

January 31, 1996

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: DELETING CERTAIN SURVEILLANCE REQUIREMENTS JUST PRIOR TO REFUELING
ACTIVITIES, LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS.
M93214 AND M93215)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 109 to Facility Operating
License No. NPF-39 and Amendment No. 72 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 (TSs) in response to your
application dated July 28, 1995.

These amendments revise TS Surveillance Requirements 4.9.1.1, 4.9.1.2, 4.9.3,
4.9.5, and 4.9.8 to delete specific requirements to perform surveillances just
prior to beginning or resuming core alterations or control rod withdrawal
associated with refueling activities. This TS change also deletes the phrase
"incore instrumentation" from the footnote in TS Section 3/4.9.5,
"Communication."

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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Docket Nos. 50-352/353

- Enclosures: 1. Amendment No. 109 to
License No. NPF-39
2. Amendment No. 72 to
License No. NPF-85
3. Safety Evaluation

cc w/encls: See next page

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NAME	MO'Brien	TLiu	FRinaldi	RJones	CPW	JStolz
DATE	1/18/96	1/25/96	1/25/96	1/22/96	1/30/96	1/31/96

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 31, 1996

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Director-Licensing, MC 62A-1
PECO Energy Company
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The Commission has issued the enclosed Amendment No. 109 to Facility Operating License No. NPF-39 and Amendment No. 72 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 (TSs) in response to your application dated July 28, 1995.

These amendments revise TS Surveillance Requirements 4.9.1.1, 4.9.1.2, 4.9.3, 4.9.5, and 4.9.8 to delete specific requirements to perform surveillances just prior to beginning or resuming core alterations or control rod withdrawal associated with refueling activities. This TS change also deletes the phrase "incore instrumentation" from the footnote in TS Section 3/4.9.5, "Communication."

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 that reads "Frank Rinaldi".

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

Docket Nos. 50-352/353

Enclosures: 1. Amendment No. 109 to
License No. NPF-39
2. Amendment No. 72 to
License No. NPF-85
3. Safety Evaluation

cc w/encls: See next page

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

Limerick Generating Station,
Units 1 & 2

cc:

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

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

Mr. David P. Helker, MC 62A-1
Manager-Limerick Licensing
PECO Energy Company
965 Chesterbrook Boulevard
Wayne, Pennsylvania 19087-5691

Mr. Michael P. Gallagher
Director - Site Engineering
Limerick Generating Station
P. O. Box A
Sanatoga, Pennsylvania 19464

Mr. Walter G. McFarland, Vice President
Limerick Generating Station
Post Office Box A
Sanatoga, Pennsylvania 19464

Mr. James L. Kantner
Manager-Experience Assessment
Limerick Generating Station
P. O. Box A
Sanatoga, Pennsylvania 19464

Mr. Robert Boyce
Plant Manager
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Library
US Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

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

Mr. Ludwig E. Thibault
Senior Manager - Operations
Limerick Generating Station
P. O. Box A
Sanatoga, Pennsylvania 19464

Mr. Neil S. Perry
Senior Resident Inspector
US Nuclear Regulatory Commission
P. O. Box 596
Pottstown, Pennsylvania 19464

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

Mr. Craig L. Adams
Director - Site Support Services
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

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



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. 109
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 28, 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 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.

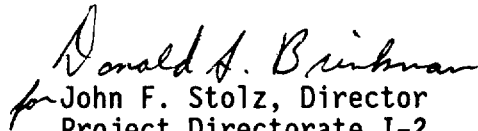
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 109 , 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, to be implemented within 30 days.

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: January 31, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 109

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

3/4 9-2

3/4 9-5

3/4 9-7

3/4 9-11

Insert

3/4 9-2

3/4 9-5

3/4 9-7

3/4 9-11

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS

4.9.1.1 The reactor mode switch shall be verified to be locked in the Shutdown or Refuel position as specified at least once per 12 hours.

4.9.1.2 Each of the above required reactor mode switch Refuel position interlocks* shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST at least once per 7 days during control rod withdrawal or CORE ALTERATIONS, as applicable.

