October 20, 1988

Docket Nos. 50-387/388

DISTRIBUTION

Docket File	OGC	Brent Clayton
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BBoger	Wanda Jones	
WButler	EButcher	
MThadani(2)	RBlough	
DFischer	ACRS (10)	
MO'Brien(2)	CMiles, GPA/PA	
RDiggs, ARM/LFMB		

Mr. Harold W. Keiser
Senior Vice President-Nuclear
Pennsylvania Power and Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Dear Mr. Keiser:

SUBJECT: MISCELLANEOUS TECHNICAL SPECIFICATION CHANGES (TAC NOS. 66923/66924)

RE: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

The Commission has issued the enclosed Amendment No. 83 to Facility Operating License No. NPF-14 and Amendment No. 51 to Facility Operating License No. NPF-22 for the Susquehanna Steam Electric Station (SSES), Units 1 and 2. These amendments are in response to your letter dated December 18, 1987.

These amendments revise the SSES Units 1 and 2 Technical Specifications to: 1) correct errors in nomenclature; 2) delete redundant information; and 3) change organizational nomenclature which reflected the realignment of the licensing organization.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Biweekly Federal Register Notice.

Sincerely,

/S/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 83 to License No. NPF-14
2. Amendment No. 51 to License No. NPF-22
3. Safety Evaluation

cc w/enclosures:
See next page

PDI-2/LA	PDI-2/PM	PDI-2/D	OGC	DF01
MO'Brien	MThadani:tr	WButler		
9/21/88	9/22/88	10/19/88	9/22/88	

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PDR ADOCK 05000387
P PDC

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

October 20, 1988

Docket Nos. 50-387/388

Mr. Harold W. Keiser
Senior Vice President-Nuclear
Pennsylvania Power and Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Dear Mr. Keiser:

SUBJECT: MISCELLANEOUS TECHNICAL SPECIFICATION CHANGES (TAC NOS. 66923/66924)

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Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 83 to License No. NPF-14
2. Amendment No. 51 to License No. NPF-22
3. Safety Evaluation

cc w/enclosures:
See next page

Mr. Harold W. Keiser
Pennsylvania Power & Light Company

Susquehanna Steam Electric Station
Units 1 & 2

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King of Prussia, Pennsylvania 19406

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

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-387

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 83
License No. NPF-14

1. The Nuclear Regulatory Commission (the Commission or the NRC) having found that:

   A. The application for the amendment filed by the Pennsylvania Power & Light Company, dated December 18, 1987 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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 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 set forth in 10 CFR Chapter I;

   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 the Facility Operating License No. NPF-14 is hereby amended to read as follows:

   (2) Technical Specifications and Environmental Protection Plan

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 83 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PP&L shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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PDR ADOCK 05000387
P PDC

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

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 20, 1988.

PDI-2/LA	PDI-2/PM	OGC	PDI-2/D
for MO'Brien	MThadani:tr	CPW	WButler
9/22/88	9/22/88	9/26/88	10/19/88

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

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 20, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 83

FACILITY OPERATING LICENSE NO. NPF-14

DOCKET NO. 50-387

Replace the following pages of the Appendix A Technical Specifications with enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. The overleaf pages are provided to maintain document completeness.*

REMOVE	INSERT
3/4 3-19	3/4 3-19*
3/4 3-20	3/4 3-20
3/4 7-21	3/4 7-21
3/4 7-22	3/4 7-22*
3/4 8-17	3/4 8-17
3/4 8-17a	3/4 8-17a*
6-3	6-3
6-4	6-4*

