

February 10 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,
DELETION OF AUTOMATIC DEPRESSURIZATION SYSTEM VALVE STARTUP
TESTING (TAC NO. MA2259)

Dear Mr. Keiser:

The Commission has issued the enclosed Amendment No. 116 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 June 25, 1998, as supplemented August 25, 1998, and December 15, 1998.

This amendment revises TS Surveillance Requirement 4.5.1.d.2.b by deleting the requirement to perform in-situ functional testing of the Automatic Depressurization System safety relief valves (SRVs) during startup testing activities. The amendment also revises TS Surveillance Requirement 4.4.2.1 such that the 18-month channel calibration for the SRV acoustic monitors will no longer require an exception to the provisions of TS 4.0.4, nor adjustments to SRV full open noise levels.

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/

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

Docket No. 50-354

Enclosures: 1. Amendment No.116 to
License No. NPF-57
2. Safety Evaluation

cc w/encls: See next page

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/s/

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Division of Reactor Projects - I/II
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Legal subject with changes to SSC

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NAME	REnnis:rb	MO'Brien	RWessman	JWermiel	Wta	WDean
DATE	1/26/99	1/26/99	01/27/99	1/28/99	1/28/99	2/9/99

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DOCUMENT NAME: HC2259.AMD



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 10, 1999

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

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Sincerely,

A handwritten signature in black ink, appearing to read "R B Ennis".

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

Docket No. 50-354

Enclosures: 1. Amendment No. 116 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:

Jeffrie J. Keenan, Esquire
Nuclear Business Unit - N21
P.O. Box 236
Hancocks Bridge, NJ 08038

Manager - Joint Generation
Atlantic Energy
6801 Black Horse Pike
Egg Harbor Twp., NJ 08234-4130

Hope Creek Resident Inspector
U.S. Nuclear Regulatory Commission
Drawer 0509
Hancocks Bridge, NJ 08038

Richard Hartung
Electric Service Evaluation
Board of Regulatory Commissioners
2 Gateway Center, Tenth Floor
Newark, NJ 07102

Mr. Louis Storz
Sr. Vice President - Nuclear Operations
Nuclear Department
P.O. Box 236
Hancocks Bridge, NJ 08038

Lower Alloways Creek Township
c/o Mary O. Henderson, Clerk
Municipal Building, P.O. Box 157
Hancocks Bridge, NJ 08038

General Manager - Hope Creek Operations
Hope Creek Generating Station
P.O. Box 236
Hancocks Bridge, NJ 08038

Mr. Elbert Simpson
Senior Vice President-
Nuclear Engineering
Nuclear Department
P.O. Box 236
Hancocks Bridge, NJ 08038

Director - Licensing Regulation & Fuels
Nuclear Business Unit - N21
P.O. Box 236
Hancocks Bridge, NJ 08038

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

Dr. Jill Lipoti, Asst. Director
Radiation Protection Programs
NJ Department of Environmental
Protection and Energy
CN 415
Trenton, NJ 08625-0415



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. 116
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 June 25, 1998, as supplemented August 25, 1998, and December 15, 1998, 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.116, 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, to be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



William M. Dean, 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: February 10, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 116

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

3/4 4-8

3/4 5-5

Insert

3/4 4-8

3/4 5-5

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS

=====

4.4.2.1 The acoustic monitor for each safety/relief valve shall be demonstrated OPERABLE with the setpoint verified to be $\leq 30\%$ of full open noise level by performance of a:

- a. CHANNEL FUNCTIONAL TEST at least once per 31 days, and a
- b. CHANNEL CALIBRATION at least once per 18 months.

4.4.2.2 At least 1/2 of the safety relief valve pilot stage assemblies shall be removed, set pressure tested and reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendations at least once per 18 months, and they shall be rotated such that all 14 safety relief valve pilot stage assemblies are removed, set pressure tested and reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendations at least once per 40 months. All safety relief valves will be re-certified to meet a $\pm 1\%$ tolerance prior to returning the valves to service after setpoint testing.

