April 9, 1985

Docket No. 50-286

Distribution

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ACRS (10)	OPA, CMiles
RDiggs	ORB#1 Gray file

Mr. C. A. McNeill, Jr.
Senior Vice President - Nuclear Generation
Power Authority of the State of New York
123 Main Street
White Plains, New York 10601

Dear Mr. McNeill:

The Commission has issued the enclosed Amendment No. 54 to Facility Operating License No. DPR-64 for the Indian Point Nuclear Generating Unit No. 3. The amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated April 13, 1982, as supplemented August 31, 1984, October 31, 1984 and January 15, 1985.

The amendment revises the Technical Specifications related to degraded grid voltage conditions.

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

Sincerely,

/s/SAVarga

Joseph D. Neighbors, Project Manager
Operating Reactors Branch #1
Division of Licensing

Enclosures:
1. Amendment No. 54 to DPR-64
2. Safety Evaluation

cc: w/enclosures
See next page

ORB#1:DL	ORB#1:DL	ORB#1:DL	BC-ORB#1:DL	OELD	AD:OR:DL
CParrish	DNeighbors/ts	KJohnston	SVarga	M. KARMAN	GLainas
03/19/85	03/27/85	03/27/85	03/28/85	04/1/85	04/9/85

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

April 9, 1985

Docket No. 50-286

Mr. C. A. McNeill, Jr.
Senior Vice President - Nuclear Generation
Power Authority of the State of New York
123 Main Street
White Plains, New York 10601

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See next page

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

POWER AUTHORITY OF THE STATE OF NEW YORK

DOCKET NO. 50-286

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 54
License No. DPR-64

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

   A. The application for amendment by Power Authority of the State of New York (the licensee) dated April 13, 1982, as supplemented August 31, 1984, October 31, 1984, and January 15, 1985 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-64 is hereby amended to read as follows:

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(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 54 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 9, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 54

FACILITY OPERATING LICENSE NO. DPR-64

DOCKET NO. 50-286

Revise Appendix A as follows:

Remove Pages	Insert Pages
Table 3.5-1	Table 3.5-1
Table 3.5-3 (Sheet 3 of 3)	Table 3.5-3 (Sheet 3 of 3)
3.7-2	3.7-2
-----	3.7-2a
3.7-6	3.7-6
Table 4.1-1 (Sheet 4 of 4)	Table 4.1-1 (Sheet 4 of 4)

TABLE 3.5-1

ENGINEERED SAFETY FEATURES INITIATION INSTRUMENT SETTING LIMITS

No.	FUNCTIONAL UNIT	CHANNEL	SETTING LIMIT
1.	High Containment Pressure (Hi Level)	Safety Injection	$\leq$3.5 psig
2.	High Containment Pressure (Hi-Hi Level)	a. Containment Spray b. Steam Line Isolation	$\leq$23 psig
3.	Pressurizer Low Pressure	Safety Injection	$\geq$1700 psig
4.	High Differential Pressure Between Steam Lines	Safety Injection	$\leq$150 psi
5.	High Steam Flow in 2/4 Steam Lines Coincident with Low T_{avg} of Low Steam Line Pressure	a. Safety Injection b. Steam Line Isolation	$\leq$40% of full steam flow at zero load $\leq$40% of full steam flow at 20 % load $\leq$110% of full steam flow at full load $\geq$540°F T_{avg} $\geq$600 psig steam line pressure
6.	Steam Generator Water Level (low-low)	Auxiliary Feedwater	$\geq$5% of narrow range instrument span each steam generator
7.*	a. 480v Bus Undervoltage Relay		$\geq$200v**
	b. 480v Bus Degraded Voltage Relay (Non-SI)		$\geq$ 414v with a $\leq$45 sec time delay
	c. 480v Bus Degraded Voltage Relay (Coincident SI)		$\geq$ 414v with a $\leq$ 10 sec time delay

* To be effective after completion of all required modifications.

** The undervoltage protection devices used for diesel generator starting are induction type disc relays; therefore, the time to actual trip will decrease as a function of voltage decrease below the setpoint.