4.9.1.3 Each of the above required reactor mode switch Refuel position interlocks* that is affected shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST prior to resuming control rod withdrawal or CORE ALTERATIONS, as applicable, following repair, maintenance or replacement of any component that could affect the Refuel position interlock.

*The reactor mode switch may be placed in the Run or Startup/Hot Standby position to test the switch interlock functions provided that all control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff.

REFUELING OPERATIONS

3/4.9.3 CONTROL ROD POSITION

LIMITING CONDITION FOR OPERATION

3.9.3 All control rods shall be inserted.*

APPLICABILITY: OPERATIONAL CONDITION 5, during CORE ALTERATIONS.**

ACTION:

With all control rods not inserted, suspend all other CORE ALTERATIONS, except that one control rod may be withdrawn under control of the reactor mode switch Refuel position one-rod-out interlock.

SURVEILLANCE REQUIREMENTS

4.9.3 All control rods shall be verified to be inserted, except as above specified at least once per 12 hours.

*Except control rods removed per Specification 3.9.10.1 or 3.9.10.2.

**See Special Test Exception 3.10.3.

REFUELING OPERATIONS

3/4.9.5 COMMUNICATIONS

LIMITING CONDITION FOR OPERATION

3.9.5 Direct communication shall be maintained between the control room and refueling floor personnel.

APPLICABILITY: OPERATIONAL CONDITION 5, during CORE ALTERATIONS.*

ACTION:

When direct communication between the control room and refueling floor personnel cannot be maintained, immediately suspend CORE ALTERATIONS.*

SURVEILLANCE REQUIREMENTS

4.9.5 Direct communication between the control room and refueling floor personnel shall be demonstrated at least once per 12 hours during CORE ALTERATIONS.*

*Except movement of control rods with their normal drive system.

REFUELING OPERATIONS

3/4.9.8 WATER LEVEL - REACTOR VESSEL

LIMITING CONDITION FOR OPERATION

3.9.8 At least 22 feet of water shall be maintained over the top of the reactor pressure vessel flange.

APPLICABILITY: During handling of fuel assemblies or control rods within the reactor pressure vessel while in OPERATIONAL CONDITION 5 when the fuel assemblies being handled are irradiated or the fuel assemblies seated within the reactor vessel are irradiated.

ACTION:

With the requirements of the above specification not satisfied, suspend all operations involving handling of fuel assemblies or control rods within the reactor pressure vessel after placing all fuel assemblies and control rods in a safe condition.

SURVEILLANCE REQUIREMENTS

4.9.8 The reactor vessel water level shall be determined to be at least its minimum required depth at least once per 24 hours during handling of fuel assemblies or control rods within the reactor pressure vessel.



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. 72
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 28, 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 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.

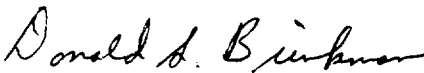
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 72, 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, to be implemented within 30 days.

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: January 31, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 72

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

3/4 9-2

3/4 9-5

3/4 9-7

3/4 9-11

Insert

3/4 9-2

3/4 9-5

3/4 9-7

3/4 9-11

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS

4.9.1.1 The reactor mode switch shall be verified to be locked in the Shutdown or Refuel position as specified at least once per 12 hours.

4.9.1.2 Each of the above required reactor mode switch Refuel position interlocks* shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST at least once per 7 days during control rod withdrawal or CORE ALTERATIONS, as applicable.

4.9.1.3 Each of the above required reactor mode switch Refuel position interlocks* that is affected shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST prior to resuming control rod withdrawal or CORE ALTERATIONS, as applicable, following repair, maintenance or replacement of any component that could affect the Refuel position interlock.

*The reactor mode switch may be placed in the Run or Startup/Hot Standby position to test the switch interlock functions provided that all control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff.

REFUELING OPERATIONS

3/4.9.3 CONTROL ROD POSITION

LIMITING CONDITION FOR OPERATION

3.9.3 All control rods shall be inserted.*

APPLICABILITY: OPERATIONAL CONDITION 5, during CORE ALTERATIONS.**

ACTION:

With all control rods not inserted, suspend all other CORE ALTERATIONS, except that one control rod may be withdrawn under control of the reactor mode switch Refuel position one-rod-out interlock.

