

November 15, 1993

Docket Nos. 50-352  
and 50-353

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 52A-5  
Philadelphia Electric Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2, DUAL-ROLE SENIOR REACTOR OPERATOR/SHIFT TECHNICAL ADVISOR POSITION (TAC NOS. M87126 AND M87127)

The Commission has issued the enclosed Amendment No. 64 to Facility Operating License No. NPF-39 and Amendment No. 29 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2. These amendments consist of changes to the Technical Specifications (TS) in response to your application dated July 16, 1993.

These amendments revise the TS, contained in Appendix A of the Operating Licenses, to allow one of the required on-shift Senior Reactor Operator positions to be combined with the required Shift Technical Advisor position. This proposed change is in accordance with the recommendation in the NRC's "Policy Statement on Engineering Expertise on Shift," issued on October 28, 1985, and transmitted to all power reactor licensees and applicants by NRC Generic Letter 86-04, "Policy Statement on Engineering Expertise on Shift," dated February 13, 1986.

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

Sincerely,

/s/

Frank Rinaldi, Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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PDR

Enclosures:

- 1. Amendment No. 64 to License No. NPF-39
- Amendment No. 29 to License No. NPF-85
- 2. Safety Evaluation

cc w/enclosures:  
See next page

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SVarga	DHagan, 3206	OPA	
JCalvo	GHill(4), P1-22	OC/LFDCB	
LNicholson	EWenzinger, RGN-I	CAnderson, RGN-I	for SPLB/BC CMcCracken 11/5/93

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DATE	:10/15/93	:10/15/93	:10/13/93	:10/13/93	:10/14/93	:11/8/93	:

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 15, 1993

Docket Nos. 50-352  
and 50-353

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 52A-5  
Philadelphia Electric Company  
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These amendments revise the TS, contained in Appendix A of the Operating Licenses, to allow one of the required on-shift Senior Reactor Operator positions to be combined with the required Shift Technical Advisor position. This proposed change is in accordance with the recommendation in the NRC's "Policy Statement on Engineering Expertise on Shift," issued on October 28, 1985, and transmitted to all power reactor licensees and applicants by NRC Generic Letter 86-04, "Policy Statement on Engineering Expertise on Shift," dated February 13, 1986.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Rinaldi".

Frank Rinaldi, Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 64 to License No. NPF-39  
Amendment No. 29 to License No. NPF-85
2. Safety Evaluation

cc w/enclosures:  
See next page

Mr. George A. Hunger, Jr.  
Philadelphia Electric Company

Limerick Generating Station,  
Units 1 & 2

cc:

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

PHILADELPHIA ELECTRIC COMPANY  
DOCKET NO. 50-352  
LIMERICK GENERATING STATION, UNIT 1  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 64  
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 July 16, 1993, 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.

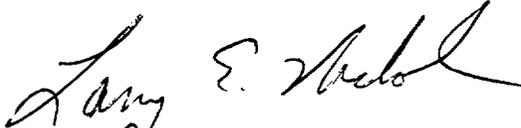
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 64, 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



Larry E. Nicholson, Acting 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: November 15, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 64

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.

Remove

6-5  
6-6

Insert

6-5  
6-6

TABLE 6.2.2-1  
MINIMUM SHIFT CREW COMPOSITION  
TWO UNITS WITH A COMMON CONTROL ROOM

WITH UNIT 2 IN CONDITION 4 OR 5 OR DEFUELED		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 OR 5
SS	1*	1*
SRO	1*	1*
RO	2	1
NLO	2	2**
STA	1***	None

WITH UNIT 2 IN CONDITION 1, 2, OR 3		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
SS	1*	1*
SRO	1*	1*
RO	2**	1
NLO	2**	1
STA	1*,***	None