TABLE 3.5-3 (SHEET 3 of 3)

FUNCTIONAL UNIT	1	2	3	4	5
3. AUXILIARY FEEDWATER					
a. Stm Gen. Water Level-Low-Low					
i. Start Motor Driven Pumps	3/stm. gen	2 in any stm gen.	2 chan. in each stm gen	1	Reduce system temperature such that $T \leq 350^{o}F$
ii. Start Turbine-Driven Pump	3/stm. gen	2/3 in each of two stm. gen.	2 chan. in each stm. gen.	1	$T \leq 350^{o}F$
b. S. I. Start Motor-Driven Pumps	(All safety injection initiating functions and requirements)				
c. Station Blackout Start Turbine-Driven Pump	2	1	1	0	$T \leq 350^{o}F$
d. Trip of Main Feedwater Pumps start Motor-Driven Pumps	2	1	1	0	Hot Shutdown
4. LOSS OF POWER					
a. 480v Bus Undervoltage Relay	2/bus	1/bus	1/bus	0	See Note 1
b. 480v Bus Degraded Voltage Relay	2/bus	2/bus	2/bus (See Note 2)	0	See Note 1

Note 1. If the 138KV and 13.8KV sources of offsite power are available and the conditions of column 3 or 4 cannot be met within 72 hours, then the requirements of 3.7.C.1 or 2 shall be met.

Note 2. If one channel becomes inoperable, it is placed in the trip position and the number of minimum operable channels is reduced by one.

and is in addition to the fuel requirements for other nuclear units on the site.

6. Three batteries plus three chargers and the D. C. distribution systems operable.

7. No more than one 120 volt A. C. Instrument Bus on the backup power supply.

B. The requirements of 3.7.A may be modified to allow any one of the following power supplies to be inoperable at any one time.

1. One diesel or any diesel fuel oil system or a diesel and its associated fuel oil system may be inoperable for up to 72 hours provided the 138 KV and the 13.8 KV sources of offsite power are available and the remaining diesel generators are tested daily to ensure operability and the engineered safety features associated with these diesel generator buses are operable.

2. The 138 KV or the 13.8 KV sources of power may be inoperable for 48 hours provided the three diesel generators are operable. This operation may be extended beyond 48 hours provided the failure is reported to the NRC within the 48 hour period with an outline of the plans for restoration of offsite power and NRC approval is granted.

3. If the 138 KV power source is lost and the 13.8KV power source is being used to feed Buses 5 and 6, in addition to satisfying the requirements of specification 3.7.B.2 above, the 6.9 KV bus tie breaker control switches 1-5, 2-5, 3-6, and 4-6 in the CCR shall be placed in the "pull-out" position to prevent an automatic transfer of the 6.9 KV buses 1, 2, 3 and 4.

4. One battery may be inoperable for 2 hours provided the other batteries and the three battery chargers remain operable with one battery charger carrying the D. C. load of the failed battery supply system.

Since the backup lighting supply is stripped on safety injection, the requirement that not more than one 120 volt A. C. instrument bus be energized from the backup lighting supply is to assure minimum operable containment spray actuation channels.

As a result of an investigation of the effect components that might become submerged following a LOCA may have and ECCS, containment isolation and other safety-related functions, a fuse and a locked open circuit breaker were provided on the electrical feeder to emergency lighting panel 318 inside containment. With the circuit breaker in the open position, containment electrical penetration H-70 is de-energized during the accident condition. Personnel access to containment may be required during power operation. Since it is highly improbable that a LOCA would occur during this short period of time, the circuit breaker may be closed during that time to provide emergency lighting inside containment for personnel safety.

When the 138 KV source of offsite power is out of service and the 13.8KV power source is being used to feed Buses 5 and 6, the automatic transfer of 6.9 KV Buses 1, 2, 3 and 4 to offsite power after a unit trip could result in overloading of the 20 MVA 13.8 KV/6.9 KV auto-transformer. Accordingly, the intent of specification 3.7.B.3 is to prevent the automatic transfer when only the 13.8 KV source of offsite power is available. However, this specification is not intended to preclude subsequent manual operations or bus transfers once sufficient loads have been stripped to assure that the 20 MVA auto-transformer will not be overloaded by these manual actions.

References

1) FSAR-Section 8.2.1
2) FSAR-Section 8.2.3

TABLE 4.1-1 (SHEET 4 of 4)

CHANNEL DESCRIPTION	CHECK	CALIBRATE	TEST	REMARKS
29. Reactor Coolant System Subcooling Margin Monitor	D	R	N.A.	
30. PORV Position Indicator (Limit Switch)	N.A.	R	R	
31. PORV Position Indicator (Acoustic Monitor)	D	R	R	
32 Safety Valve Position Indicator (Acoustic Monitor)	D	R	R	
33. Auxiliary Feedwater Flow Rate	N.A.	R	N.A.	
34. Plant Effluent Radioiodine/ Particulate Sampling (Sample line common with monitor R 13)	N.A.	N.A.	R	
35.* Loss of Power				
a. 480v Bus Undervoltage Relay	N.A.	R	M	
b. 480v Bus Degraded Voltage Relay	N.A.	R	M	
c. 480v Safeguards Bus Under Voltage Alarm - Alarm Title 25 on Panel SBF-2 Safeguards	N.A.	R	M	

