

April 16, 1990

Docket Nos. 50-317
and 50-318

Mr. G. C. Creel
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
MD Rtes. 2 & 4
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Dear Mr. Creel:

SUBJECT: ISSUANCE OF AMENDMENTS (UNIT 1 TAC NO. 71225;
UNIT 2 TAC NO. 71226)

The Commission has issued the enclosed Amendment No.141 to Facility Operating License No. DPR-53 and Amendment No. 124 to Facility Operating License No. DPR-69 for the Calvert Cliffs Power Plant, Unit Nos. 1 and 2, respectively. The amendments consist of changes to the Technical Specifications in response to your application transmitted by letter dated November 1, 1988, as supplemented on July 21 and November 21, 1989.

These amendments modify the Units 1 and 2 Technical Specifications (TS) by incorporating recommendations provided by the NRC staff in Generic Letter 87-09 related to the applicability of the surveillance requirements of TS Section 4.0.

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

This completes the staff's action in relation to the above referenced TAC numbers.

Sincerely,

ORIGINAL SIGNED BY:

Daniel G. McDonald, Jr. Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.141 to DPR-53
2. Amendment No.124 to DPR-69
3. Safety Evaluation

cc: w/enclosures
See next page

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Mr. G. C. Creel
Baltimore Gas & Electric Company

Calvert Cliffs Nuclear Power Plant

cc:

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

BALTIMORE GAS AND ELECTRIC COMPANY

DOCKET NO. 50-317

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 141
License No. DPR-53

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Baltimore Gas and Electric Company (the licensee) dated November 1, 1988, as supplemented on July 21 and November 21, 1989, 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-53 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. 141, 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 and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Capra, 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: April 16, 1990



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

BALTIMORE GAS AND ELECTRIC COMPANY

DOCKET NO. 50-318

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 124
License No. DPR-69

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Baltimore Gas and Electric Company (the licensee) dated November 1, 1988, as supplemented on July 21 and November 21, 1989, 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-69 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 124, 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 and shall be implemented with 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert A. Capra

Robert A. Capra, 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: April 16, 1990

ATTACHMENT TO LICENSE AMENDMENTS

AMENDMENT NO. 141 FACILITY OPERATING LICENSE NO. DPR-53

AMENDMENT NO. 124 FACILITY OPERATING LICENSE NO. DPR-69

DOCKET NOS. 50-317 AND 50-318

Revise Appendix A as follows:

Remove Pages

3/4 0-2
B3/4 0-3
B3/4 0-4
B3/4 0-5

Insert Pages

3/4 0-2
B3/4 0-3
B3/4 0-4
B3/4 0-5

APPLICABILITY

LIMITING CONDITION FOR OPERATION

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This specification is not applicable in MODES 5 or 6.

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
- b. The combined time interval for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. However, this time of applicability may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

APPLICABILITY

SURVEILLANCE REQUIREMENTS (Continued)

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities

Required frequencies for performing inservice inspection and testing activities

Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semi-annually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

APPLICABILITY

BASES

mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in the other division must be OPERABLE or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 or 6 Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities.

The tolerance values, taken either individually or consecutively over 3 test intervals, are sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval.

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements.

APPLICABILITY

BASES

This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded.

Completion of the Surveillance Requirement within the allowable time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, and the time required to perform the surveillance.

This time limit provision also provides for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

APPLICABILITY

BASES

4.0.4 This specification establishes the requirement that all applicable surveillances must be met before entry into an **OPERATIONAL MODE** or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component **OPERABILITY** requirements or parameter limits are met before entry into a **MODE** or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in **OPERATIONAL MODES** or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with **ACTION** requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower **MODE** of operation.

4.0.5 This specification ensures that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55 a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these Technical Specifications.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section IX of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. For example, the requirements of Specification 4.0.4 to perform surveillance activities prior to entry into an **OPERATIONAL MODE** or other specified applicability condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps to be tested up to one week after return to normal operation. And for example, the Technical Specification definition of **OPERABLE** does not grant a grace period before a device that is not capable of performing its specified function is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 141 TO FACILITY OPERATING LICENSE NO. DPR-53
AND AMENDMENT NO. 124 TO FACILITY OPERATING LICENSE NO. DPR-69
BALTIMORE GAS AND ELECTRIC COMPANY
CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2
DOCKET NOS. 50-317 AND 50-318

INTRODUCTION

By letter dated November 1, 1988, as supplemented on July 21, 1989 and November 21, 1989, the Baltimore Gas and Electric Company (BG&E, the licensee) proposed to change the Units 1 and 2 Technical Specifications (TS) based on the recommendations provided by the staff in Generic Letter (GL) 87-09 related to the applicability of limiting conditions for operations (LCO) TSO Section 3.0 and the surveillance requirements of the TS Section 4.0. Specifically, the licensee has requested the following revisions to TS 4.0.3 and 4.0.4 as follows:

Specification 4.0.3 is revised to incorporate a 24-hour delay in implementing Action requirements due to a missed surveillance when the Action requirements provide a restoration time that is less than 24 hours.

