

March 8, 1985

Docket Nos. 50-272
and 50-311

Mr. Richard A. Uderitz, Vice President -
Nuclear
Public Service Electric and Gas Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

Dear Mr. Uderitz:

Distribution

<u>Docket File</u>	NRC PDR
L PDR	ORB#1 Rdg
HThompson	CParrish
DFischer	OELD
LHarmon	EJordan
BGrimes	JPartlow
TBarnhart 4	WJones
DBrinkman	ACRS 10
CMiles	RDiggs
ORB#1 Gray	

The Commission has issued the enclosed Amendment No. 60 to Facility Operating License No. DPR-70 and Amendment No. 31 to Facility Operating License No. DPR-75 for the Salem Nuclear Generating Station, Unit Nos. 1 and 2, respectively. The amendments consist of changes to the Technical Specifications in response to your application transmitted by letter dated December 27, 1983 and supplemented February 25, 1985.

These amendments consist of three (3) independent parts. Part (1) modifies the Salem Unit 1 Technical Specifications, Table 3.3-1 (Action 1) and Table 3.3-3 (Action 13) to read the same as Salem Unit 2 Technical Specifications Tables 3.3-1 and 3.3-3. Part (2) corrects a typographical error in the Salem Unit 2 Technical Specifications. Part (3) revises the response time requirement for the overtemperature delta T reactor trip for both Units 1 and 2 and makes them identical.

The licensee's supplemental submittal dated February 25, 1985 provided an additional Westinghouse analysis which was done subsequent to the original license change request. The analysis would confirm that the licensee's revised response time was conservative and did not violate safety limits. We have not completed our review of this new information. Therefore, and with the concurrence of your staff, we have concluded that a 4.0 second response time for the overtemperature delta T trip is presently acceptable. The licensee may submit a new amendment request utilizing the information provided in the recent analysis.

8503250393 850308
PDR ADDCK 05000272
P PDR

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These amendments consist of three (3) independent parts. Part (1) modifies the Salem Unit 1 Technical Specifications, Table 3.3-1 (Action 1) and Table 3.3-3 (Action 13) to read the same as Salem Unit 2 Technical Specifications Tables 3.3-1 and 3.3-3. Part (2) corrects a typographical error in the Salem Unit 2 Technical Specifications. Part (3) revises the response time requirement for the overtemperature delta T reactor trip for both Units 1 and 2 and makes them identical.

The licensee's supplemental submittal dated February 25, 1985 provided an additional Westinghouse analysis which was done subsequent to the original license change request. The analysis confirmed that the licensee's revised response time was conservative and did not violate safety limits.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular monthly Federal Register notice.

Sincerely,

Donald Fischer, Project Manager
Operating Reactors Branch #1
Division of Licensing

Enclosures:

1. Amendment No. to DPR-70
2. Amendment No. to DPR-75
3. Safety Evaluation

cc: w/enclosures
See next page

ORB#1:DL *DF*
DFischer;ps
2/26/85

ORB#1:DL *CP*
CParrish
2/24/85

DL
BC-ORB#1:DL
SVarga
3/1/85

OELD
3/ /85

AD-OR:DL
GLainas
3/ /85

Mr. Richard A. Uderitz

- 2 -

March 8, 1985

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular monthly Federal Register notice.

Sincerely,

/s/SVarga

Donald Fischer, Project Manager
Operating Reactors Branch #1
Division of Licensing

Enclosures:

1. Amendment No. 60 to DPR-70
 2. Amendment No. 31 to DPR-75
 3. Safety Evaluation
- cc: w/enclosures
See next page

*See previous white for concurrence

ORB#1:DL	ORB#1:DL*	BC-ORB#1:DL*
DFischer;ps	CParrish	SVarga
3/ /85	2/28/85	3/1/85

[Signature]
R Houston
3/7/85

[Signature]
OFLD
Telephone
concur
3/7 /85
J. Moore

AD-ORB#1:DL
GLainas
3/7/85

Mr. R. A. Uderitz
Public Service Electric & Gas Company

Salem Nuclear Generating Station
Units 1 and 2

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Salem Nuclear Generating Station
Units 1 and 2

- 2 -

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PHILADELPHIA ELECTRIC COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-272

SALEM NUCLEAR GENERATING STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.60
License No. DPR-70

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Public Service Electric and Gas Company, Philadelphia Electric Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) dated December 27, 1983 and supplemented February 25, 1985, 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. DPR-70 is hereby amended to read as follows:


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PDR ADOCK 05000272
PDR

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 60, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION


Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 8, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 60

FACILITY OPERATING LICENSE NO. DPR-70

DOCKET NO. 50-272

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
3/4 3-5	3/4 3-5
3/4 3-9	3/4 3-9
3/4 3-21	3/4 3-21

TABLE 3.3-1 (Continued)

TABLE NOTATION

- * With the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal.
- ** The channel(s) associated with the protective functions derived from the out of service Reactor Coolant Loop shall be placed in the tripped condition.
- # The provisions of Specification 3.0.4 are not applicable.
- ## High voltage to detector may be de-energized above P-6.

