March 10, 1988

Docket No.: 50-352

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Mr. Edward G. Bauer, Jr.
Vice President and General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: SECONDARY CONTAINMENT INTEGRITY (TAC NO. 65049)

RE: LIMERICK GENERATING STATION, UNIT 1

The Commission has issued the enclosed Amendment No. 8 to Facility Operating License No. NPF-39 for the Limerick Generating Station, Unit 1. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated March 23, 1987.

This amendment revises the Technical Specifications (TSs) to include consideration of wind speed during verification of reactor enclosure secondary containment integrity.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by
Richard J. Clark

Richard J. Clark, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 8 to License No. NPF-39
2. Safety Evaluation

cc w/enclosures:
See next page

PDI-2/LA	PDI-2/PM	OGC	PDI-2/D
MO'Brien	RClark	SHLewis	WButler
3/10/88	02/18/88	2/24/88	3/10/88

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

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See next page

Mr. Edward G. Bauer, Jr
Philadelphia Electric Company

Limerick Generating Station
Units 1 & 2

cc:
Troy B. Conner, Jr., Esquire
Conner and Wetterhahn
1747 Pennsylvania Ave., N.W.
Washington, D. C. 20006

Mr. Charles Mengers S7-1
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Mr. David Honan N2-1
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Mr. Grahm M. Leitch, Acting Plant Manager
Limerick Generating Station
Post Office Box A
Sanatoga, Pennsylvania 19464

Mr. James Linville
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Mr. Robert Gramm
Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 58
Sanatoga, Pennsylvania 19464

Chairman Board of Supervisors of
Limerick Township
646 West Ridge Pike
Limerick, Pennsylvania 19468

Dept of Environmental Resources
ATTN: Director, Office Radiologic
Health
P. O. Box 2063
Harrisburg, Pennsylvania 17105

Thomas Gerusky, Director
Bureau of Radiation Protection
PA Dept. of Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

Governor's Office of State
Planning and Development
ATTN: Coordinator, Pennsylvania
State Clearinghouse
P. O. Box 1323
Harrisburg, Pennsylvania 17102

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

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 8
License No. NPF-39

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

   A. The application for amendment by Philadelphia Electric Company (the licensee) dated March 23, 1987, 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. NPF-39 is hereby amended to read as follows:

   Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 8 , are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION

/s/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 10, 1988

PDI-2/LA	PDI-2/PM	OGC	PDI-2/D
MO'Brien	RClark	S HLewis	WButler
3/10/88	02/18/88	2/24/88	3/10/88

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FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 10, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 8

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf page is provided to maintain document completeness.*

Remove	Insert
xxi	xxi
xxii*	xxii*
3/4 6-45*	3/4 6-45*
3/4 6-46	3/4 6-46
B 3/4 6-5*	B 3/4 6-5*
B 3/4 6-5a	B 3/4 6-6

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SURVEILLANCE REQUIREMENTS

4.6.4.1 Each suppression chamber - drywell vacuum breaker shall be:

a. Verified closed at least once per 7 days.

b. Demonstrated OPERABLE:

1. At least once per 31 days and within 2 hours after any discharge of steam to the suppression chamber from the safety/relief valves, by cycling each vacuum breaker through at least one complete cycle of full travel.

2. At least once per 31 days by verifying both position indicators OPERABLE by observing expected valve movement during the cycling test.

3. At least once per 18 months by;

a) Verifying each valve's opening setpoint, from the closed position, to be 0.5 psid ± 5%, and

b) Verifying both position indicators OPERABLE by performance of a CHANNEL CALIBRATION.

c) Verifying that each outboard valve's position indicator is capable of detecting disk displacement $\geq$0.050", and each inboard valve's position indicator* is capable of detecting disk displacement $\geq$0.120".