TABLE 3.3.2-2 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

TRIP FUNCTION	TRIP SETPOINT	ALLOWABLE VALUE
REACTOR CORE ISOLATION COOLING SYSTEM ISOLATION (Continued)		
d. RCIC Equipment Room Temperature - High	≤ 167°F	≤ 174°F
e. RCIC Equipment Room Δ Temperature - High	≤ 89°F	≤ 98°F
f. RCIC Pipe Routing Area Temperature - High	≤ 167°F##	≤ 174°F##
g. RCIC Pipe Routing Area Δ Temperature - High	≤ 89°F##	≤ 98°F##
h. RCIC Emergency Area Cooler Temperature - High	≤ 147°F	≤ 154°F
i. Manual Initiation	NA	NA
j. Drywell Pressure - High	≤ 1.72 psig	≤ 1.88 psig
6. HIGH PRESSURE COOLANT INJECTION SYSTEM ISOLATION		
a. HPCI Steam Line Flow - High	≤ 275 inches H_2O	≤ 292 inches H_2O
b. HPCI Steam Supply Pressure - Low	≥ 104 psig	≥ 90 psig
c. HPCI Turbine Exhaust Diaphragm Pressure - High	≤ 10 psig	≤ 20 psig
d. HPCI Equipment Room Temperature - High	≤ 167°F	≤ 174°F
e. HPCI Equipment Room Δ Temperature - High	≤ 89°F	≤ 98°F
f. HPCI Emergency Area Cooler Temperature - High	≤ 147°F	≤ 154°F
g. HPCI Pipe Routing Area Temperature - High	≤ 167°F##	≤ 174°F##
h. HPCI Pipe Routing Area Δ Temperature - High	≤ 89°F##	≤ 98°F##
i. Manual Initiation	NA	NA
j. Drywell Pressure - High	≤ 1.72 psig	≤ 1.88 psig

TABLE 3.3.2-2 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

TRIP FUNCTION	TRIP SETPOINT	ALLOWABLE VALUE
7. RHR SYSTEM SHUTDOWN COOLING/HEAD SPRAY MODE ISOLATION		
a. Reactor Vessel Water Level - Low, Level 3	≥ 13.0 inches*	≥ 11.5 inches
b. Reactor Vessel (RHR Cut-in Permissive) Pressure - High	≤ 98 psig	≤ 108 psig
c. RHR Equipment Area Δ Temperature - High	≤ 89°F	≤ 90.5°F
d. RHR Equipment Area Temperature - High	≤ 167°F	≤ 170.5°F
e. RHR Flow - High	≤ 25,000 gpm	≤ 26,000 gpm
f. Manual Initiation	NA	NA
g. Drywell Pressure - High	≤ 1.72 psig	≤ 1.88 psig

*See Bases Figure B 3/4 3-1.

#Lower setpoints for TSH-G33-2N600 E, F and TDSH-G33-2N602 E, F.

##15 minute time delay.

DRYWELL AND SUPPRESSION CHAMBER INTERNAL PRESSURE

LIMITING CONDITION FOR OPERATION

3.6.1.6 Drywell and suppression chamber internal pressure shall be maintained between -1.0 and +2.0 psig.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

With the drywell and/or suppression chamber internal pressure outside of the specified limits, restore the internal pressure to within the limit within 1 hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.6 The drywell and suppression chamber internal pressure shall be determined to be within the limits at least once per 12 hours.

DRYWELL AVERAGE AIR TEMPERATURE

LIMITING CONDITION FOR OPERATION

3.6.1.7 Drywell average air temperature shall not exceed 135°F.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

With the drywell average air temperature greater than 135°F, reduce the average air temperature to within the limit within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.7 The drywell average air temperature shall be the arithmetical average of the higher temperature at a minimum of three of the following areas and shall be determined to be within the limit at least once per 24 hours:

	Area	Elevation	Azimuth
a.	Top	797'8"	105°, 285°
b.	Middle	752'2"	90°, 270°
c.	Bottom	725' or 716'	258°, 80°
d.	Pedestal	711' or 720'	270°, 85°

