



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

May 3, 2001

Mr. Nathan L. Haskell, Director
Licensing and Performance Assessment
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT RE: TECHNICAL SPECIFICATIONS TASK FORCE CHANGE NO. 287, "VENTILATION SYSTEM ENVELOPE ALLOWED OUTAGE TIME" (TAC NO. MB0869)

Dear Mr. Haskell:

The Commission has issued the enclosed Amendment No. 197 to Facility Operating License No. DPR-20 for the Palisades Plant. The amendment consists of changes to the Technical Specifications (TSs) in response to a portion of your application dated December 7, 2000.

The amendment changes the TSs in accordance with changes to the "Standard Technical Specifications, Combustion Engineering Plants," NUREG 1432, Revision 1, made by the Nuclear Energy Institute Technical Specifications Task Force Change Number 287, Revision 5, addressing allowances for breach of the control room envelope. Also, the action table for TS Limiting Condition for Operation 3.7.10 is corrected by restoring Required Action D.2 (now renumbered to E.2), which was inadvertently omitted in Amendment No. 189, issued on November 30, 1999.

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

Handwritten signature of Claudia M. Craig in cursive script.

Darl S. Hood, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosures: 1. Amendment No. 197 to DPR-20
2. Safety Evaluation

cc w/encls: See next page

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/RA by C. Craig for/
Darl S. Hood, Senior Project Manager, Section 1
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Docket No. 50-255

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cc w/encls: See next page

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PDIII-1 Reading
CCraig
DHood
RBouling
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SMiranda
RGiardina

*Provided SE Input by memo

OFFICE	PDIII-1/PM	PDIII-1/PM	PDIII-1/LA	RTSB/SC*	OGC	PDIII-1/SC
NAME	SMiranda	DHood	RBouling	RDennig	S. Hood	CCraig
DATE	4/20/01	4/23/01	4/18/01	3/16/01	4/30/01	5/2/01

Palisades Plant

cc:

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January 2000



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

CONSUMERS ENERGY COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 197
License No. DPR-20

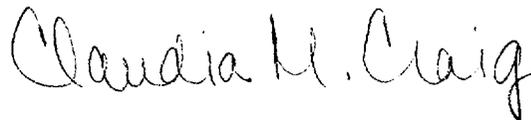
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consumers Energy Company (the licensee) dated December 7, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules 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;
 - 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 the license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-20 is hereby amended to read as follows:

The Technical Specifications contained in Appendix A, as revised through Amendment No. 197 , and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Consumers Energy Company 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 issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: May 3, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 197

FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

3.7.10-1
3.7.10-2
3.7.10-3
B 3.7.10-3
B 3.7.10-4
B 3.7.10-5
B 3.7.10-6
-

INSERT

3.7.10-1
3.7.10-2
3.7.10-3
B 3.7.10-3
B 3.7.10-4
B 3.7.10-5
B 3.7.10-6
B 3.7.10-7

3.7 PLANT SYSTEMS

3.7.10 Control Room Ventilation (CRV) Filtration

LCO 3.7.10 Two CRV Filtration trains shall be OPERABLE.

-----NOTE-----
The control room boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, 4,
During CORE ALTERATIONS,
During movement of irradiated fuel assemblies,
During movement of a fuel cask in or over the Spent Fuel Pool (SFP).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CRV Filtration train inoperable.	A.1 Restore CRV Filtration train to OPERABLE status.	7 days
B. Two CRV Filtration trains inoperable due to inoperable control room boundary in MODE 1, 2, 3, or 4.	B.1 Initiate preplanned compensatory measures. <u>AND</u> B.2 Restore control room boundary to OPERABLE status.	Immediately 24 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, 3, or 4.	C.1 Be in MODE 3. <u>AND</u> C.2 Be in MODE 5.	6 hours 36 hours