TABLE NOTATIONS

- \*Individual may fill the same position on Unit 2.
- \*\*One of the two required individuals may fill the same position on Unit 2.
- \*\*\*The STA position may be filled by the on-shift Shift Superintendent, Shift Supervisor or other SRO provided the individual meets the 1985 NRC Policy Statement on Engineering Expertise on Shift.
- SS - Shift Superintendent or Shift Supervisor with a Senior Operator license on Unit 1.
- SRO - Individual with a Senior Operator license on Unit 1.
- RO - Individual with an Operator license on Unit 1.
- NLO - Non-licensed operator properly qualified to-support the unit to which assigned.
- STA - Shift Technical Advisor

Except for Shift Supervision (SS), the shift crew composition may be one less than the minimum requirements of Table 6.2.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of Shift Supervision (SS) from the control room while the unit is in OPERATIONAL CONDITION 1, 2, or 3, an individual with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of Shift Supervision from the control room while the unit is in OPERATIONAL CONDITION 4 or 5, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

## ADMINISTRATIVE CONTROLS

### 6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

#### FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety. Such recommendations shall be submitted through the General Manager-Nuclear Quality Assurance to the Executive Vice President-Nuclear.

#### COMPOSITION

6.2.3.2 The Limerick ISEG shall be composed of at least five, dedicated, full-time engineers, including the ISEG Superintendent, located onsite. Each shall have a bachelor's degree in engineering or related science and at least two years professional level experience in his or her field. The Limerick ISEG Superintendent shall have at least six years of experience in the nuclear field. The LGS ISEG reports to the General Manager-Nuclear Quality Assurance.

#### RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.

#### RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the General Manager-Nuclear Quality Assurance.

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to Shift Supervision in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall meet the qualifications specified by the 1985 NRC Policy Statement on Engineering Expertise on Shift.

### 6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions, except for the Senior Health Physicist who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the licensed operators who shall comply with the requirements of 10CFR55.

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\*Not responsible for sign-off function.



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

PHILADELPHIA ELECTRIC COMPANY  
DOCKET NO. 50-353  
LIMERICK GENERATING STATION, UNIT 2  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 29  
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Philadelphia Electric Company (the licensee) dated July 16, 1993, 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.

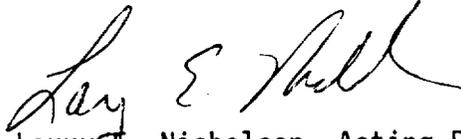
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 29, 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



Larry E. Nicholson, Acting 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: November 15, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 29

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

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.

Remove

6-5  
6-6

Insert

6-5  
6-6

TABLE 6.2.2-1  
MINIMUM SHIFT CREW COMPOSITION  
TWO UNITS WITH A COMMON CONTROL ROOM

WITH UNIT 1 IN CONDITION 4 OR 5 OR DEFUELED		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 OR 5
SS	1*	1*
SRO	1*	1*
RO	2	1
NLO	2	2**
STA	1***	None

WITH UNIT 1 IN CONDITION 1, 2, OR 3		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
SS	1*	1*
SRO	1*	1*
RO	2**	1
NLO	2**	1
STA	1*,***	None

TABLE NOTATIONS

- \*Individual may fill the same position on Unit 1.
- \*\*One of the two required individuals may fill the same position on Unit 1.
- \*\*\*The STA position may be filled by the on-shift Shift Superintendent, Shift Supervisor or other SRO provided the individual meets the 1985 NRC Policy Statement on Engineering Expertise on Shift.
- SS - Shift Superintendent or Shift Supervisor with a Senior Operator license on Unit 2.
- SRO - Individual with a Senior Operator license on Unit 2.
- RO - Individual with an Operator license on Unit 2.
- NLO - Non-licensed operator properly qualified to support the unit to which assigned.
- STA - Shift Technical Advisor

Except for Shift Supervision (SS), the shift crew composition may be one less than the minimum requirements of Table 6.2.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of Shift Supervision (SS) from the control room while the unit is in OPERATIONAL CONDITION 1, 2, or 3, an individual with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of Shift Supervision from the control room while the unit is in OPERATIONAL CONDITION 4 or 5, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

## ADMINISTRATIVE CONTROLS

### 6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

#### FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety. Such recommendations shall be submitted through the General Manager-Nuclear Quality Assurance to the Executive Vice President-Nuclear.

