^3) within 2 minutes of detection and that the operators are protected.

Paragraph C.4 - The charcoal filters will not be used for chlorine removal, as described in Paragraph C.4.a, because the filters are not designed to remove or limit chlorine accumulation. The design basis of the charcoal filters is only radiological. The surveillance requirements of the Technical Specifications are in lieu of those suggested in Paragraph

C.4. The system response time (addressed in Paragraph C.4.d.2) will be sufficient to ensure that the chlorine concentration inside the control room could not exceed 15 ppm by volume (45 mg/m^3) within 2 minutes after the operators are made aware of the presence of chlorine.

The licensee has stated that their positions regarding conformance of the systems associated with the Unit 2 design with RG 1.52, 1.78 and 1.95 regulatory positions are contained in the Unit 2 FSAR, Table 1.8-1.

1.4 Proposed Technical Specification

The proposed technical specifications require control room ventilation system normal air intake and exhaust isolation dampers to be operable and capable of automatic closure on a containment isolation phase B (CIB) signal (Modes 1, 2, 3, and 4) (TS 3/4.7.7) and on control room high radiation and chlorine isolation signals, or to be closed (Modes 1, 2, 3, 4, 5 and 6) (TS 3/4.9.15). The licensee has stated that this will ensure that no flow path is open to the outside atmosphere and the control room can be pressurized following an isolation signal during the respective Modes. The proposed specification requires, at all times, operability of all five of the 25% capacity bottled air pressurization subsystems and two of the three 100% capacity control room emergency ventilation subsystems (one identified in the proposed Technical Specifications as the Unit 1 subsystem and two identified as Unit 2 subsystems).

Proposed TS 3/4.7.7 provides an Action statement and Surveillance Requirements corresponding to its Applicability when either Unit 1 or Unit 2 is in Mode 1, 2, 3, or 4. Likewise TS 3/4.9.15 provides an Action statement and Surveillance Requirements corresponding to its Applicability when both Unit 1 and Unit 2 are in either Mode 5 or 6.

In TS 3.7.7, the proposed Action statement provides actions to be taken when the Limiting Conditions of Operation are not met to ensure that the single failure criterion can be satisfied in a timely manner and otherwise for placing Unit 1 and Unit 2 in Modes in which the specification does not apply. In TS 3.9.15.1, the proposed Action statement provides actions to be taken when the Limiting Conditions of Operation are not met to ensure that the single failure criterion is met in a timely manner and otherwise for closing isolation dampers and for suspending all operations involving movement of irradiated fuel or movement of loads over irradiated fuel.

Surveillance requirements are proposed for periodically demonstrating the operability of the control room emergency habitability systems. The requirements are based on the as-modified design and provide updated testing criteria, e.g., ANSI N510-1980. A proposed surveillance requirement is to verify that on receipt of a CIB/Control Room High Radiation or chlorine test signal from either Unit, all the normal ventilation system dampers which isolate the control room from the outside atmosphere are automatically closed.

Surveillance requirements are proposed for demonstrating that the Unit 1 and Unit 2 emergency ventilation subsystems are operable by periodically verifying that (1) the control room air temperature is maintained at no greater than 88°F to ensure that the environmental conditions do not exceed the control room equipment qualification temperature of 104°F; (2) the subsystem flow rates, duct heater power capabilities, HEPA filter and charcoal adsorber pressure drops, penetration and bypass leakage, and radioiodine removal efficiencies are in compliance with specified acceptance criteria when tested in accordance with ANSI N510-1980, as described in the licensee's discussion of conformance with RG 1.52; and (3) each emergency ventilation subsystem maintains the combined control room area at a positive pressure of no less than 1/8-inch water gauge relative to the outside atmosphere during system operation.

The licensee has also proposed a surveillance requirement that the Unit 2 emergency ventilation subsystems be demonstrated to be operable by verifying periodically that they automatically start 60 minutes after a CIB/Control Room High Radiation test signal and supply filtered outside air to the control room. There is no similar surveillance requirement for the Unit 1 subsystem since it is designed only to start on a manually actuated signal.

A Surveillance Requirement is proposed that the bottled air pressurization system be demonstrated operable by verifying periodically that (1) the system contains at least 10 bottles of air each pressurized to at least 1825 psig; (2) the system solenoid valves are powered from an emergency bus; and (3) upon a partial discharge test using four of the bottled air subsystems, the system will supply no greater than 1000 cfm of air and pressurize the control room to at least 1/8-inch water gauge relative to the outside air during system operation. The licensee stated that a one-time, 1-hour discharge test has been performed using four of the five bottled air subsystems demonstrating that the system will maintain the combined control room area at a positive pressure of no less than 1/8-inch water gauge relative to the outside atmosphere. The proposed Surveillance Requirements would apply at all times, except that when both Units 1 and 2 are in either Mode 5 or 6 automatic operation upon receipt of a containment isolation phase B (CIB) signal is not required to be verified.

