

May 6, 1991

Docket No. 50-410

Mr. B. Ralph Sylvia  
Executive Vice President, Nuclear  
Niagara Mohawk Power Corporation  
301 Plainfield Road  
Syracuse, New York 13212

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Dear Mr. Sylvia:

SUBJECT: ISSUANCE OF AMENDMENT FOR NINE MILE POINT NUCLEAR STATION,  
UNIT 2 (TAC NO. 79811)

The Commission has issued the enclosed Amendment No. 29 to Facility Operating License No. NPF-69 for the Nine Mile Point Nuclear Station Unit 2 (NMP-2). The amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated February 20, 1991.

The amendment revises Technical Specification 4.7.5 to incorporate the recommendations on snubber visual inspection frequencies contained in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." The amendment increases the allowable time interval between visual inspections of snubbers when the snubbers are operating at a high level of dependability. The amendment also makes editorial changes to delete references to tests and inspections required during the first refueling outage since those tests and inspections have been completed.

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:

Donald S. Brinkman, Senior Project Manager  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 29 to NPF-69
- 2. Safety Evaluation

cc w/enclosures:  
See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

May 6, 1991

Docket No. 50-410

Mr. B. Ralph Sylvia  
Executive Vice President, Nuclear  
Niagara Mohawk Power Corporation  
301 Plainfield Road  
Syracuse, New York 13212

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Sincerely,

A handwritten signature in cursive script that reads "Donald S. Brinkman".

Donald S. Brinkman, Senior Project Manager  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 29 to NPF-69
2. Safety Evaluation

cc w/enclosures:  
See next page

Mr. B. Ralph Sylvia  
Niagara Mohawk Power Corporation

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Unit 2

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

NIAGARA MOHAWK POWER CORPORATION

DOCKET NO. 50-410

NINE MILE POINT NUCLEAR STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.29  
License No. NPF-69

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Niagara Mohawk Power Corporation (the licensee) dated February 20, 1991, 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 1;
  - 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. NPF-69 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, as revised through Amendment No. 29 are hereby incorporated into this license. Niagara Mohawk Power Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance to 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: May 6, 1991

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 29 TO FACILITY OPERATING LICENSE NO. NPF-69

DOCKET NO. 50-410

Revise Appendix A as follows:

Remove Pages

xii  
3/4 7-16  
3/4 7-17  
3/4 7-18  
3/4 7-19  
3/4 7-20  
-  
-

Insert Pages

xii  
3/4 7-16  
3/4 7-17  
3/4 7-18  
3/4 7-19  
3/4 7-20  
3/4 7-20a (added)  
3/4 7-20b (added)

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## PLANT SYSTEMS

### 3/4.7.5 SNUBBERS

#### LIMITING CONDITIONS FOR OPERATION

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3.7.5 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements are those installed on non-safety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3 and OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

ACTION: With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.5 on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

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4.7.5 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Snubber Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.5-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.5-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment 29.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result



## PLANT SYSTEMS

### 3/4.7.5 SNUBBERS

#### LIMITING CONDITIONS FOR OPERATION

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##### 4.7.5.c (continued)

of visual inspections shall be classified as unacceptable and may be reclassified as acceptable for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.5.f. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

##### d. Transient Event Inspection

An inspection shall be performed of all snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients, as determined from a review of operational data or a visual inspection of the systems, within 72 hours for accessible areas and within 6 months for inaccessible areas following this determination. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement, or (2) evaluation of in-place snubber piston setting, or (3) stroking the mechanical snubber through its full range of travel.

##### e. Functional Tests

At least once per 18 months during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans for each type of snubber. The sample plan shall be selected before the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected before the test period or the sample plan used in the previous test period shall be implemented:

1. An initial representative sample of at least 10% of the total of each type of snubber shall be functionally tested either in place or in a bench test. For any snubber(s) of a type that do not meet the functional test acceptance criteria of Specification 4.7.5.f, an additional sample of at least 1/2 the size of the initial sample lot shall be tested until the total number tested is equal to the initial sample size multiplied by the factor,  $1 + C/2$ ,

## PLANT SYSTEMS

### 3/4.7.5 SNUBBERS

#### LIMITING CONDITIONS FOR OPERATION

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##### 4.7.5.e (continued)

where C is the total number of snubbers found to be unacceptable or all snubbers in the failure mode group have been tested; or

2. An initial representative sample of 37 snubbers of each type shall be functionally tested in accordance with Figure 4.7.5-1. "C" is the total number of snubbers found not meeting the acceptance requirements of Specification 4.7.5.f. The cumulative number of snubbers of a type tested is denoted by "N." If at any time the point plotted falls in the "Accept" region, testing of snubbers may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers shall be tested until the point falls in the "Accept" region or all the snubbers of that type have been tested.

The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type and reviewed before beginning the testing. The review shall ensure, as far as practical, that they are representative of the various configurations, operating environments, range of size, and capacity of snubbers of each type. Snubbers placed in the same locations as snubbers that failed the previous functional test shall be retested at the time of the next functional test but shall not be included in the sample plan. Testing equipment failure during functional testing may invalidate the day's testing and allow that day's testing to resume anew at a later time provided all snubbers tested with the failed equipment during the day of equipment failure are retested.

