

November 16, 1994

Mr. Stephen E. Quinn  
Vice President, Nuclear Power  
Consolidated Edison Company  
of New York  
Broadway and Bleakley Avenue  
Buchanan, NY 10511

SUBJECT: ISSUANCE OF AMENDMENT FOR INDIAN POINT NUCLEAR GENERATING  
UNIT NO. 2 (TAC NO. M88861)

Dear Mr. Quinn:

The Commission has issued the enclosed Amendment No. 178 to Facility Operating License No. DPR-26 for the Indian Point Nuclear Generating Unit No. 2. The amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated October 29, 1993, as supplemented on March 28, 1994, and November 8, 1994.

The amendment revises surveillance intervals for the Volume Control Tank Level Instrument, the Containment High Range Radiation Monitors, the Safety Injection System Electrical Loading, the Safety Injection System, and the Reactor Coolant System Sub-Cooling Margin Monitors to accommodate a 24-month fuel cycle. These revisions are being made in accordance with the guidance provided by Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle."

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

Sincerely,

Original signed by

Francis J. Williams, Jr., Project Manager  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosures: 1. Amendment No. 178 to DPR-26  
2. Safety Evaluation

cc w/encls: See next page

DOCUMENT NAME: G:\IP2\IP288861.AMD \*See previous concurrence

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 16, 1994

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Consolidated Edison Company  
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Docket No. 50-247

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2. Safety Evaluation

cc w/encls: See next page

Mr. Stephen E. Quinn  
Consolidated Edison Company  
of New York, Inc.

Indian Point Nuclear Generating  
Station Units 1/2

cc:

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Consolidated Edison Company  
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New York, New York 10003

Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

DATED: November 16, 1994

AMENDMENT NO. 178 TO FACILITY OPERATING LICENSE NO. DPR-26-INDIAN POINT UNIT 2

Docket File

PUBLIC

PDI-1 Reading

S. Varga, 14/E/4

J. Zwolinski, 14/H/3

M. Case

C. Vogan

F. Williams

OGC

D. Hagan, T-4 A43

G. Hill (2), T-5 C3

C. Grimes, 0-11-E-22

ACRS (4)

OPA

OC/LFDCB

PD plant-specific file

C. Cowgill, Region I

J. Wermiel, 08/H/3

cc: Plant Service list



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

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

DOCKET NO. 50-247

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 178  
License No. DPR-26

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Consolidated Edison Company of New York, Inc. (the licensee) dated October 29, 1993, as supplemented on March 28, 1994, and November 8, 1994, 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-26 is hereby amended to read as follows:

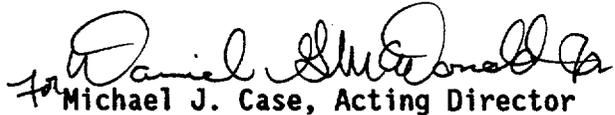
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(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 178, 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 to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

  
for Michael J. Case, Acting Director  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: November 16, 1994

ATTACHMENT TO LICENSE AMENDMENT NO.178

FACILITY OPERATING LICENSE NO. DPR-26

DOCKET NO. 50-247

Revise Appendix A as follows:

Remove Pages

Table 4.1-1 (page 2 of 7)  
Table 4.1-1 (page 5 of 7)  
Table 4.1-1 (page 6 of 7)  
Table 4.1-3 (page 1 of 1)  
4.5-1  
4.5-2  
4.5-6  
4.6-1

Insert Pages

Table 4.1-1 (page 2 of 7)  
Table 4.1-1 (page 5 of 7)  
Table 4.1-1 (page 6 of 7)  
Table 4.1-3 (page 1 of 1)  
4.5-1  
4.5-2  
4.5-6  
4.6-1

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and  
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
10. Rod Position Bank Counters	S	N.A.	N.A.	With analog rod position
11. Steam Generator Level	S	R#	Q	
12. Charging Flow	N.A.	R#	N.A.	
13. Residual Heat Removal Pump Flow	N.A.	R#	N.A.	
14. Boric Acid Tank Level	W	R	N.A.	Bubbler tube rodded during calibration
15. Refueling Water Storage Tank Level	W	R	N.A.	
16. DELETED				
17. Volume Control Tank Level	N.A.	R#	N.A.	
18a. Containment Pressure	D	R#	Q	Wide Range
18b. Containment Pressure	S	R#	Q	Narrow Range
18c. Containment Pressure (PT-3300, PT-3301)	M	R#	N.A.	High Range
19. Process Radiation Monitoring System	D	R#	M	
19a. Area Radiation Monitoring System	D	R#	M	
19b. Area Radiation Monitoring System (VC)	D	R#	M	