The proposed Technical Specifications contain specific exceptions as follows:

(1) With either unit in Modes 1, 2, 3, or 4, emergency power for one train of dampers of the unit in Modes 5 or 6 need not be available. This is to allow diesel generator maintenance when one of the two units is in either Mode 5 or 6 as defined in TS 3.0.5 and its bases;

(2) For verifying automatic closure of normal ventilation system isolation dampers, the requirement for testing input signals from Unit 2 is not applicable until prior to initial entry of Unit 2 into Mode 4. This is proposed since the Unit 2 solid state protection system will not be operable until the time prescribed by the exception, which is after the Unit 1 restart. However, the licensee stated that equivalent protection is provided since the Unit 1 protection signals will initiate operation of the Unit 2 emergency control room habitability subsystems independently of the Unit 2 protective systems;

(3) When both units are in either Mode 5 or 6, the requirement that the normal ventilation isolation dampers be capable of automatic closure on isolation signals is not applicable when output relay fuses are removed in order to prevent inadvertent engineered safety feature actuation while performing surveillance testing; and

(4) When both units are in either Mode 5 or 6, emergency backup power in not required for any one of two series normal ventilation isolation dampers. This is to allow diesel generator maintenance and preclude a condition where no makeup air would be available for an extended period of time to the control room. This is consistent with TS 3.0.5 and its bases.

2.0 EVALUATION

2.1 Basis for Evaluation

In February 1982, the staff concluded based on previous staff analysis and review of the licensee's submittals for Unit 1 in accordance with NUREG-0737, Item III.D.3.4 that the control room habitability systems will provide safe, habitable conditions within the control room under both toxic gas and radiological releases and the design meets the criteria identified in Item III.D.3.4 and is, therefore, acceptable. (Letter from Dennis A. Chaney, NRC, to J. J. Carey, Duquesne Light Company, February 9, 1982).

In October 1985, the NRC issued the Safety Evaluation Report Related to the Operation of the Beaver Valley Power Station, Unit 2, NUREG-1057. In Section 6.4 of this report it is stated that the staff has evaluated the control room habitability system in accordance with SRP Section 6.4 and RGs 1.78 and 1.95. The staff concludes that the control room habitability system is acceptable and meets GDC 19 with respect to maintaining the control room in a safe and habitable condition under accident conditions by providing adequate protection against radiation and toxic gas accidents. In meeting the guidance of the SRP and RGs, the licensee has demonstrated that the control room will adequately protect the control room operators and remain habitable in accordance with NUREG-0737, Item III.D.3.4.

In Section 6.5.1 of NUREG-1057 the following was stated. FSAR Section 6.5 contains information pertaining to ESF filter systems (includes the main control room pressurization filtration system), their design bases, and applicable acceptance criteria. The staff has reviewed the licensee's design, design

criteria, and design bases for the ESF filter systems according to the guidelines of SRP 6.5.1. The acceptance criteria include the applicable GDC, ANSI N509-1976, ANSI N510-1980, RG 1.52 and other documents identified in the SRP. Conformance to the acceptance criteria provides the bases for the staff's conclusion that the ESF filter systems meet the requirements of 10 CFR 50. On the basis of its evaluation with respect to the SRP, the staff concludes that the proposed ESF filter systems are acceptable. The filter efficiencies given in Table 2 of RG 1.52 are appropriate for use in accident analyses.

Unit 2 FSAR Amendment 13, issued by the licensee in January 1987, described a reevaluation of the dose consequences of postulated accidents in which the small line break outside containment was determined to produce the most severe dose consequences for control room operators, rather than the large break LOCA as described on the FSAR on which NUREG-1057 was based. This reevaluation necessitates the provision by the licensee of radiation monitors for the Unit 1 control room normal ventilation system, whereas none was required for protecting the control operators against the consequences of the large break LOCA. The licensee has stated that they have added these monitors to Unit 1 and intend to submit a change to the Unit 1 Technical Specifications incorporating these monitors by July 1, 1987.

2.2 Review and Evaluation

The staff has reviewed the design which provided the basis for previous evaluations performed by the staff of the acceptability of the Beaver Valley control room habitability systems and the findings of these evaluations. The staff has further reviewed the description of the design modifications to these systems and analyses as provided in the identified licensee submittals. The staff has also performed an evaluation of the consequences of postulated radiological and non-radiological accidents related to control room habitability.

