February 22, 1985

Docket No. 50-333

Mr. C. A. McNeill
Executive 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. 87 to Facility Operating License No. DPR-59 for the James A. FitzPatrick Nuclear Power Plant. The amendment consists of changes to the Technical Specifications in response to your request dated December 6, 1984, as supplemented January 10, 1985, February 8, 14, and 21, 1985.

The amendment revises the Technical Specifications to permit refueling with the Reactor Protection System and certain specified refueling interlocks and control rod blocks inoperable. These revisions will facilitate installation of Analog Trip Transmitter components during the Reload 6/Cycle 7 refueling outage.

A copy of the related Safety Evaluation is also enclosed.

Sincerely,

Original signed by/

Harvey I. Abelson, Project Manager
Operating Reactors Branch #2
Division of Licensing

Enclosures:
1. Amendment No. 87 to
License No. DPR-59
2. Safety Evaluation

cc w/enclosures:
See next page

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02/15/85	02/15/85	02/15/85	02/20/85	02/21/85

Mr. C. A. McNeill, Jr.
Power Authority of the State of New York
James A. FitzPatrick Nuclear Power Plant

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

POWER AUTHORITY OF THE STATE OF NEW YORK

DOCKET NO. 50-333

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 87
License No. DPR-59

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

   A. The application for amendment by the Power Authority of the State of New York (the licensee) dated December 6, 1984, as supplemented January 10, 1985, February 8, 14, and 21, 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-59 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 87, 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

Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 22, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 87

FACILITY OPERATING LICENSE NO. DPR-59

DOCKET NO. 50-333

Revise the Appendix "A" Technical Specifications as follows:

Remove	Insert
41	41
41a	41a
41b	41b
42	42
43a	43a
227	227
230	230
230a	230a
-	230b
-	230c

TABLE 3. 1-1

REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENT

Minimum No. of Operable Instrument Channels per Trip System (1)	Trip Function	Trip Level Setting	Modes in Which Function Must be Operable			Total Number of Instrument Channels Provided by Design for Both Trip Systems	Action (1)
			Refuel (6) (16)	Startup	Run		
1	Mode Switch in Shutdown		X	X	X	1 Mode Switch (4 Sections)	A
1	Manual Scram		X	X		2 Instrument Channels	A
3	IRM High Flux	≤ 120/125 of full scale	X	X		8 Instrument Channels	A
3	IRM Inoperative		X	X		8 Instrument Channels	A
2	APRM Neutron Flux-Startup (15)	≤15% Power	X	X		6 Instrument Channels	A
2	APRM Flow Referenced Neutron Flux (12)(13)(14) (Not to exceed 117%)	$S \leq (0.66W+54\%) \times \left[\frac{FRP}{MFLPD}\right]$	X	X		6 Instrument Channels	A or B
2	APRM Fixed High Neutron Flux (14)	≤120% Power			X	6 Instrument Channels	A or B
2	APRM Inoperative	(10)	X	X	X	6 Instrument Channels	A or B

TABLE 3. 1-1

REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENT

Minimum No. of Operable Instrument Channels per Trip System (1)	Trip Function	Trip Level Setting	Modes in Which Function Must be Operable			Total Number of Instrument Channels Provided by Design for Both Trip Systems	Action (1)
			Refuel (6) (16)	Startup	Run		
2	APRM Downscale	≥ 2.5 indicated on scale (9)			X	6 Instrument Channels	A or B
2	High Reactor Pressure	≤ 1045 psig	x(8)	X	X	4 Instrument Channels	A
2	High Drywell Pressure	≤ 2.7 psig	x(7)	x(7)	X	4 Instrument Channels	A
2	Reactor Low Water Level	≥ 12.5 in. indicated level (177 in. above the top of active fuel)	X	X	X	4 Instrument Channels	A
3	High Water Level in Scram Discharge Volume	≤ 34.5 gallons per Instrument Volume	X(2)	X	X	8 Instrument Channels	A
2	Main Steam line High Radiation	≤ 3x normal full power background	X	X	X	4 Instrument Channels	A
4	Main Steam line Isolation Valve Closure	≥ 10% valve closure	X(3)(5)	X(3)(5)	X(5)	8 Instrument Channels	A

