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REFERENCE: SNM-2500
Docket 72-1

In accordance with the requirements of 10CFR72, General Electric Company submits the proposed **Amendment 11 to Appendix A Technical Specifications for Safety License SNM-2500 for Morris Operation**. This request supplies a new Attachment C, "Safety Evaluation for Proposed Changes".

GE has determined the proposed changes included in this submittal are acceptable for ensuring the activities at Morris Operation are conducted without endangering the health and safety of the public, and are in compliance with the applicable regulations of 10 CFR 72. Also, approval of this proposed amendment will not be inimical to the common defense and security, and the changes do not involve any adverse environmental impact. If there are any questions regarding the technical information contained in these revisions, please call E. W. Secko at the above phone number.

Please acknowledge receipt of this latest revision by signing and returning this letter to E. W. Secko at the above address.

Sincerely,

E. W. Secko
Regulatory Compliance Manager

Enclosures

I acknowledge receipt of Amendment 11 to Morris Operation License SNM-2500.

Signed Title Date

NMSSol Public



ATTACHMENT A

**GUIDE TO REVISED SUBSECTIONS IN GE MORRIS OPERATION
SPECIAL NUCLEAR MEATERIAL LICENSE SNM-2500**

Title	Previous Amendment "10"	New Amendment "11"	Comment
Introduction	1.0	1.0	Deleted "of the receipt" in 1 st line.
Quality Assurance	1.2.1	1.2.1	Deleted "(See App B.8 of the CSAR)"
Specification	2.1.1	2.1.1	Changes paragraph a to identify current fuel inventory. Deleted paragraph b Renumbered para "c to b" and "d to c"
Basis	2.1.2	2.1.2	Deleted Figures 2-1a, 2-1b, 2-2a, 2-2b Revised 1 st paragraph to identify current inventory
Basis	4.4.2	4.4.2	Deleted "LAW Vault Leak Detection System"
Coolers	4.5		Deleted
Cask Coolants	4.7		Deleted
Basin Water Chemical Characteristics	4.7	4.5	Renumbered to allow for deleted sections
Specification	4.7.1	4.5.1	Changed pH to Conductivity
Basis	4.7.2	4.5.2	Renumbered
Basin Water Radioactive Contaminants	4.9	4.6	Renumbered this entire sub-section
Fuel Storage System	5.2	5.2	Added "in accordance with 10 CFR 72.48"
Plans and Procedures – Minimum Requirements	6.3.2 b	6.3.2 b	Added "per 10 CFR 72.38"
Functional and Operating Limits	6.5.1 a	6.5.1 a	Deleted "When feasible"
Functional and Operating Limits	6.5.1 c	6.5.1.c	Deleted Region III included NRC Operations Center
Functional and Operating Limits	6.5.1 d	6.5.1 d	Deleted "Plant"
Limiting Conditions	6.5.2 b	6.5.2.b	Deleted "Plant"
Limiting Conditions	6.5.2 c	6.5.2 c	Deleted Region III included "NRC Operations Center"
Limiting Conditions	6.5.2 d	6.5.2 d	Reworded to require review of all non-compliances
Surveillance Requirements	6.5.3 b	6.5.3 b	Deleted "Plant"
Design Features	6.5.4	6.5.4	Added requirement for 10 CFR 72.48
Logs and Records			
References and Notes	7.0	8.0	Renumbered for continuity



Morris Operation
Special Nuclear Material License

SNM-2500
Ammendment 11

Title	Previous Amendment "10"	New Amendment "11"	Comment
Environmental Monitoring	8.0	7.0	Renumbered for continuity
Table of Contents	i		Deleted
Tables	ii	ii	Deleted
Introduction	8.0	7.1	Renumbered for continuity. Deleted "receipt"
Specification	8.1.1	7.2.1	Deleted "indicated in Table 8-1" Changed Specification reference from 8.2 to 7.3
Basis	8.1.2	7.2.2	Reworded
Annual Environmental Report	8.2	7.3	Renumbered

