September 28, 199

Docket No. 50-443
Serial No. SEA-93-024

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Mr. Ted C. Feigenbaum
Senior Vice President
and Chief Nuclear Officer
North Atlantic Energy Service Corporation
Post Office Box 300
Seabrook, New Hampshire 03874

Dear Mr. Feigenbaum:

SUBJECT: AMENDMENT NO. 25 TO FACILITY OPERATING LICENSE NPF-86: ENGINEERED SAFETY FEATURES ACTUATION SYSTEM SURVEILLANCE REQUIREMENT - LICENSE AMENDMENT REQUEST 93-10 (TAC NO. M87307)

The Commission has issued the enclosed Amendment No. 25 to Facility Operating License No. NPF-86 for the Seabrook Station, Unit 1, in response to your application dated August 26, 1993.

The amendment modifies an Appendix A Technical Specification (TS) surveillance requirement relating to the Refueling Water Storage Tank (RWST) narrow range level transmitters. Specifically, the amendment revises Technical Specification 4.3.2.1, Table 4.3-2, Functional Unit 8.b by deleting the requirement to perform a CHANNEL CHECK at least once per 12 hours and by adding a new requirement to perform a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) at least once per 92 days. Also, a note is added to clarify that setpoint verification is not applicable to the TADOT.

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

Sincerely,

Original signed by:

Albert W. De Agazio, Sr. Project Manager
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 25 to NPF-86
2. Safety Evaluation

cc w/enclosures:
See next page *See previous concurrence

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

September 28, 1993

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Senior Vice President
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North Atlantic Energy Service Corporation
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Sincerely,

Albert W. De Agazio

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Project Directorate I-4
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Office of Nuclear Reactor Regulation

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cc w/enclosures:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NORTH ATLANTIC ENERGY SERVICE CORPORATION, ET AL*

DOCKET NO. 50-443

SEABROOK STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 25
License No. NPF-86

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by North Atlantic Energy Service Corporation, et al. (the licensee) dated August 26, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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*North Atlantic Energy Service Corporation (NAESCO) is authorized to act as agent for the: North Atlantic Energy Corporation, Canal Electric Company, The Connecticut Light and Power Company, Great Bay Power Corporation, Hudson Light and Power Department, Massachusetts Municipal Wholesale Electric Company, Montaup Electric Company, New England Power Company, New Hampshire Electric Cooperative, Inc., Taunton Municipal Light Plant, The United Illuminating Company, and Vermont Electric Generation and Transmission Cooperative, Inc., and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

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-86 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 25 , and the Environmental Protection Plan contained in Appendix B are incorporated into Facility Operating License No. NPF-86. NAESCO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance, to be implemented immediately.

FOR THE NUCLEAR REGULATORY COMMISSION

Alexander W Dromerick Jr

John F. Stolz, Director
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the
Technical Specifications

Date of Issuance: September 28, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 25

FACILITY OPERATING LICENSE NO. NPF-86

DOCKET NO. 50-443

Replace the following pages of Appendix A, Technical Specifications, with the attached pages as indicated. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change. Overleaf pages have been provided.*

Remove	Insert
3/4 3-33*	3/4 3-33*
3/4 3-34	3/4 3-34
3/4 3-35	3/4 3-35
3/4 3-36*	3/4 3-36*