TABLE 3. 1-1

REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENT

Minimum No. of Operable Instrument Channels per Trip System (1)	Trip Function	Trip Level Setting	Modes in Which Function Must be Operable			Total Number of Instrument Channels Provided by Design for Both Trip Systems	Action (1)
			Refuel (6) (16)	Startup	Run		
2	Turbine Control Valve Fast Closure	500 P 850 psig Control oil pressure between fast closure solenoid and disc dump valve			X(4)	4 Instrument Channels	A or C

TABLE 3. 1-1 (cont'd)

REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENT

Minimum No. of Operable Instrument Channels per Trip System (1)	Trip Function	Trip Level Setting	Modes in Which Function Must be Operable			Total Number of Instrument Channels Provided by Design for Both Trip Systems	Action (1)
			Refuel (6)	Startup (16)	Run		
4	Turbine Stop Valve Closure	10 % valve closure			X(4)(5)	8 Instrument Channels	A or C

NOTES OF TABLE 3.1-1

1. There shall be two operable or tripped trip systems for each function, except as specified in 4.1.D. From and after the time that the minimum number of operable instrument channel for a trip system cannot be met, that affected trip system shall be placed in the safe (tripped) condition, or the appropriate actions listed below shall be taken.

   A. Initiate insertion of operable rods and complete insertion of all operable rods within four hours.
   B. Reduce power level to IRM range and place Mode Switch in the Startup Position within eight hours.
   C. Reduce power to less than 30 percent of rated.

2. Permissible to bypass, in Refuel and Shutdown positions of the Reactor Mode Switch.

3. By passed when reactor pressure is 1005 psig.

4. Bypassed when turbine first stage pressure is less than 217 psig or less than 30 percent of rated.

5. The design permits closure of any two lines without a scram being initiated.

6. When the reactor is subcritical and the reactor water temperature is less than 212°F, only the following trip functions need to be operable:
   A. Mode Switch in Shutdown
   B. Manual Scram

TABLE 3. 1-1 (cont'd)

REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENT

NOTES OF TABLE 3.1-1 (cont'd)

14. The APRM flow biased high neutron flux signal is fed through a time constant circuit of approximately 6 seconds. The APRM fixed high neutron flux singal does not incorporate the time constant, but responds directly to instantaneous neutron flux.

15. This Average Power Range Monitor scram function is fixed point and is increased when the reactor mode switch is place in the Run position.

16. When all rods are full-in and electrically disarmed, the reactor protection system need not be operable. The conditions specified in Section 3.10.A.8 must be met while the reactor protection system is inoperable and refueling is in progress. This footnote is effective only for the Reload 6/Cycle 7 refueling outage.

3.10 LIMITING CONDITIONS FOR OPERATION

3.10 CORE ALTERATIONS

Applicability:

Applies to fuel handling and core reactivity limitations.

Objective:

To assure that core reactivity is within the capability of the control rods and to prevent criticality during refueling.

Specification:

A. Refueling Interlocks

1. The Reactor Mode Switch shall be locked in the Refuel position during core alterations and the refueling interlocks shall be operable except as specified in Specifications 3.10.A.2, 3.10.A.8, 3.10.D, and 3.10.E.

2. Fuel shall not be loaded into the reactor core unless all control rods are fully inserted except in accordance with Specification 3.10.A.7.

3. The fuel grapple hoist load switch shall be set at ≤650 lbs.

4.10 SURVEILLANCE REQUIREMENTS

4.10 CORE ALTERATIONS

Applicability:

Applies to the periodic testing of those interlocks and instruments used during refueling and core alterations.

Objective:

To verify the operability of instrumentation and interlocks used during refueling and core alterations.

Specification:

A. Refueling Interlocks

1. Prior to any fuel handling, with the head off the reactor vessel, the refueling interlocks shall be functionally tested. They shall also be tested at weekly intervals thereafter until no longer required and following any repair work associated with the interlocks.

2. Whenever the reactor is in the refuel mode and rod block interlocks are being bypassed for core unloading, one licensed operator and a member of the reactor analyst department shall verify that the fuel from the cell has been removed before the corresponding control rod is withdrawn.

3.10 (cont'd)

control rod after the fuel assemblies in the cell containing (controlled by) that control rod have been removed from the reactor core. All other refueling interlocks shall be operable.

7. In the "refuel" mode, there are interlocks which prevent the refueling bridge (if loaded) from moving toward the core unless all control rods are fully inserted. Those interlocks may be bypassed during spiral loading except for those control cells which contain fuel or that control cell which is being loaded. Interlocks for all cells containing fuel, or for any cell about to be loaded, shall be operable.