APPENDIX A

**GENERAL ELECTRIC COMPANY
MORRIS OPERATION
MORRIS, ILLINOIS**

**TECHNICAL SPECIFICATIONS FOR SAFETY
LICENSE SNM-2500**

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1.0 INTRODUCTION

These technical specifications govern safe possession, and storage of irradiated light-water reactor fuel at Morris Operation.*

1.1 DEFINITIONS

The following definitions apply for the purpose of these technical specifications:

- a. Administrative Controls: Provisions relating to organization and management procedures, record keeping, review and audit, and reporting necessary to assure that operations involving storage of spent fuel at Morris Operation are performed in a safe manner.
- b. Design Features: Facility features associated with basic design such as construction materials, geometric arrangements, dimensions, etc., which if altered or modified, could have a significant effect on safety.
- c. Functional and Operating Limits: Limits on fuel handling and storage conditions necessary to protect the integrity of stored fuel; to protect employees against occupational exposures; and to guard against uncontrolled release of radioactive materials.
- d. Fuel Bundle: Unit of nuclear fuel in the form used in the core of a light-water reactor (LWR). Normally, will consist of a rectangular arrangement of fuel rods held together by end fittings, spacers and tie rods. The BWR fuel bundle does not include the reusable fuel channel which is not shipped with fuel bundles.
- e. Limiting Conditions: The lowest functional capabilities or performance levels of equipment required for *facility* safe operation.
- f. Surveillance Requirements: Surveillance requirements include: (i) inspection and monitoring of spent fuel in storage; (ii) inspection, test and calibration activities necessary to ensure the integrity of required systems and components and the stored spent fuel is maintained; (iii) confirmation that facility operation is within required functional and operating limits; and (iv) a confirmation that limiting conditions required for safe storage are met.
- g. Tonne (Te): One metric ton, equivalent to 1000 kg or 2204.6 lb. Fuel quantity is expressed in terms of the fuel heavy metal content, measured in metric tons, and written TeU.

See Section 8.0 of this document for references and notes.

1.2 GENERAL LICENSE CONDITIONS

1.2.1 Quality Assurance

Morris Operation activities shall be conducted in accordance with 10CFR 72 subpart G, as described in Morris Operation Quality Assurance Plan, NEDE-31559.

1.2.2 Fuel Transfer Canal Closure

The transfer canal upper end (CSAR Figure 1-5) has been sealed by welding a 1/4-inch thick stainless steel plate to imbedded steel angles framing the opening. There are no protrusions from the plate that could be used to facilitate removal. The fuel basket transfer arm has been rendered inoperative by welding a block in place preventing arm movement, and disabling the arm hydraulic system. These conditions shall not be changed without prior Nuclear Regulatory Commission approval.

2.0 FUNCTIONAL AND OPERATING LIMITS

2.1 AUTHORIZED MATERIALS

2.1.1 Specification

- a. Light-water reactor nuclear fuel stored at GE-MO has previously met specific requirements detailed in earlier revisions of this document. Fuel currently in storage has been at GE-MO since 1989, the basins are essentially full and storage is limited to the following:

Station	Type	Cladding	Bundle Array	1 st Bundle Received	Last Bundle Received	Total Bundles
Conn Yankee	PWR	SS	15x15	01-13-72	08-05-87	82
Cooper	BWR	Zircalloy	7x7 & 8x8	08-24-84	01-27-89	1054
Dresden	BWR	Zircalloy	7x7	09-05-75	03-31-77	753
Monticello	BWR	Zircalloy	8x8	11-21-84	04-24-87	1058
San Onofre	PWR	SS	14x14	03-27-72	09-07-80	270

- b. Radioactively contaminated tools and equipment that are incidental to the conduct of General Electric's nuclear and nuclear related business may be possessed, repaired and decontaminated. The total contamination of all tools and equipment shall not exceed 10 Ci as determined by external exposure from the items as received. Items containing smearable contamination shall be packaged for storage.
- c. Tools and equipment specifically related to fuel storage operations, such as shipping cask internals, contaminated with radioactive materials may be possessed.