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and  
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
d. Trip of Main Feedwater Pumps	N.A.	N.A.	R#	
31. Reactor Coolant System Subcooling Margin Monitor	M	R#	N.A.	
32. PORV Position Indicator (Limit Switch)	M	R#	R#	
33. PORV Block Valve Position Indicator (Limit Switch)	M*	R#	R#	
34. Safety Valve Position Indicator (Acoustic Monitor)	M	R#	R#	
35. Auxiliary Feedwater Flow Rate	M	R	R	
36. PORV Actuation/ Reclosure	N.A.	R#	N.A.	
37. Overpressure Protection System (OPS)	N.A.	R#	**	

\* Except when block valve operator is deenergized.

\*\* Within 31 days prior to entering a condition in which OPS is required to be operable and at monthly intervals thereafter when OPS is required to be operable.

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and  
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
38. Wide Range Plant Vent Noble Gas Effluent Monitor (R-27)	S	R	N.A.	
39. Main Steam Line Radiation Monitor (R-28, R-29, R-30, R-31)	S	R#	N.A.	
40. High Range Containment Radiation Monitor (R-25, R-26)	S	R*#	N.A.	
41. Containment Hydrogen Monitor	Q	Q**	N.A.	

\* Acceptable criteria for calibration are provided in Table II.F-13 of NUREG-0737.

\*\* Calibration will be performed using calibration span gas.

Table 4.1-3

Frequencies for Equipment Tests

	Check	Frequency	Maximum Time Between Tests
1.	Control Rods	Rod drop times of all control rods	Refueling # Interval *
2.	Control Rods	Movement of at least 10 steps in any one direction of all control rods	Every 31 days during reactor critical operations *
3.	Pressurizer Safety Valves	Setpoint	Refueling # Interval *
4.	Main Steam Safety Valves	Setpoint	Refueling # Interval *
5.	Containment Isolation System	Automatic Actuation	Refueling # Interval *
6.	Refueling System Interlocks	Functioning	Each refueling shutdown prior to refueling operation Not Applicable
7.	Diesel Fuel Supply	Fuel Inventory	Weekly 10 days
8.	Turbine Steam Stop Control Valves	Closure	** **
9.	Cable Tunnel Ventilation Fans	Functioning	Monthly 45 days

\* See Specification 1.9.

\*\* The turbine steam stop and control valves shall be tested at a frequency determined by the methodology presented in WCAP-11525 "Probabilistic Evaluation of Reduction in Turbine Valve Test Frequency", and in accordance with established NRC acceptance criteria for the probability of a missile ejection incident at IP-2. In no case shall the test interval for these valves exceed one year.

## 4.5 ENGINEERED SAFETY FEATURES

### Applicability

Applies to testing of the Safety Injection System, the Containment Spray System, the Hydrogen Recombiner System, and the Air Filtration System.

### Objective

To verify that the subject systems will respond promptly and perform their design functions, if required.

### Specifications

#### A. SYSTEM TESTS

##### 1. Safety Injection System

- a. System tests shall be performed at each reactor Refueling Interval (#). With the Reactor Coolant System pressure less than or equal to 350 psig and temperature less than or equal to 350°F, a test safety injection signal will be applied to initiate operation of the system. The safety injection pumps are made inoperable for this test.
- b. The test will be considered satisfactory if control board indication and visual observations indicate that all components have received the safety injection signal in the proper sequence and timing; that is, the appropriate pump breakers shall have opened and closed, and the appropriate valves shall have completed their travel.
- c. Conduct a flow test of the high head safety injection system after any modification is made to either its piping and/or valve arrangement.

- d. Verify that the mechanical stops on Valves 856 A, C, D and E are set at the position measured and recorded during the most recent ECCS operational flow test or flow tests performed in accordance with (c) above. This surveillance procedure shall be performed following any maintenance on these valves or their associated motor operators and at a convenient outage if the position of the mechanical stops has not been verified in the preceding three months.

B. CONTAINMENT SPRAY SYSTEM

1. System tests shall be performed at each reactor Refueling Interval (#). The tests shall be performed with the isolation valves in the spray supply lines at the containment and the spray additive tank isolation valves blocked closed. Operation of the system is initiated by tripping the normal actuation instrumentation.
2. The spray nozzles shall be tested for proper functioning at least every five years.
3. The test will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

C. HYDROGEN RECOMBINER SYSTEM

1. A complete recombiner system test shall be performed at each Refueling Interval (#) on each unit. The test shall include verification of ignition and attainment of normal operating temperature.
2. A complete control system test shall be performed at intervals not greater than six months on each unit. The test shall consist of a complete dry run startup using artificially generated signals to simulate light off.
3. The above tests will be considered satisfactory if visual observations and control panel indication indicate that all components have operated satisfactorily.