8. Refuel interlocks and rod blocks associated with one rod permissive need not be operable, if all rods are fully inserted and electrically disarmed, and the following conditions are also met:

   a. Each control rod drive has four associated directional control valves. Each of the four directional control valve amphenols on each of the 137 hydraulic control units will be disconnected and tagged with a Hold - Do Not Operate tag to preclude inadvertent reconnection during the entire time period that the reactor protection system is inoperable and refueling is in progress.

   b. No control rod drive maintenance will be performed while the reactor protection system is inoperable.

3.10 (cont'd)

c. At least one train of the standby liquid control system will remain operable during the period that the reactor protection system is inoperable and refueling is in progress.

d. Verification that all control rods are fully inserted will be performed daily.

e. The neutron monitoring system will be operable as required by Technical Specification Table 3.1-1 for refueling operations.

f. Neutron monitoring surveilliance required by Technical Specification Table 4.1-1 on a weekly basis will be conducted to the extent possible while the reactor protection system is inoperable.

g. All refuel interlocks not associated with rod motion will remain operable during the period that the reactor protection system is inoperable and refueling is in progress.

h. Core monitoring required by Technical Specification Section 3.10.B during core alterations will be performed on a daily basis during the time period that the reactor protection system is inoperable.

This specification is effective only for the Reload 6/Cycle 7 refueling outage.

3.10 (cont'd)

B. Core Monitoring

During core alterations two SRM's shall be operable, one in the core quadrant where fuel or control rods are being moved and one in an adjacent quadrant. For an SRM to be considered operable, the following conditions shall be satisfied:

1. The SRM shall be inserted to the normal operating level. (Use of special movable, dunking type detectors during initial fuel loading and major core alterations in place of normal detectors is permissable as long as the detector is connected into normal SRM circuit).

2. The SRM shall have a minimum of 3 counts/sec with all rods fully inserted in the core except as noted in 3 and 4 below.

3. Prior to spiral unloading, the SRM's shall have an initial count rate of $\geq$ 3 CPS. During spiral unloading, the count rate of the SRM's may drop below 3 CPS.

4.10 (cont'd)

B. Core Monitoring

Prior to making alterations to the core the SRM's shall be functionally tested and checked for neutron response. Thereafter, the SRM's will be checked daily for response, except as specified in Specification 3.10.B.3 and 4

3.10 (cont'd)

4. During Spiral reload, SRM operability will be verified by using a portable external source every 12 hours until enough fuel is loaded to maintain 3 CPS. Alternatively, two fuel assemblies will be loaded in different cells containing control blades around each SRM to obtain the required 3 CPS. Until these two assemblies have been loaded in a given quadrant, it is not necessary for the SRM in that quadrant to indicate the minimum count rate of 3 CPS. The loading of fuel near the SRM's does not violate the intent of the spiral reloading pattern.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 87 TO FACILITY OPERATING

LICENSE NO. DPR-59

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

1.0 Background and Discussion

By letters JPN 84-81 dated December 6, 1984, JPN-85-01 dated January 10, 1985, and JPN-85-11 dated February 14, 1985, the licensee (Power Authority of the State of New York) requested changes to the James A. FitzPatrick Nuclear Power Plant Technical Specifications (TS) to allow refueling with the reactor protection system (RPS), and certain specified refueling interlocks and rod blocks inoperable. The licensee has stated that these changes are necessary to allow installation of Analog Transmitter Trip System (ATTS) components without causing excessive delays (up to 20 days) during the refueling outage. The ATTS is a solid-state electronic trip system being installed to replace existing mechanical sensing devices (e.g., pressure switches and differential pressure switches) for the RPS, nuclear steam supply shutoff system (NSSSS), emergency core cooling system (ECCS), and reactor core isolation cooling (RCIC) system. Advantages of the ATTS over the existing mechanical trip system components include continuous indication of measured parameters, reduced setpoint drift, reduced time required for testing, and the prevention of instrument valving errors during instrument functional tests.

