

50-277/278



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

April 18, 1995

Mr. George A. Hunger, Jr.
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: HIGH PRESSURE COOLANT INJECTION SYSTEM SURVEILLANCE REQUIREMENTS,
PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3 (TAC NOS.
M90698 AND M90699)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendments Nos. 200 and 202 to Facility Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. These amendments consist of changes to the Technical Specifications (TS) in response to your application dated October 25, 1994, as supplemented by letter dated February 13, 1995.

These amendments clarify the TS surveillance requirements and bases for high pressure coolant injection system testing at low reactor pressure.

By letter dated October 24, 1994, you indicated your intent to submit a TS change request to clarify the TS regarding surveillance testing of the reactor core isolation cooling (RCIC) system. However, the staff notes that your September 29, 1994 application to implement improved Technical Specifications clarifies the RCIC surveillance requirements. That application is currently under staff review. Therefore, you need not send in the additional RCIC TS change request described in your October 24, 1994 letter.

You are requested to inform the staff when you have implemented the provisions of these amendments.

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

Sincerely,
/s/

Joseph W. Shea, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-277/50-278

Enclosures:

- 1. Amendment No. 200 to DPR-44
- 2. Amendment No. 202 to DPR-56
- 3. Safety Evaluation

cc w/encls:
See next page

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*subject to
 noted changes
 OK. m 4/11/95*

*Previous Concurrence

OFFICE	LA:PDI2:DRPE	PM:PDI2:DRPE	C:SRXB:DSSA	OGC	PDI-2:DRPE
NAME	MO'Brien	JShea	RJones *	OPW	JStolz
DATE	4/11/95	4/11/95	01/30/95	4/11/95	4/13/95

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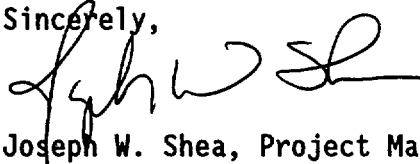
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G. Hunger, Jr.

- 2 -

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

Sincerely,



Joseph W. Shea, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-277/50-278

Enclosures:

1. Amendment No. 200 to DPR-44
2. Amendment No. 202 to DPR-56
3. Safety Evaluation

cc w/encls: See next page

Mr. George A. Hunger, Jr.
PECO Energy Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

J. W. Durham, Sr., Esquire
Sr. V.P. & General Counsel
PECO Energy Company
2301 Market Street, S26-1
Philadelphia, Pennsylvania 19101

Mr. Rich R. Janati, Chief
Division of Nuclear Safety
Pennsylvania Department of
Environmental Resources
P. O. Box 8469
Harrisburg, Pennsylvania 17105-8469

PECO Energy Company
ATTN: Mr. G. R. Rainey, Vice President
Peach Bottom Atomic Power Station
Route 1, Box 208
Delta, Pennsylvania 17314

Board of Supervisors
Peach Bottom Township
R. D. #1
Delta, Pennsylvania 17314

PECO Energy Company
ATTN: Regulatory Engineer, A4-5S
Peach Bottom Atomic Power Station
Route 1, Box 208
Delta, Pennsylvania 17314

Public Service Commission of Maryland
Engineering Division
Chief Engineer
6 St. Paul Centre
Baltimore, MD 21202-6806

Resident Inspector
U.S. Nuclear Regulatory Commission
Peach Bottom Atomic Power Station
P.O. Box 399
Delta, Pennsylvania 17314

Mr. Richard McLean
Power Plant and Environmental
Review Division
Department of Natural Resources
B-3, Tawes State Office Building
Annapolis, Maryland 21401

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

Mr. John Doering, Chairman
Nuclear Review Board
PECO Energy Company
965 Chesterbrook Boulevard
Mail Code 63C-5
Wayne, Pennsylvania 19087

Mr. Roland Fletcher
Department of Environment
201 West Preston Street
Baltimore, Maryland 21201

Dr. Judith Johnsrud
National Energy Committee
Sierra Club
433 Orlando Avenue
State College, PA 16803

