

March 31, 1987

Docket No. 50-247

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Mr. Murray Selman
Vice President, Nuclear Power
Consolidated Edison Company of
New York, Inc.
Broadway and Bleakley Avenue
Buchanan, New York 10511

Dear Mr. Selman:

SUBJECT: ENVIRONMENTAL ASSESSMENT - LICENSE EXTENSION

Enclosed is a copy of the Environmental Assessment relating to your December 27, 1985 application for license amendment as supplemented December 31, 1986, January 27, 1987 and March 3, 1987. The proposed amendment would change the expiration date for Indian Point Unit No. 2 Facility Operating License DPR-26 from October 14, 2006 to September 28, 2013.

A copy of a Notice of Issuance of Environmental Assessment and Finding of No Significant Impact, which will be published in the Federal Register is also enclosed.

Sincerely,

Marylee M. Slosson, Project Manager
Project Directorate #3
Division of PWR Licensing-A

Enclosure:
As stated

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* SEE PREVIOUS CONCURRENCE

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Docket No. 50-247

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Indian Point Nuclear Generating
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ENVIRONMENTAL ASSESSMENT
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATING TO THE CHANGE IN EXPIRATION DATES OF
FACILITY OPERATING LICENSE NO. DPR-26
CONSOLIDATED EDISON COMPANY OF NEW YORK
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
DOCKET NO. 50-247

1.0 INTRODUCTION

The currently licensed term for Indian Point Nuclear Generating Unit 2 is 40 years commencing with issuance of the construction permit (October 14, 1966). Accounting for the time that was required for plant construction, this represents an effective operating license term of 33 years. The licensee's application dated December 27, 1985, as supplemented December 21, 1986, January 27, 1987 and March 3, 1987, requests a 40 year operating license term for Indian Point Unit No. 2.

2.0 THE NEED FOR THE PROPOSED ACTION

The granting of the proposed license amendment would allow the licensee to operate Indian Point Unit No. 2 for approximately an additional 7 years beyond the currently approved date.

3.0 ENVIRONMENTAL IMPACTS OF THE PROPOSED ACTION

In September 1972, the Atomic Energy Commission issued the "Final Environmental Statement Related to Operation of Indian Point Nuclear Generating Unit No. 2" (FES). This amendment provides an evaluation of the environmental impact associated with Indian Point Unit No. 2. The NRC staff reviewed this document to determine if any significant environmental impacts other than those previously considered, would be associated with the proposed license extension.

3.1 RADIOLOGICAL IMPACTS

The NRC staff has considered the radiological impacts as a result of a hypothetical, design basis accident at Indian Point Unit No. 2, including the impact of revised population estimates.

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In 1970 and 1972 (Safety Evaluation Report Indian Point Nuclear Generating Unit No. 2, November 16, 1970, and Final Environmental Statement, Indian Point Nuclear Generating Unit No. 2, September 1972), the staff evaluated the regional demography and found that Westchester County, in which Indian Point lies, has long had industry along the river banks but otherwise serves as suburbia and exurbia for Metropolitan New York City.

The population within 50 miles of the plant was 17,500,000 in 1970. The FES uses the projected 1980 population distribution in the assessment of the Environmental Impacts of Postulated Accidents. Actual population distributions from the 1980 census data were 26% below those predicted in the FES and 22% below those predicted in the original FSAR which formed the bases for the initial issuance of the operating license. These earlier assessments would therefore be unaffected by plant operating license expiration in 2013 versus 2006. According to the New York State Department of Commerce, the population within the four counties surrounding Indian Point is not expected to experience any substantial increases during the remaining period of operation.

The outer boundary of the low population zone (LPZ) is at a nominal distance of 1100 meters (.68 miles) from the plant. The 1960 census for the LPZ population was 66. The Indian Point 2 updated Final Safety Analysis Report states that the LPZ has a population of approximately 50 people. This is based on a survey of the area in the early 1970's. The LPZ population in 2010 is projected to be approximately 88, based on the Indian Point Unit 3 Final Safety Analysis Report in Table 2.4-1.

The nearest population center to the site with over 25,000 population is the city of White Plains. The population of White Plains according to the 1980 Census Bureau data is 46,999. The projected population of White Plains in the year 2010 according to a 1986 projection from the Westchester County Department of Planning is 45,900.