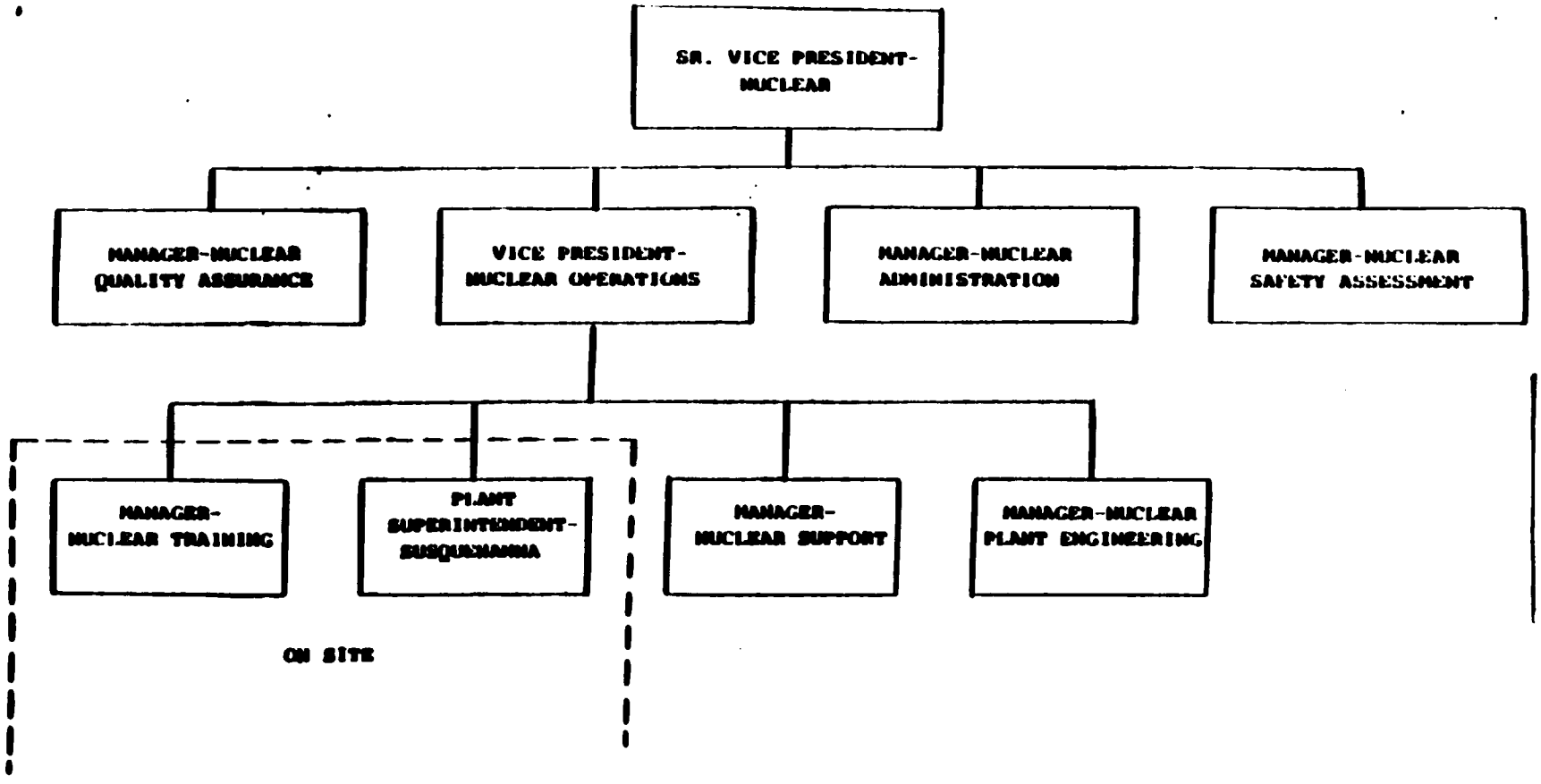

FIGURE 6.2.1-1

OFFSITE ORGANIZATION

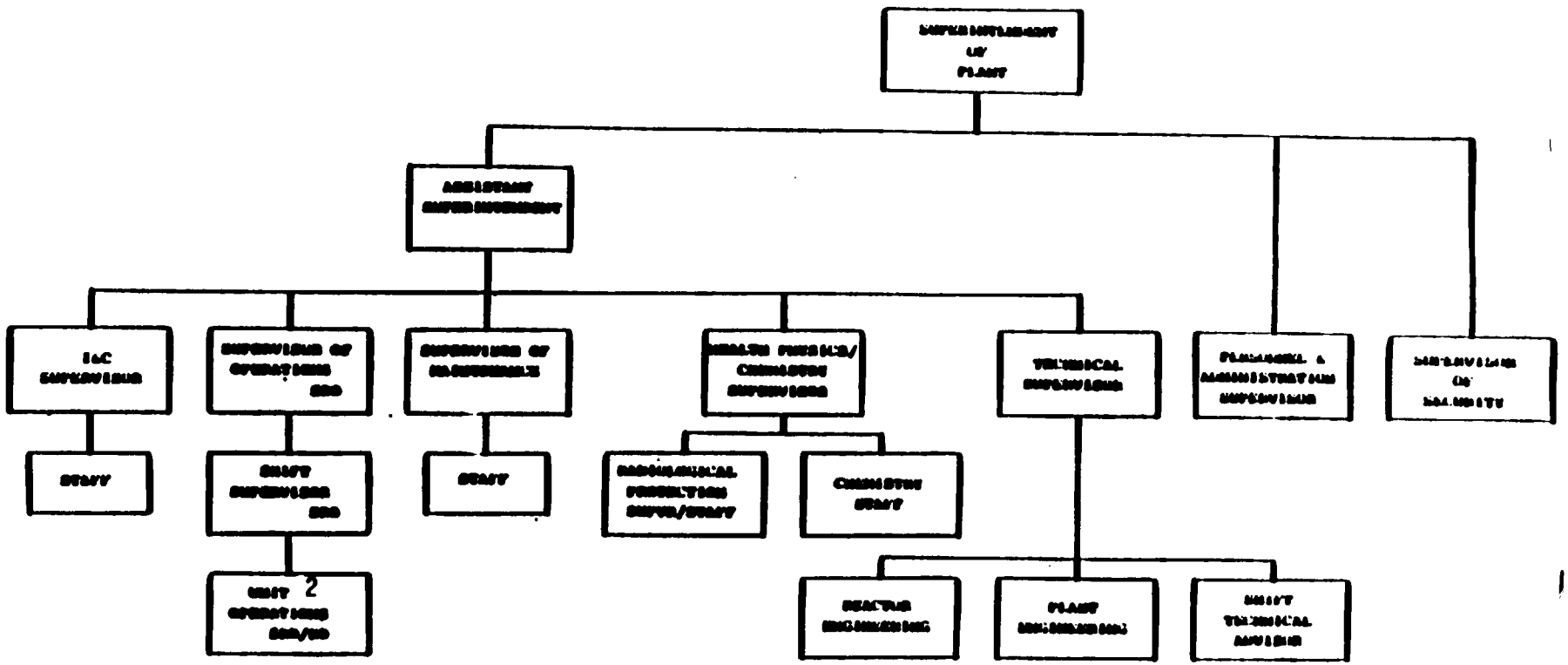

FIGURE 6.2.2-1

UNIT ORGANIZATION

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

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 51
License No. NPF-22

1. The Nuclear Regulatory Commission (the Commission or the NRC) having found that:

   A. The application for the amendment filed by the Pennsylvania Power & Light Company, dated December 18, 1987 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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 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 set forth in 10 CFR Chapter I;

   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 the Facility Operating License No. NPF-22 is hereby amended to read as follows:

   (2) Technical Specifications and Environmental Protection Plan

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 51 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PP&L shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 20, 1988

PDI-2/LA	PDI-2/PM	OGC	PDI-2/D
for MO'Brien	MThadani:tr		WButler
9/22/88	9/22/88	9/26/88	10/19/88

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

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 20, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 51

FACILITY OPERATING LICENSE NO. NPF-22

DOCKET NO. 50-388

Replace the following pages of the Appendix A Technical Specifications with enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. The overleaf pages are provided to maintain document completeness.*

