



An Exelon/British Energy Company

Clinton Power Station

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10 CFR 50.90
10 CFR 50 Appendix H

U-603505
8E.100a

August 13, 2001

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Request for Amendment to CPS License for the Proposed Deferral of Withdrawal of Vessel Surveillance Specimens

References:

1. U. S. NRC Administrative Letter 97-04, NRC Staff Approval for Changes to 10 CFR Part 50, Appendix H, Reactor Vessel Surveillance Specimen Withdrawal Schedules, dated September 30, 1997.
2. Letter from J. M. Heffley (AmerGen) to the U. S. Nuclear Regulatory Commission, "Revision to Reactor Vessel Material Specimen Removal Schedule," dated June 5, 2001.
3. BWRVIP-78, "BWR Vessel and Internals Project, BWR Integrated Surveillance Program Plan (BWRVIP-78)," dated December 1999.
4. Letter from D. L. Wigginton (U.S. NRC) to J. R. McGaha, Jr. (Entergy Operations, Inc.), "River Bend Station, Unit 1 – Amendment No. 92 to Facility Operating License No. NPF-47 (TAC No. M96637)," dated February 13, 1997.
5. Letter from J. R. Strosnider (U.S. NRC) to C. Terry (BWRVIP Chairman), "BWR Surveillance Program (BWRVIP-78)," dated May 16, 2000.

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," and Reference 1, AmerGen Energy Company, LLC (i.e., AmerGen) proposes a change to the Facility Operating License No. NPF-62 for Clinton Power Station (CPS). The proposed change would increase the exposure limit on the first set of encapsulated

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reactor vessel surveillance specimens to a vessel exposure of 10.4 effective full power years (EFPY) from a vessel exposure of 10 EFPY in order to defer capsule withdrawal for one operating cycle. This change is beyond the currently NRC approved licensing basis for CPS and requires NRC approval.

This request supersedes AmerGen's request in Reference 2. As stated in Reference 1, changes to a facilities' reactor vessel surveillance specimen capsule withdrawal schedule as specified in 10 CFR 50, Appendix H, "Reactor Vessel Material Surveillance Program," that do not conform to the required American Society for Testing and Materials standard referenced in Appendix H will be treated as license amendments requiring public notice and opportunity for hearing. Additional information to justify a license amendment is provided herein in order to facilitate a timely review and approval.

AmerGen proposes a deferral of the withdrawal of the first surveillance capsule for one operating cycle in order to realize the benefit of participation in the Boiling Water Reactor Vessel and Internals Project (BWRVIP) Integrated Surveillance Program (ISP) in Reference 3. Upon approval of the license amendment, AmerGen will perform a conforming change to the CPS Updated Safety Analysis Report (USAR) Chapter 5, Section 5.3.1.6, Material Surveillance and to the Technical Specification (TS) Bases 3.4.11, "RCS Pressure and Temperature (P/T) Limits." This change, if approved, would be consistent with the NRC approved increase in the exposure limit to 10.4 EFPY for River Bend Station, as described in Reference 4.

AmerGen, as an active participant in the BWRVIP, intends to participate in the ISP as described in Reference 3. The NRC is reviewing the ISP that is described in Reference 3. In Reference 5, the NRC provided the criteria for a one cycle deferral of the withdrawal of vessel specimens in order to provide time for the NRC review and approval of the ISP. AmerGen has confirmed that CPS meets the specific criteria in Reference 5 without exception and meets the requirement for a license amendment.

AmerGen respectfully requests approval of this change prior to February 15, 2002, in order to support preparation for the next refueling outage. This request is subdivided as follows.

1. Attachment A gives a description of the change, description of how the Reference 5 criteria are satisfied, and description of the safety analysis of the proposed change.
2. Attachment B describes our evaluation performed using the criteria in 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (a)(1) which provides information supporting a finding of no significant hazards consideration in accordance with 10 CFR 50.92, "Issuance of amendment," paragraph (c).
3. Attachment C provides information supporting an Environmental Assessment.

Because no pages in NPF-62, Appendix A, "Technical Specifications," are affected, no marked-up pages are provided.

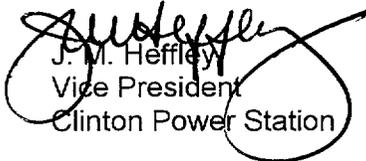
This proposed change has been reviewed by the CPS Plant Operations Review Committee and approved by the Nuclear Safety Review Board.

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AmerGen is notifying the State of Illinois of this application for change to the license by transmitting a copy of this letter and its attachments to the designated State Official.

Should you have any questions concerning this letter, please contact Mr. R. W. Chickering at (217) 937-3334.