A. F. Kirby, III
External Operations - Nuclear
Delmarva Power & Light Company
P.O. Box 231
Wilmington, DE 19899



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

PECO ENERGY COMPANY

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-277

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 200
License No. DPR-44

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by PECO Energy Company, et al. (the licensee) dated October 25, 1994, as supplemented by letter dated February 13, 1995, 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 or 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-44 is hereby amended to read as follows:

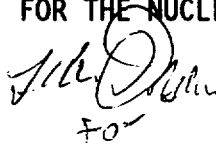
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(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 200, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 18, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 200

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove

Insert

129

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PBAPS

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS3.5.C HPCI Subsystem (cont'd.)4.5.C HPCI Subsystem (cont'd.)

<u>Item</u>	<u>Frequency</u>
(b) Pump Operability	Once/month
(c) Motor Operated Valve Operability	Once/month
(d) Flow Rate at approximately 1030 psig Reactor Steam Pressure	Once/3 months
(e) Verify, with reactor pressure ≤ 175 psig, the HPCI pump can develop a flow rate ≥ 5000 gpm against a system head corresponding to reactor pressure.*	Once/operating cycle

2. From and after the date that the HPCI Subsystem is made or found to be inoperable for any reason, continued reactor operation is permissible only during the succeeding seven days unless such subsystem is sooner made operable, providing that during such seven days all active components of the ADS subsystem, the RCIC system, the LPCI subsystem and both core spray subsystems are operable.
3. If the requirements of 3.5.C cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a Cold Shutdown Condition within 24 hours.

The HPCI pump shall deliver at least 5000 gpm for a system head corresponding to a reactor pressure of approximately 1030 to 150 psig.

2. DELETED

* Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test.

4.5 BASESCore and Containment Cooling Systems Surveillance Frequencies

The performance of individual emergency core cooling systems (HPCI, LPCI, Core Spray and ADS) and the integrated performance of the emergency core cooling systems are described in analyses referenced in Section 6.5 of the Updated Final Safety Analysis Report. Periodic surveillance of pumps and valves is performed in accordance with ASME Code, Section XI, to the extent described in the Inservice Testing Plan, to verify that the systems will provide the flow rates required by the respective analyses. HPCI and RCIC flow tests are performed at two pressures so that the systems' capability to provide rated flow over their operating range is verified. Reactor steam pressure must be ≤ 1030 and ≥ 920 psig to perform the high pressure test and greater than or equal to the Electro-Hydraulic Control (EHC) System minimum pressure set with the EHC System controlling pressure (EHC System begins controlling pressure at a nominal 150 psig) and ≤ 175 psig to perform TS 4.5.C.1.e. To avoid damaging Core Spray system valves during Core Spray pump flow testing, throttling is not normally performed to obtain a system head corresponding to a reactor pressure of ≥ 105 psig. Pump curves are used to determine equivalent values for flow rate and test pressure for the Core Spray pumps in order to meet the Surveillance Requirements. HPSW flow tests verify that rated flow can be delivered to the RHR heat exchangers.

The testing interval for the core and containment cooling systems is based on industry practice, sound engineering judgment and practicality. The core cooling systems have not been designed to be fully testable during operation. For example, in the case of the HPCI, automatic initiation during power operation would result in pumping cold water into the reactor vessel which is not desirable. Complete ADS testing during power operation causes an undesirable loss-of-coolant inventory. To increase the availability of the core and containment cooling systems, the components which make up the system; i.e., instrumentation, pumps, valves, etc., are tested frequently. The pumps and motor operated injection valves are also tested each month to assure their operability. A simulated automatic actuation test once each cycle combined with frequent tests of the pumps and injection valves is deemed to be adequate testing of these systems.

The flow path piping of the emergency core cooling systems (ECCS) has the potential to develop voids and pockets of entrained air. Maintaining the pump discharge lines of the HPCI system, Core Spray system, and LPCI subsystems full of water ensures that the ECCS will perform properly, injecting its full capacity into the reactor pressure vessel upon demand. This will also prevent a water hammer following an ECCS initiation signal. One acceptable method of ensuring that the lines are full is to vent at the high points. An acceptable method of ensuring the LPCI and Core Spray system discharge lines are full is to verify the absence of the associated "keep fill" system accumulator alarms.

