UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 17, 2000

Mr. Robert P. Powers, Senior Vice President
Indiana Michigan Power Company
Nuclear Generation Group
500 Circle Drive
Buchanan, MI 49107

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS (TAC NOS. MA9867 AND MA9868)

Dear Mr. Powers:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 248 to Facility Operating License No. DPR-58 and Amendment No. 229 to Facility Operating License No. DPR-74 for the Donald C. Cook Nuclear Plant (D. C. Cook), Units 1 and 2.

By letter dated September 1, 2000, Indiana Michigan Power Company, the licensee for D. C. Cook Units 1 and 2, requested an exemption from 10 CFR Part 50, Appendix J, Option B, for Unit 1 in order to eliminate the need for an integrated leakage rate test (ILRT) following modifications to the Unit 1 primary reactor containment boundary.

This request was revised by a licensee letter dated October 27, 2000, which requested a one-time change to the D. C. Cook Unit 1 Technical Specifications to accomplish the same objective of substituting an American Society of Mechanical Engineers (ASME) Code test for the Appendix J ILRT. The licensee revised the request from an exemption to a technical specifications change since the requirement to leak test the containment following repairs or modifications to the containment boundary is a technical specifications requirement and not a requirement of Appendix J, Option B, and therefore, no exemption is required.

The amendments consist of changes to the Technical Specifications in response to your application dated September 1, 2000, as supplemented October 27, 2000.

The amendments change Technical Specification (TS) surveillance requirement 4.6.1.2 and the associated TS Bases to address exemptions to leakage rate testing specified by 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," and Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

This action closes out Restart Action Matrix item 8.5.

DF01

A copy of our related safety evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

John F. Stang

John F. Stang, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosures: 1. Amendment No. 248 to DPR-58
2. Amendment No. 229 to DPR-74
3. Safety Evaluation

cc w/encls: See next page

A copy of our related safety evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

John F. Stang, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

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cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-315

DONALD C. COOK NUCLEAR PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 248
License No. DPR-58

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

   A. The application for amendment by Indiana Michigan Power Company (the licensee) dated September 1, 2000, as supplemented October 27, 2000, 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-58 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 248 , 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 its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Claudia M. Craig

Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: November 17, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 248

TO FACILITY OPERATING LICENSE NO. DPR-58

DOCKET NO. 50-315

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE	INSERT
3/4 6-2	3/4 6-2
B 3/4 6-1	B 3/4 6-1

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

a. An overall integrated leakage rate of $\leq L_a$, 0.25 percent by weight of the containment air per 24 hours at P_a, 12.0 psig, and

b. A combined leakage rate of $\leq 0.60\ L_a$ for all penetrations and valves subject to Types B and C tests when pressurized to P_a.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With either (a) the measured overall integrated containment leakage rate exceeding $0.75\ L_a$, or (b) with the measured combined leakage rate for all penetrations and valves subject to Types B and C tests exceeding $0.60\ L_a$, restore the overall integrated leakage rate to $\leq 0.75\ L_a$ and the combined leakage rate for all penetrations and valves subject to Types B and C tests to $\leq 0.60\ L_a$ prior to increasing the Reactor Coolant System temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 Perform leakage rate testing in accordance with 10 CFR 50 Appendix J Option B, except as modified by NRC-approved exemptions, and Regulatory Guide 1.163, dated September 1995. *

a. Each containment air lock shall be verified to be in compliance with the requirements of Specification 3.6.1.3.

b. The provisions of Specification 4.0.2 are not applicable.

* A one-time exception to the requirement to perform post-modification Type A testing is allowed for the steam generators and associated piping, as components of the containment barrier. For this case, ASME Section XI leak testing will be used to verify the leak tightness of the repaired or modified portions of the containment barrier. Entry into MODES 3 and 4 following the extended outage that commenced in 1997 may be made to perform this testing.

3/4.6.1 PRIMARY CONTAINMENT

Primary CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This restriction, in conjunction with the leakage rate limitation, will limit the site boundary radiation doses to within the limits of 10 CFR 100 during accident conditions.

3/4 6.1.2 CONTAINMENT LEAKAGE

The limitations on containment leakage rates ensure that the total containment leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure, P_a. As an added conservatism, the measured overall integrated leakage rate is further limited to $\leq 0.75\ L_a$ during performance of the periodic tests to account for possible degradation of the containment leakage barriers between leakage tests.

The surveillance testing for measuring leakage rates are consistent with the requirements of Appendix "J" of 10 CFR 50, Regulatory Guide 1.163, dated September 1995, and Nuclear Energy Institute document NEI 94-01, except as modified.