S - Each Shift
D - Daily
W - Weekly
M - Monthly
P - Prior to each startup if not done previous week
Q - Quarterly
R - Each Refueling Outage
NA - Not Applicable

* To be effective after completion of all required modifications.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 54 TO FACILITY OPERATING LICENSE NO. DPR-64

POWER AUTHORITY OF THE STATE OF NEW YORK

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

DOCKET NO. 50-286

INTRODUCTION

By generic letters dated August 12, 1976, June 3, 1977 and August 8, 1979, the staff requested that licensees review degraded grid voltage conditions and the adequacy of station electrical distribution system voltages. In response, by letters of application dated April 13, 1982 and August 31, 1984, the Power Authority of the State of New York (the licensee) requested changes to the Indian Point Nuclear Generation Unit No. 3 Technical Specifications. This amendment will revise the Technical Specifications by: adding relay setpoints, time delays, testing intervals and calibration intervals for the 480V Emergency Buses; increasing the setting limit for the 480V Bus Undervoltage Relay; and requiring procedures to prevent an automatic fuse transfer of the 6.9 kV Buses.

A technical evaluation of these proposed modifications and changes to the Technical Specifications was performed by EG&G, under contract to the NRC, and with general supervision by NRC staff. This work is reported by EG&G in Technical Evaluation Report (TER) "Degraded Grid Protection for Class 1E Power Systems, Indian Point Nuclear Station, Unit No. 3," dated August 1982 and TER "Adequacy of Station Electrical Distribution System Voltages, Indian Point Nuclear Station Unit No. 3" dated July 1981. The TER's were forwarded to the licensee on February 16 and September 29, 1982, respectively. We have reviewed the licensee's submittals of February 10, 1983, April 30, 1984, July 16, 1984, August 31, 1984, October 31, 1984 and January 15, 1985 which address the four open item of the August 1982 TER and supplies satisfactory results for testing requested by the July 1981 TER, and find the proposed modifications and associated Technical Specifications acceptable.

Evaluation Criteria

The criteria used by EG&G in this technical evaluation of the analysis includes GDC 5 ("Sharing of Structures, Systems and Components"), GDC 13 (Instrumentation and Control"), and GDC 17 ("Electric Power Systems") of Appendix A to 10 CFR 50; IEEE Standard 279-1971 ("Criteria for Protection Systems for Nuclear Power Generating Stations"), IEEE Standard 308-1974 ("Class 1E Power Systems for Nuclear Power Generating Stations"); ANSI C84.1-1977 ("Voltage Ratings for Electric Power Systems and Equipment - 60 Hz"); and the staff positions and guidelines in NRC letters to PASNY dated June 3, 1977 and August 8, 1979.

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DISCUSSION

1) Degraded Grid Voltage Protection for the Class 1E System

The existing loss of voltage protection at Indian Point Unit 3 consists of two undervoltage relays on each of the four 480 volt Class 1E buses. These are inverse time relays arranged in a one-out-of-two logic per bus with a tap voltage of 46% and time dial 2. At this voltage the relays will trip in approximately two seconds. Actuation of these relays will disconnect the offsite power source, initiate load shedding, start the onsite emergency diesel generator and initiate load sequencing.

The licensee has proposed to install two degraded voltage relays on each 480 volt safety related bus. These relays will be arranged in a two-out-of-two logic with a setpoint $\geq$414 volts. Actuation of these relays will trip the offsite power source. Tripping the offsite power source will actuate the loss of voltage relays which will initiate load shedding, start the onsite emergency diesel generator and initiate load sequencing. The staff finds the relay setpoint exceeds the minimum setpoint requirement of 408V and is therefore acceptable.

The degraded voltage relays are arranged in a two-out-of-two logic to prevent spurious operation and are capable of being tested during power operation. However, the loss of voltage relays are arranged in a one-out-of-two logic. To resolve concerns that spurious actuation of one relay could lead to undesirable separation from the preferred source of offsite power, by letters dated February 11, 1980 and February 10, 1983 the licensee stated that spurious operation of a loss of voltage relay will only cause its single associated 480V bus to transfer to the onsite emergency diesel generator and the remaining three 480V buses are intact and capable of effecting safe shutdown of the reactor.