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

CHANNEL FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	ANALOG CHANNEL OPERATIONAL TEST	TRIP ACTUATING DEVICE OPERATIONAL TEST	ACTUATION LOGIC TEST	MASTER RELAY TEST	SLAVE RELAY TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
4. Steam Line Isolation								
a. Manual Initiation (System)	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3
b. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2, 3
c. Containment Pressure-Hi-2	S	R	M	N.A.	N.A.	N.A.	N.A.	1, 2, 3
d. Steam Line Pressure-Low	S	R	M	N.A.	N.A.	N.A.	N.A.	1, 2, 3
e. Steam Line Pressure-Negative Rate-High	S	R	M	N.A.	N.A.	N.A.	N.A.	3
5. Turbine Trip								
a. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2
b. Steam Generator Water Level-High-High (P-14)	S	R	M	N.A.	N.A.	N.A.	N.A.	1, 2
6. Feedwater Isolation								
a. Steam Generator Water Level--High-High (P-14)	S	R	M	N.A.	N.A.	N.A.	N.A.	1, 2
b. Low RCS T_{avg} Coincident with Reactor Trip	S	R	M	N.A.	N.A.	N.A.	N.A.	1, 2
c. Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.							
7. Emergency Feedwater								
a. Manual Initiation								
1) Motor-driven pump	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3
2) Turbine-driven pump	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	ANALOG CHANNEL OPERATIONAL TEST	TRIP ACTUATING DEVICE OPERATIONAL TEST	ACTUATION LOGIC TEST	MASTER RELAY TEST	SLAVE RELAY TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
7. Emergency Feedwater (Continued)								
b. Automatic Actuation and Actuation Relays	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2, 3
c. Steam Generator Water Level-Low-Low, Start Motor-Driven Pump and Turbine-Driven Pump	S	R	M	N.A.	N.A.	N.A.	N.A.	1, 2, 3
d. Safety Injection, Start Motor-Driven Pump and Turbine-Driven Pump	See Item 1. above for all Safety Injection Surveillance Requirements.							
e. Loss-of-Offsite Power Start Motor-Driven Pump and Turbine-Driven Pump	See Item 9. for all Loss-of-Offsite Power Surveillance Requirements.							
8. Automatic Switchover to Containment Sump								
a. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2, 3, 4
b. RWST Level Low-Low Coincident With	N.A.	R	M	Q(3)	N.A.	N.A.	N.A.	1, 2, 3, 4
Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.							

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

CHANNEL FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	ANALOG CHANNEL OPERATIONAL TEST	TRIP ACTUATING DEVICE OPERATIONAL TEST	ACTUATION LOGIC TEST	MASTER RELAY TEST	SLAVE RELAY TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
9. Loss of Power (Start) Emergency Feedwater)								
a. 4.16 kV Bus E5 and E6 Loss of Voltage	N.A.	R	N.A.	M	N.A.	N.A.	N.A.	1, 2, 3, 4
b. 4.16 kV Bus E5 and E6 Degraded Voltage Coincident With Safety Injection	N.A.	R	N.A.	M	N.A.	N.A.	N.A.	1, 2, 3, 4
	See Item 1. above for all Safety Injection Surveillance Requirements							
10. Engineered Safety Features Actuation System Interlocks								
a. Pressurizer Pressure, P-11	N.A.	R	M	N.A.	N.A.	N.A.	N.A.	1, 2, 3
b. Reactor Trip, P-4	N.A.	N.A.	N.A.	N.A.	R	N.A.	N.A.	1, 2, 3
c. Steam Generator Water Level, P-14	S	R	M	N.A.	M(1)	M(1)	Q	1, 2, 3

TABLE NOTATION

(1) Each train shall be tested at least every 62 days on a STAGGERED TEST BASIS.

(2) A DIGITAL CHANNEL OPERATIONAL TEST will be performed on this instrumentation.

(3) Setpoint verification is not applicable.

3/4.3.3 MONITORING INSTRUMENTATION

RADIATION MONITORING FOR PLANT OPERATIONS

LIMITING CONDITION FOR OPERATION

3.3.3.1 The radiation monitoring instrumentation channels for plant operations shown in Table 3.3-6 shall be OPERABLE with their Alarm/Trip Setpoints within the specified limits.

APPLICABILITY: As shown in Table 3.3-6.

ACTION:

a. With a radiation monitoring channel Alarm/Trip Setpoint for plant operations exceeding the value shown in Table 3.3-6, adjust the Setpoint to within the limit within 4 hours or declare the channel inoperable.

b. With one or more radiation monitoring channels for plant operations inoperable, take the ACTION shown in Table 3.3-6.

c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.1 Each radiation monitoring instrumentation channel for plant operations shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and DIGITAL CHANNEL OPERATIONAL TEST for the MODES and at the frequencies shown in Table 4.3-3.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 25 TO FACILITY OPERATING LICENSE NO. NPF-86

NORTH ATLANTIC ENERGY SERVICE CORPORATION

SEABROOK STATION, UNIT 1

DOCKET NO. 50-443

1.0 INTRODUCTION

By letter dated August 26, 1993, North Atlantic Energy Service Corporation (North Atlantic) submitted an application for license amendment for a change to Technical Specification (TS) 4.3.2.1, Table 4.3-2, Engineered Safety Features Actuation System Instrumentation Surveillance Requirements. The amendment would revise Technical Specification 4.3.2.1, Table 4.3-2, Functional Unit 8.b by deleting the requirement to perform a CHANNEL CHECK at least once per 12 hours and by adding a new requirement to perform a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) at least once per 92 days. A note also would be added to clarify that setpoint verification is not applicable to the TADOT.