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A not met during CORE ALTERATIONS, during movement of irradiated fuel assemblies, or during movement of a fuel cask in or over the SFP.</p>	<p>D.1 Place OPERABLE CRV Filtration train in emergency mode.</p> <p><u>OR</u></p> <p>D.2.1 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>D.2.2 Suspend movement of irradiated fuel assemblies.</p> <p><u>AND</u></p> <p>D.2.3 Suspend movement of a fuel cask in or over the SFP.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
<p>E. Two CRV Filtration trains inoperable during CORE ALTERATIONS, during movement of irradiated fuel assemblies, or during movement of a fuel cask in or over the SFP.</p>	<p>E.1 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>E.2 Suspend movement of irradiated fuel assemblies.</p> <p><u>AND</u></p> <p>E.3 Suspend movement of a fuel cask in or over the SFP.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two CRV Filtration trains inoperable in MODE 1, 2, 3, or 4 for reasons other than Condition B.	F.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.10.1	Operate each CRV Filtration train for ≥ 10 continuous hours with associated heater (VHX-26A or VHX-26B) operating.	31 days
SR 3.7.10.2	Perform required CRV Filtration filter testing in accordance with Ventilation Filter Testing Program.	In accordance with the Ventilation Filter Testing Program
SR 3.7.10.3	<p>-----NOTE----- Only required to be met in MODES 1, 2, 3, and 4, and during movement of irradiated fuel assemblies in containment. -----</p> <p>Verify each CRV Filtration train actuates on an actual or simulated actuation signal.</p>	18 months
SR 3.7.10.4	Verify one CRV Filtration train can maintain a positive pressure of ≥ 0.125 inches water gauge, relative to the adjacent area during the emergency mode of operation, at an emergency ventilation flow rate of ≥ 3040 cfm and ≤ 3520 cfm.	18 months

BASES

LCO
(continued)

The CRV Filtration is considered OPERABLE when the individual components necessary to control operator exposure are OPERABLE in both trains. A CRV Filtration train is considered OPERABLE when the associated:

- a. Main recirculation fan and emergency filter fan are OPERABLE;
- b. HEPA filters and charcoal adsorber are not excessively restricting flow, and are capable of performing their filtration functions; and
- c. Required heater, ductwork, valves, and dampers are OPERABLE,

In addition, the control room boundary must be maintained, including the integrity of the walls, floors, ceilings, ductwork, and access doors such that 0.125 inches water gauge positive pressure can be maintained in the emergency mode.

This LCO is modified by a Note allowing the control room boundary to be opened intermittently under administrative control. Since this Note modifies the LCO, no Condition entry is required when the control room boundary is opened under its provisions. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control room isolation is indicated.

APPLICABILITY

In MODES 1, 2, 3, and 4, the CRV Filtration must be OPERABLE to limit operator exposure during and following a DBA.

In MODES 5 and 6, the probability and consequences of a Design Basis Accident are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining CRV Filtration OPERABLE is not required in MODE 5 or 6, except for the following situations under which significant radioactive releases can be postulated:

- a. During CORE ALTERATIONS;
- b. During movement of irradiated fuel assemblies; and
- c. During movement of a fuel cask in or over the SFP.

BASES

ACTIONS

A.1

With one CRV Filtration train inoperable, action must be taken to restore OPERABLE status within 7 days. In this Condition, the remaining OPERABLE CRV Filtration subsystem is adequate to perform control room radiation protection function. However, the overall reliability is reduced because a single failure in the OPERABLE CRV Filtration train could result in loss of CRV Filtration function. The 7 day Completion Time is based on the low probability of a DBA occurring during this time period, and the ability of the remaining train to provide the required capability.

B.1 and B.2

If the control room boundary is inoperable in MODE 1, 2, 3, or 4, the CRV Filtration trains cannot perform their functions. Actions must be taken to restore an OPERABLE control room boundary within 24 hours. During the period that the control room boundary is inoperable, appropriate compensatory measures (consistent with the intent of General Design Criterion 19) shall be utilized to protect control room operators from potential hazards such as radioactive contamination, toxic chemicals, or smoke, and to ensure control room physical security. Preplanned measures shall be available to address these concerns for intentional entry into the Condition. The 24 hour Completion Time is reasonable based on the low probability of an analyzed event requiring control room isolation occurring during this time period, and the use of compensatory measures. The 24 hour Completion Time is a reasonable time to diagnose and repair most problems occurring with the control room boundary.

