

April 14, 1999

Mr. Harold W. Keiser  
Chief Nuclear Officer & President  
Nuclear Business Unit  
Public Service Electric & Gas  
Company  
Post Office Box 236  
Hancocks Bridge, NJ 08038

SUBJECT: HOPE CREEK GENERATING STATION, ISSUANCE OF AMENDMENT,  
EMERGENCY DIESEL GENERATOR SURVEILLANCE REQUIREMENTS  
(TAC NO. MA4387)

Dear Mr. Keiser:

The Commission has issued the enclosed Amendment No. 119 to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated December 16, 1998, as supplemented March 22, 1999.

This amendment revises TS Surveillance Requirements 4.8.1.1.2 and 4.8.1.1.3, Table 4.8.1.1.2-1, and the associated Bases. These changes remove the emergency diesel generator accelerated testing and special reporting requirements from the TSs in accordance with the guidance provided in Generic Letter 94-01.

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 B. Ennis, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-354

- Enclosures: 1. Amendment No. 119 to License No. NPF-57
- 2. Safety Evaluation

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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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 "R B Ennis".

Richard B. Ennis, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-354

Enclosures: 1. Amendment No. 119 to  
License No. NPF-57  
2. Safety Evaluation

cc w/encls: See next page

Mr. Harold W. Keiser  
Public Service Electric & Gas  
Company

Hope Creek Generating Station

cc:

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c/o Mary O. Henderson, Clerk  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-354

HOPE CREEK GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 119  
License No. NPF-57

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by the Public Service Electric & Gas Company (PSE&G) dated December 16, 1998, as supplemented March 22, 1999, 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 set forth in 10 CFR Chapter I;
  - 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-57 is hereby amended to read as follows:

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P PDR

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 119 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into the license. PSE&G shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance, and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: April 14, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 119

FACILITY OPERATING LICENSE NO. NPF-57

DOCKET NO. 50-354

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

Insert

3/4 8-4

3/4 8-4

3/4 8-9

3/4 8-9

3/4 8-10

3/4 8-10

B 3/4 8-1d

B 3/4 8-1d

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

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4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments and indicated power availability, and
- b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring, manually and automatically, unit power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each of the above required diesel generators shall be demonstrated OPERABLE:\*

- a. At least once per 31 days on a STAGGERED TEST BASIS by:
  1. Verifying the fuel level in the fuel oil day tank.
  2. Verifying the fuel level in the fuel oil storage tank.
  3. Verifying the fuel transfer pump starts and transfers fuel from the storage system to the fuel oil day tank.
  4. Verify each diesel generator starts from standby conditions and achieves  $\geq 3950$  volts and  $\geq 58.8$  Hz in  $\leq 10$  seconds after receipt of the start signal, and subsequently achieves steady state voltage of  $4160 \pm 420$  volts and frequency of  $60 \pm 1.2$  Hz. The diesel generator shall be started for this test by using one of the following signals:
    - a) Manual.
    - b) Simulated loss of offsite power by itself.
    - c) Simulated loss of offsite power in conjunction with an ESF actuation test signal.
    - d) An ESF actuation test signal by itself.
  5. Verifying the diesel generator is synchronized, loaded to between 4300 and 4400\*\* kw in less than or equal to 130 seconds,\* and operates with this load for at least 60 minutes.

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\* The diesel generator start (10 sec) and subsequent loading (130 sec) from standby conditions shall be performed at least once per 184 days in these surveillance tests. All engine starts and loading for the purpose of this surveillance testing may be preceded by an engine prelube period and/or other warmup procedures recommended by the manufacturer so that mechanical stress and wear on the diesel engine is minimized.

\*\* This band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band shall not invalidate the test; the loads, however, shall not be less than 4300 kw nor greater than 4430 kw.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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2. Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code in accordance with ASME Code Section XI Article IWD-5000.

k. At least once per refueling cycle# by:

1. Verifying the diesel generator operates for at least 24 hours. During the first 22 hours of this test, the diesel generator shall be loaded to between 4300 and 4400 kW## and during the remaining 2 hours of this test, the diesel generator shall be loaded to between 4800 and 4873 kW. The diesel generator shall achieve  $\geq 3950$  volts and  $\geq 58.8$  Hz in  $\leq 10$  seconds following receipt of the start signal and subsequently achieve steady state voltage of  $4160 \pm 420$  volts and frequency of  $60 \pm 1.2$  Hz.
2. Within 5 minutes after completing 4.8.1.1.2.k.1, verify each diesel generator starts and achieves  $\geq 3950$  volts and  $\geq 58.8$  Hz in  $\leq 10$  seconds after receipt of the start signal, and subsequently achieves steady state voltage of  $4160 \pm 420$  volts and frequency of  $60 \pm 1.2$  Hz.