While the reactor is in the Cold Condition one low pressure ECCS subsystem can maintain adequate reactor vessel water level. To provide redundancy, a minimum of two low pressure ECCS subsystems are required to be OPERABLE with the reactor in the Cold Condition.



UNITED STATES
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WASHINGTON, D.C. 20555-0001

PECO ENERGY COMPANY

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-278

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 202
License No. DPR-56

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by PECO Energy Company, et al. (the licensee) dated October 25, 1994, as supplemented by letter dated February 13, 1995, 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 or 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-56 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No.202, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION



for

John F. Stolz, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 18, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 202

FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove

Insert

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PBAPS

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<u>Item</u>	<u>Frequency</u>
(b) Pump Operability	Once/month
(c) Motor Operated Valve Operability	Once/month
(d) Flow Rate at approximately 1000 psig Reactor Steam Pressure	Once/3 months
(e) Verify, with reactor pressure ≤ 175 psig, the HPCI pump can develop a flow rate ≥ 5000 gpm against a system head corresponding to reactor pressure.*	Once/operating cycle

2. From and after the date that the HPCI Subsystem is made or found to be inoperable for any reason, continued reactor operation is permissible only during the succeeding seven days unless such subsystem is sooner made operable, providing that during such seven days all active components of the ADS subsystem, the RCIC system, the LPCI subsystem and both core spray subsystems are operable.
3. If the requirements of 3.5.C cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a Cold Shutdown Condition within 24 hours.

The HPCI pump shall deliver at least 5000 gpm for a system head corresponding to a reactor pressure of 1000 to 150 psig.

2. DELETED

* Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test.

4.5 BASESCore and Containment Cooling Systems Surveillance Frequencies

The performance of individual emergency core cooling systems (HPCI, LPCI, Core Spray and ADS) and the integrated performance of the emergency core cooling systems are described in analyses referenced in Section 6.5 of the Updated Final Safety Analysis Report. Periodic surveillance of pumps and valves is performed in accordance with ASME Code, Section XI, to the extent described in the Inservice Testing Plan, to verify that the systems will provide the flow rates required by the respective analyses. HPCI and RCIC flow tests are performed at two pressures so that the systems' capability to provide rated flow over their operating range is verified. Reactor steam pressure must be ≤ 1030 and ≥ 920 psig to perform the high pressure test and greater than or equal to the Electro-Hydraulic Control (EHC) System minimum pressure set with the EHC System controlling pressure (EHC System begins controlling pressure at a nominal 150 psig) and ≤ 175 psig to perform TS 4.5.C.1.e. To avoid damaging Core Spray system valves during Core Spray pump flow testing, throttling is not normally performed to obtain a system head corresponding to a reactor pressure of ≥ 105 psig. Pump curves are used to determine equivalent values for flow rate and test pressure for the Core Spray pumps in order to meet the Surveillance Requirements. HPSW flow tests verify that rated flow can be delivered to the RHR heat exchangers.

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While the reactor is in the Cold Condition one low pressure ECCS subsystem can maintain adequate reactor vessel water level. To provide redundancy, a minimum of two low pressure ECCS subsystems are required to be OPERABLE with the reactor in the Cold Condition.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 200 AND 202 TO FACILITY OPERATING

LICENSE NOS. DPR-44 and DPR-56

PECO ENERGY COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

By letter dated October 25, 1994, as supplemented by letter dated February 13, 1995, the PECO Energy Company (the licensee) submitted a request for changes to the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, (Peach Bottom, PBAPS) Technical Specifications (TS). The requested changes would clarify the Technical Specification surveillance requirements and bases for the high pressure coolant injection (HPCI) system testing at low reactor pressure. The February 13, 1995, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

The high pressure coolant injection system is one of the core standby cooling systems installed at Peach Bottom whose objective, in conjunction with primary and secondary containment features, is to limit the release of radioactive material to the environment following a loss of coolant accident (LOCA). The HPCI system is provided to ensure that the reactor is adequately cooled to limit fuel-clad temperature in the event of a small break in the nuclear pressure boundary and subsequent loss of coolant which does not cause the rapid depressurization of the reactor vessel. The HPCI system consists of a steam turbine driven pump, piping, valves and controls necessary to meet the above objective.