C.1 and C.2

If the inoperable CRV Filtration train or control room boundary cannot be restored to OPERABLE status within the required Completion Time of Condition A or B in MODE 1, 2, 3, or 4, the plant must be placed in a MODE that minimizes the accident risk. To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

BASES

ACTIONS
(continued)

D.1, D.2.1, D.2.2, and D.2.3

During CORE ALTERATIONS, during movement of irradiated fuel assemblies, during movement of a fuel cask in or over the SFP, if Required Action A.1 cannot be completed within the required Completion Time, the OPERABLE CRV Filtration train must be immediately placed in the emergency mode of operation. This action ensures that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that could result in a release of radioactivity that might require isolation of the control room. This places the plant in a condition that minimizes the accident risk. This does not preclude the movement of fuel assemblies or a fuel cask to a safe position.

E.1, E.2, and E.3

During CORE ALTERATIONS, during movement of irradiated fuel assemblies, or during movement of a fuel cask in or over the SFP, with two CRV Filtration trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might enter the control room. This places the plant in a condition that minimizes the accident risk. This does not preclude the movement of fuel assemblies or a fuel cask to a safe position.

E.1

If both CRV Filtration trains are inoperable in MODE 1, 2, 3, or 4 for reasons other than an inoperable control room boundary (i.e., Condition B), the CRV Filtration may not be capable of performing the intended function and the plant is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.7.10.1

Standby systems should be checked periodically to ensure that they function properly. Since the environment and normal operating conditions on this system are not severe, testing each train once every month provides an adequate check on this system.

Monthly heater operations dry out any moisture accumulated in the charcoal from humidity in the ambient air. Each train must be operated for ≥ 10 continuous hours with the associated heater, VHX-26A or VHX-26B, energized. The 31 day Frequency is based on the known reliability of the equipment, and the two train redundancy available.

SR 3.7.10.2

This SR verifies that the required CRV Filtration testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The CRV Filtration filter tests are in accordance with Regulatory Guide 1.52 (Ref. 3) as described in the VFTP. The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.10.3

This SR verifies each CRV Filtration train starts and operates on an actual or simulated actuation signal. Specific signals (e.g., containment high pressure, containment high radiation) are tested under Section 3.3, "Instrumentation." This SR is modified by a Note which states this SR is only required to be met in MODES 1, 2, 3 and 4 and during movement of irradiate fuel assemblies in containment. The instrumentation providing the input signal is not required in these plant conditions, therefore, to keep consistency with Section 3.3, "Instrumentation," the SR is not required to be met. The Frequency of 18 months is consistent with that specified in Reference 3.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.7.10.4

This SR verifies the integrity of the control room enclosure and the assumed inleakage rates of potentially contaminated air. The control room positive pressure, with respect to potentially contaminated adjacent areas, is periodically tested to verify proper function of the CRV Filtration. During the emergency mode of operation, the CRV Filtration is designed to pressurize the control room ≥ 0.125 inches water gauge positive pressure with respect to adjacent areas in order to prevent unfiltered inleakage. The CRV Filtration is designed to maintain this positive pressure with one train at an emergency ventilation flow rate of ≥ 3040 cfm and ≤ 3520 cfm. The Frequency of 18 months is consistent with the guidance provided in NUREG-0800, Section 6.4 (Ref. 4).

REFERENCES

1. FSAR, Section 9.8
 2. FSAR, Chapter 14
 3. Regulatory Guide 1.52 (Rev. 2)
 4. NUREG-0800, Section 6.4, Rev. 2, July 1981
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 197 TO FACILITY OPERATING LICENSE NO. DPR-20