- d. verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
3. After every 720 hours of charcoal adsorber operation, by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1973, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
  4. At least once every Refueling Interval by:
    - a. verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches water gauge while operating the system at ambient conditions and at a flow rate of 1840 cfm  $\pm 10\%$ .
    - b. verifying that, on a Safety Injection Test Signal or a high radiation signal in the control room, the system automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks. <sup>1</sup>
    - c. verifying that the system maintains the control room at a neutral or positive pressure relative to the outside atmosphere during system operation.
  5. After each complete or partial replacement of an HEPA filter bank, by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 1840 cfm  $\pm 10\%$ .

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1. In this instance Refueling Interval is defined by R#.

## 4.6 EMERGENCY POWER SYSTEM PERIODIC TESTS

### Applicability

Applies to periodic testing and surveillance requirements of the emergency power systems.

### Objective

To verify that emergency power systems will respond promptly and properly when required.

### Specifications

The following tests and surveillances shall be performed as stated:

#### A. DIESEL GENERATORS

1. Each month, each diesel generator shall be manually started and synchronized to its bus or buses and shall be allowed to assume the normal bus load.
2. At each Refueling Interval (#), each diesel generator shall be manually started, synchronized and loaded up to its continuous (nameplate) and short term ratings.
3. At each Refueling Interval (#), to assure that each diesel generator will automatically start and assume the required load within 60 seconds after the initial start signal, the following shall be accomplished: by simulating a loss of all normal AC station service power supplies and simultaneously simulating a Safety Injection signal, observations shall verify automatic start of each diesel generator, required bus load shedding and restoration to operation of particular vital equipment. To prevent Safety Injection flow to the core, certain safeguards valves will be closed and made inoperable.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 178 TO FACILITY OPERATING LICENSE NO. DPR-26  
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

DOCKET NO. 50-247

1.0 INTRODUCTION

By letter dated October 29, 1993, as supplemented March 28, 1994, and November 8, 1994, the Consolidated Edison Company of New York (the licensee) submitted a request for changes to the Indian Point Nuclear Generating Unit No. 2 Technical Specifications (TS). The requested changes are a follow-up to License Amendment No. 159, issued on December 10, 1992, which changed the TS Section 1.0, Definitions, to accommodate a 24-month fuel cycle and which extended test intervals for specific surveillance tests. The requested changes in this proposal would extend the surveillance intervals to 24 months for the Volume Control Tank Level Instrument, the Containment High Range Radiation Monitors, the Safety Injection System Electrical Loading, the Safety Injection System, and the Reactor Coolant System Subcooling Margin Monitors. The changes requested by the licensee are related to a 24-month fuel cycle and are in accordance with Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle." The March 28, 1994, submittal requested deletion of the change related to the Auxiliary Feedwater System since it had been submitted and approved in a previous amendment. The November 8, 1994, submittal provided replacement TS pages which had been revised due to issuance of amendments following the original submittal. It did not change the initial proposed no significant hazards consideration and was not outside the scope of the original *Federal Register* notice.

2.0 EVALUATION

Improved reactor fuels allow licensees to consider an increase in the duration of the fuel cycle for their facilities. A longer fuel cycle increases the time interval between refueling outages and the performance of TS surveillance requirements. GL 91-04 provides guidance to support the development of TS revisions to allow a 24-month surveillance interval and includes requirements to evaluate the effect on safety for an increase in surveillance testing and calibration intervals to accommodate a 24-month fuel cycle.

The licensee evaluation should conclude that the net effect on safety is small, that historical plant maintenance and surveillance data support the proposed extended surveillance interval, and that the assumptions in the plant licensing basis are still bounding with the incorporation of a 24-month surveillance interval.

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The staff also determined that a licensee should address the issue of instrumentation errors/setpoint methodology assumptions when proposing an extended instrumentation calibration interval. Specifically, the licensee must evaluate the effects of an increased calibration interval on instrument uncertainties, equipment qualification, and vendor maintenance requirements to ensure that an extended surveillance interval does not result in exceeding the assumptions stated in the safety analysis.