SURVEILLANCE REQUIREMENTS

4.9.3 All control rods shall be verified to be inserted, except as above specified at least once per 12 hours.

*Except control rods removed per Specification 3.9.10.1 or 3.9.10.2.

**See Special Test Exception 3.10.3.

REFUELING OPERATIONS

3/4.9.5 COMMUNICATIONS

LIMITING CONDITION FOR OPERATION

3.9.5 Direct communication shall be maintained between the control room and refueling floor personnel.

APPLICABILITY: OPERATIONAL CONDITION 5, during CORE ALTERATIONS.*

ACTION:

When direct communication between the control room and refueling floor personnel cannot be maintained, immediately suspend CORE ALTERATIONS.*

SURVEILLANCE REQUIREMENTS

4.9.5 Direct communication between the control room and refueling floor personnel shall be demonstrated at least once per 12 hours during CORE ALTERATIONS.*

*Except movement of control rods with their normal drive system.

REFUELING OPERATIONS

3/4.9.8 WATER LEVEL - REACTOR VESSEL

LIMITING CONDITION FOR OPERATION

3.9.8 At least 22 feet of water shall be maintained over the top of the reactor pressure vessel flange.

APPLICABILITY: During handling of fuel assemblies or control rods within the reactor pressure vessel while in OPERATIONAL CONDITION 5 when the fuel assemblies being handled are irradiated or the fuel assemblies seated within the reactor vessel are irradiated.

ACTION:

With the requirements of the above specification not satisfied, suspend all operations involving handling of fuel assemblies or control rods within the reactor pressure vessel after placing all fuel assemblies and control rods in a safe condition.

SURVEILLANCE REQUIREMENTS

4.9.8 The reactor vessel water level shall be determined to be at least its minimum required depth at least once per 24 hours during handling of fuel assemblies or control rods within the reactor pressure vessel.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 109 AND 72 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 28, 1995, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TS). The requested changes would modify TS Surveillance Requirements 4.9.1.1, 4.9.1.2, 4.9.3, 4.9.5, and 4.9.8 to delete specific requirements to perform surveillances just prior to beginning or resuming core alterations or control rod withdrawal associated with refueling activities. This proposed TS change also requests that the phrase "incore instrumentation" be deleted from the footnote in TS Section 3/4.9.5, "Communication." These proposed TS changes are consistent with criteria delineated in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," dated September 28, 1992.

2.0 EVALUATION

The current LGS TS, Units 1 and 2, require that during refueling operations, certain surveillance tests be performed just prior to beginning or resuming core alterations or control rod withdrawal, in addition to other periodic surveillance requirements. The surveillance tests were required because the industry had limited operational experience regarding the reliability of the interlocks. Operating experience has demonstrated that these circuits are very reliable and not prone to failure, thus, the surveillances can be reduced. The proposed TS amendments delete specific requirements to perform surveillances just prior to beginning or resuming core alterations or control rod withdrawal associated with refueling activities. Specifically, the current TS require that the following surveillances be performed:

- 1) The reactor mode switch is verified locked in the refuel or shutdown position within 2 hours prior to beginning core alterations and at least once per 12 hours.
- 2) Each of the required reactor mode switch refuel position interlocks shall be demonstrated operable by performance of a channel functional test within 24 hours prior to the start of core alteration or control rod withdrawal.

- 3) All control rods are verified inserted within 2 hours prior to the start of core alterations and at least once per 12 hours.
- 4) Direct communications between the control room and refuel floor personnel shall be demonstrated within 1 hour prior to the start of and at least once per 12 hours during core alterations.
- 5) The reactor vessel water level shall be determined to be at least the minimum depth within 2 hours prior to the start of and at least once per 24 hours during handling of fuel assemblies or control rods within the reactor pressure vessel;
- 6) The reactor mode switch refuel position interlocks shall be demonstrated operable by performance of a channel functional test within 24 hours prior to the start of and at least once per 7 days during control rod withdrawal or core alteration and
- 7) Direct communication shall be maintained between the control room and refueling floor personnel during core alterations except as indicated in the footnote i.e., "Except the movement of incore instrumentation and control rods with their normal drive system."