ACTION STATEMENTS

- ACTION 1 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, be in HOT STANDBY within 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.1.1 provided the other channel is OPERABLE.
- ACTION 2 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the following conditions are satisfied:
 - a. The inoperable channel is placed in the tripped condition within 1 hour.
 - b. The Minimum Channels OPERABLE requirement is met; however, one additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.1.1.
 - c. Either, THERMAL POWER is restricted to $\leq 75\%$ of RATED THERMAL and the Power Range, Neutron Flux trip setpoint is reduced to $\leq 85\%$ of RATED THERMAL POWER within 4 hours; or, the QUADRANT POWER TILT RATIO is monitored at least once per 12 hours.
- ACTION 3 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement and with the THERMAL POWER level:

TABLE 3.3-2

REACTOR TRIP SYSTEM INSTRUMENTATION RESPONSE TIMES

<u>FUNCTIONAL UNIT</u>	<u>RESPONSE TIME</u>
1. Manual Reactor Trip	NOT APPLICABLE
2. Power Range, Neutron Flux	≤ 0.5 seconds*
3. Power Range, Neutron Flux, High Positive Rate	NOT APPLICABLE
4. Power Range, Neutron Flux, High Negative Rate	≤ 0.5 seconds*
5. Intermediate Range, Neutron Flux	NOT APPLICABLE
6. Source Range, Neutron Flux	NOT APPLICABLE
7. Overtemperature ΔT	≤ 4.0 seconds*
8. Overpower ΔT	NOT APPLICABLE
9. Pressurizer Pressure--Low	≤ 2.0 seconds
10. Pressurizer Pressure--High	≤ 2.0 seconds
11. Pressurizer Water Level--High	NOT APPLICABLE

*Neutron detectors are exempt from response time testing. Response time of the neutron flux signal portion of the channel shall be measured from detector output or input of first electronic component in channel.

TABLE 3.3-2 (Continued)REACTOR TRIP SYSTEM INSTRUMENTATION RESPONSE TIMES

<u>FUNCTIONAL UNIT</u>	<u>RESPONSE TIME</u>
12. Loss of Flow - Single Loop (Above P-8)	≤ 1.0 seconds
13. Loss of Flow - Two Loops (Above P-7 and below P-8)	≤ 1.0 seconds
14. Steam Generator Water Level--Low-Low	≤ 2.0 seconds
15. Steam/Feedwater Flow Mismatch and Low Steam Generator Water Level	NOT APPLICABLE
16. Undervoltage-Reactor Coolant Pumps	≤ 1.2 seconds
17. Underfrequency-Reactor Coolant Pumps	≤ 0.6 seconds
18. Turbine Trip	
A. Low Fluid Oil Pressure	NOT APPLICABLE
B. Turbine Stop Valve	NOT APPLICABLE
19. Safety Injection Input from ESF	NOT APPLICABLE
20. Reactor Coolant Pump Breaker Position Trip	NOT APPLICABLE

TABLE 3.3-3 (Continued)

TABLE NOTATION

- # Trip function may be bypassed in this MODE below P-11.
- ## Trip function may be bypassed in this MODE below P-12.
- ### The channel(s) associated with the protective functions derived from the out of service Reactor Coolant Loop shall be placed in the tripped mode.
- * The provisions of Specification 3.0.4 are not applicable.

ACTION STATEMENTS

- ACTION 13 - With the number of OPERABLE Channels one less than the Total Number of Channels, be in HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 14 - With the number of OPERABLE Channels one less than the Total Number of Channels, operation may proceed until performance of the next required CHANNEL FUNCTIONAL TEST, provided the inoperable channel is placed in the tripped condition within 1 hour.
- ACTION 15 - With a channel associated with an operating loop inoperable, restore the inoperable channel to OPERABLE status within 2 hours or be in HOT SHUTDOWN within the following 12 hours; however, one channel associated with an operating loop may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 16 - With the number of OPERABLE Channels one less than the Total Number of Channels, operation may proceed provided the inoperable channel is placed in the bypassed condition and the Minimum Channels OPERABLE requirement is demonstrated within 1 hour; one additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.