By letters dated August 31, 1984 and January 15, 1985 the licensee stated that necessary modifications to the loss of voltage (LOV) relays to enable monthly functional test will be made during the next refueling outage following cycle 4 or during an outage of sufficient duration, but not later than cycle 5 startup. The proposed design will allow testing of the LOV sensing relays without causing a bus trip.

The licensee had proposed a time delay of $\leq$210 seconds for the degraded voltage relays. This time delay was selected to allow sufficient time for the transformer automatic tap changer to attempt to restore offsite power system voltage and thereby prevent disconnection from this source during a short duration transient. Under non-accident conditions when minimum safety equipment is normally operating this is considered a reasonable approach and is acceptable. However; delaying actuation of the degraded voltage relays for 210 seconds under accident conditions could result in exposure of safety equipment to voltages as low as 46% (loss of voltage relay setpoint) of nominal for this time period. Exposing safety equipment to these extremely low voltages could result in damage to safety equipment normally in operation, or could possible prevent starting of equipment needed to mitigate the accident. The staff found this design approach unacceptable.

By letter dated August 31, 1984, the licensee proposed a maximum time delay of 45 seconds for non-accident conditions and a maximum time delay of 10 seconds for accident conditions. The licensee stated that these modifications to the degraded voltage relays will be implemented during the refueling outage following cycle 4 or an outage of sufficient duration, but not later than cycle 5 startup. The staff finds the above design modifications acceptable.

By letter dated August 31, 1984, the licensee provided the necessary Technical Specification changes which show that functional tests of loss of voltage and degraded grid voltage relays will be performed monthly. The staff finds the proposed changes to the Technical Specification acceptable.

2) Adequacy of Station Electrical Distribution System Voltages

The analysis was performed using the 138 kV offsite power source (station auxiliary transformer) and the 13.8 kV offsite backup source under the extremes of load and offsite voltage conditions. The station auxiliary transformer utilizes automatic load tap changers to maintain 1.0 per unit voltage on the 6.9 kV station buses, and voltage on the 13.8 offsite system is maintained by automatic load tap changers between 14.1 to 13.7 kV depending on system load. The analysis has shown that all safety related equipment operates within their required voltage ratings except for a slight no-load overvoltage condition for 440 volt motors which will drop to an acceptable level when load is applied.

By letter dated October 31, 1984, the licensee provided the results of the 480V motor starter transient analysis and tests conducted to verify the manufacturer's specifications for starter pickup and dropout voltages. The above analysis was performed for both the immediate access offsite source (138/6.9 kV Station Auxiliary Transformer (SAT)) and the backup offsite source (13.8/6.9 kV Autotransformer) under minimum grid voltage and maximum loading conditions. With SAT as the source of power, the analysis simulated a fast transfer and dynamic LOCA loading sequence in order to provide a more conservative voltage profile. Transfer to backup offsite power if SAT is unavailable is manual and requires operator actions. The analysis indicates that under the above postulated condition starting a large Class 1E load irrespective of the source of power (SAT or Autotransformer) will not cause any starter contactors to drop out and adequate voltage will be available at motor control centers (MCC's) for starters to pick all required safety loads. Starting of large non-Class 1E load when SAT is supplying the loads under the above postulated fast transfer condition would not cause any starter contactors to drop out or prevent any starter from picking up its respective safety load. However, with the Autotransformer as the source of power, starting a large non-Class 1E load (i.e. reactor coolant pump (6000 HP)) will cause voltage at MCC's to drop below the manufacturer's recommended minimum pickup voltage. The licensee states that under a postulated accident condition no large non-Class 1E motor will start automatically. In a telephone conference conducted on November 18, 1984, the licensee stated that procedures are in place requiring manual operator action to prevent overloading of the Autotransformer in order to assure adequate voltages at all safety buses and MCC's.

The licensee did not provide an analysis for the use of a Unit 2/Unit 3 tie breaker. However, this is a third source of offsite power not required by GDC 17 and use of the tie breaker requires manual operator action under the administrative control of the Indian Point 3 operator (Indian Point Unit 3 Standard Operating Procedure No. SOP-EL-5). The staff considers these provisions on the use of the tie breaker acceptable.