4.4.2.3 The safety relief valve main (mechanical) stage assemblies shall be set pressure tested, reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendations at least once every 5 years.

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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2. For the HPCI system, verifying that:
 - a) The system develops a flow of at least 5600 gpm against a test line pressure corresponding to a reactor vessel pressure of >200 psig, when steam is being supplied to the turbine at $200 + 15, -0$ psig.**
 - b) The suction is automatically transferred from the condensate storage tank to the suppression chamber on a condensate storage tank water level - low signal and on a suppression chamber - water level high signal.
 3. Performing a CHANNEL CALIBRATION of the CSS, and LPCI system discharge line "keep filled" alarm instrumentation.
 4. Performing a CHANNEL CALIBRATION of the CSS header ΔP instrumentation and verifying the setpoint to be \leq the allowable value of 4.4 psid.
 5. Performing a CHANNEL CALIBRATION of the LPCI header ΔP instrumentation and verifying the setpoint to be \leq the allowable value of 1.0 psid.
- d. For the ADS:
1. At least once per 31 days, performing a CHANNEL FUNCTIONAL TEST of the Primary Containment Instrument Gas System low-low pressure alarm system.
 2. At least once per 18 months:
 - a) Performing a system functional test which includes simulated automatic actuation of the system throughout its emergency operating sequence, but excluding actual valve actuation.
 - b) Verify that when tested pursuant to Specification 4.0.5, that each ADS valve is capable of being opened.
 - c) Performing a CHANNEL CALIBRATION of the Primary Containment Instrument Gas System low-low pressure alarm system and verifying an alarm setpoint of 85 ± 2 psig on decreasing pressure.

**The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 116 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 June 25, 1998, as supplemented August 25, 1998, and December 15, 1998, the Public Service Electric & Gas Company (the licensee) submitted a request for changes to the Hope Creek Generating Station (HCGS), Technical Specification (TSs). The requested changes would revise TS Surveillance Requirement (SR) 4.5.1.d.2.b by deleting the requirement to perform in-situ functional testing of the Automatic Depressurization System (ADS) safety relief valves (SRVs) during startup testing activities. The requested changes would also revise TS SR 4.4.2.1 such that the 18-month channel calibration for the SRV acoustic monitors will no longer require an exception to the provisions of TS 4.0.4, nor adjustments to SRV full open noise levels. The August 25, 1998, and December 15, 1998, letters provided clarifying information that did not change the initial proposed no significant hazards consideration determination or expand the scope of the original Federal Register Notice.

2.0 BACKGROUND

2.1 Background for TS SR 4.5.1.d.2.b Proposed Change

Each HCGS SRV is a Target Rock two-stage pilot operated SRV with an attached pneumatic actuator. There are a total of 14 SRVs installed on the HCGS main steam system. Five of these valves serve the ADS function which is to reduce reactor pressure during a small break LOCA or after containment isolation, in the event that the High Pressure Coolant Injection system and/or the Reactor Core Isolation Cooling system fail to maintain adequate reactor pressure vessel water level. The ADS function is accomplished by an automatic control circuit that applies electric power to solenoids which provide control air to the pneumatic diaphragm assembly (i.e., auxiliary actuating device) that removes the pilot spring force allowing the pilot disk to open. Once the pilot disk is open, steam pressure provides the necessary force to open the main SRV disk.

Currently, HCGS TS SR 4.5.1.d.2.b requires that, at least once every 18 months, the ADS SRVs undergo manual in-situ functional exercise testing as part of startup activities following an outage. This testing is typically performed at 750 +/-50 psig. The licensee considers this testing to impose an unnecessary challenge on the ADS SRVs and has linked this testing to SRV leakage of the pilot and main stages. The licensee has provided several examples of instances where the SRVs began to leak after the in-situ stroke testing was performed. The licensee states that the elimination of the in-situ testing should reduce leakage of the SRVs and reduce the potential for spurious valve actuation.