In order to assure the ability of the system to meet its design objectives, surveillance requirements are included for the HPCI system in the TS. One of the existing requirements, TS 4.5.C.1.e, currently states "HPCI Subsystem testing shall be performed as follows: ... (e) Flow Rate at 150 psig Steam Pressure." The test frequency is currently specified as once-per-operating cycle. A separate surveillance requirement, 4.5.C.1.d, specifies that the HPCI subsystem flow rate be tested at 1000 psig steam pressure once per three months. HPCI flow rate tests are specified at these two separate pressures in order to verify the system's capability to provide rated flow over its

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operating range.

During NRC inspection 50-277/90-200 and 50-278/90-200, the NRC staff identified that the licensee had previously performed the surveillance test associated with SR 4.5.C.1.e at pressures greater than 150 psig (160 psig) although no allowance for a range of test pressures was allowed by the existing TS (Unresolved Item (URI) 90-200-12). The licensee stated in response to URI 90-200-12 that PBAPS TS would be converted to the improved Standard TS (iSTS) which would provide a range of acceptable test pressures. By letter dated September 29, 1994, the licensee applied to convert the Peach Bottom TS to an improved STS version based on NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," dated September 1992.

The license amendment request evaluated in this SE clarifies the requirements of TS 4.5.C.1.e in advance of staff review of the improved TS conversion application.

In order to test the HPCI system at low pressure, a stable steam supply pressure must be established and maintained. At Peach Bottom, operating experience has shown that steam pressures as high as 175 psig are needed before the electro-hydraulic control system can provide stable steam pressure regulation. PECO has proposed to revise TS 4.5.C.1.e to reflect the words of NUREG-1433. The revised wording states that for the HPCI Subsystem, on a once-per cycle frequency, "verify, with reactor pressure \leq 175 psig the HPCI pump can develop a flow rate \geq 5000 gpm against a system head corresponding to reactor pressure." The licensee has also proposed a footnote to 4.5.C.1.e which states that "Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test." The licensee has also proposed to revise the associated TS bases to reflect the need to have stable reactor pressure for performing the HPCI low pressure test.

The licensing analysis of record with regard to emergency core cooling system performance is NEDC-32163P, "Peach Bottom Atomic Power Station, Units 2 and 3 SAFER/GESTR-LOCA Loss of Coolant Accident Analysis" dated January 1993 (SAFER/GESTR). The SAFER GESTR report states that the minimum assumed operating pressure for the HPCI system is 150 psid (vessel to drywell). The proposed revision to the SR would allow the HPCI system not to be periodically tested down to the assumed minimum value. The licensee states that the effect on analytical results of raising the assumed minimum HPCI operating pressure to 175 psig, in the SAFER/GESTR analysis is insignificant. The staff accepts the licensee's assertion by recognizing that the low pressure coolant injection system and the low pressure core spray system are assumed in SAFER/GESTR to inject up to a maximum of 295 psid and 289 psid respectively. These maximum injection pressures provide sufficient overlap with the assumed range of injection pressures for the HPCI system. In addition, the automatic depressurization system (ADS) is capable of depressurizing the reactor vessel down to the range of low pressure system operation.

The staff has reviewed the licensee's proposed changes. The proposed SR

wording implements the wording of NUREG-1433 and clarifies existing requirements. The impact of raising HPCI surveillance test pressure on overall emergency core cooling system performance is minimal for the reasons articulated in the preceding paragraph. For these reasons, the staff finds the licensee's proposed changes acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change 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 change the surveillance requirements. The NRC staff has determined that the 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 the amendments involve no significant hazards consideration, and there has been no public comment on such finding (59 FR 55498). Accordingly, the amendments meet 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 amendments.

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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Shea

Date: April 18, 1995