Specification 4.0.4 is revised to clarify that "This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with Action requirements."

The July 21, 1989, submittal requested that the proposed changes to TS 3.0.4 be reviewed separately from the proposed changes to TS 4.0.3 and 4.0.4. The November 21, 1989, submittal provided the final version of the marked-up TS pages applicable to the requested changes to TS 4.0.3 and 4.0.4. A phrase added to 4.0.3 was removed to reflect the exact words recommended in GL 87-09. The information provided in these letters did not affect the substance of the proposed amendment as it relates to TS 4.0.3 and 4.0.4, as noticed (54 FR 13757), nor did it affect the related no significant hazards determination.

2.0 EVALUATION

The changes proposed by the licensee have been reviewed considering the limitations set forth in GL 87-09 for TS 4.0.3 and 4.0.4 as follows.

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Specification 4.0.3

In GL 87-09 the staff stated that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed, because the vast majority of surveillance demonstrate that systems or components in fact are operable. Because the allowable outage time limits of some Action requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

The time limit should be based on consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the Action requirements are less than this time limit or when shutdown Action requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with Action requirements before the surveillance can be completed.

This limit does not waive compliance with Specification 4.0.3. Under Specification 4.0.3, the failure to perform a surveillance requirement will continue to constitute noncompliance with the operability requirements of an LCO and to bring into play the applicable Action requirements.

Based on the above, the licensee's proposed change to Specification 4.0.3 is acceptable.

Specification 4.0.4

TS 4.0.4 prohibits entry into an OPERATIONAL CONDITION or other specified condition until all required surveillances have been performed. This could cause an interpretation problem when OPERATIONAL CONDITION changes are required in order to comply with ACTION requirements. Specifically, two possible conflicts between TS 4.0.3 and 4.0.4 could exist. The first conflict arises because TS 4.0.4 prohibits entry into an operational mode or other specified condition when surveillance requirements have not been performed within the specified surveillance interval. The licensee proposed modification to resolve this conflict involves the revision of TS 4.0.3 to permit a delay of up to 24 hours in the application of the Action requirements, as explained above, and a clarification of TS 4.0.4 to allow passage through or to operational modes as required to comply with Action requirements. The second potential conflict between TS 4.0.3 and 4.0.4 arises because an exception to the requirements of 4.0.4 is allowed when surveillance requirements can only be completed after entry into a mode or condition. However, after entry into this mode or condition, the requirements of TS 4.0.3 may not be met because the surveillance requirements may not have been performed within the allowable surveillance interval.

The licensee proposes to resolve these conflicts by providing the following clarifying statement to TS 4.0.4:

"This provision shall not prevent passage through or to OPERATION CONDITIONS as required to comply with ACTION requirements."

The NRC staff has provided in GL 87-09 a clarification that: (a) it is not the intent of 4.0.3 that the Action requirements preclude the performance of surveillances allowed under any exception to TS. 4.0.4; and (b) that the delay of up to 24 hours in TS 4.0.3 for the applicability of Action requirements provides an appropriate time limit for the completion of surveillance requirements that become applicable as a consequence of any exception to TS 4.0.4.

Based on the above, the NRC staff finds the proposed changes to TS 4.0.4 are acceptable.

ENVIRONMENTAL CONSIDERATION

These amendments involve a change to the surveillance requirements. The staff has determined that these amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet 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 these amendments.

CONCLUSION

The Commission made a proposed determination that these amendments involved no significant hazards consideration which was published in the FEDERAL REGISTER on April 5, 1989 (54 FR 13757), and consulted with the State of Maryland. No public comments were received, and the State of Maryland 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 or to the health and safety of the public.

PRINCIPAL CONTRIBUTORS:

S. McNeil
D. McDonald

Dated: April 16, 1990