A one-time exemption from post-modification Type A testing is allowed for the steam generator and associated piping, as components of the containment barrier, for entry into MODES 4 and 3 following the extended outage that commenced in 1997. For this case, ASME Section XI in-service testing may be used to verify the leak tightness of the repaired or modified portions of the containment barrier.

3/4.6.1.3 CONTAINMENT AIR LOCKS

The limitations on closure and leak rate for the containment air locks are required to meet the restrictions on CONTAINMENT INTEGRITY and containment leak rate. Surveillance testing of the air lock seals provide assurance that the overall air lock leakage will not become excessive due to seal damage during the intervals between air lock leakage tests.

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-316

DONALD C. COOK NUCLEAR PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 229
License No. DPR-74

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

   A. The application for amendment by Indiana Michigan Power Company (the licensee) dated September 1, 2000, as supplemented October 27, 2000, 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-74 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 229 , 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 its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Claudia M. Craig

Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: November 17, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 229

FACILITY OPERATING LICENSE NO. DPR-74

DOCKET NO. 50-316

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE	INSERT
3/4 6-2	3/4 6-2
B 3/4 6-1	B 3/4 6-1

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

a. An overall integrated leakage rate of $\leq L_a$, 0.25 percent by weight of the containment air per 24 hours at P_a, 12 psig, and

b. A combined leakage rate of $\leq 0.60\ L_a$ for all penetrations and valves subject to Types B and C tests when pressurized to P_a.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With either (a) the measured overall integrated containment leakage rate exceeding 0.75 L_a, or (b) with the measured combined leakage rate for all penetrations and valves subject to Types B and C tests exceeding 0.60 L_a, restore the overall integrated leakage rate to $\leq 0.75\ L_a$ and the combined leakage rate for all penetrations and valves subject to Types B and C tests to $\leq 0.60\ L_a$ prior to increasing the Reactor Coolant System temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 Perform leakage rate testing in accordance with 10 CFR 50 Appendix J Option B, except as modified by NRC-approved exemptions, and Regulatory Guide 1.163, dated September 1995.

a. Each containment air lock shall be verified to be in compliance with the requirements of Specification 3.6.1.3.

b. The provisions of Specification 4.0.2 are not applicable.

3/4.6.1 PRIMARY CONTAINMENT

Primary CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This restriction, in conjunction with the leakage rate limitation, will limit the site boundary radiation doses to within the limits of 10 CFR 100 during accident conditions.

3/4.6.1.2 CONTAINMENT LEAKAGE

The limitations on containment leakage rates ensure that the total containment leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure, P_a. As an added conservatism, the measured overall integrated leakage rate is further limited to $\leq 0.75\ L_a$, during performance of the periodic tests to account for possible degradation of the containment leakage barriers between leakage tests.

The surveillance testing for measuring leakage rates are consistent with the requirements of Appendix "J" of 10 CFR 50, Regulatory Guide 1.163, dated September 1995, and Nuclear Energy Institute document NEI 94-01, except as modified.

3/4.6.1.3 CONTAINMENT AIR LOCKS

The limitations on closure and leak rate for the containment air locks are required to meet the restrictions on CONTAINMENT INTEGRITY and containment leak rate. Surveillance testing of the air lock seals provide assurance that the overall air lock leakage will not become excessive due to seal damage during the intervals between air lock leakage tests.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 248 TO FACILITY OPERATING LICENSE NO. DPR-58

AND AMENDMENT NO. 229 TO FACILITY OPERATING LICENSE NO. DPR-74

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-315 AND 50-316

1.0 INTRODUCTION

By application dated September 1, 2000, as supplemented October 27, 2000, the Indiana Michigan Power Company (the licensee) requested amendments to the Technical Specifications (TSs) for the Donald C. Cook (D. C. Cook) Nuclear Plant, Units 1 and 2. The proposed amendments would change TS surveillance requirement (SR) 4.6.1.2 and the associated TS Bases to address exemptions to leakage rate testing specified by 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," and Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

In the September 1, 2000, application, the licensee requested an exemption from 10 CFR Part 50, Appendix J, Option B, for Unit 1 in order to eliminate the need to perform an integrated leakage rate test (ILRT) following modifications to the Unit 1 primary reactor containment boundary. The licensee has requested that, instead of primary containment leakage rate testing following the modifications and repairs, leakage rate testing of the steam generators and the main steam, feedwater and blowdown lines required by 10 CFR 50.55(a) be considered as equivalent. This latter testing is required to be performed in accordance with Section XI of the American Society of Mechanical Engineers (ASME) Code. Also, the licensee proposed related changes to the TSs for Units 1 and 2.