REMOVE	INSERT
3/4 3-19	3/4 3-19*
3/4 3-20	3/4 3-20
3/4 6-9	3/4 6-9*
3/4 6-10	3/4 6-10
6-3	6-3
6-4	6-4*

TABLE 3.3.2-2 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

TRIP FUNCTION	TRIP SETPOINT	ALLOWABLE VALUE
REACTOR CORE ISOLATION COOLING SYSTEM ISOLATION Continued)		
d. RCIC Equipment Room Temperature - High	≤ 167°F**	≤ 174°F**
e. RCIC Equipment Room Δ Temperature - High	≤ 89°F	≤98°F
f. RCIC Pipe Routing Area Temperature - High	≤ 167°F##	≤ 174°F##
g. RCIC Pipe Routing Area Δ Temperature - High	≤ 89°F##	≤ 98°F##
h. RCIC Emergency Area Cooler Temperature - High	≤ 147°F	≤ 154°F
i. Manual Initiation	NA	NA
j. Drywell Pressure - High	≤1.72 psig	≤1.88 psig
6. HIGH PRESSURE COOLANT INJECTION SYSTEM ISOLATION		
a. HPCI Steam Line Flow - High	≤ 350 inches H_2O	≤ 367 inches H_2O
b. HPCI Steam Supply Pressure - Low	≥ 104 psig	≥ 90 psig
c. HPCI Turbine Exhaust Diaphragm Pressure - High	≤ 10 psig	≤ 20 psig
d. HPCI Equipment Room Temperature - High	≤ 167°F	≤ 174°F
e. HPCI Equipment Room Δ Temperature - High	≤ 89°F	≤ 98°F
f. HPCI Emergency Area Cooler Temperature - High	≤ 147°F	≤154°F
g. HPCI Pipe Routing Area Temperature - High	≤ 167°F##	≤ 174°F##

TABLE 3.3.2-2 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

TRIP FUNCTION	TRIP SETPOINT	ALLOWABLE VALUE
h. HPCI Pipe Routing Area Δ Temperature - High	≤ 89°F##	≤ 98°F##
i. Manual Initiation	NA	NA
j. Drywell Pressure - High	≤1.72 psig	≤1.88 psig
7. RHR SYSTEM SHUTDOWN COOLING/HEAD SPRAY MODE ISOLATION		
a. Reactor Vessel Water Level - Low, Level 3	≥ 13.0 inches*	≥ 11.5 inches
b. Reactor Vessel (RHR Cut-in Permissive) Pressure - High	≤ 98 psig	≤ 108 psig
c. RHR Equipment Area Δ Temperature - High	≤ 89°F	≤ 90.5°F
d. RHR Equipment Area Temperature - High	≤ 167°F	≤ 170.5°F
e. RHR Flow - High	≤ 25,000 gpm	≤ 26,000 gpm
f. Manual Initiation	NA	NA
g. Drywell Pressure - High	≤1.72 psig	≤1.88 psig

*See Bases Figure B 3/4 3-1.

#Lower setpoints for TSH-G33-1N600 E, F and TDSH-G33-1N602 E, F.

##15 minute time delay.

LIMITING CONDITIONS

3.7.6.3 The following low pressure CO_2 systems shall be OPERABLE:

a. Control Room Under Floor, Unit 1
b. Control Room Under Floor, Unit 2
c. Lower Relay Room, Unit 1#
d. Upper Relay Room, Unit 1#
e. South Cable Chase
f. Center Cable Chase
g. North Cable Chase
h. Room C-411 Soffit
i. Control Room Soffit, Unit 1
j. Control Room Soffit, Unit 2
k. Room C-413 Soffit

APPLICABILITY: Whenever equipment protected by the CO_2 systems is required to be OPERABLE.

ACTION:

a. With one or more of the above required CO_2 systems inoperable, within 1 hour establish a continuous fire watch with backup fire suppression equipment for those areas in which redundant systems or components could be damaged; for other areas, establish an hourly fire watch patrol.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.6.3.1 Each of the above required low pressure CO_2 systems shall be demonstrated OPERABLE at least once per 31 days by verifying that each valve, manual, power operated, or automatic, in the flow path is in its correct position.

4.7.6.3.2 Each of the above required low pressure CO_2 systems shall be demonstrated OPERABLE:

a. At least once per 7 days by verifying the CO_2 storage tank level to be greater than 25% and pressure to be greater than 270 psig, and

b. At least once per 18 months by:

1. Verifying the system valves and associated ventilation dampers and fire door release mechanisms actuate manually and automatically, upon receipt of a simulated actuation signal, and

2. Flow from each accessible nozzle by performance of a "Puff Test."

#Accessible nozzles.