Respectfully,



J. M. Heffley
Vice President
Clinton Power Station

RWC/blf

Attachments:

- Affidavit
- Attachment A: Description and Safety Analysis for Proposed Change
- Attachment B: Information Supporting a Finding of No Significant Hazards Consideration
- Attachment C: Information Supporting An Environmental Assessment

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Clinton Power Station
Office of Nuclear Facility Safety – Illinois Department of Nuclear Safety

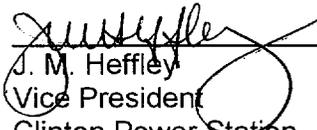
STATE OF ILLINOIS)
COUNTY OF DEWITT)
IN THE MATTER OF)
AMERGEN ENERGY COMPANY, LLC) Docket Number
CLINTON POWER STATION, UNIT 1) 50-461

**SUBJECT: Request for Amendment to the CPS License for the Proposed
Deferral of Withdrawal of Vessel Surveillance Specimens**

AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



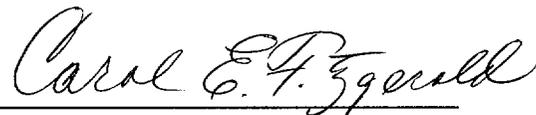


J. M. Heffley
Vice President
Clinton Power Station

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 13th day of

August, 2001.



Carol E. Fitzgerald

Notary Public

DESCRIPTION AND SAFETY ANALYSIS FOR THE PROPOSED CHANGE

A. SUMMARY OF THE PROPOSED CHANGE

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," AmerGen Energy Company, LLC (i.e., AmerGen), proposes a change to the Facility Operating License No. NPF-62 for Clinton Power Station (CPS). The proposed change is to modify the AmerGen commitment to ASTM E 185-82, "Conducting Surveillance Tests for Light Water Cooled Nuclear Power Reactor Vessels," (Reference 1). The change will increase the exposure limit on the reactor vessel to 10.4 effective full power years (EFPY) in order to accommodate the deferral of the withdrawal of the first set of reactor vessel surveillance specimens until the ninth refueling outage, scheduled for the fall of 2003. The CPS Technical Specifications (TS) are not impacted, but this will impact the CPS TS Bases and Update Safety Analysis Report (USAR). AmerGen will make conforming changes to TS Bases 3.4.11, "RCS Pressure and Temperature (P/T) Limits," and USAR Chapter 5, Section 5.3.1.6, "Material Surveillance," to reflect the modified commitment to Reference 1 and to change the vessel specimen withdrawal exposure limit to a vessel exposure of 10.4 EFPY. These changes will be made upon NRC approval of this amendment request.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

CPS has a modified commitment to the 1982 version of Reference 1. Reference 1 indicates that the first of three sets of vessel surveillance specimens will be withdrawn during the outage that is nearest to 6 EFPY. The CPS approved schedule indicates that the specimens will be withdrawn before an exposure of 10 EFPY on the reactor vessel. The basis for the commitment is in Reference 2 as approved in Reference 3 by the NRC.

C. BASES FOR THE CURRENT REQUIREMENTS

The bases for the current requirement in Reference 1 is to provide a surveillance program for monitoring the radiation induced changes in the mechanical properties of ferritic materials in the beltline of the CPS reactor vessel. Table 1 of Reference 1 provides a schedule for the withdrawal, testing, and reporting of test results for vessel surveillance specimens. There are three sets of vessel surveillance specimens provided for testing over the projected lifetime of the CPS vessel.

According to Reference 1, the first set of encapsulated surveillance specimens is withdrawn during the refueling nearest an exposure of 6 EFPY at the inner vessel wall, at the time when the accumulated neutron fluence of the capsule exceeds 5×10^{18} n/cm², or at the time when the highest predicted nil ductility transition temperature shift (i.e., ΔRT_{NDT}) of all encapsulated material is approximately 28° C (i.e., 50° F), whichever comes first. The specimens are withdrawn in order to verify early in vessel life the initial prediction of the surveillance material response to the actual radiation environment. These specimens are removed when the predicted shift in the nil ductility transition temperature exceeds the scatter by sufficient margin to be measurable. At CPS, 6 EFPY will occur prior to exceeding the specified fluence and before the ΔRT_{NDT} exceeds 50°F.

The vessel exposure limit at CPS was increased to 10 EFPY because Reference 1 assumed that the specimen lead factor was between one and three which is not a valid assumption for CPS. At CPS, the lead factor is 0.67, and the vessel exposure is approximately 10 EFPY when the surveillance specimen exposure is 6.7 EFPY. Therefore, the approved (Reference 3) vessel exposure limit for withdrawal of the vessel surveillance specimens is 10 EFPY.