The staff has concluded that, based upon these population estimates, the current Exclusion Area Boundary, Low Population Zone and nearest population center distances would likely be unchanged from those originally used for licensing Indian Point 2. Therefore, the conclusion reached in the staff's Safety Evaluation that Indian Point 2 meets the intent of 10 CFR Part 100 remains unchanged.

3.1.1 ENVIRONMENTAL IMPACTS - GENERAL PUBLIC

The NRC has calculated dose commitments to the human population residing around nuclear power reactors to assess the radiological impact on this population from radioactive material released from these reactors. The annual dose commitment is the calculated dose that would be received over a 50-year period following the intake of radioactivity for one year under the conditions that would exist 15 years after the plant has begun operations.

The 15 year period was chosen as representing the midpoint of a 30-year plant operations cycle, and was incorporated into the dose models by allowing for buildup of long-lived radionuclides in the soil. Estimated doses are affected significantly only for radionuclides that have half-lives greater than a few years and are ingested by humans. For a plant licensed for 40 years, increasing the buildup period from 15 to 20 years would increase the dose from long-lived radionuclides via the ingestion pathways by 10%, at most. The effect on dose from shorter-lived radionuclides would be much less. Additionally, population dose estimates in the FES were based on population projections which have proved to be over 20% higher than actual population in the Indian Point 2 area.

Table V-12 of the Final Environmental Statement (FES) indicates that the estimated doses via the ingestion pathways are well below the regulatory design objectives. For example, the ingestion dose to the thyroid from Indian Point Unit 2 is 1 mrem/yr compared to an Appendix I design objective of 15 mrem/yr. Thus, an increase of even as much as 10% in these pathways would remain well below the Appendix I guidelines and would not be significant.

We have conducted a general comparison of the radiological impacts on man as assessed in the Indian Point 2 FES with those actually experience during plant operations. The following table gives a summary of liquid and gaseous dose information during the period from January 1, 1985 through December 31, 1985. These annual doses compare favorable with 10 CFR Part 50, Appendix I limits.

| | <u>Indian Point Unit 2 Gaseous Doses</u> | <u>10 CFR Part 50 Appendix I Guidelines</u> |
|------------------------------|--|---|
| 1. Maximum Total Body Dose | 0.323 mrem/yr | 10 mrem/yr |
| 2. Maximum Total Skin Dose | 0.728 mrem/yr | 20 mrem/yr |
| 3. Maximum Dose to Any Organ | 1.370 mrem/yr | 15 mrem/yr |

| | <u>Indian Point Unit 2 Liquid Doses</u> | |
|------------------------------|---|------------|
| 1. Maximum Whole Body | 0.006 mrem/yr | 3 mrem/yr |
| 2. Maximum Dose to Any Organ | 0.009 mrem/yr | 10 mrem/yr |

The liquid and gaseous effluent doses reported in 1985 are consistent with the estimated effluent doses in Section V of the Indian Point 2 FES, and they are significantly less than the 10 CFR Part 50, Appendix I limits.

Based on the continued operation of Indian Point Unit 2 using existing liquid and gaseous radwaste treatment systems coupled with the current radiological monitoring program, the staff anticipates liquid and gaseous effluent doses during the period covered by the requested amendments will remain a fraction of the 10 CFR Part 50, Appendix I limits and will not adversely impact upon the environment.

3.1.2 ENVIRONMENTAL IMPACTS - URANIUM FUEL CYCLE

The impacts of the uranium fuel cycle are based on 30 years of operation of model light water reactor (LWR). The fuel requirements for the model LWR were assumed to be one initial core load and 29 annual refuelings (approximately 1/3 core per refueling). While the extension of the operating life to 40 years results in a net increase in consumption of uranium, with attendant net increases of resources in producing the uranium, the average annual fuel requirements remain unchanged or are somewhat reduced. The annual fuel requirement for the model LWR averaged out over a 40-year operating life (1 initial core and 39 refuelings of approximately 1/3 core) would be reduced slightly as compared to the annual fuel requirement averaged for a 30-year operating life.