2.0 BACKGROUND AND DISCUSSION

On August 25, 1993, North Atlantic representatives requested the NRC to exercise its discretion not to enforce compliance with Seabrook Technical Specification Surveillance Requirement 4.3.2.1, Table 4.3-2, Functional Unit 8.b, CHANNEL CHECK, commencing on August 25, 1993. North Atlantic informed the NRC that on August 24, 1993, it had determined that the subject CHANNEL CHECK of the Refueling Water Storage Tank (RWST) low-low level instrumentation (Functional Unit 8.b), had not been performed adequately in the past. Furthermore, North Atlantic had determined that the present design of the RWST low-low level instrumentation precludes performing an adequate CHANNEL CHECK.

Upon determining that the required surveillances could not be performed adequately, North Atlantic performed an operational check (which met the intent of the CHANNEL CHECK) on each of the four level channels and was continuing to perform such operational checks every 12 hours. The operational check involved venting each level instrument and verifying that the low level bistable actuated and that the transmitter was accurate at the zero level.

North Atlantic asserted that performance of the operational check every 12 hours to satisfy the CHANNEL CHECK requirement potentially reduced the level of protection to the health and safety of the public, involved an increase to occupational exposure, and increased the possibility for personnel contamination. Furthermore, the frequent manipulation of equipment to perform the operational checks greatly increased the potential for equipment malfunction and human error. Because of these considerations, North Atlantic believed that enforcement discretion was warranted.

In lieu of performing CHANNEL CHECKS, North Atlantic committed to propose an amendment to the operating license that would replace the requirement for performing a CHANNEL CHECK on the RWST low-low level instruments pursuant to Technical Specification 4.3.2.1, Table 4.3-2, Functional Unit 8.b, with a requirement to perform a TADOT at least once per 92 days. The proposed amendment would not affect the current requirement for performing an analog channel operational test (ACOT) monthly. The TADOT would not include setpoint verification since this is accomplished under the ACOT.

The NRC staff, orally, indicated its intention to exercise discretion not to enforce compliance with Technical Specification Surveillance Requirement 4.3.2.1, Table 4.3-2, Functional Unit 8.b, CHANNEL CHECK, commencing on August 25, 1993. This discretionary action would be effective until a decision by the staff regarding the proposed amendment could be issued. This enforcement discretion was confirmed by NRC letter to North Atlantic dated August 30, 1993.

3.0 EVALUATION

The RWST at Seabrook Station is equipped with seven level transmitters. Four of these level transmitters provide an input into the 2/4 low-low level logic for swapping the water supply for the Emergency Core Cooling System (ECCS) pumps from the RWST to the containment recirculation sump. These four level transmitters are narrow-range transmitters, i.e., they do not cover the entire volume of the RWST. Instead, they provide level indication for approximately 140% of the low-low level setpoint. Therefore, when the RWST is at its normal operating level these transmitters are over-ranged and are saturated. As a result the output signal is at the saturation level. These level transmitters are not equipped with either local level indication or remote level indication on the Main Control Board (MCB). The three other level transmitters provide wide-range RWST level indication on the MCB and are used for accident monitoring and Technical Specification monitoring of the RWST level.

Technical Specification 4.3.2.1, Table 4.3-2, Functional Unit 8.b requires a CHANNEL CHECK be performed at least every 12 hours on the channels which input into the RWST level low-low coincident with Safety Injection logic. This requires that a CHANNEL CHECK be performed on the RWST level transmitters which are not provided with any indication. A CHANNEL CHECK, by definition, is a qualitative assessment of channel behavior during operation by observation. Typically, such a check consists of a channel to channel

comparison of indications derived from independent instrument channels measuring the same parameter. The intent of the CHANNEL CHECK is to detect anomalous behavior of a channel; the CHANNEL CHECK is not intended to verify operability. At Seabrook Station the RWST low-low level narrow range instrument design precludes performing a meaningful channel to channel comparison since the transmitters are expected to be over-ranged and saturated during normal operation.