2.1.2 Basis

The design criteria and subsequent safety analyses of Morris Operation assumed certain characteristics and limitations for fuels that are received and stored. Specification 2.1.1a assures these bases remain valid by defining the stored fuel.

The design bases for criticality analyses were selected from detailed analytical studies based on physical parameters of specific fuel designs (see Table A.10-1, CSAR Appendix A.10). The largest bundle cross-sectional area and infinite bundle length were assumed in the calculations. These limits were based on unirradiated clean fuel and include allowance for the poisoning effect of the stainless steel baskets. Fuel centerline locations and other orientations were assumed to be those giving the maximum system reactivity.

Specification 2.1.1b provides for storage of tools and equipment incidental to the conduct of General Electric's nuclear businesses while awaiting decontamination, reuse, or ultimate disposal. Activity will be calculated from exposure rate measurements from a package, assuming the radiation originates from a uniform volumetric source having approximately the same dimensions as the package. Unless otherwise determined, gamma emissions of 1 MeV/disintegration will be assumed.

Specification 2.1.1c provides for storage of tools and equipment specifically related to General Electric's fuel storage operations, such as cask internals and yokes while awaiting decontamination, reuse, or ultimate disposal. These items may be contaminated with Co-60, Cs-137, or other isotopes as encountered in fuel handling and storage activities.

2.2 FUEL STORAGE PROVISIONS

2.2.1 Specification

Irradiated fuel bundles shall be stored under water in authorized fuel storage baskets mounted in a support grid, in a fuel storage basin.

2.2.2 Basis

The design criteria and subsequent safety analysis for Morris Operation assume irradiated fuel is stored under water in fuel storage baskets, mounted in a support grid in a fuel storage basin. Specification 2.2.1 assures these assumptions remain valid. The fuel storage baskets and support grid are those described in the CSAR, Chapter 5.

2.3 VENTILATION EXHAUST VACUUM

2.3.1 Specification

- a. A negative air tunnel vacuum is required whenever the low activity waste evaporator is operating.
- b. If air tunnel vacuum drops below 0.75 inches of water during low activity waste evaporator operation, evaporator shutdown will be initiated promptly.

2.3.2 Basis

A negative water pressure in the air tunnel is required relative to the equipment cells to assure adequate air flow to carry radioactive material released during low activity waste evaporator operation through the air tunnel to the sand filter and up the stack. Air tunnel vacuum measurement is indicated in the Control Room (as shown in CSAR Table 5-2).

3.0 LIMITING CONDITIONS

3.1 LIMITING CONDITION - WATER SHIELD

3.1.1 Specification

The basin water depth between the uppermost part of a fuel bundle and the basin water surface shall be a minimum of 9 feet.

3.1.2 Basis

This specification establishes a minimum water shielding depth to limit radiation dose rate in the basin area. This specification applies to all fuel in storage or being transferred from cask to storage location (also, see Section 5.2).

Tests have shown the water surface dose rate does not increase above background until the water depth is decreased to about 7 feet. A conservative water shield depth of 9 feet has been chosen to provide an increased margin of safety.

3.2 LIMITING CONDITION - CRITICALITY

3.2.1 Specification

A structure (unloading pit doorway guard: (CSAR Figure 5-5)¹) shall be used at the doorway between the unloading basin and Storage Basin No. 1 to prevent a basket from tipping in a manner that its contents may be emptied into the unloading basin.

3.2.2 Basis

The analysis of a fuel basket drop accident (CSAR Chapter 8) indicates that a basket dropped or tipped over in Basin No. 1, near the cask unloading basin doorway, could empty its contents into the unloading basin. It is assumed the fuel might fall into a critical configuration on the

bottom of the unloading basin. The unloading pit doorway guard assures that a basket cannot empty its fuel into the unloading basin.