The net result would be approximately 1.5% reduction in the annual fuel requirements for the model LWR, due to averaging out of initial core load over 40 years, instead of 30 years. This small reduction in fuel requirements would not lead to significant changes in the impacts of the uranium fuel cycle. The staff judges that there would not be any changes to FES Table V-14 that would be necessary in order to consider 40 years of operation. If anything, the values in Table V-14 become more conservative when a 40-year period of operation is considered.

3.1.3 ENVIRONMENTAL IMPACTS - OCCUPATIONAL EXPOSURE

The staff has evaluated the licensee's dose assessment for the years 2006 to 2013 (the additional years during which Indian Point 2 would operate) and compared it with current Indian Point 2 and overall industry occupational dose experience.

The average dose over the recent five year period covering 1982-1986 is 1127.5 person-rem per year. Historically Indian Point 2 has experienced occupational doses higher than the industry average. However, a recent downward trend has occurred. In 1985, a year in which there was no refueling outage, exposure was less than 175 man-rem. This was the lowest recorded since plant startup. In 1986, monthly exposures during periods of full operation averaged approximately 10 man-rem. Total exposure in the twenty-four month period from January 1985 through December 1986 was 1380 man-rem. This time period included one refueling.

Several factors and modifications have contributed to the downward trend. Consolidated Edison has indicated that its ALARA (As Low As Reasonably Achievable) Program is an integral part of the Indian Point radiation protection program and is part of all normal and special work processes. Procedures, designs, modifications, work packages, inspections, surveillance, maintenance activities and plant betterment activities are subject to ALARA reviews to ensure that dose reduction actions are taken. Operational and design ALARA training programs are provided to station and support engineering and technical groups. ALARA is taught in radiation worker qualification courses.

Several plant modifications have been made in the effort to reduce exposure. Consolidated Edison has constructed a Maintenance and Outage Building which has increased work efficiency, the staging and storing of equipment and the recovery

from major outage and maintenance tasks. An equipment and tool decontamination facility was recently installed in a recovered area of Unit 1 to provide service to Units 1 and 2. Permanent lockable doors have replaced ones that were temporarily erected to control access to high radiation areas. The waste and boron evaporator systems have been supplanted by demineralizers. Consolidated Edison has increased the fresh fuel storage enrichment limit so as to allow the design of fuel cycle lengths longer than the current 18 month cycle (16 months of operation and 2 months of refueling outage). This would reduce the number of refueling outages over the life of the plant and thus reduce personnel radiation exposure. In addition to the above, the licensee plans a major decontamination of the primary system during the next refueling outage.

The licensee has projected occupation exposures for the seven year period from 2006-2013. The period would include four refueling outages if a twenty-four month operating cycle is achieved, or one additional refueling outage is the current 18 month cycle is assumed. It is possible that a major in-service inspection, including ASME boiler code inspections may also occur during this period. The licensee made predictions for projected high, medium and low exposures as follows:

| | |
|--------|----------------------|
| High | 560 man-rem per year |
| Medium | 440 man-rem per year |
| Low | 320 man-rem per year |

Based on the current downward trend and the licensee's aggressive ALARA program, the licensee believes the above values to be achievable.

Currently there are 980 spent fuel assembly storage spaces, of which 464 are filled. A 1982 rerack created the 980 storage space capacity. Storage capacity, with reserve for a full core discharge, will be sufficient until 1993, and with another rerack until 2001. Beyond this date Consolidated Edison indicated that other technologies will be employed to increase spent assembly storage capacity. Consolidated Edison is presently investigating fuel consolidation and dry storage technologies. Because dry storage has been licensed elsewhere and fuel consolidated demonstration efforts are underway, Consolidated Edison expects that Indian Point 2's spent fuel storage requirements will be met throughout the license extension period.

The licensee's ALARA program, dose-saving plant modifications and management commitments should ensure that the occupational dose received during the additional years of operation is maintained as low as reasonably achievable and would be consistent with industry standards.

The staff concludes that the licensee's dose assessment is acceptable, and the licensee's radiation protection program is adequate to ensure that occupational radiation exposures for the additional years of plant operations will be in accordance with 10 CFR Part 20.

3.1.4 ENVIRONMENTAL IMPACTS - TRANSPORTATION OF FUEL AND WASTE

The licensee is presently making about 19 radwaste shipments per year. This corresponds to 269 cubic meters of solid radioactive waste. A review of the past several years of data for Indian Point 2 indicates that there has been a steady decrease in the annual volume of solid radwaste. The 1986 volume was the lowest since Unit 2 began operation. Consolidated Edison expects to further minimize the generation and volume of solid radwaste and has projected a volume of 225 cubic meters or 16 truck loads in 1990.