During the licensing of Seabrook Station, the applicant, then Public Service Company of New Hampshire (PSNH), was asked to identify those instrument channels which would perform a safety function but which would not be provided with certain features. The RWST low-low level transmitters were identified as not having indication, but a commitment was made to provide indicators to allow channel comparisons (cf. Amendment 49 to the Final Safety Analysis Report, RAI 420.73).

Later, in a revised response (cf. Amendment 59 to the Final Safety Analysis Report), PSNH noted that the narrow range transmitters would be over-ranged during normal operation, thus indicators would not be useful for routine surveillance. The commitment to install indication was retracted and replaced by a commitment to employ increased surveillance to ensure operability of the level transmitters to compensate for the lack of main control board indication. To meet this new commitment, an operational check was developed that would be adequate to verify the operability of the RWST low-low level transmitters.

North Atlantic has stated that they believe that this operational check was intended to replace the requirement to perform a periodic CHANNEL CHECK, but that during the review and approval of the original Technical Specifications the CHANNEL CHECK requirement was not deleted through error.

North Atlantic has indicated that the operational check procedure involves placing the channel being tested in the tripped condition prior to venting the level instrument to verify that the empty alarm is actuated at its setpoint, and that the transmitter is accurate at the zero level. This operational check has been performed every six months on a staggered test basis, and was performed to satisfy the CHANNEL CHECK requirement starting on August 24, 1993, until enforcement discretion was granted on August 25, 1993.

North Atlantic asserts that the performance of the operational check takes approximately 7 man-hours to complete and exposes personnel to increased radiation exposure (approximately 2 mrem per performance) and has the potential to contaminate personnel with radioactive water during the draining and venting processes required by the procedure. Additionally, the manipulation of equipment to perform the operational checks greatly increases the potential for equipment malfunction and human error.

To perform a surveillance that meets the intent of a CHANNEL CHECK with the Seabrook design requires that the channel being tested be placed in the tripped condition. This action could contribute to premature switchover of

the Residual Heat Removal suction path from the RWST to the containment building sump during accident conditions, which could place the plant in an unanalyzed condition. (The premature switchover to the containment building sump was discussed in Seabrook Station Licensee Event Report 93-002). The staff has considered the safety significance of premature switchover and the increased potential for its occurrence while the operational test is being conducted. The staff agrees that performing these tests has the potential to degrade public health and safety.

The staff has reviewed North Atlantic's assertions regarding the inability, with the present design, to perform a CHANNEL CHECK on the RWST low-low level instruments that would provide useful information regarding channel behavior. The staff agrees with North Atlantic's assertion.

In lieu of performing CHANNEL CHECKS, North Atlantic has proposed to replace the requirement for performing a CHANNEL CHECK on the RWST low-low level instruments pursuant to Technical Specification 4.3.2.1, Table 4.3-2, Functional Unit 8.b, with a requirement to perform a TRIP ACTUATING DEVICE OPERATIONAL CHECK (TADOT) at least once per 92 days. The TADOT would not include setpoint verification since this is accomplished under the ACOT. North Atlantic asserts that the installed instruments are accurate and reliable and that a quarterly TADOT is sufficient to detect an instrument failure in the time period between channel calibrations. North Atlantic supports this assertion by noting a history (at Seabrook) of 7 years of satisfactory performance of calibrations and ACOT, and three successful operational checks that have been performed since August 24, 1993. North Atlantic notes further that the narrow range RWST level transmitters have not experienced any gross failures and have not required significant adjustment during periodic calibrations.

Based on review and evaluation of (1) the additional occupational radiation exposure, (2) the increased potential for personnel contamination, (3) the increased potential for human error and/or equipment malfunction, and (4) the increased potential for premature switchover of the Residual Heat Removal suction path associated with performing the operational test (to satisfy the requirement for a CHANNEL CHECK), and the demonstrated reliability of the RWST low-low level transmitters, the staff concludes that North Atlantic's proposed replacement of the CHANNEL CHECK for Functional Unit 8.b, Table 4.3-2 with a quarterly TADOT is acceptable and involves no significant impact to public health and safety.