The proposed TS changes will allow refueling operations and installation of ATTS components to be performed and managed simultaneously, and will allow installation of ATTS components in redundant protection system channels simultaneously. With the RPS required to be operable, ATTS modifications would be restricted to one channel at a time while that channel was in the tripped condition, thus, placing the unit in a half-scram configuration. The specific TS changes are to Table 3.1-1 "Reactor Protection System (SCRAM) Instrumentation Requirements," allowing the RPS to be inoperable when in the Refuel Mode if all control rods are fully inserted into the core and electrically disarmed (described below), and Section 3.10.A "Refueling Interlocks," allowing refueling interlocks and rod blocks associated with single rod motion permissives to be inoperable if all control rods are fully inserted and electrically disarmed.

The staff's review has concluded that the proposed changes to the FitzPatrick TS requested by the licensee are acceptable as discussed in the evaluation provided below. It should be noted that the ATTS, designed by General

Electric (GE), has been retrofitted to several operating boiling water reactors (BWRs). A GE Topical Report (NEDO-21617A) addressing the ATTS has been reviewed and accepted by the staff. Prior to plant operation with the ATTS installed, the licensee should reference the GE report, identify any differences between the FitzPatrick ATTS design and the GE standard design, and address proposed technical specification changes resulting from the ATTS modifications (e.g., performance of channel checks each shift).

2.0 Evaluation

The reactor protection system (RPS) is designed to automatically initiate insertion of all control rods into the core (i.e., scram the reactor) when monitored variables exceed pre-established limits to protect against the onset and consequences of conditions that threaten the integrity of the fuel cladding and reactor coolant pressure boundary. Instrumentation that initiates a reactor scram on the following signals is required to be operable when in the refuel mode to prevent or terminate inadvertent criticality.

- Mode Switch in Shutdown
- Manual Scram
- Intermediate Range Monitor (IRM) Trips
- Average Power Range Monitor (APRM) Trips
- Scram Discharge Volume High Water Level

Other scram functions are required to be operable in the refuel mode to ensure that shifting to the refuel mode during reactor power operation does not diminish the protection provided by the RPS.

The proposed TS changes will allow the RPS to be inoperable in the refuel mode if all rods are fully inserted and electrically disarmed. An "electrically disarmed control rod" is defined in the FitzPatrick TS as follows:

> "To disarm a rod drive electrically, the four amphenol type plug connectors are removed from the drive insert and withdrawal solenoids rendering the rod incapable of withdrawal. This procedure is equivalent to valving out the drive and is preferred. Electrical disarming does not eliminate position indication."

Thus, for each control rod, four amphenol connectors (one for each of the four associated directional control valve DCV) solenoids will be disconnected, preventing power from being applied to the solenoids, thus, preventing DCV operation. With the rods fully inserted and the DCVs disabled (i.e., closed with power removed), the control rod drive collet locking mechanism can not be unlocked/disengaged to allow control rod withdrawal motion. The amphenol connectors and the DCVs (120, 121, 122, and 123) are located at the individual hydraulic control units (HCUs) for each rod. The licensee has stated that once disconnected, the cables will be tagged out of service with red "DO NOT OPERATE" tags in accordance with

procedures and administrative controls which meet the requirements of 10 CFR 50 Appendix B.

When in the refuel mode, neutron monitoring system (NMS) instrumentation indications and alarms are required to be operable and periodically checked in accordance with Sections 3.10 and 4.10 (Limiting Conditions for Operation, and Surveillance Requirements for Core Alterations) of the FitzPatrick TS. This includes daily verification of source range monitor (SRM) operability. In addition, the licensee will perform daily verification of control rod position. The staff has concluded that this combination of daily surveillance and operability of NMS alarms is sufficient to verify subcriticality with the RPS inoperable during refueling. The licensee has stated that the nuclear characteristics of the core assure that the reactor would remain subcritical even if the highest worth control rod were fully withdrawn.

The proposed TS changes will also allow control rod blocks and refueling interlocks associated with rod withdrawal permissives to be inoperable during refueling. The purpose of the control rod blocks and refueling interlocks during refueling are to prevent inadvertent criticality by restricting the movement of control rods. With the control rods fully inserted and electrically disarmed, a rod drop accident is not considered credible since it can not occur in the absence of rod withdrawal. The only other design basis accidents applicable during refueling are fuel assembly drop accidents. The proposed revisions will not increase the probability of a fuel assembly drop accident. Furthermore, neither the RPS nor the control rod blocks and refueling interlocks are designed to prevent or mitigate the consequences of this type of accident. All refueling interlocks not based on control rod position will remain operable. It would not be possible to verify operability of rod blocks and refueling interlocks using rod position as an input with the rods electrically disarmed since rod movement is not possible. The staff has concluded that the proposed TS changes are acceptable since rod movement is not possible, and rod position and core conditions are checked periodically. The licensee has stated that all tests performed as part of the refueling outage that require control rod movement will be performed following restoration of the RPS, control rod blocks, and refueling interlocks to an operable status.