The environmental impacts (both radiological and non-radiological) attributable to transportation of fuel and waste to and from the Indian Point 2 site, with respect to normal conditions of transport and possible accidents in transport, would continue to be in accordance with the impacts set forth in Table S-4 of 10 CFR 51.52. Table S-4 represents the contribution of such transportation to annual environmental costs including dose per reactor year to exposed transportation workers and to the general public (both onlookers and individuals located along the route), and the estimated numbers of such persons exposed per year. These annual environmental costs would not be changed by the extended period of operation. Although some integral risk with respect to normal conditions of transportation and possible accidents in transport would be attributed to the additional years of operations, the integral risk would not be significant because the annual risk for such transport is small.

Accordingly, the Commission concludes that there would not be any significant changes to the FES with respect to the transportation of fuel and waste that would be necessary in order to consider 40 years of operation.

3.2 NON-RADIOLOGICAL IMPACTS

Reexamination of the staff's FES of September, 1972 reveals that the assessments of non-radiological impacts were based on several considerations depending on the type of impact being addressed. For some types of impact, the assessments were based on a fixed life-of-plant; for other types, the assessments were based on plant design features on relative loss of renewable resources, or on relative loss or degradation of available habitat.

Amendment 90 to the Operating License, issued by letter dated June 6, 1984 deleted the water quality monitoring requirements (Appendix B) from the Technical Specifications since these requirements are administered by the U.S. Environmental Protection Agency (EPA) under a National Pollutant Discharge Elimination System (NPDES) permit. The licensee will request extension of the NPDES permit, as appropriate, to match the extended license.

A number of plant modifications have been made since the FES was issued. These modifications have been reviewed by the staff or have been done under provisions of 10 CFR 50.59, and environmental impact has been minimal. The plant modifications are described in the Updated Final Safety Analysis Report which is revised annually. In addition, the 40 year plant operating life has been considered part

of the design and construction of the modifications. Components that are expected to wear out during plant life are subjected to a maintenance and surveillance program so that component degradation will be identified and corrected. Extending the operating life as proposed by the licensee will have no detectable environmental impact resulting from the plant modifications.

All potential impacts have been identified, described, and evaluated in previously issued environmental impact statements and/or appraisals by the NRC and reviews by the NPDES permitting authority under the Clean Water Act. All operational non-radiological impacts on biological resources have been assessed by the staff on bases other than a life-of-plant basis; hence the requested extension of the operating license will not alter previous staff findings and conclusions.

4.0 ALTERNATIVES TO THE PROPOSED ACTION

The principal alternative to issuance of the proposed license extension would be to deny the application. In this case, Indian Point 2 would shut down upon expiration of the present operating license.

In Chapter VI of the FES, a cost-benefit analysis is presented for Indian Point 2. Included in the analysis is a comparison among various options for producing an equivalent electrical power capacity. Even considering significant changes in the economics of the alternatives, operation of Indian Point 2 for approximately an additional 7 years would only require incremental yearly costs. These costs would be substantially less than the costs associated with the purchase of replacement power or the installation of new electrical generating capacity. Moreover, the overall cost per year of the facility would decrease since the large initial capital outlay would be averaged over a greater number of years. In summary, the cost/benefit advantage of Indian Point 2, compared to alternative electrical power generating capacity, improves with the extended plant lifetime.

5.0 ALTERNATIVE USE OF RESOURCES

This action does not involve the use of resources not previously considered in connection with the "Final Environmental Statement Relating to Operation of Indian Point Nuclear Generating Unit No. 2," dated September 1972.

6.0 AGENCIES AND PERSON CONSULTED

The NRC staff reviewed the licensee's request and consulted with the New York State Energy Office (J. Dunkelberger). That Agency did not indicate a concern in granting the proposed extension.

7.0 BASIS AND CONCLUSION FOR NOT PREPARING AN ENVIRONMENTAL IMPACT STATEMENT

The staff has reviewed the proposed license amendment relative to the requirements set forth in 10 CFR Part 51. Based on this assessment, the staff concludes that there are no significant radiological or non-radiological impacts associated with the proposed action and that the issuance of the proposed license amendment will have no significant impact on the quality of the human environment. Therefore, pursuant to 10 CFR 51.31, an environmental impact statement need not be prepared for this action.