The licensee proposes to perform the surveillance of the ADS SRV function without in-situ stroking the main disks of the valves. The proposed TS change would revise the wording in TS SR 4.5.1.d.2.b to delete the requirement to perform the in-situ testing and would provide a requirement to verify that when the valves are tested pursuant to TS Section 4.0.5, which pertains to inservice inspection and testing of American Society of Mechanical Engineers Code Class 1, 2, and 3 components, each ADS valve is capable of being opened by performing the following testing:

- a. ADS logic system functional testing which verifies the Emergency Core Cooling System logic for actuating the ADS, not including actual stroking of the instrument gas/accumulator solenoids.
- b. A test which verifies proper operation of the ADS solenoid valves, air operator, and pilot assembly each refueling cycle.
- c. An ADS leak test, performed each refueling cycle and each time maintenance is performed on the ADS valve, which verifies that ADS instrument gas/accumulator leakage is low enough to ensure adequate pneumatic pressure for design-basis ADS SRV operation.
- d. SRV setpoint and leakage testing, performed on at least 50% of the SRV pilot stages each refueling outage, which verifies the pilot setpoints and that leakage is within strict limits.
- e. A main disk exercise test, performed on all SRVs at least once every 5 years and when the entire valve assembly is shipped to the certified test facility, which ensures that the main disks can freely open.

As justification for not performing the current TS-required in-situ SRV main stage disk exercising, the licensee emphasized that there has never been an inservice occurrence where a Target Rock SRV main stage disk did not stroke after the pilot stage was actuated.

2.2 Background for TS SR 4.4.2.1 Proposed Changes

Acoustic monitors are installed for each of the 14 SRVs (i.e., not just the 5 ADS SRVs). The acoustic monitors provide SRV position indication to meet the requirements of Regulatory Guide 1.97 (variable D10), and NUREG-0737 (Action Item II.D.3) as described on HCGS Updated Final Safety Analysis Report pages 1.10-51 and 7.5-18. This instrumentation is not safety-related.

Each acoustic monitor instrument loop consists of a sensor (mounted by clamp on the SRV discharge tailpipe), a preamplifier, and a fluid flow detector module. Surveillance testing for this instrumentation is performed per TS SR 4.4.2.1. The surveillance test requires a channel calibration to be performed at least once per 18 months to verify that the acoustic monitor for each SRV is demonstrated to be operable with the setpoint verified to be $\leq 30\%$ of full open noise level. There are two notes associated with TS SR 4.4.2.1. The first note states that the provisions of TS 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test. The second note states that initial acoustic monitor settings shall be in accordance with the manufacturer's recommendations and that adjustments to SRV full open noise levels shall be accomplished after the initial noise traces have been analyzed.

Based on information in the submittal dated December 15, 1998, and as clarified in conference calls with the licensee on December 18, December 22, and December 23, 1998, the TS SR 4.4.2.1.b channel calibration is currently performed as follows:

- 1) The sensor is disconnected electrically from the preamplifier. A sinewave generator is connected to the input of the preamplifier. A digital multimeter is connected to the analog output of the fluid flow detector. The sinewave generator provides test input signals and the fluid flow detector is calibrated (no adjustments are made to the preamplifier).
- 2) After the calibration is complete, the test equipment is removed from the loop and the sensor is reconnected to the preamplifier. An integrated system response test (also known as the "ping" test) is then performed to verify the functionality of the reinstalled instrumentation (i.e., tests sensor to fluid flow detector continuity). This test is performed by tapping the SRV tailpipe near the sensor and verifying that the fluid flow detector provides a response.
- 3) Acoustic monitor loop setpoint confirmation (and readjustment as required) is then performed while the SRVs are lifted by steam pressure during startup testing.

The proposed elimination of the in-situ testing of the ADS SRVs (as per TS SR 4.5.1.d.2.b) would also require a change to the manner in which the channel calibration is performed for the SRV acoustic monitors. The proposed calibration method for this instrumentation would be identical to steps 1 and 2 as described above. Step 3 would not be performed since the SRVs would no longer be opened by steam pressure during startup testing. Therefore, the licensee has proposed to delete the two notes associated with TS SR 4.4.2.1 since reactor steam pressure and adjustments to full open noise levels would no longer be applicable.