4.0 SURVEILLANCE REQUIREMENTS

Requirements for surveillance of various radiation levels, water levels, and other physical quantities, as well as inspections and other periodic activities to provide assurance of specification compliance, are contained in specific Morris Operation Compliance and Operability Tests. Included among these are:

4.1 EFFLUENT AIR

Ventilation air leaving the sand filter is monitored to provide assurance that offsite concentrations will be within the 10CFR 20 limits. The sampling and analysis program provides data for estimating the amounts of radioactive material released to the environment during routine or accident conditions.

4.2 HOLDING BASINS

Morris Operation is designed to preclude the release of radioactive materials in normal liquid effluents. As a precautionary measure the holding basin and sanitary lagoons, which receive and retain plant liquid discharges, are periodically sampled to detect inadvertent contamination by radioactive materials.

4.3 SEALED SOURCES

Surface contamination is measured on each licensed sealed source (not irradiated fuel) to determine that has not developed a leak. The limitations on removable contamination are based on 10CFR 70.39(c) limits for plutonium, but other provisions of this reference are not applicable.

4.4 INSTRUMENTATION

Systems and equipment shall be tested for operability and calibrated in accordance with manufacturer's recommendations, and operational tests shall be performed to check alarm functions and demonstrate other operational features of the system or equipment

4.5 BASIN WATER CHEMICAL CHARACTERISTICS

4.5.1 Specification

Basin water chemistry shall be maintained as follows:

<u>Item</u>	<u>Acceptable Analysis</u>
-------------	----------------------------

Conductivity less than 2.5 uMho/cm (equivalent to pH of 4.5 to 9.0)

NaNO₃ <200 ppm

Cl⁻ <10 ppm

4.5.2 Basis

Basin water chemical characteristics are selected to maintain a benign environment for fuel and equipment stored in the basin water.

4.6 BASIN WATER RADIOACTIVE CONTAMINANTS

4.6.1 Specification

Additional basin water cleanup measures shall be initiated if the concentration of radioactive material in the water exceeds 0.02 µCi/ml beta.

4.6.2 Basis

Periodic sampling of basin water is required to assure that concentration of radioactive materials remain as low as reasonably achievable. The values selected are consistent with current decontamination practices.

5.0 DESIGN FEATURES

5.1 FUEL STORAGE BASIN

The energy-absorbing pad on the cask set-off shelf shall not be altered without appropriate safety review and documentation as required by 10 CFR 82.48.

5.1.1 Basis

The cask drop accident was analyzed for the IF-300 cask with the energy-absorbing pad in place (CSAR Chapter 8).

5.2 FUEL STORAGE SYSTEM

The following pieces of equipment employ favorable geometry, specific materials, and methods of construction to assure nuclear criticality safety and radiation protection. Modifications to the design in dimensions, construction materials, or construction methods shall not be made without appropriate safety review and documentation in accordance with 10 CFR 72.48.

5.2.1 Fuel Storage Baskets

5.2.1.1 Basis

- a. The neutron attenuation properties of stainless steel are considered in the nuclear safety analysis.
- b. The structural strength, as fabricated, is considered in seismic accident analyses and is related to nuclear safety.
- c. The heat transfer properties are considered in fuel cooling thermal analyses and are related to nuclear safety.

5.2.2 Basket Support Grids

5.2.2.1 Basis

- a. The grid spacing determines the spacing of fuel that was used in the nuclear safety analysis.
- b. The structural strength of the grids and grid-to-wall intertie are integral to the system strength during design seismic conditions, and therefore related to nuclear safety.

5.2.3 Fuel Grapples

5.2.3.1 Basis

Fuel grapples used with the fuel handling crane and with the basin crane are designed to preclude lifting a fuel bundle closer than 9 feet to the normal basin water level.

5.2.4 Fuel Basket Grapples

5.2.4.1 Basis

Basket grapples are designed for use with the basin crane, and preclude lifting a basket such that the fuel bundles are closer than 9 feet to the normal basin water level.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

The Manager, Morris Operation shall be responsible for overall facility operation in accordance with these specifications and applicable government regulations, and shall delegate in writing the succession of this responsibility during his absence. Operations involving licensed materials shall be performed by, or under the supervision of individuals designated by the Manager, Morris Operation, or his delegate.