- OR -

Operate the diesel generator between 4300 kW and 4400 kW for two hours. Within 5 minutes of shutting down the diesel generator, verify each diesel generator starts and achieves  $\geq 3950$  volts and  $\geq 58.8$  Hz in  $\leq 10$  seconds after receipt of the start signal, and subsequently achieves steady state voltage of  $4160 \pm 420$  volts and frequency of  $60 \pm 1.2$  Hz. This test shall continue for at least five minutes.

4.8.1.1.3 Reports - Not used

4.8.1.1.4 The buried fuel oil transfer piping's cathodic protection system shall be demonstrated OPERABLE at least once per 2 months and at least once per year by subjecting the cathodic protection system to a performance test.

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# For any start of a diesel generator, the diesel may be loaded in accordance with manufacturer's recommendations.

## This band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band shall not invalidate the test; the loads; however, shall not be less than 4300 kW nor greater than 4873 kW.

TABLE 4.8.1.1.2-1

DIESEL GENERATOR TEST SCHEDULE

Not used

### 3/4.8 ELECTRICAL POWER SYSTEMS

#### BASES (Continued)

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Particulate concentration should be determined in accordance with ASTM D2276-94, Method A. This method involves a gravimetric determination of total particulate concentration in the fuel oil and has a limit of 10 mg/l. The 0.8 micron filters specified in ASTM D2276-94 may be replaced with membrane filters up to 3.0 microns. This is acceptable since the closest tolerance fuel filter in the HC EDGs is a five micron particle retention duplex filter on the engine driven fuel oil pump. It is acceptable to obtain a field sample for subsequent laboratory testing in lieu of field testing. The total volume of stored fuel oil contained in two or more interconnected tanks must be considered and tested separately. The frequency of this test takes into consideration fuel oil degradation trends that indicate the particulate concentration is unlikely to change significantly between frequency intervals.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that (1) the facility can be maintained in the shutdown or refueling condition for extended time periods and (2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The surveillance requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations for Regulatory Guide 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies", March 10, 1971, Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants", Revision 1, August 1977 and Regulatory Guide 1.137 "Fuel-Oil Systems for Standby Diesel Generators", Revision 1, October 1979 as modified by plant specific analysis, diesel generator manufacturer's recommendations, and Amendment 59, to the Facility Operating License, issued November 22, 1993. Regulatory Guide 1.108 criteria for determining and reporting valid tests and failures and accelerated diesel generator testing have been superceded by implementation of the Maintenance Rule for diesel generators per 10CFR50.65.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 119 TO FACILITY OPERATING LICENSE NO. NPF-57

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

1.0 INTRODUCTION

By letter dated December 16, 1998, as supplemented March 22, 1999, the Public Service Electric & Gas Company (the licensee) submitted a request for changes to the Hope Creek Generating Station (HCGS), Technical Specifications (TSs). The requested changes would revise Surveillance Requirements (SRs) 4.8.1.1.2 and 4.8.1.1.3, Table 4.8.1.1.2-1, and the associated Bases. Specifically, the proposed TS amendment would modify SR 4.8.1.1.2 by replacing the accelerated emergency diesel generator (EDG) testing requirements (i.e., Table 4.8.1.1.2-1) with a maintenance program that monitors EDG performance in accordance with the maintenance rule (i.e., Section 50.65 of Title 10 of the Code of Federal Regulations (10 CFR 50.65), "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants"). The proposed TS amendment would also eliminate SR 4.8.1.1.3, which specifies the reporting requirements for EDG failures, since EDG failures would be reported by the requirements of 10 CFR 50.72 (notification requirements) and 10 CFR 50.73 (licensee event reporting system) instead. In addition, the associated TS Bases would be changed to indicate that the Regulatory Guide (RG) 1.108 criteria for determining and reporting valid tests and failures and the accelerated testing of the EDGs have been superseded by implementation of the maintenance rule. The March 22, 1999, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

On May 31, 1994, the U.S. Nuclear Regulatory Commission issued Generic Letter (GL) 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators," which advised licensees that they may request a license amendment to remove accelerated testing and special reporting requirements for EDGs from plant TSs. It also provided guidance on preparing the amendment request and the model TS for this improvement. Generic Letter 94-01 stated that the staff's approval would be contingent upon the licensee's commitment to implement a maintenance program for monitoring and maintaining EDG performance in accordance with the provisions of the maintenance rule, 10 CFR 50.65, and the guidance contained in RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Generic Letter 94-01 further stated that the fulfillment

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of this commitment need not necessarily result in a new or a separate EDG maintenance program, but rather could be implemented by the modification of existing maintenance program requirements that include EDGs.