While in the refuel mode with the RPS inoperable, maintenance activities associated with the control rod drive mechanisms (CRDMs) is prohibited. The control rod assemblies are to remain coupled to the CRDMs. The licensee has stated that there will be no activities performed involving the control rod assemblies or drive mechanisms during refueling with the RPS inoperable. In addition, the licensee has stated that at least one train of the standby liquid control system (SLCS) will remain operable at all times during refueling with the RPS inoperable. This will provide the licensee with the capability to inject liquid neutron poison into the reactor vessel if necessary. It is noted that the control rod drive hydraulic system and manual scram circuits will remain operable.

Based on the above evaluation, we have determined that the proposed revisions to the FitzPatrick TS allowing refueling with the RPS and certain specified control rod blocks and refueling interlocks inoperable are acceptable.

3.0 Emergency Circumstances

The FitzPatrick facility shut down for a refueling outage on February 16, 1985. By letter dated February 21, 1985, the licensee informed us that the duration of the outage has been shortened by approximately 5 days because the scheduled completion time for a critical path modification (the installation of valve 10MOV-18 in the RHR system) has been reduced. Additionally, the commencement of refueling operations has been advanced because preparations (vessel disassembly, cavity flood-up, and achievement of satisfactory water quality) have been completed earlier than scheduled and normally anticipated. A delay in issuance of this amendment will preclude simultaneous installation of ATTS components and refueling, resulting in the outage being extended.

4.0 Final No Significant Hazards Consideration Determination

4.1 State Consultation

In accordance with the Commission's regulations, consultation was held with the State of New York by telephone. The State expressed no concern over issuance of this amendment from the standpoint of no significant hazards consideration determination.

4.2 Response to Comments

In response to the FEDERAL REGISTER Notice of February 4, 1985 (50 FR 4929) containing the NRC proposed no significant hazards consideration determination, no comments were received.

4.3 No Significant Hazards Consideration Determination

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations if operation of the facility in accordance with the amendment would not:

(1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or

(2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or

(3) Involve a significant reduction in a margin of safety.

The information in this SE provides the basis for evaluating this license amendment against these criteria.

Since the reactor would be in cold shutdown, the only design basis accidents that could possibly occur, and, therefore, need to be considered are: a rod drop accident, a fuel assembly drop accident in the spent fuel pool, and a refueling accident in which a fuel assembly drops on the core during refueling. The revisions contained in the amendment would not increase the probability of fuel assembly drops. In the unlikely event one occurs, neither the reactor protection system nor the control rod blocks and refueling interlocks could, or are designed to, prevent or mitigate the consequences. A rod drop accident, which is described in Section 14.6.1.2 of the FitzPatrick Final Safety Analysis Report (FSAR), is not considered credible since it cannot occur in the absence of rod withdrawal. Rod motion is physically prevented by electrically disarming all rods as described above. In addition, procedures and administrative controls which meet the requirements of 10 CFR 50 Appendix B will be used to assure that the rods are electrically disarmed. On this basis, the amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The amendment, in addition, would not create the possibility of a new or different kind of accident from any accident previously evaluated. The only events that could be associated with the revisions contained in the amendment have been discussed above. No new possible events can be attributed to these revisions contained in the amendment. Since the revisions apply only when all rods are fully inserted and electrically disarmed, the reactor, in effect, would already be in a scrammed condition. Therefore, under these circumstances, no reduction in safety margin would result from an inoperable RPS. In addition, the nuclear characteristics of the core assure that the reactor would remain subcritical even if the highest worth control rod were able to be fully withdrawn. Thus, this amendment does not involve a significant reduction in a margin of safety.

Accordingly, we conclude that the amendment to Facility Operating License No. DPR-59, which permits refueling operations to proceed with the Reactor Protection System inoperable, involves no significant hazards consideration.

5.0 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. The Commission has also made final no significant hazards consideration finding with respect to this amendment. Accordingly, this 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 this amendment.

6.0 Conclusions

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.

Principal Contributor: R. Kendall

Dated: February 22, 1985