This request was revised by the licensee in a letter dated October 27, 2000. In lieu of the exemption from 10 CFR Part 50, Appendix J, the licensee requested a one-time change to the D. C. Cook Unit 1 TSs to accomplish the same objective of substituting an ASME Code test for the Appendix J ILRT. The licensee revised the request from an exemption to a TSs change since the requirement to leak test the containment following repairs or modifications to the containment boundary is a TSs requirement and not a requirement of Appendix J, Option B. Therefore, no exemption is required.

The supplemental information contained clarifying information and did not change the initial no significant hazards consideration determination and did not expand the scope of the original *Federal Register* notice.

2.0 BACKGROUND

The licensee has replaced the original Westinghouse Model 51 steam generators with Babock and Wilcox Model 51R steam generators during the current outage. This replacement was done by welding the refurbished steam domes of the Westinghouse steam generators, which were refurbished with modern moisture separator equipment, to new lower assemblies. In addition, fluid lines associated with the steam generators, including the main steam, feedwater and blowdown lines, were cut and re-welded.

The secondary side of the steam generators and the portions of the main feedwater, main steam and steam generator blowdown lines are considered a closed system. This closed system forms part of the primary reactor containment boundary.

Title 10 of the Code of Federal Regulations (10 CFR Part 50), Appendix J, Option B, specifies the requirements which must be met related to leakage rate testing of the primary reactor containment. However, Option B does not specify requirements related to testing following modifications or repairs to the containment boundary. The D. C. Cook Units 1 and 2 TSs Section 4.6.1.2, require that leakage rate testing be done in accordance with 10 CFR Part 50, Appendix J, Option B, and Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995. This Regulatory Guide references Nuclear Energy Institute (NEI) 94-01, "Revision 0, "Industry Guideline for Implementing Performance-Based Option 10 CFR Part 50, Appendix J," dated July 26, 1995, as an acceptable method of complying with 10 CFR Part 50, Appendix J, Option B. NEI 94-01, Section 9.2.4 states that "Repairs and modifications that affect containment leakage integrity require leakage rate testing (Type A testing or local leakage rate testing) prior to returning to operation."

Since this requirement is not in the regulation but only in the D. C. Cook TSs, an exemption is not required. In an October 27, 2000, letter to the Nuclear Regulatory Commission (NRC), the licensee provided a one-time revision to the TSs SR to test the Unit 1 primary reactor containment following repairs and modifications. This one-time change will state: "A one-time exception to the requirement to perform post-modification Type A testing is allowed for the steam generators and associated piping, as components of the containment barrier. For this case, ASME Section XI leak testing will be used to verify leak tightness of the repaired or modified portions of the containment barrier. Entry into MODES 3 and 4 following the extended outage that commenced in 1997 may be made to perform this testing."

In lieu of the Appendix J, Option B, Type A leakage rate test, the licensee proposes to allow credit for the performance of the ASME Section XI in-service testing per IWA-5000, "System Pressure Tests." The licensee describes this test as similar to a Type B test in that it is a local leak rate test where pressure is applied inside of the closed piping or system. The in-service test is expected to detect any leaks that exist in the closed piping portion of the containment barrier. ASME Section XI in-service pressure testing allows zero through-wall leakage of pressure boundary components. Other components, such as bolted connections and packing may also be subject to leakage. The licensee's October 27, 2000, letter stated that "The proposed change does not affect I&M's [the licensee's] ability to meet all applicable code requirements. Station procedures contain additional requirements, including the evaluation of any leakage discovered during system pressure testing beyond those of the ASME XI code. The requirements of 10 CFR 50.55a, 'Codes and Standards,' will continue to be met."

The licensee states that the steam generator and its associated piping can be demonstrated to be leak-tight by either pressurizing the containment with air to 27 psia (the Type A test) or pressurizing the shell side of the steam generator with steam to 1020 psia. The licensee states that leakage can be readily identified with a high differential pressure and asserts that a leakage path between the secondary side of the steam generator or the associated piping and the containment atmosphere is susceptible to leakage in either direction and therefore, leakage out of the steam generator should be equal to leakage into the steam generator.

The proposed test, unlike the Type A test, does require that the leakage rate be quantified. The acceptance criterion for the proposed test is no visual through-wall leakage and location and evaluation of leakage from other (non-through-wall) sources.