The licensee has included a requirement in the Indian Point Unit 3 Standard Operating Procedure No. SOP-EL-5 that a bus automatic fast transfer (which would overload the 13.8/6.9 kV transformer) be defeated by the operator by placing the 6.9 kV bus tie breakers' control switches in the "pull-out" position and tagging them whenever the 138 kV power source is lost. By letter dated April 13, 1982, the licensee provided the necessary amendment to the Technical Specification which incorporates the above limiting condition for operation. The above amendment to the Technical Specification is consistent with the Standard Operating Procedures No. SOP-EL-5 and is, therefore, acceptable.

In addition to the normal grid interties, the offsite system at the Indian Point plants has three gas turbine generators which can be made available to the stations. Since the licensee has provided the required maximum and minimum grid voltage variations, further specific analysis on the use of these gas turbine generators to provide adequate station voltages is beyond the scope of this generic review; however, it is noted that the Technical Specifications do have controls on the minimum power available from the gas turbines together with a minimum number of 13.8 kV offsite feeders prior to accomplishing an emergency Black Start of the unit.

The licensee provided the result of the tests conducted to verify the accuracy of the voltage analysis in the October 31, 1984 letter. The tests were conducted during plant operation and measured voltages were compared with calculated values. For both steady state and transient conditions, the measured voltages closely correlated with calculated values and the deviation between the two did not exceed ±3%. We, therefore, find the voltage analysis acceptable.

Summary

Based upon our review of the EG&G plant, the background correspondence and the Indian Point Unit 3 electrical distribution system, the staff finds that:

(1) The licensee has provided voltage analyses to demonstrate that the Class 1E equipment terminal voltages remain within acceptable operating limits for the postulated worst case conditions provided the automatic fast transfer to the 13.8/6.9 kV transformer is defeated by the operator as required by Standard Operating Procedure No. SOP-EL-5. This amendment provides Technical Specifications consistent with Standard Operating Procedure No. SOP-EL-5 and is, therefore, acceptable.

(2) By letter dated October 31, 1984, the licensee provided the verification test results. The test results showed the Class 1E equipment terminal voltage analyses to be accurate.

(3) By letter dated October 31, 1984, the licensee provided the results of motor starter transient analyses and tests conducted to verify the starter manufacturer's specifications for pickup and dropout voltages. The above analyses showed that except for condition where power to loads is provided via Autotransformer, starters will not dropout under minimum grid voltage and maximum loading conditions when a large Class 1E or non-Class 1E is started. When power to safety loads is provided via Autotransformer, starting a large non-Class 1E (i.e. reactor coolant pump (6000 HP)) would cause voltage at MCC's to drop below the starter's pickup capability. However, the licensee states that no large non-Class 1E motor would be started automatically under a postulated accident condition. The licensee stated in a telephone conference conducted in November 28, 1984 that procedures are in place requiring manual operator action to prevent overloading of the Autotransformer in order to assure adequate voltages at all safety buses and MCC's.

(4) The licensee's reaffirmation of compliance with GDC 17 requirements is acceptable.

(5) There is acceptable assurance that spurious tripping of the offsite power to Class 1E equipment will not take place upon starting a large non-Class 1E load.

(6) The proposed setpoint of 414 volts provided with revised technical specification (Table 3.5-1) will ensure the pickup of the 480 volt Class 1E motor control contactors and is therefore acceptable.

(7) Spurious tripping of a loss of voltage relay will only affect its associated 480 volt bus. However, the plant safe shutdown can be accomplished by the remaining 480 volt safety buses and is therefore acceptable.

(8) The proposed time delay of maximum 45 seconds under non-accident conditions and maximum 10 seconds under accident conditions as shown in the revised Technical Specification, Table 3.5-1, will ensure equipment safe operation under degraded voltage conditions. In addition, the 10 seconds time delay does not exceed the time delay assumed in the accident analysis and is therefore acceptable.

(9) The proposed channel functional surveillance test periodicity of the loss of voltage and degraded grid voltage relays as shown in the revised Technical Specification Table 4.1-1, Sheet 4 of 4 is in accordance with the NRC June 3, 1977 generic letter and is therefore acceptable.

We, therefore, find the Indian Point Unit 3 design to be acceptable with respect to the adequacy of station electric distribution and degraded grid protection system.

The licensee's submittal dated October 31, 1984 and January 15, 1985 provided results of voltage verification tests and 480V motor starters transient analyses and information regarding monthly surveillance testing of the 480V loss of voltage relays, respectively. These submittals served to only clarify the previous amendment requests dated April 13, 1982, and August 31, 1984 and did not change the proposed Technical Specifications. Therefore, no substantive changes were made by the licensee's October 31, 1984, and January 15, 1985 submittals.

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 Sec 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.

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: April 9, 1985

Principal Contributors:

J. Emami