D. NEED FOR REVISION OF THE REQUIREMENTS

The proposed change will allow CPS to benefit from participation in the Boiling Water Reactor Vessel and Internals Project (BWRVIP) Integrated Surveillance Program (ISP) that is currently under review by the NRC. As indicated in Reference 4, the involvement of CPS in the ISP will preclude CPS from withdrawing any surveillance specimen capsules. The benefits are:

1. Reduced outage work and associated worker dose in the March, 2002 refueling outage for specimen removal,
2. Cost savings of approximately \$500,000 for each specimen withdrawal, specimen testing and analyses, report preparation, and NRC review, and
3. Application at CPS of the results of the testing of the encapsulated test specimens that are in the ISP that have been withdrawn from the River Bend reactor and are expected to be tested in 2002.

Without NRC approval of this proposed change, CPS will be required to withdraw the first set of vessel surveillance specimens in the upcoming refueling outage, scheduled to begin March, 2002. This corresponds to a projected vessel exposure of 8.9 EFPY and a projected specimen exposure of 6 EFPY. This is a much lower exposure than the exposure on the withdrawn specimens from River Bend Station, a reactor of the same design as CPS. This is significant because test result from higher exposure specimens will provide more credible results.

E. DESCRIPTION OF THE PROPOSED CHANGE

The proposed change defers withdrawal of the first set of vessel surveillance specimens for one operating cycle, which would conservatively increase the vessel exposure limit to 10.4 EFPY. It modifies the CPS commitment to the vessel surveillance withdrawal schedule in Reference 1. Reference 1 requires that the specimens be withdrawn at 6 EFPY, and the proposed change increases the specimen exposure to 6.9 EFPY which corresponds to a vessel exposure of less than 10.4 EFPY. This is a small increase beyond the currently approved vessel exposure limit in the CPS USAR Chapter 5, Section 5.3.1.6 of 10 EFPY.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

With Reference 5, the NRC endorsed a one cycle deferral of the withdrawal of vessel surveillance specimens in support of the ISP and states that deferral requests should address three criteria. The resolution of the criteria for CPS are as follows:

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1. The first NRC criterion is to demonstrate how the deferral is consistent with the ISP plan submitted in Reference 4.

Based on the selection criteria in the Reference 4 program plan, e. g. chemistry match, baseline data, and fabrication details, the BWRVIP did not select CPS capsules for analysis. Instead of analyzing CPS specimens, AmerGen will characterize CPS reactor pressure vessel (RPV) material by using the results from the analysis of specimens in the River Bend Station reactor. Reference 4 indicates that representative surveillance material for CPS is in the River Bend Station surveillance specimens to give meaningful results for CPS. Therefore, in accordance with the BWRVIP program, no CPS capsules will require withdrawal during the CPS operating license period. CPS will use the test results from River Bend Station surveillance specimens in order to be consistent with the BWRVIP ISP.

2. The second NRC criterion is to explain how the acquisition of materials property data in accordance with the facility's plant-specific Appendix H program is not necessary at this time to ensure that the integrity of the facility RPV will be maintained through the period of deferral.

Currently the CPS TS contain P/T curves applicable for up to 32 EFPY. The CPS vessel will be at 8.9 EFPY at the end of the current cycle in March 2002. No capsule removal is required to support these P/T curves in the next two operating cycles. In addition, the data from the capsules would not be expected to provide Charpy shift values above 56°F for welds and 34°F for plates. These are the threshold values for the data to be distinguishable from the scatter in the Charpy test method based on Equation 2 in Regulatory Guide 1.99, "Radiation Embrittlement of Reactor Vessel Materials," Revision 2. Accordingly, no capsule removal is required to evaluate material properties in order to support the P/T curves.

3. The third NRC criterion is to explain how deferral of the acquisition of dosimetry data from the capsule to be tested does not affect the validity of the facility's RPV integrity assessments through the period of deferral.

The CPS vessel exposure will be 8.9 EFPY at the end of the current operating cycle, and the vessel exposure at the end of the following operating cycle is projected to be less than 10.4 EFPY. The vessel exposure calculations have been benchmarked based on analysis of dosimetry specimens in the first refueling outage, and the vessel fluence has recently been verified by GE using two-dimensional neutron transport analyses. In the first refueling outage, a dosimetry specimen was tested, but no Charpy specimens were withdrawn. The analyzed exposure of 32 EFPY provides ample margin to the exposure for the ninth refueling outage of 10.4 EFPY.

In summary regarding the three NRC criteria in Reference 5, the proposed deferral of the RPV material surveillance capsule withdrawal for one operating cycle is considered acceptable because it is consistent with the proposed BWR ISP, it will not delay obtaining data needed to support existing vessel evaluation requirements, and it will not affect the reactor vessel integrity assessment during the deferral period.