The licensee has proposed to extend the calibration interval from 18 to 24 months for the following surveillances which involve instrumentation errors/setpoint methodology:

- (1) Volume Control Tank Level Instrument Channel
- (2) Reactor Coolant System Subcooling Margin Monitors

To support the proposed changes the licensee reviewed instrument calibration data from applicable surveillances and maintenance records and recorded the historical as-left and as-found drift information. The licensee confirmed that instrument drift has not, except on rare occasions, exceeded acceptable results and that the historical data does not indicate any problems that would preclude an increase in the interval for instrument calibration. The licensee's description of the methodology and assumptions used to determine the rate of instrument drift with time was approved by the staff as documented in Amendment No. 159 to Facility Operating License No. DPR-26.

The licensee statistically evaluated the past drift data to determine a projected 30-month drift value. The projected 30-month drift value was used as input to determine the Channel Statistical Allowance using the NRC-approved Westinghouse setpoint methodology. This evaluation included, along with instrument drift, the determination of all other channel uncertainties, including sensor, rack, measurement and test equipment, and process effects for normal environmental conditions. The licensee evaluated the resulting channel uncertainties and determined that they supported the current TSs and safety analysis limits.

The licensee has proposed to extend the surveillance interval from 18 to 24 months for the following Radiation Monitors:

- (1) Containment High Range Area Radiation Monitors (R-25 and R-26)

Radiation Monitors R-25 and R-26 are used for post-accident planning purposes. They serve no function during normal plant operation nor do they serve any purpose in preventing accident initiation or mitigation. They are essentially redundant to each other since either device would respond to a release of radioactivity to containment. They are installed in different containment locations. The TSs require that one of the two monitors be operable and in

the event both become inoperable that one channel be restored to operable status within 7 days or that an alternate means of high-range radiation monitoring in the containment be initiated. The TS require the monitors to be checked once each shift.

The licensee reviewed a 5 year history of test results for these monitors and determined that in no case were both monitors out of calibration at the same time and that in all cases both monitors were operable. The licensee concluded that there would be no significant reduction in the margin of safety due to an extended operating cycle.

The licensee has proposed to extend the surveillance interval from 18 to 24 months for the following functions:

- (1) Safety Injection System Electrical Loading
- (2) Safety Injection System

The Safety Injection System Electrical Loading surveillance accomplishes the TS requirement to assure that each emergency diesel generator will automatically start and assume the required load within 60 seconds after the initial start signal. The test is a complex, integrated procedure involving several plant systems and the licensee thoroughly reviewed the results of the completed tests from the last five refueling outages. The significant findings were a failure of a component cooling water (CCW) pump to strip from the bus during the 1989 test and a relay which did not function within its timing sequence. In the case of the CCW pump, the diesel generator was not overloaded and in both cases the safety functions would have been performed. The failures revealed by the test history appeared to be random and showed no indication of being time dependent. The latest test reviewed, performed during the 1993 outage, achieved all test acceptance criteria with no adverse observations. The licensee has concluded that no significant increase in probability or consequence of an accident would be incurred by extending the surveillance interval.

The Safety Injection System surveillance accomplishes the refueling shutdown TS requirements to: a) test the automatic actuation of the Containment Isolation System, b) test the Safety Injection System, c) test the Containment Spray System, and d) verify that the Control Room Air filtration system automatically switches into a recirculation mode of operation upon a safety injection signal or a high radiation signal. The Safety Injection System test is a complex integrated procedure which involves several plant systems and the licensee thoroughly reviewed the results of the completed tests from the last five refueling outages. The test problems were few and of minimal or nonexistent safety significance and after correction the failures were not repeated in subsequent tests. The licensee has concluded that no significant increase in probability or consequence of an accident would be incurred by extending the surveillance interval.

The licensee has evaluated the effect of the increase in the above surveillance intervals on safety and has concluded that the effect is small. The licensee has confirmed that historical plant maintenance and surveillance data do not invalidate this conclusion. The licensee also confirmed that the increase in surveillance intervals to accommodate a 24-month fuel cycle does not invalidate any assumption on the plant licensing basis. For the instrument surveillances the licensee evaluated the past drift data to determine a projected 30-month drift value. The projected 30-month drift value was used as input to determine the channel statistical allowance using the NRC-approved Westinghouse setpoint methodology. This evaluation included, along with instrument drift, the determination of all other channel uncertainties, including sensor, rack, measurement and test equipment, and process effects for normal environmental conditions. The licensee evaluated the resulting channel uncertainties and determined that they supported the current TSs and safety analysis limits. The staff reviewed this information and agrees with the conclusions contained therein. The staff finds that the proposed TS changes do not have a significant effect on safety and are, therefore, acceptable.

### 3.0 STATE CONSULTATION

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

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding (59 FR 37067). Accordingly, the 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 the amendment.

**5.0 CONCLUSION**

The Commission 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

**Principal Contributor: F. Williams**

**Date: November 16, 1994**