#### COMPOSITION

6.2.3.2 The Limerick ISEG shall be composed of at least five dedicated, full-time engineers, including the ISEG Superintendent, located onsite. Each shall have a bachelor's degree in engineering or related science and at least two years professional level experience in his or her field. The Limerick ISEG Superintendent shall have at least six years of experience in the nuclear field. The LGS ISEG reports to the General Manager-Nuclear Quality Assurance.

#### RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.

#### RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the General Manager-Nuclear Quality Assurance.

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to Shift Supervision in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall meet the qualifications specified by the 1985 NRC Policy Statement on Engineering Expertise on Shift.

### 6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions, except for the Senior Health Physicist who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the licensed operators who shall comply with the requirements of 10CFR55.

\*Not responsible for sign-off function.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NOS. 64 AND 29 TO FACILITY OPERATING  
LICENSE NOS. NPF-39 AND NPF-85  
PHILADELPHIA ELECTRIC COMPANY  
LIMERICK GENERATING STATION, UNITS 1 AND 2  
DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated July 16, 1993, the Philadelphia Electric Company (PECo or the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TS). The requested changes would allow one of the required on-shift Senior Reactor Operator positions to be combined with the required Shift Technical Advisor position.

2.0 EVALUATION

In the submittal dated July 16, 1993, PECo proposed changes to the Limerick Generating Station (LGS), Units 1 and 2 TS allowing one of the required on-shift Senior Reactor Operator (SRO) positions to be combined with the required Shift Technical Advisor (STA) position. The proposed change would enable a currently dedicated STA position to become a dual-role SRO/STA position. In TS Table 6.2.2-1, the position title "STA" will be marked,

\*\*\* The STA position may be filled by the on-shift Shift Superintendent, Shift Supervisor or other SRO provided the individual meets the 1985 NRC Policy Statement on Engineering Expertise on Shift."

Also for TS Table 6.2.2-1, the notation regarding the absence from the Main Control Room (MCR) of Shift Supervision (SS) would be changed to delete the parenthetical statement prohibiting the STA from assuming the MCR command function under this TS change request. In TS Section 6.2.4, the statement specifying the education requirements for the STA is proposed to be replaced with the statement, "The Shift Technical Advisor shall meet the qualifications specified by the 1985 NRC Policy Statement on Engineering Expertise on Shift."

This proposed change from a dedicated STA position to a dual-role SRO/STA position is in accordance with the recommendation in the NRC's "Policy Statement on Engineering Expertise on Shift," issued on October 28, 1985, and transmitted to all power reactor licensees and applicants by Generic Letter (GL) 86-04, "Policy Statement on Engineering Expertise on Shift," dated February 13, 1986.

Further, the licensee has indicated that sufficient and appropriately qualified personnel will be available at all times to meet the TS requirements for the fire brigade. Specifically, that the onsite fire brigade consists, at all times, of five members, that the minimum shift crew necessary for the safe shutdown of the plant or other essential personnel involved in the fire emergency is not part of the fire brigade, that the fire brigade leader and at least two other fire brigade members have sufficient training in, or knowledge of, plant safety-related systems, and that the fire brigade leader be able to assess safety consequences of a fire and serve as advisor to the main control room (MCR) personnel.

The fire brigade leader will be the shift supervisor or another on-shift qualified individual. The fire brigade composition and training requirements have been approved by the staff in the Limerick Safety Evaluation Report, (NUREG-0991), Supplement 2, Section 9.5.1.3. Specifically the fire brigade training (licensed and non-licensed operators), is identified in the Limerick Updated Final Safety Analysis Report Section 13.2.

The staff concludes that the proposed changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications allowing one of the required on-shift SRO positions to be combined with the required STA position is consistent with and meets the intent of the relevant review criteria as specified in the NRC GL 86-04, "Policy Statement on Engineering Expertise on Shift." Therefore, the proposed change for a dual-role SRO/STA position is considered 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 relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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 Contributors: F. Rinaldi  
T. Liu

Date: November 15, 1993