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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PHILADELPHIA ELECTRIC COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-311

SALEM NUCLEAR GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.31
License No. DPR-75

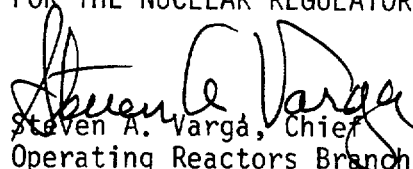
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Public Service Electric and Gas Company, Philadelphia Electric Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) dated December 27, 1983 and supplemented February 25, 1985, 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. DPR-75 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 31, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION


Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 8, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 31

FACILITY OPERATING LICENSE NO. DPR-75

DOCKET NO. 50-311

Revise Appendix A as follows:

Remove Pages

3/4 3-9

3/4 8-4

Insert Pages

3/4 3-9

3/4 8-4

TABLE 3.3-2REACTOR TRIP SYSTEM INSTRUMENTATION RESPONSE TIMES

<u>FUNCTIONAL UNIT</u>	<u>RESPONSE TIME</u>
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3. Power Range, Neutron Flux, High Positive Rate	NOT APPLICABLE
4. Power Range, Neutron Flux, High Negative Rate	≤ 0.5 seconds*
5. Intermediate Range, Neutron Flux	NOT APPLICABLE
6. Source Range, Neutron Flux	NOT APPLICABLE
7. Overtemperature ΔT	≤ 4.0 seconds*
8. Overpower ΔT	NOT APPLICABLE
9. Pressurizer Pressure--Low	≤ 2.0 seconds
10. Pressurizer Pressure--High	≤ 2.0 seconds
11. Pressurizer Water Level--High	NOT APPLICABLE

*Neutron detectors are exempt from response time testing. Response time of the neutron flux signal portion of the channel shall be measured from detector output or input of first electronic component in channel.

TABLE 3.3-2 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION RESPONSE TIMES

<u>FUNCTIONAL UNIT</u>	<u>RESPONSE TIME</u>
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13. Loss of Flow - Two Loops (Above P-7 and below P-8)	≤ 1.0 seconds
14. Steam Generator Water Level--Low-Low	≤ 2.0 seconds
15. Steam/Feedwater Flow Mismatch and Low Steam Generator Water Level	NOT APPLICABLE
16. Undervoltage-Reactor Coolant Pumps	≤ 1.2 seconds
17. Underfrequency-Reactor Coolant Pumps	≤ 0.6 seconds
18. Turbine Trip	
A. Low Fluid Oil Pressure	NOT APPLICABLE
B. Turbine Stop Valve	NOT APPLICABLE
19. Safety Injection Input from ESF	NOT APPLICABLE
20. Reactor Coolant Pump Breaker Position Trip	NOT APPLICABLE
21. Reactor Trip Breakers	NOT APPLICABLE
22. Automatic Trip Logic	NOT APPLICABLE

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

5. Verifying that on a simulated loss of the diesel generator (with offsite power not available), the diesel generator cannot be auto-connected to a loaded bus and that subsequent loading of the diesel generator is in accordance with design requirements.
6. Simulating a loss of offsite power in conjunction with an ESF actuation test signal, and
 - a) Verifying de-energization of the vital busses and load shedding from the vital busses.
 - b) Verifying the diesel starts from ambient condition on the auto-start signal, energizes the vital busses with permanently connected loads within 13 seconds, energizes the auto-connected emergency (accident) loads through the load sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the emergency loads. The steady state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz during this test.
 - c) Verifying that all automatic diesel generator trips, except engine overspeed, lube oil pressure low, 4 KV Bus differential and generator differential, are automatically bypassed upon loss of voltage on the vital bus concurrent with a safety injection actuation signal.
7. Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to greater than or equal to 2860 kw and during the remaining 22 hours of this test, the diesel generator shall be loaded to greater than or equal to 2600 kw. Within 5 minutes after completing this 24-hour test, perform Specification 4.8.1.1.2.c.4. The steady state voltage and frequency shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz during this test.
8. Verifying that the auto-connected loads to each diesel generator do not exceed the 2000-hour rating of 2760 kw.
9. Verifying that with the diesel generator operating in a test mode (connected to its bus), a simulated safety injection signal overrides the test mode by (1) returning the diesel generator to standby operation and (2) automatically energizes the emergency loads with offsite power.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 60 TO FACILITY OPERATING LICENSE NO. DPR-70
AND AMENDMENT NO. 31 TO FACILITY OPERATING LICENSE NO. DPR-75

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PHILADELPHIA ELECTRIC COMPANY
DELMARVA POWER AND LIGHT COMPANY, AND
ATLANTIC CITY ELECTRIC COMPANY

SALEM NUCLEAR GENERATION STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-272 AND 50-311

Introduction

By letter dated December 27, 1983, and supplemented February 25, 1985, Public Service Electric Gas Company (the licensee) requested amendments to the Technical Specifications in Appendix A of Facility Operating Licenses DPR-70 and DPR-75 for the Salem Generating Station, Units Nos. 1 and 2. The amendments request consisted of three (3) independent parts.