CONSUMERS ENERGY COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By application dated December 7, 2000, Consumers Energy Company (the licensee) requested an amendment to the Technical Specifications (TSs) for the Palisades Plant. This safety evaluation addresses the portion of the December 7, 2000, application relating to Technical Specifications Task Force (TSTF) Change Number 287, Revision 5 (TSTF-287R5), "Ventilation System Envelope Allowed Outage Time." The proposed amendment would change the TSs in accordance with changes to the "Standard Technical Specifications [STS], Combustion Engineering Plants," NUREG 1432, Revision 1, made by the Nuclear Energy Institute Technical Specifications Task Force (TSTF) change number 287, revision 5 (TSTF-287R5), addressing allowances for breach of the control room envelope. Also, the action table for TS Limiting Condition for Operation (LCO) 3.7.10 would be corrected by restoring Required Action D.2 (now renumbered to E.2), which was inadvertently omitted in Amendment No. 189, issued on November 30, 1999, which converted the TSs to improved TSs (ITS). Specifically, the following changes to the Palisades TSs are proposed in accordance with TSTF-287R5:

A. Changes to TS 3.7.10, Control Room Ventilation Filtration

1. A note would be added allowing the control room boundary to be opened intermittently under administrative control.
2. A new Condition B is would be added which addresses an inoperable control room boundary. The subsequent conditions and required actions would be renumbered accordingly. Editorial changes would be made to the wording of the conditions.

B. Correction to the Action Table of TS 3.7.10

STS Required Action D.2, which was inadvertently omitted in Amendment No. 189, would be added and renumbered as E.2.

The December 7, 2000, application also forwarded associated changes to the TS Bases.

In addition, the licensee requested additional changes based upon TSTFs other than TSTF-287R5. The NRC staff will address those changes by separate correspondence.

2.0 EVALUATION

The proposed changes, outlined in TSTF-287R5, are evaluated below:

2.1 Changes to TS 3.7.10, "Control Room Ventilation Filtration"

A note is added to the LCO allowing the control room boundary to be opened intermittently under administrative control. Corresponding TS Bases have been added which establish the administrative controls that minimize the consequences of the open boundary. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control room area isolation is indicated. This change is consistent with approved TSTF-287R5 and is acceptable.

A new Condition B is added which addresses an inoperable control room boundary. All other conditions have been editorially re-labeled to support this change. Corresponding TS Bases are added to support this change. If the control room boundary is inoperable in MODES 1, 2, 3, and 4, such that the control room ventilation filtration trains cannot establish or maintain the required pressure, action will be taken to restore an operable control room boundary within 24 hours. The 24-hour completion time is reasonable based on the low probability of a design-basis accident occurring during this time period and compensatory measures available to the operator to minimize the consequences of potential hazards.

The proposed changes allow 24 hours (during Modes 1, 2, 3, and 4) to restore the capability to maintain control room boundary pressure before requiring the plant operators to perform an orderly shutdown. The proposed changes also allow intermittent opening of the control room boundary under administrative control. While the control building boundary is inoperable, appropriate compensatory measures consistent with the intent of General Design Criterion (GDC) 19 in 10 CFR Part 50, Appendix A, will be utilized to ensure physical security and to protect the control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature, and relative humidity. These preplanned measures will be available to address these concerns for intentional and unintentional entry into the condition. For example, when the control room boundary is opened for other than entry through doors, the TS Bases state that, in addition to other necessary measures, a dedicated individual will be stationed in the area in continuous contact with the control room to rapidly restore the boundary.

On the basis of its review of the licensee's application for amendment, the low probability of an event occurring during the 24-hour action Completion Time associated with Condition B, and the availability of compensatory measures consistent with GDC 19 to minimize the consequences during an event, the NRC staff concludes that the proposed TS changes are in conformance with TSTF-287R5 and are acceptable. The NRC staff does not object to the licensee's changes to the TS Bases.

2.2 Editorial Correction to the Action Table of TS 3.7.10

STS Required Action D.2 was inadvertently omitted in Amendment No. 189, which did not specifically approve any such omission. The current amendment corrects this omission by adding this Action, and renumbering it as E.2 for editorial consistency. Action E.2 requires that movement of irradiated fuel assemblies be immediately suspended if two control room ventilation filtration trains are inoperable during core alterations, during movement of irradiated fuel assemblies, or during movement of a fuel cask in or over the spent fuel pool. The NRC staff finds that this administrative change is consistent with the STS and TSTF-287R5 and is, therefore, acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. 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 (66 FR 7678). 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: R. Giardina

Date: May 3, 2001