3/4.6.5 SECONDARY CONTAINMENT

REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.5.1.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

Without REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY, restore REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.5.1.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall be demonstrated by:

a. Verifying at least once per 24 hours that the pressure within the reactor enclosure secondary containment is greater than or equal to 0.25 inch of vacuum water gauge.

b. Verifying at least once per 31 days that:

   1. All reactor enclosure secondary containment equipment hatches and blowout panels are closed and sealed.

   2. At least one door in each access to the reactor enclosure secondary containment is closed.

   3. All reactor enclosure secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers/valves and required to be closed during accident conditions are closed by valves, blind flanges, slide gate dampers or deactivated automatic dampers/valves secured in position.

c. At least once per 18 months:

   1. Verifying that one standby gas treatment subsystem will draw down the reactor enclosure secondary containment to greater than or equal to 0.25 inch of vacuum water gauge in less than or equal to 121 seconds with the reactor enclosure recirc system in operation, and

   2. Operating one standby gas treatment subsystem for one hour and maintaining greater than or equal to 0.25 inch of vacuum water gauge in the reactor enclosure secondary containment at a flow rate not exceeding 1250 cfm with wind speeds of $\leq$ 7.0 mph as measured on the wind instrument on Tower 1 elevation 30' or, if that instrument is unavailable, Tower 2, elevation 159'.

3/4.6.5 SECONDARY CONTAINMENT

Secondary containment is designed to minimize any ground level release of radioactive material which may result from an accident. The Reactor Enclosure and associated structures provide secondary containment during normal operation when the drywell is sealed and in service. At other times the drywell may be open and, when required, secondary containment integrity is specified.

Establishing and maintaining a vacuum in the reactor enclosure secondary containment with the standby gas treatment system once per 18 months, along with the surveillance of the doors, hatches, dampers and valves, is adequate to ensure that there are no violations of the integrity of the secondary containment.

The OPERABILITY of the reactor enclosure recirculation system and the standby gas treatment systems ensures that sufficient iodine removal capability will be available in the event of a LOCA or refueling accident (SGTS only). The reduction in containment iodine inventory reduces the resulting SITE BOUNDARY radiation doses associated with containment leakage. The operation of this system and resultant iodine removal capacity are consistent with the assumptions used in the LOCA and refueling accident analyses. Provisions have been made to continuously purge the filter plenums with instrument air when the filters are not in use to prevent buildup of moisture on the adsorbers and the HEPA filters

Although the safety analyses assumes that the reactor enclosure secondary containment draw down time will take 135 seconds, these surveillance requirements specify a draw down time of 121 seconds. This 14 second difference is due to the diesel generator starting and sequence loading delays which is not part of this surveillance requirement.

The reactor enclosure secondary containment draw down time analyses assumes a starting point of 0.25 inch of vacuum water gauge and worst case SGTS dirty filter flow rate of 2800 cfm. The surveillance requirements satisfy this assumption by starting the drawdown from ambient conditions and connecting the adjacent reactor enclosure and refueling area to the SGTS to split the exhaust flow between the three zones and verifying a minimum flow rate of 2800 cfm from the test zone. This simulates the worst case flow alignment and verifies adequate flow is available to drawdown the test zone within the required time. The Technical Specification Surveillance Requirement 4.6.5.3.b.3 is intended to be a multi-zone air balance verification without isolating any test zone.

The SGTS fans are sized for three zones and therefore, when aligned to a single zone or two zones, will have excess capacity to more quickly drawdown the affected zones. There is no maximum flow limit to individual zones or pairs of zones and the air balance and drawdown time are verified when all three zones are connected to the SGTS.

The three zone air balance verification and drawdown test will be done prior to initial criticality of Unit 2 or after any major system alteration, which is any modification which will have an effect on the SGTS flowrate such that the ability of the SGTS to drawdown the reactor enclosure to greater than or equal to 0.25 inch of vacuum water gage in less than or equal to 121 seconds could be affected.