6.2 ORGANIZATION

6.2.1 The facility staff organization is shown in the CSAR, Figure 9-2.

6.3 PLANS AND PROCEDURES

Plans and procedures shall be established and implemented to assure compliance with these Technical Specifications and applicable governmental regulations.

6.3.1 Changes to Plans and Procedures

All changes or revisions of plans or procedures required by this section shall be made in accordance with facility modification control practices as described in the CSAR, Chapter 9.

6.3.2 Plans and Procedures - Minimum Requirements

Plans and procedures required by this section shall include:

- a. A safety manual defining responsibilities and specifying actions to protect the health and safety of employees and others while on site, appropriate safety training programs, and other measures to maintain exposures as low as reasonably achievable.
- b. Requirements for analysis of cask drop accident consequences prior to receipt of spent nuclear fuel in types of casks not previously received or unloaded per 10 CFR 72.48.
- c. Procedures for the conduct of routine fuel storage operations.
- d. A preventive maintenance system for structures, systems and components important to site radiological and criticality safety.
- e. Arrangements for providing makeup water to the storage basins under normal and emergency conditions.

6.4 REVIEW AND AUDIT

6.4.1 Safety Committee

Plans, procedures and operations carried out under established plans and procedures involving elements of radiological safety shall be reviewed and approved by a Safety Committee. Three members must be present to conduct business. Other individuals may participate in SC meetings. This committee will consist of members as determined by the Manager, Morris Operation and described in a Safety Committee operating procedure.

The Committee shall normally meet on a monthly basis, but at no greater than 45-day intervals. The Manager, Morris Operation shall establish appropriate procedures and practices for the conduct of Committee responsibilities.

6.4.2 Audits

Morris Operation activities shall be audited to ascertain the degree of compliance with specifications, standards and procedures. Audits shall be conducted by organizations and persons at such times as designated by GE Nuclear Energy Management. Audits and audit response shall be performed in accordance with General Electric procedures.

6.5 ACTION REQUIRED FOR SPECIFICATION NONCOMPLIANCE

6.5.1 Functional and Operating Limits

The following actions shall be taken if a functional or operating limit is exceeded:

- a. Prompt action shall be taken to assure timely return of operations to specification compliance.
- b. The Safety Committee shall be promptly notified of the noncompliance.
- c. NRC Operations Center shall be notified within 24 hours, advising them of events that resulted in a noncompliance condition.
- d. A review of the incident shall be made by the Safety Committee to establish the cause and to define means to prevent reoccurrence.

6.5.2 Limiting Conditions

The following actions shall be taken if a limiting condition is exceeded:

- a. Prompt corrective action shall be taken to assure timely return of operations to specification compliance.
- b. The Safety Committee shall be advised of the noncompliance within 24 hours.
- c. A report shall be sent to the NRC Operations Center within 30 days to advise them of events resulting in limiting conditions being exceeded.

6.5.3 Surveillance Requirements

The following actions shall be taken if surveillance requirements are not satisfied:

- a. The Manager, Morris Operation, or his delegate, shall take such action as may be required to assure future compliance with surveillance requirements and, if necessary, to assure return of operations to specification compliance in minimum time.
- b. The Safety Committee shall be advised of any event, or sequence of events, involving surveillance requirements that involve systems directly related to radiological safety. The Committee shall investigate such events and recommend corrective action.

6.5.4 Design Features

Design features shall only be changed in accordance with Specification 6.3.1, and CSAR Chapter 9 and 10 CFR 72.48. Unauthorized modifications of specified design features, or unauthorized introduction of unapproved tools, fixtures, or other equipment shall require action as specified for functional and operating conditions in Specification 6.5.1.³

6.6 LOGS, RECORDS AND REPORTS

6.6.1 Logs and Records

- a. A shift log shall be maintained to record nonroutine and significant events that may occur during a shift.
- b. Minutes of the Safety Committee shall be documented, including copies of reports required in Section 6.5.1, and other actions of the Committee.
- c. Records of facility changes, and changes in procedures described in the CSAR shall be maintained throughout the lifetime of the facility.
- d. Records of tests or experiments conducted under provisions of CSAR Chapter 9 shall be maintained throughout the facility lifetime and shall include written safety evaluations providing the bases for determining the test or experiment did not involve unreviewed safety or environmental questions.