Based on its review and evaluation, the staff finds that the proposed changes meet the intent of applicable RGs and do not change the conclusions of the staff's previous evaluations identified above and are, therefore, acceptable. The staff finds that the proposed amendments to Unit 1 TS are appropriate to the as-modified designs, provide appropriate updated testing criteria, and meet the intent of the guidance of the Standard Technical Specifications and are, therefore, acceptable for incorporation in the Beaver Valley, Unit 1 license.

The staff finds, in addition, that inclusion by the licensee of the newly installed control room radiation monitors in the Unit 1 Technical Specifications to ensure compliance with GDC 19 based on the Unit 2 FSAR Amendment 13 is a an appropriate course of action being pursued independent of the described modifications and changes to the Unit 1 Technical Specifications evaluated by the staff.

3.0 EMERGENCY CIRCUMSTANCES

These TS changes are being issued without a normal 30 day notice period to preclude an unnecessary delay in plant startup from the current outage. On October 9, 1986, the licensee applied for a technical specification change to facilitate the removal of a temproary wall separating the Unit 1 and Unit 2

control rooms in preparation for licensing Unit 2. This amendment request was noticed on December 17, 1986 (51 FR 45198). During meetings with the staff on April 2, 1987, it became clear that the modifications to the Unit 1 control room habitability systems proposed by the licensee would require incorporating additional operability requirements, Limiting Conditions of Operation, and surveillance requirements that were not included in the December 17, 1986 notice. The licensee could not have reasonably anticipated these additional requirements. The licensee promptly submitted a revision to their amendment request on April 16, 1987.

The Commission has determined that emergency circumstances exist in that swift action is necessary to avoid a delay in startup and finds that for the reason stated above, and an accelerated outage schedule, emergency circumstances exist.

In connection with a request indicating an emergency, the Commission expects its licensees to apply for license amendments in a timely fashion. However, with this consideration in mind, it has been determined that a circumstance has arisen where the licensee and the Commission must act quickly, and the licensee has made a good effort to make a timely application.

4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

In accordance with 10 CFR 50.92, the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the 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 of different kind of accident previously evaluated; or (3) involve a significant reduction in a margin of safety. The information in this section provides the staff's evaluation of this license amendment against the three criteria.

The staff has confirmed the basis of the no significant hazards findings described in the notice published in the Federal Register on December 17, 1986 (51 FR 45198) and renoticed on May 4, 1987 (52 FR 16323). The amendment does not involve a significant increase in probability or consequences of accidents previously evaluated.

The change requiring two out of three emergency ventilation subsystems to be operable incorporates the Unit 2 design of two 100% redundant emergency ventilation subsystems, and the Unit 1 system, being defined as one subsystem. This results in the operators having additional equipment to utilize in meeting the minimum required subsystems to provide control room habitability during accident conditions. All equipment is supported by equivalent support systems at each respective unit and is capable of protecting the operators well within the habitability requirements of the General Design Criteria 19 in Appendix A of the Code of Federal Regulations Title 10 Part 50. This change is a substantial increase in reliability over the previously single ventilation system provided for Unit 1.

The amendment does not create the possibility of a new or different kind of accident from any previously analyzed. The proposed changes will ensure control room environmental conditions are maintained suitable for operator habitability during accident conditions. Removal of the temporary wall, defining the need for two out of three emergency ventilation subsystems or increasing the capacity of the bottled air pressurization system does not create a new or different kind of accident. The combined control room has been analyzed for radiological and non-radiological accidents, none of which are a new or different type.

The amendment does not involve a significant reduction in a margin of safety. The Technical Specifications provided in this amendment ensure the same level of habitability in the combined Unit 1 and Unit 2 control room as was provided in the previous Unit 1 control room. Thus, the margin of safety has not been reduced.

Therefore, the staff concluded that:

(1) Operation of the facility in accordance with the amendment would not significantly increase the probability or consequences of an accident previously evaluated.

(2) Operation of the facility in accordance with the amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) Operation of the facility in accordance with the amendment would not involve a significant reduction in a margin of safety.

Therefore, we conclude that the amendment to Facility Operating License No. DPR-66 to support operation of the Beaver Valley Power Station, Unit 1, which provides for a combined Unit 1 and Unit 2 control room involves no significant hazards considerations.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, consultation was held with the State of Pennsylvania by telephone. The State expressed no concern, either from the standpoint of safety or of our no significant hazards consideration determination.

6.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment 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 this amendment.

7.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) 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.

Dated: May 20, 1987

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