3/4.6.5 SECONDARY CONTAINMENT (Continued)

The field tests for bypass leakage across the SGTS charcoal adsorber and HEPA filter banks are performed at a flow rate of 3000 ± 10% cfm. This flow rate corresponds to the maximum overall three zone inleakage rate of 3264 cfm.

The SGTS filter train pressure drop is a function of air flow rate and filter conditions. Surveillance testing is performed using either the SGTS or drywell purge fans to provide operating convenience.

Each reactor enclosure secondary containment zone and refueling area secondary containment zone is tested independently to verify the design leak tightness. A design leak tightness of 1250 cfm or less for each reactor enclosure and 764 cfm or less for the refueling area at a 0.25 inch of vacuum water gage will ensure that containment integrity is maintained at an acceptable level if all zones are connected to the SGTS at the same time.

The post-LOCA offsite dose analysis assumes a reactor enclosure secondary containment post-draw down leakage rate of 1250 cfm and certain post-accident X/Q values. While the post-accident X/Q values represent a statistical interpretation of historical meteorological data, the highest ground level wind speed which can be associated with these values is 7 mph (Pasquill-Gifford stability Class G for a ground level release). Therefore, the surveillance requirement assures that the reactor enclosure secondary containment is verified under meteorological conditions consistent with the assumptions utilized in the design basis analysis. Reactor Enclosure Secondary Containment leakage tests that are successfully performed at wind speeds in excess of 7 mph would also satisfy the leak rate surveillance requirements, since it shows compliance with more conservative test conditions.

3/4.6.6 PRIMARY CONTAINMENT ATMOSPHERE CONTROL

The OPERABILITY of the systems required for the detection and control of hydrogen combustible mixtures of hydrogen and oxygen ensures that these systems will be available to maintain the hydrogen concentration within the primary containment below the lower flammability limit during post-LOCA conditions. The primary containment hydrogen recombiner is provided to maintain the oxygen concentration below the lower flammability limit. The combustible gas analyzer is provided to continuously monitor, both during normal operations and post-LOCA, the hydrogen and oxygen concentrations in the primary containment. The primary containment atmospheric mixing system is provided to ensure adequate mixing of the containment atmosphere to prevent localized accumulations of hydrogen and oxygen from exceeding the lower flammability limit. The hydrogen control system is consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA," March 1971.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 8 TO FACILITY OPERATING LICENSE NO. NPF-39

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNIT 1

DOCKET NO. 50-352

1.0 Introduction

By letter dated March 23, 1987, the Philadelphia Electric Company (the licensee) requested an amendment to Facility Operating License No. NPF-39 for the Limerick Generating Station, Unit 1. The proposed amendment would revise the Technical Specifications (TSs) to include consideration of wind speed during verification of reactor enclosure secondary containment integrity.

2.0 Discussion

The current Technical Specification (4.6.5.1.1.C.2) Surveillance Requirement states that the reactor enclosure secondary containment integrity shall be demonstrated at least once per 18 months by "Operating one standby gas treatment subsystem for one hour and maintaining greater than or equal to 0.25 inch of vacuum water gauge in the reactor enclosure secondary containment at a flow rate not exceeding 1250 cfm."

The requested Technical Specification (TS) amendment adds the phrase "... with wind speeds of less than or equal to 7.0 mph as measured on the wind instrument on Tower 1 elevation 30' or, if that instrument is unavailable, Tower 2 elevation 159'."

In addition, the licensee requested that the bases for Technical Specification Section 3/4.6.5 be amended to include a discussion of reactor enclosure secondary containment leakage and meteorological conditions.

The reactor enclosure secondary containment inleakage rate of 1250 cfm was assumed for the Limerick LOCA analysis with the Standby Gas Treatment System (SGTS) in operation under a negative pressure of 0.25 inches water following a Design Basis Accident (DBA). The meteorological data used for the DBA LOCA analysis was associated with the highest ground level wind speed of 7.0 mph. Therefore, the added wording for the proposed TS change assures that the reactor enclosure secondary containment integrity is maintained under meteorological conditions consistent with the assumptions utilized in the design basis analysis.