LIMITING CONDITION FOR OPERATION

3.7.6.4 The Halon systems in the following panel modules shall be OPERABLE with the storage tanks having at least 95% of full charge weight and 90% of full charge pressure:

1U700	1U701	1U702	1U703	1U704	1U705
1U706	1U730	1U731	1U732		

APPLICABILITY: Whenever equipment protected by the Halon systems is required to be OPERABLE.

ACTION:

a. With one or more of the above required Halon systems inoperable, within 1 hour establish a continuous fire watch with backup fire suppression equipment for those areas in which redundant systems or components could be damaged; for other areas, establish an hourly fire watch patrol.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.6.4 Each of the above required Halon systems shall be demonstrated OPERABLE.

a. At least once per 31 days by verifying that each valve, manual, power operated or automatic, in the flow path is in its correct position.

b. At least once per 6 months by verifying Halon storage tank weight and pressure.

c. At least once per 18 months by:

1. Performance of a flow test through accessible headers and nozzles to assure no blockage.

2. Performance of a functional test of the general alarm circuit and associated alarm and interlock devices.

3/4.8.3 ONSITE POWER DISTRIBUTION SYSTEMS

DISTRIBUTION - OPERATING

LIMITING CONDITION FOR OPERATION

3.8.3.1 The following power distribution system divisions shall be energized with tie breakers open both between redundant buses within the unit and between units at the same station:

a. A.C. power distribution:

1. Division I, consisting of:
   - a) Load group Channel "A", consisting of:
     - 1) 4160 volt A.C. switchgear bus — 1A201
     - 2) 480 volt A.C. load center — 1B210
     - 3) 480 volt A.C. motor control centers — 0B516, 0B517, 1B216, 1B217
     - 4) 208/480 volt A.C. instrument panels — 1Y216
   - b) Load group Channel "C", consisting of:
     - 1) 4160 volt A.C. switchgear bus — 1A203
     - 2) 480 volt A.C. load center — 1B230
     - 3) 480 volt A.C. motor control centers — 0B536, 0B136, 1B236, 1B237
     - 4) 208/120 volt A.C. instrument panels — 1Y236
   - c) Isolated 480 volt A.C. swing bus, including: — 1B219
     - 1) Preferred power source
     - 2) Preferred power source MG set
     - 3) Alternate power source
     - 4) Automatic transfer switch
2. Division II, consisting of:
   - a) Load group Channel "B", consisting of:
     - 1) 4160 volt A.C. switchgear bus — 1A202
     - 2) 480 volt A.C. load center — 1B220
     - 3) 480 volt A.C. motor control centers — 0B526, 0B527, 1B226, 1B227
     - 4) 208/120 volt A.C. instrument panels — 1Y226
   - b) Load group Channel "D", consisting of:
     - 1) 4160 volt A.C. switchgear bus — 1A204
     - 2) 480 volt A.C. load center — 1B240
     - 3) 480 volt A.C. motor control centers — 0B546, 0B146, 1B246, 1B247
     - 4) 208/120 volt A.C. instrument panels — 1Y246

c) Isolated 480 volt A.C. swing bus, including: 1B229

1) Preferred power source
2) Preferred power source MG set
3) Alternate power source
4) Automatic transfer switch

3. Diesel Generator E, when aligned to the Class 1E system

a) Load group consisting of:

1) 480 volt A.C. motor control center 0B565

b. D.C. power distribution:

1. Division I, consisting of:

a) Load group Channel "A", consisting of:

1) 125 volt DC buses 1D612, 2D612,*

2) Fuse box 1D614, 2D614*
1D611, 2D611*

*Not required to be OPERABLE when the requirements of ACTION C have been satisfied.