The fuel handling system is designed to provide a safe and effective method for transporting and handling fuel from the time it reaches the plant until it leaves the plant after post irradiation cooling. Safe handling of fuel includes design considerations for maintaining occupational radiation exposures as low as reasonably achievable (ALARA) during transportation and handling. Most of the refueling and servicing equipment is manually operated and controlled by the operator's visual observations.

Refueling interlocks are provided for use during planned refueling operations. Criticality is prevented during fuel insertion, provided that control rods in the vicinity of the vacant fuel space are fully inserted during fuel insertion. The interlock systems accomplish this by the following mechanisms:

- a. Preventing operation of fuel-loaded refueling equipment over the core whenever any control rod is withdrawn.
- b. Preventing control rod withdrawal whenever fuel loading equipment is over the core.
- c. Preventing withdrawal of more than one control rod when the mode switch is in the REFUEL position.

The refueling interlocks have been designed utilizing redundancy of sensors and circuitry to provide a high level of reliability and assurance that the design bases are met. Each of the individual refueling interlocks considered need not meet the single failure criteria, since the four (4) essentially independent levels (including procedural control) of protection ensure that the design basis is met. Section 7.7 of the LGS Updated Final Safety Analysis

Report (UFSAR) shows that a single interlock failure does not cause an accident, result in potential physical damage to fuel, or result in radiation exposure to personnel during fuel handling operations.

The rod block interlocks and refueling platform interlocks provide two (2) independent levels of interlock action. The interlocks that restrict operation of the platform hoist and grapple provide a third level of interlock action because they would be required only after a failure of a rod block and refueling platform interlock. The strict procedural control exercised during refueling operations is a fourth level of backup, even though this is actually the primary means of control.

The proposed TS change does not make any physical modifications to any fuel handling equipment, nor does it eliminate any refueling interlocks or procedural controls. Therefore, the potential for an inadvertent criticality as discussed in UFSAR Section 15.4.1.1, "Control Rod Withdrawal Error During Refueling," is not altered. The probability of the initial causes of this transient alone are considered low enough to warrant its being categorized as an infrequent incident, since there is no postulated set of circumstances that results in an inadvertent rod withdrawal error while in the refueling mode. The refueling interlock system combined with strict procedural controls provide sufficient barriers to preclude an inadvertent criticality. In addition, the potential for a Fuel Handling Accident as discussed in Section 15.7.4 of the UFSAR is not increased since this proposed TS does not support any physical modifications to plant equipment, and this accident is assumed to occur as a consequence of the failure of the fuel handling mechanism resulting in a dropped fuel bundle.

The periodic surveillance test frequencies provide adequate assurance that the equipment will remain in an operable condition. The normal periodic surveillance intervals bound those surveillance intervals for the tests that are being altered by this proposed TS change. In the event that one of the periodic surveillances has not been performed within the specified time interval, entry into the specified condition (i.e., performance of core alterations, control rod withdrawal, or handling of fuel or control rods) is not permitted as required by TS 4.0.4 until the surveillance has been satisfactorily completed.

The licensee has also proposed to delete the words "incore instrumentation" from the footnote for TS 3.9.5. It requires that direct communication be maintained between the control room and refueling floor during core alterations. The footnote presently states that this communication is not required during movement of control rods or incore instrumentation. There is no need to include the latter because movement of the incore instrumentation cannot affect criticality.

The staff concludes that these TS revisions are acceptable because the interlocks have been demonstrated reliable during the term of the license and routine surveillance is therefore sufficient. In addition, the TS changes

reflect the criteria contained in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," dated September 28, 1992. Therefore, the staff considers the deletion of TS Surveillance Requirements 4.9.1.1, 4.9.1.2, 4.9.3, 4.9.5, and 4.9.8 to perform surveillances just prior to beginning or resuming core alterations or control rod withdrawal associated with refueling activities, and deletion of the phrase "incore instrumentation" from the footnote in TS Section 3/4.9.5, "Communication," to be 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 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 (60 FR 49943). 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: T. Liu

Date: January 31, 1996