4.0 EXIGENT CIRCUMSTANCES

A CHANNEL CHECK on Functional Unit 8.b in accordance with Technical Specification (TS) 4.3.2.1, Table 4.3-2, Engineered Safety Features Actuation System, is required at least every 12 hours. North Atlantic informed the NRC that on August 24, 1993, it had determined that the subject CHANNEL CHECK of the RWST low-low level instrumentation (Functional Unit 8.b), had not been performed adequately in the past. Furthermore, North Atlantic had determined

that the present design of the RWST low-low level instrumentation precludes performing an adequate CHANNEL CHECK. Upon determining that the required surveillances had not been and could not be performed adequately, North Atlantic performed an operational check (which meets the intent of the CHANNEL CHECK) on each of the four level channels and continued to perform such operational checks every 12 hours until informed that the NRC would exercise discretion not to enforce compliance with the Technical Specification Surveillance Requirement.

On August 25, 1993, North Atlantic representatives requested the NRC to exercise its discretion not to enforce compliance with Seabrook Technical Specification Surveillance Requirement 4.3.2.1, Table 4.3-2, Functional Unit 8.b, CHANNEL CHECK, commencing on August 25, 1993. The request for enforcement discretion was presented during a teleconference between NRC and North Atlantic representatives. The request, along with supporting information and a proposed amendment, was also submitted by letter dated August 26, 1993.

The NRC staff, orally, indicated its intention to exercise discretion as requested commencing on August 25, 1993. This discretionary action would be effective until a decision by the staff could be issued regarding the proposed amendment which is the subject of this Safety Evaluation. The basis for this action is documented in a NRC letter to North Atlantic dated August 30, 1993.

The NRC staff concluded that this action involved minimum safety impact, and the staff was satisfied that the exercise of enforcement discretion was warranted from a public health and safety perspective because:

1. This action could contribute to premature switchover of the Residual Heat Removal suction path from the RWST to the containment building sump during accident conditions, which could place the plant in an unanalyzed condition.

2. The performance of the twice daily operational checks would involve exposure of personnel to radiation (approximately 4 mrem), and require approximately 14 man-hours to complete.

3. Performing the operational test has the potential to contaminate personnel with radioactive water due to the venting processes required by the procedure.

4. The frequent manipulation of equipment to perform the operational checks greatly increases the potential for equipment malfunction and human error.

The NRC staff does not believe that North Atlantic has abused the exigency provisions of 10 CFR 50.91 in this instance. Accordingly, the Commission has determined that exigent circumstances existed warranting prompt action, the situation could not have been avoided, and the amendment as discussed in Section 5.0 does not involve a significant hazards consideration.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has made a final determination that the amendment involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92(c), this means that the operation of the facility in accordance with the proposed amendment would not (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Involve a significant reduction in a margin of safety.

The Commission has evaluated the proposed changes against the above standards as required by 10 CFR 50.91(a) and has concluded that:

A. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated (10 CFR 50.92 (c)(1) because they do not involve a change in the design or operation of the facility, nor do they affect the response of the facility to an accident. Since the proposed changes merely involve a surveillance requirement for devices which are used in the mitigation of an accident, they will not affect the operation of the equipment. Furthermore, none of the failure modes of the instruments are accident initiators, and any failure would be detected during the proposed quarterly TADOT or during calibrations. The revised surveillance requirements will continue to provide adequate assurance that the equipment will perform its specified function if called upon to do so.

B. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated (10 CFR 50.92(c)(2)) because the changes do not affect the manner by which the facility is operated or involve any changes to equipment or features which affect the operational characteristics of the facility.

C. The changes do not involve a significant reduction in a margin of safety (10 CFR 50.92(c)(3)) because they do not affect the manner by which the facility is operated or involve equipment or features which affect the operational characteristics of the facility.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Hampshire and Massachusetts State officials were notified of the proposed issuance of the amendment. The State officials had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a surveillance requirement. 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 (58 FR 47773). The staff has made a final determination that the amendment involves no significant hazards consideration. 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.

8.0 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.

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