3.0 EVALUATION

3.1 Evaluation of TS SR 4.5.1.d.2.b Proposed Change

The staff has reviewed the licensee's proposed TS change and finds that the current TS requirement to perform the in-situ stroke testing of the ADS SRVs may contribute to undesirable SRV valve seat leakage and could result in spurious actuation of the valves during

power operation. The testing proposed by the licensee provides periodic verification of the individual ADS SRV components and includes: testing of the ADS logic, solenoid valves, air operator, and pilot assembly; leak testing of the ADS instrument gas/accumulator; setpoint testing of 50% of the pilot stages each refueling; main disk exercising of all SRVs at least each 5 years and when the entire valve assembly is shipped to the certified test facility. The staff finds that the proposed surveillance and testing of the ADS SRVs and associated components provide adequate assurance of proper valve operation.

One difference between the current TS required stroking of the ADS SRV main stages during plant startup and the licensee's proposal is that, with the proposed testing, there would be less frequent stroking of the SRV main stages. However, because the main stage disks of these valves are very reliable, as demonstrated by the good performance history of the main stages of Target Rock SRVs at Boiling Water Reactor plants, the staff finds that the proposed exercising of all SRVs at least once each 5 years is adequate.

Another difference between the current TS-required stroking and the licensee's proposal is that, when performing the testing in-situ as required by the current TS, the testing verifies that the SRV discharge line is not blocked. However, the licensee stated that there is a Foreign Material Exclusion Program in place at the plant which minimizes the potential of debris blocking the discharge lines such that the possibility of blockage is extremely remote. The staff agrees that there is a very small possibility of blockage of an SRV discharge line as demonstrated by operational history and finds that the licensee has acceptably addressed this concern.

Based on the above evaluation, the staff concludes that the licensee has provided adequate justification for the proposed change to the HCGS TS. The proposed change to TS SR 4.5.1.d.2.b provides for adequate testing of the ADS SRVs to demonstrate proper operation without the need for in-situ stroking of the main disk stages of the valves. Therefore, the proposed change to TS SR 4.5.1.d.2.b for HCGS, is acceptable.

3.2 Evaluation of TS SR 4.4.2.1 Proposed Changes

As a result of the proposed TS modifications, the channel calibration test, TS SR 4.4.2.1.b, for the SRV acoustic monitor instrumentation will be performed in two parts on an 18 month frequency. In the first part of the test, the acoustic monitor sensor will be disconnected from the preamplifier and the rest of the SRV system instrumentation will be calibrated by connecting a sinewave generator to the preamplifier input terminals and a digital multimeter to the fluid flow detector analog output terminals. On completion of this part of the channel calibration test, the acoustic monitors will be reconnected to the SRV system instrumentation and the entire acoustic monitor instrumentation will be subjected to a ping test with sufficient force to assure the operability of the acoustic sensor, but not confirming the activation setpoint.

In a letter dated December 15, 1998, the licensee stated that they will perform the acoustic monitor setpoint confirmation process under the provisions of 10 CFR 50.59 ensuring that the acoustic monitor setpoints are less than or equal to 30% of full open SRV noise level. The licensee further stated that with this provision, it is not necessary to conduct final calibration

confirmation of the acoustic monitor instrumentation by opening the SRVs by steam pressure during startup testing.

The licensee confirmed during conference calls that the acoustic monitors are used only to provide operator information and do not perform any control functions. The capability of the SRVs to perform their intended function is not dependent on the operation of the acoustic monitor, and no credit is taken for the acoustic monitor operability in the accident analysis. Furthermore, this TS requirement exceeds the present staff position included in the Improved Standard Technical Specification.

Based on the above evaluation, the staff concludes that the licensee has provided adequate justification for the proposed changes to the HCGS TS. The acoustic monitors provide operator information only and are in conformance with NUREG-0737 and Regulatory Guide 1.97. Therefore, the proposed changes to TS SR 4.4.2.1 for HCGS, 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 the 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 (63 FR 43212). 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 Contributors: G. Hammer
S. Mazumdar
R. Ennis

Date: February 10, 1999