The licensee stated that similar changes have been approved by the staff for Salem Nuclear Generating Station, Units 1 and 2; Waterford Steam Electric Station, Unit 3; and Turkey Point, Units 3 and 4.

### 3.0 EVALUATION

The staff has reviewed the proposed TS SR modifications and changes to the Bases section as described below.

#### 3.1 Modification of SR 4.8.1.1.2 and Deletion of Table 4.8.1.1.2-1

The current SR 4.8.1.1.2 states that:

- 4.8.1.1.2 Each of the above required diesel generators shall be demonstrated OPERABLE: \*
- a. In accordance with the frequency specified in Table 4.8.1.1.2-1 on a STAGGERED TEST BASIS by:

The licensee proposes to delete the above EDG accelerated test frequency, which refers to an EDG test schedule provided in Table 4.8.1.1.2-1, and proposes to modify the test frequency as follows:

- 4.8.1.1.2 Each of the above required diesel generators shall be demonstrated OPERABLE: \*
- a. At least once per 31 days on a STAGGERED TEST BASIS by:

The licensee contends that the proposed change is consistent with the TS improvement endorsed by GL 94-01 because GL 94-01 allows licensees to eliminate the accelerated EDG testing from the TSs once the maintenance rule has been implemented. The licensee states that it has now implemented a maintenance program for monitoring and maintaining EDG performance in accordance with the provisions of the maintenance rule and the guidance of RG 1.160, including the following key elements applicable to EDGs:

- Performance criteria for EDG reliability and unavailability, under paragraph (a)(2) of 10 CFR 50.65;
- Appropriate root cause determination and corrective action following a single maintenance-preventable failure; and

- Goals and EDG performance monitoring under paragraph (a)(1) of 10 CFR 50.65 if any performance criterion is not met, or if a repeat maintenance-preventable failure occurs.

The staff has reviewed the proposed modification to SR 4.8.1.1.2 that allows the licensee to relocate accelerated EDG testing requirements from the plant TS to the maintenance program and to delete Table 4.8.1.1.2-1. Based on the fact that: (1) the licensee has implemented the maintenance rule (which went into effect July 1996) and conforms to the guidance of RG 1.160, and (2) the licensee's EDG maintenance program includes the three key elements previously listed that were identified for EDGs in GL 94-01, the staff finds that there is an adequate basis for ensuring EDG performance. As for the deletion of the diesel generator test schedule (i.e., Table 4.8.1.1.2-1), which actually removes the requirement for accelerated EDG testing, the staff has compared the proposed modification with the model EDG TS provided in GL 94-01 and finds them to be identical. The staff concludes that the proposed modification of SR 4.8.1.1.2 and the deletion of Table 4.8.1.1.2-1 from the TSs will ensure that the EDGs would perform their intended functions and would minimize failures; therefore, the proposed changes are acceptable.

### 3.2 Deletion of Reporting Requirements of SR 4.8.1.1.3 and Change to the Bases

Currently, SR 4.8.1.1.3 requires that all EDG failures, valid or nonvalid, be reported to the NRC within 30 days. This SR also prescribes that the report shall include certain information, based on the recommendation of Regulatory Position C.3.b of RG 1.108, Revision 1, August 1977. With the issuance of GL 94-01, the licensee proposes to (1) eliminate this administrative burden of reporting EDG failures by deleting SR 4.8.1.1.3 and (2) revise the TS Bases section to reflect the above TS change.

The staff reviewed the proposed deletion of SR 4.8.1.1.3 and the proposed change in the TS Bases that inserted a sentence, that states, "Regulatory Guide 1.108 criteria for determining and reporting valid tests and failures and accelerated diesel generator testing have been superseded by implementation of the Maintenance Rule for diesel generators per 10CFR50.65." The staff finds that the proposed deletion of SR 4.8.1.1.3 is consistent with the changes endorsed by GL 94-01, and also agrees with the licensee that the reporting requirements of 10 CFR 50.72 and 10 CFR 50.73 are adequate for reporting EDG failures, thereby avoiding duplication of reporting EDG failures. The staff concludes that the deletion of SR 4.8.1.1.3 and the change to the TS Bases are acceptable.

### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Jersey State Official was notified of the proposed issuance of the amendment. The State official had no comments.

### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes surveillance requirements. The NRC 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding (64 FR 2251). Accordingly, the 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 or environmental assessment need be prepared in connection with the issuance of the amendment.

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

Principal Contributor: P. Kang

Date: April 14, 1999