ASME Section XI requires non-destructive examination and visual examination of welds as well as system leakage testing. If any through wall leakage is detected from the welds, the leakage is required to be repaired prior to further operation. The non-destructive examination of the welds provides assurance that the joints are free of flaws that could result in leakage and provides the necessary assurance to pressurize the secondary side of the steam generators in order to demonstrate leak-tight integrity in MODES 3 and 4 under no-load plant conditions.

3.0 EVALUATION

The approach proposed by the licensee is different from the Type A test in several ways as discussed in this safety evaluation report. The pressure is applied in the opposite direction to the expected differential pressure in a loss-of-coolant accident (LOCA). Also, the leakage is not measured in the licensee's proposed approach.

Application of the pressure in the opposite direction from that expected in a LOCA is acceptable according to NEI 94-01, Section 9.2.1, if the test results are not affected (that is, the test results are equivalent or more conservative). In this case, the staff considers the tests to be basically equivalent.

In the alternative testing proposed by the licensee, the leakage rate is not measured. This is acceptable since the differential pressure will be higher than during a Type A test and the test criterion is more stringent since no through-wall leakage is permitted. Leakage through bolted connections, packing, etc., is not through-wall leakage. In a conference call with the licensee representatives on October 24, 2000, the licensee stated that D .C. Cook test procedures require that such leakage be evaluated and corrected. The licensee's October 27, 2000, letter confirmed this information.

Since no other modifications were made to the containment boundary, there is no other purpose in performing the Type A test. The results of previous Type A tests for Unit 1 have been well below the leakage rate limit L_a, which is specified in the D. C. Cook TSs as 0.25 weight-per cent per day. The previous ILRT results for Unit 1 are documented in the licensee's October 27, 2000, letter.

The licensee did request another change to TSs Section 4.6.1.2 for both Units 1 and 2 to add the phrase "except as modified by approved exemptions," to the requirement to perform testing in accordance with 10 CFR Part 50, Appendix J, Option B, and the September 1995, version of Regulatory Guide 1.163. While the use of the ASME Section XI test in lieu of the Type A test does not require an exemption, this change is acceptable and would be necessary if, at some time in the future, the licensee proposes an exemption to Appendix J, Option B.

3.1 Summary

In summary, the licensee proposed three changes:

(1) A one-time change to Unit 1 TS SR 4.6.1.2 to add the following: "A one-time exception to the requirement to perform post-modification Type A testing is allowed for the steam generators and associated piping, as components of the containment barrier. For this case, ASME Section XI leak testing will be used to verify leak tightness of the repaired or modified portions of the containment barrier. Entry into MODES 3 and 4 following the extended outage that commenced in 1997, may be made to perform this testing."

(2) A change to Unit 1 and Unit 2 TS SR 4.6.1.2 to add the phrase "except as modified by NRC-approved exemptions" to the requirement to perform testing in accordance with 10 CFR Part 50, Appendix J, Option B, and the September 1995, version of Regulatory Guide 1.163.

(3) A change to the Unit 1 and Unit 2 Bases TS SR 4.6.1.2 to add the phrase " Regulatory Guide 1.163, dated September 1995, and Nuclear Energy Institute document NEI 94-01, except as modified" after the surveillance testing for measuring leakage rates are consistent with the Appendix "J" of 10 CFR Part 50.

The licensee has proposed a one-time alternative to the Type A primary reactor containment integrated leakage rate test in Unit 1 TS surveillance requirement 4.6.1.2. Since the criteria for the test ensure an acceptably low leakage of those portions of the containment affected by the steam generator replacement and other portions of the containment have not been affected, the staff finds this alternative test to be acceptable.

The licensee proposed to change TS SR Section 4.6.1.2 for both Units 1 and 2 to add the phrase "except as modified by approved exemptions," to the requirement to perform testing in accordance with 10 CFR Part 50, Appendix J, Option B, and the September 1995, version of Regulatory Guide 1.163. While the use of the ASME Section XI test in lieu of the Type A test does not require an exemption, this change is acceptable and would be necessary if, at some time in the future, the licensee proposes an exemption to Appendix J, Option B.

The licensee proposed to change the Bases TS SR Section 4.6.1.2 for both Units 1 and 2 to add Regulatory Guide and Industry references except as modified. The staff does not object to the Bases changes.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments change the requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or change the surveillance requirements. The staff has determined that the amendments involve 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 the amendments involve no significant hazards consideration and there has been no public comment on such finding (65 FR 56953). Accordingly, the amendments meet 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 amendments.

5.0 CONCLUSION

The staff has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Lobel

Date: November 17, 2000