7.0 REFERENCES AND NOTES

1. The use of the unloading pit doorway guard is described in CSAR Chapters 1 and 5.
2. Dry to the extent that water samples cannot be obtained in the usual manner.
3. Authorized modifications and approved tools, fixtures, or other equipment are those processed under the provisions of CSAR Section 9.

8.0 ENVIRONMENTAL PROTECTION

8.1 ENVIRONMENTAL MONITORING PROGRAM

8.1.1 Specification

The licensee will maintain the effectiveness of the environmental monitoring program. Changes in frequency or collection sites by the licensee shall be evaluated against the experience of acquired data and reported with the information required by Specification 8.2.

8.1.2 Basis

The environmental monitoring program results from over 20 years of Morris Operation environmental monitoring experience. These years of operational experience with the monitoring program provide a sound basis for evaluating the programs effectiveness.

8.2 ANNUAL ENVIRONMENTAL REPORT

8.3.1 Specification

An annual report will be submitted to the NRC Region III office with a copy to the Director, Office of Nuclear Material Safety and Safeguards, within 60 days after January 1 of each year, specifying the quantity of each of the principal radionuclides released to the environment in liquid and gaseous effluents during the previous 12 months of operation and such other information as may be required by the Commission to estimate maximum potential radiation dose commitment to the public resulting from effluent release and direct radiation at the site property protection area.

8.3.2 Basis

The report of Specification 7.3.1 is required pursuant to 10 CFR 72.44(d)(3).

ATTACHMENT C

SAFETY EVALUATION FOR PROPOSED CHANGES

1. **Section 1.2.1** – Delete reference to Appendix B.8 of the CSAR.

Rationale – The QA Plan shouldn't be an attachment to the CSAR, but a stand alone NCR reviewed document.

2. **Section 1.2.2** – Deleted (CSAR Figure 1-5)

Rationale – The Figure was deleted from the CSAR. Description is sufficient, figure is not required.

3. **Section 2.1.1(a)** – Replaced with description of current fuel inventory.

Rationale – The current inventory has been on hand since 1989. No new receipts, no shuffling of fuel in storage, and no shipments are planned or expected.

4. **Section 2.1.1(b)** – Deleted

Rationale – Changes in 2.1.1(a) delete the requirement for this section.

5. **Figures 2.1a, 2-1.b, 2-2.a and 2-2.b** – deleted

Rationale – Changes in 2.1.1(a) delete need for this information.

6. **Section 2.1.1(b)** – changed from 2.1.1(c) and changed wording as shown. |

Rationale - Alterations in the text were made to clarify GEMO activities with incidental GE owned equipment. |

7. **Section 2.1.1(c)** – changed from 2.1.1(d)

Rationale – Renumbered for consistency.

8. **Section 4.5** - Deleted

Rationale – The outdoor coolers have been replaced with an indoor chiller system that has an automatic alarm system and any water leaks would go to a sump and back to the basin

ATTACHMENT C

SAFETY EVALUATION FOR PROPOSED CHANGES

9. **Section 4.7**, "Cask Flush" - delete entirely.

Rationale – The fuel basins are essentially full and no shipment or receipt of fuel is planned or expected.

10. **Section 4.8.1**, "Specification" – delete pH and substitute conductivity measurement.

Rationale - Please refer to attached 72.48 analysis dated February 16, 1996, "Justification for Assuming Equivalency Between Conductivity and pH".

11. **Section 6.2.2** - Delete this section entirely.

Rationale - these positions are described in specific GE and GEMO corporate position descriptions.

12. **Section 6.3.2(b)** - Insert "... spent nuclear fuel in..." as indicated in italics.