The first part (LCR 83-17) for Unit 1 is an administrative change which rewords two ACTION statements to agree with the corresponding statements for Unit 2. The second part (LCR 83-18) for Unit 2 is an administrative change which removes a typographical error. The final part (LCR 83-19) revises the response time requirement for the overtemperature delta T reactor trip for Units 1 and 2.

Evaluation and Summary

The licensee has requested the ACTION statement 1 in Table 3.3-1 and ACTION statement 13 in Table 3.3-3 for the Unit 1 Technical Specifications be revised to be consistent with the corresponding ACTION statements in the

Unit 2 Technical Specifications. The change would increase the time that one channel may be bypassed for surveillance testing from one hour to two hours. Since this change is consistent with the guidance provided in the Standard Technical Specification for Westinghouse Plants, NUREG-0452, we find that it is acceptable.

The licensee has requested that Section 4.8.1.1.2.c.7 of the Unit 2 Technical Specifications be revised to note the requirement to perform the surveillance required by Section 4.8.1.1.2.c.4 following the completion of the 24 hour test. The current technical specification references Section 4.8.1.1.2.c.7b, a non-existing section, referenced due to a typographical error. We find that the proposed change is consistent with the intended surveillance requirements and, therefore, acceptable.

The licensee has requested that the response time for the overtemperature delta T trip as specified in Table 3.3--2 of the Unit 1 and Unit 2 technical specifications be changed to reflect a value of "less than or equal to 5 seconds." The current bounded response time requirement is specified as 6 seconds for Unit 1 and 2 seconds for Unit 2. The licensee notes that the resistance temperature detectors (RTDs) used to monitor the hot and cold leg temperatures in the primary coolant loops are being replaced with detectors that meet environmental qualification requirements. The original RTDs had a response time of approximately 1.5 seconds, however, the replacement units have response times that have been determined to be about 3.4 seconds at the maximum. The licensee notes

that the proposed 5 second response time value is conservative with respect to the 6 second time delay assumed in the accident analysis as stated in Table 15.1-3 of Salem Unit 1 and 2 updated FSAR.

Since the safety analysis was performed by Westinghouse, the staff has discussed the generic aspects of the safety analysis assumptions used by Westinghouse with respect to the 6-second value noted for the overtemperature ΔT trip function time response. Herein, Westinghouse has indicated that the 6-second response time is derived based on three specific considerations. The first consideration was the allowance of a 2 second response time delay in the transport of primary coolant samples to the RTD bypass manifolds. The second was a 2-second response time for the resistance temperature detectors and the final consideration was a 2-second response for electronic equipment, reactor trip breakers and voltage decay for the control rod gripper coils. Hence, the overall response was taken as sum of these three considerations, i.e., 6 seconds.

The technical specifications further defines the Reactor Trip System Response Time as the time interval from when the monitored parameter exceeds its trip value at the channel sensor (emphasis added) until loss of stationary gripper coil voltage. This definition excludes the primary coolant transport delays as a consideration which is to be included in surveillance tests to verify the reactor trip system response time for this safety function. Therefore, the portion of the 6-second response time used in the safety analysis which is applicable to the surveillance testing requirement is only 4 seconds. Further, Westinghouse has indicated that the 2-second response time allowance for electronic equipment, reactor trip breakers and gripper voltage decay is very conservative and that the response time of these components is only of the

order of a few hundred milliseconds. Therefore, RTD response times approaching the 4 second limit could exist without exceeding the specified technical specification limit.

Thus, the staff advised the licensee that the proposed technical specification limit should not exceed 4 seconds in that a time delay of about 2 seconds, associated with transport delays, should be deducted from the 6-second response stated in the safety analysis assumptions. In response, the licensee indicated by telecon on February 20, 1985, that subsequent to the original license change request, Westinghouse had reanalyzed various accident cases involving the overtemperature ΔT trip and had confirmed that a 9 second response time assumption did not result in consequences which would violate the minimum DNBR limit of 1.3. By letter dated February 25, 1985, the licensee submitted the results of the reanalysis which assumed a 9 second response time for overtemperature delta T trip. While this new information may justify increasing the technical specification surveillance requirement for the overtemperature delta T trip to a value of 7 seconds, we require additional time to complete our evaluation of the information. Therefore, at this time and with the concurrence of the licensee provided by telecon on March 7, 1985, the technical specifications for Salem Units 1 and 2 will be revised to specify the response time of the overtemperature delta T trip at a value of 4.0 seconds, consistent with the safety analysis of record and consistent with the information provided in licensee's original change request.

Environmental Consideration

These amendments involve a change in the installation or use of the facilities components located within the restricted areas as defined in 10 CFR 20. The staff has determined that these 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 these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR Sec 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 these amendments.

Conclusion

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

Dated: March 8, 1985

Principal Contributor:

T. Dunning