8.0 PRINCIPAL CONTRIBUTORS:

R. Serbu, Health Physicist
M. Slosson, Project Manager

DATED . March 31, 1987

UNITED STATES NUCLEAR REGULATORY COMMISSIONCONSOLIDATED EDISON COMPANY OF NEW YORKINDIAN POINT NUCLEAR GENERATING UNIT NO. 2DOCKET NO. 50-247NOTICE OF ISSUANCE OF ENVIRONMENTAL ASSESSMENTAND FINDING OF NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. DPR-26 issued to Consolidated Edison Company of New York (the licensee), for operation of the Indian Point Nuclear Generating Unit No. 2 located in Westchester County, New York.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action: The amendment would consist of changes to the operating license authorizing an extension to expiration date for the Unit 2 Facility Operating License DPR-26 from October 14, 2006 to September 28, 2013.

The amendment to the Technical Specification (TS) is responsive to the licensee's application dated December 27, 1985, as supplemented December 31, 1986, January 27, 1987 and March 3, 1987. The NRC staff has prepared an Environmental Assessment of the Proposed Action, "Environmental Assessment by the Office of Nuclear Reactor Regulation Relating to the Change in Expiration Dates of Facility Operating License No. DPR-26, Consolidated Edison Company of New York, Indian Point Nuclear Generating Unit No. 2, Docket No. 50-247," dated

Summary of Environmental Assessment: The NRC staff has reviewed the potential environmental impact of the proposed change in the expiration dates of the Operating Licenses for Indian Point Unit No. 2. This evaluation considered the previous environmental studies, including the "Final Environmental Statement Relating to Operation of Indian Point Nuclear Generating Plant Unit No. 2" September 1972, and more recent NRC policy.

Radiological Impacts: Although the population in the vicinity of Indian Point Unit No. 2 has increased, it is lower than projections reviewed in the FES, and the site requirements of 10 CFR Part 100 are still met with regard to Exclusion Area Boundary, Low Populator Zone, and nearest population center distances. In addition, the proposed additional years of reactor operation do not increase the annual public risk for reactor operation.

With regard to normal plant operation, the licensee complies with NRC guidance and requirements for keeping radiation exposures "as low as is reasonably achievable" (ALARA) for occupational exposures and for radioactivity in effluents. The licensee would continue to comply with these requirements during any additional years of facility operation and also apply advanced technology when available and appropriate.

Non-Radiological Impacts: The NRC review identified no additional degradation of the habitat surrounding Indian Point Unit No. 2 with regard to indigenous plant and animal species for the additional years of facility operation. In addition, the National Pollutant Discharge Elimination System permit provides additional environmental protection.

FINDING OF NO SIGNIFICANT IMPACT

The staff has reviewed the proposed change to the expiration date of the Indian Point Unit No. 2 Facility Operating License relative to the requirements set forth in 10 CFR Part 51. Based upon the environmental assessment, the staff concluded that there are no significant radiological or nonradiological impacts associated with the proposed action and that the proposed license amendment will not have a significant effect on the quality of the human environment. Therefore, the Commission has determined, pursuant to 10 CFR 51.31, not to prepare an environmental impact statement for the proposed amendment.

For further details with respect to this action, see (1) the application for amendments dated December 27, 1985, as supplemented December 31, 1986 and January 27, 1987, (2) the Final Environmental Statement Relating to Operation of Indian Point Nuclear Generating Unit No. 2 issued September 1972, and (3) the Environmental Assessment dated March 31, 1987. These documents are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W. Washington, DC, 20555 and at the White Plains Public Library, 100 Martine Avenue, White Plains, New York 10610.

Dated at Bethesda, Maryland, this 31st day of March, 1987.

FOR THE NUCLEAR REGULATORY COMMISSION

Steven A. Varga, Director
Project Directorate #3
Division of PWR Licensing-A

Concern @ changes noted to Fuel Cycle Section - 10 makes incorrect MS 2/18/87

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NOT SE TO FE-1010 AMEND WILL ADDRESS FE24 ISSUES

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SVarga
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