If during the functional testing, additional testing is required due to failure of snubbers, the unacceptable snubbers may be categorized into failure mode group(s). A failure mode group shall include all unacceptable snubbers that have a given failure mode and all other snubbers subject to the same failure mode. Once a failure mode group has been established, it can be separated for continued testing apart from the general population of snubbers. However, all unacceptable snubbers in the failure mode group shall be counted as one unacceptable snubber for additional testing in the general population. Testing in the failure mode group shall be based on the number of unacceptable snubbers and shall continue until no more failures are found or all snubbers in the failure mode group have been tested. Any additional unacceptable snubbers found in the failure mode group shall be counted for continued testing only for that test failure mode group. In the event that a snubber(s) becomes included in more than one test failure

PLANT SYSTEMS

3/4.7.5 SNUBBERS

LIMITING CONDITIONS FOR OPERATION

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4.7.5.e (continued)

mode group, it shall be counted in each failure mode group and shall be subject to the corrective action of each test failure mode group.

f. Functional Test Acceptance Criteria

The snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range in both tension and compression;
2. For mechanical snubbers, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel; and

Testing methods may be used to measure parameters indirectly or parameters other than those specified if those results can be correlated to the specified parameters through established methods.

g. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers are attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the designed service.

If any snubber selected for functional testing either fails to lock up or fails to move. i.e., frozen-in-place, the cause will be evaluated and if caused by manufacturer or design deficiency, or unexpected transient event, all snubbers of the same type subject to the same defect shall be functionally tested. Snubbers of the same type subject to the same defect shall be categorized as one failure mode group for the purpose of additional testing per Specification 4.7.5.e.

PLANT SYSTEMS

3/4.7.5 SNUBBERS

LIMITING CONDITIONS FOR OPERATION

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4.7.5 (continued)

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers that fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers that have repairs that might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. Mechanical snubbers shall have met the acceptance criteria subsequent to their most recent service, and the freedom-of-motion test must have been performed within 12 months before being installed in the unit.

i. Snubber Service Life Program

The service life of all snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be determined and established on the basis of engineering information and shall be extended or shortened on the basis of monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replaced shall be documented and the documentation shall be retained in accordance with Specification 6.10.1.2.

TABLE 4.7.5-1

SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

**Note 1:** The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

**Note 2:** Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

TABLE 4.7.5-1 (continued)

SNUBBER VISUAL INSPECTION INTERVAL

- Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.
- Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.
- Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the differences in the numbers in Columns B and C.
- Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 29 TO FACILITY OPERATING LICENSE NO. NPF-69  
NIAGARA MOHAWK POWER CORPORATION  
NINE MILE POINT NUCLEAR STATION, UNIT 2  
DOCKET NO. 50-410

1.0 INTRODUCTION

By letter dated February 20, 1991, the Niagara Mohawk Power Corporation (the licensee) submitted a request for changes to the Nine Mile Point Nuclear Station, Unit 2, Technical Specifications (TS). The requested changes would remove the snubber visual examination schedule in the existing Technical Specifications and replace it with a refueling outage based visual examination schedule, Table 1 of the Generic Letter 90-09 dated December 11, 1990, to all holders of operating licenses or construction permits for nuclear power reactors.

2.0 EVALUATION

The snubber visual examination schedule in the existing Technical Specification is based on the permissible number of inoperable snubbers found during the visual examination. Because the existing snubber visual examination schedule is based only on the absolute number of inoperable snubbers found during the visual examinations irrespective of the total population of snubbers, licensee's with a large snubber population find the visual examination schedule excessively restrictive. The purpose of the alternative visual examination schedule is to allow the licensee to perform visual examinations and corrective actions during plant outages without reduction of the confidence level provided by the existing visual examination schedule. The new visual examination schedule specifies the permissible number of inoperable snubbers for various snubber populations. The basic examination interval is the normal fuel cycle up to 24 months. This interval may be extended to as long as twice the fuel cycle or reduced to as small as two-thirds of the fuel cycle depending on the number of unacceptable snubbers found during the visual examination. The examination interval may vary by  $\pm 25$  percent to coincide with the actual outage.

In the event one or more snubbers are found inoperable during a visual examination, the Limiting Conditions for Operation (LCO) in the present TS require the licensee to restore or replace the inoperable snubber(s) to operable status within 72 hours or declare the attached system inoperable and follow the appropriate action statement for that system. This LCO will remain

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in the TS; however, the permissible number of inoperable snubber(s) and the subsequent visual examination interval will now be determined in accordance with the new visual examination schedule (Table 1 of Generic Letter 90-09 dated December 11, 1990). As noted in the guidance for this line item TS improvement, certain corrective actions may have to be performed depending on the number of inoperable snubbers found. All requirements, for corrective actions and evaluations associated with the use of visual examination schedule and stated in the footnotes 1 thru 7 (Table 1 of Generic Letter 90-09), shall be included in the TS.

The licensee has proposed changes to Specification 4.7.5 that are consistent with the guidance provided in Generic Letter 90-09 for the replacement of the snubber visual examination schedule with Table 1 (including footnotes 1 thru 7) of the Generic Letter 90-09. On the basis of its review of this matter, the staff finds that the proposed changes to the TS for Nine Mile Point Unit No. 2 are acceptable.

The current technical specifications refer to the first refueling outage as (1) the first inspection period for functional testing of snubbers and as (2) the second inspection period for visual inspection of snubbers. The functional tests and visual inspections required during the first refueling outage were completed during the first refueling outage which was completed during January 1991. Since these required actions were completed during the first refueling outage, the licensee has proposed deletion of references to these requirements. The staff finds these proposed deletions acceptable since they are purely editorial type changes and the required functional tests and visual inspection have been completed.

### 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 (56 FR 13657). 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:  
J. Rajan

Date: May 6, 1991