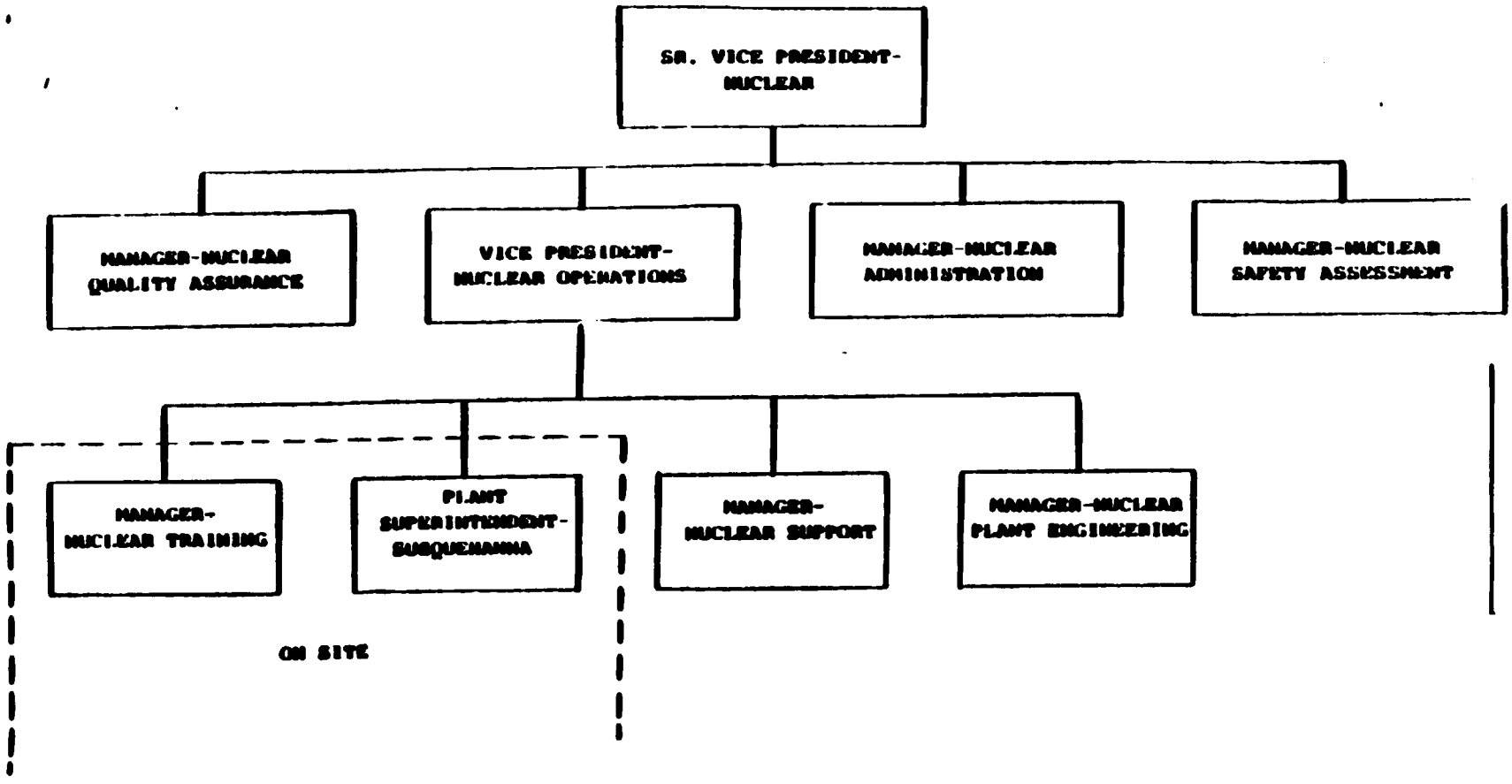

Figure 6.2.1-1

OFFSITE ORGANIZATION

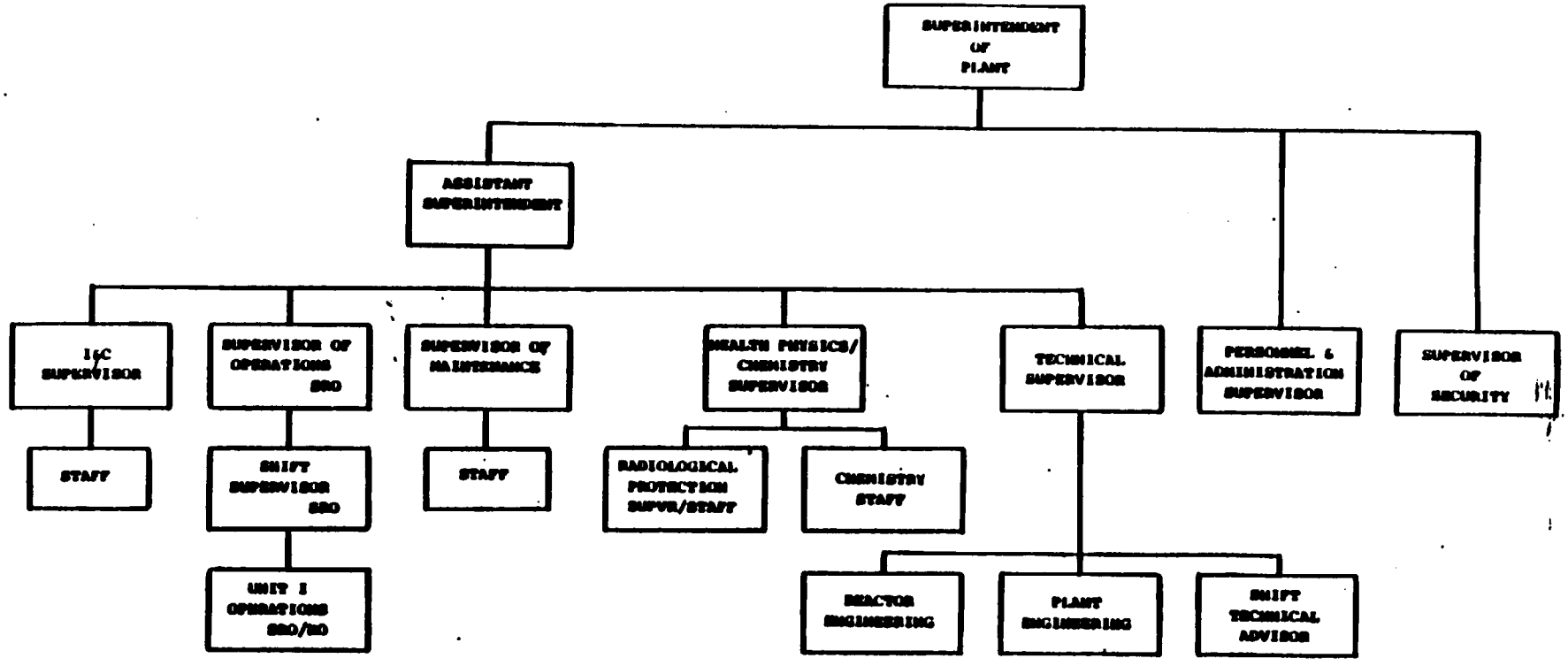

FIGURE 6.2.2-1
UNIT ORGANIZATION

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 83 TO FACILITY OPERATING LICENSE NO. NPF-14 AND

AMENDMENT NO. 51 TO FACILITY OPERATING LICENSE NO. NPF-22

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NOS. 50-387 AND 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

1.0 INTRODUCTION

By letter dated December 18, 1987, Pennsylvania Power & Light Company requested an amendment to Facility Operating License Nos. NPF-14 and NPF-22 for the Susquehanna Steam Electric Station (SSES), Units 1 and 2. The proposed amendments would revise the Technical Specifications for Units 1 and 2 as follows.

- Correct errors of inconsistency in the nomenclature in Technical Specifications and the plant drawings,
- Delete redundant information, and
- Delete "Manager - Nuclear Licensing" from offsite organization chart.

2.0 EVALUATION

The staff has reviewed the licensee's request for the above changes and finds that the proposed changes do not affect any systems, components, procedures, and/or operation of SSES Units 1 and 2. The proposed changes are, therefore, acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of these amendments.

4.0 CONCLUSION

The Commission made a proposed determination that these amendments involve no significant hazards consideration which was published in the Federal Register

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P PDC

(53 FR 30141) on August 10, 1988 and consulted with the State of Pennsylvania. No public comments were received, and the State of Pennsylvania did not have any comments.

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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributor: Mohan C. Thadani

Dated: October 20, 1988