3.0. Evaluation

On December 1, 1987, the staff participated in a meeting with the PECo technical personnel to discuss their submittal and the proposed TS change.

At Limerick Unit 1, reactor enclosure secondary containment isolations have occurred during routine operations. Under these conditions, the SGTS initiated and operated as designed. The licensee has observed the SGTS exhaust flow rate, as measured by the instrument in the main control room, to increase with increasing wind speed. Reactor enclosure secondary containment inleakage higher than 1250 cfm as specified in TS has been observed.

The reason for the increased reactor enclosure secondary containment inleakage with increased wind speed is a combination of wind effects on the building and the conservative location of the roof-mounted reactor enclosure outside air pressure reference. The roof area of the reactor enclosure becomes the most negative pressure region due to high wind effect. Therefore, during periods of higher wind speed, the overall Reactor Enclosure secondary containment vacuum exceeds the 0.25 inch water and thus increases the inleakage.

The SGTS at Limerick is common to Units 1 and 2. Each of the two redundant SGTS filter trains consists of an electric air heater, two banks of High Efficiency Particulate Air (HEPA) filters (upstream and downstream of charcoal adsorbers), a vertical 8-inch charcoal adsorber bed and associated dampers, ducts, instruments, valves, and controls. Limerick recently replaced their old SGTS fans with new higher capacity fans. Each fan has a controllable capacity of 500 to 8400 cfm, which is sufficient to establish and maintain the reactor enclosure at 0.25 inches water negative pressure in relation to atmospheric pressure during secondary containment isolation.

The proposed TS change identifies the maximum wind speed (7.0 mph) applicable to the allowable SGTS flow rate, of 1250 cfm secondary containment inleakage. The surveillance test at wind speeds greater than 7.0 mph would be invalid, independent of the measured inleakage. It also means that during an inadvertent initiation of the SGTS, if the inleakage rate exceeds 1250 cfm when the wind speed is greater than 7.0 mph, the licensee would not be in violation of their TS with respect to maintaining the reactor enclosure secondary containment integrity.

The licensee performed calculations which indicated that at the wind speed in excess of 8.0 mph and for SGTS flows of up to 3000 cfm, the dose analyses values were not exceeded with respect to the FSAR analyses values. This is because at higher wind speeds, the increased dispersion factor offsets the increased SGTS flow rates which reduce the radiological dose to the environment. For high wind conditions at Limerick, typically greater than 10 mph, the same resultant dose will allow even higher inleakage rates. The Limerick reactor enclosure secondary containment maximum measured inleakage to date has been about 1800 cfm. Since the

maximum observed inleakage is substantially less than the theoretical limit of 3000 cfm, we conclude that for Limerick Station, the 1250 cfm in combination with wind speed of 7.0 mph is a bounding value.

The proposed TS retains the requirement of maintaining greater than or equal to 0.25 inches of vacuum water gauge in the reactor enclosure secondary containment. This ensures that there is no unfiltered radioactivity release from the secondary containment. The increased SGTS exhaust flow during periods of high wind speed will be filtered by the SGTS filters. At higher wind speeds beyond 7.0 mph, the increased meteorological dispersion factor would more than offset the radioactivity release due to the slightly increased infiltration rate. Therefore, the infiltration rate at 7.0 mph or less is still bounding.

The staff finds that the proposed TS revision would not affect the FSAR radiological dose analyses as a bounding condition and would not cause any additional radiological dose to the workers on site or to the general public. The proposed TS would be consistent with previous design basis analysis. The staff concludes that the proposed TS is acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to 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 and a change to the surveillance requirement. 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. 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 nor environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (52 FR 28384) on July 29, 1987 and consulted with the State of Pennsylvania. No public comments were received and the State of Pennsylvania did not have any comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and the security nor to the health and safety of the public.

Prinicipal Contributor: Angela Chu

Dated: March 10, 1988