In addition, there are three other considerations.

1. Reference 6 indicates that the CPS P/T curves are conservative. Reference 6 bases the conclusion that the P/T curves are conservative on the observation that P/T curves are limited by the feedwater nozzle material and not the beltline material, that the fluence value for the P/T curves is conservatively low, and that the P/T curves are inherently conservative.
2. According to the NRC letter in Reference 7, comparable surveillance specimens have been removed from River Bend Station and are scheduled to be tested in support of the ISP. The River Bend Station reactor is the same size and model as CPS (Reference 8), and according to Reference 8, the test specimen material for plate and weld material is very similar to the material that is in the CPS test specimens.
3. In Reference 9, the NRC approved an exposure limit of 10.4 EFPY for the River Bend Station which has the same reactor design, the same reactor vessel size, the same core size with the same number of fuel bundles and the same exposure rate as in CPS. In addition to the other similarities identified, the River Bend Station and CPS surveillance specimens are located in the same vessel location and the material used in both vessels is of similar low copper material. The CPS beltline plate material has a copper level of 0.07 weight percent which is similarly low and bounded by the copper level of 0.09 weight percent in the River Bend Station surveillance specimens. Reference 10 provides the analytical basis for 10.4 EFPY by the reactor vendor, General Electric Company (GE). GE designed and fabricated the reactor vessels for both River Bend Station and CPS.

Because of the above reasons, withdrawal of the CPS surveillance specimens at this time will provide very little additional value and does not warrant the associated radiation exposure and expense. Specimen withdrawal in the March 2002 outage at 8.9 EFPY has low value because the NRC has approved a higher exposure limit of 10.4 EFPY for the River Bend Station, which has a comparable reactor configuration and comparable vessel material.

G. IMPACT ON PREVIOUS SUBMITTALS

We have reviewed the proposed change regarding impact on any previous submittals, and have determined that there is no impact on any outstanding license amendment requests. Regarding the Extended Power Uprate (EPU) submittal, the fluence on the reactor vessel was re-analyzed using a more accurate method. The resultant vessel fluence level was unchanged.

H. SCHEDULE REQUIREMENTS

We request approval of the proposed change prior to February 15, 2002, to support preparation for the next refueling outage.

I. REFERENCES

1. American Society for Testing and Materials (ASTM) Standard E 185-82, "Conducting Surveillance Tests for Light-Water Cooled Nuclear Power Reactor Vessels," date July 1, 1982

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2. Letter U-602001 from J. S. Perry (Illinois Power) to the U.S. NRC, "Clinton Power Station's (CPS) Response to Generic Letter (GL) 92-01, Revision 1, "Reactor Vessel Structural Integrity," dated July 2, 1992.
3. Letter from D. V. Pickett (U.S. NRC) to R.F. Phares (Illinois Power), "Clinton Power Station, Unit 1 – Generic Letter (GL) 92-01, Revision 1, "Reactor Vessel Structural Integrity (TAC No. M83450)," dated April 7, 1994.
4. BWRVIP-78, "BWR Vessel and Internals Project, BWR Integrated Surveillance Program Plan (BWRVIP-78)," dated December 1999.
5. Letter from J. R. Strosnider (U.S. NRC) to C. Terry (BWRVIP Chairman), "BWR Surveillance Program (BWRVIP-78)," dated May 16, 2000.
6. Letter from J. B. Hopkins (U.S. NRC) to M. Reandeau (AmerGen), "Clinton Power Station, Unit 1 – Issuance of Amendment (TAC No. MA9862)," dated October 31, 2000.
7. Letter from R. A. Gramm (U.S. NRC) to Mr. R. K. Edington (EOI), "River Bend Station, Unit 1 – Request to Defer the Testing of the Reactor Vessel Surveillance Capsule Specimens and Request to Extend the Date for Reporting Testing Results," dated February 26, 2001.
8. GE NEDE-31152P, Rev. 7, "General Electric Fuel Bundle Design," dated June 2000.
9. Letter from D. L. Wigginton (U.S. NRC) to J. R. McGaha, Jr. (EOI), "River Bend Station, Unit 1 – Amendment No. 92 to Facility Operating License No. NPF-47 (TAC No. M96637) dated February 13, 1997.
10. Letter from J. R. McGaha (EOI) to the U.S. NRC, License Amendment Request (LAR) 96-35, "Request for a Revision to the Reactor Vessel Material Surveillance Program Capsule Withdrawal Schedule," dated August 29, 1996.

**INFORMATION SUPPORTING A FINDING OF
NO SIGNIFICANT HAZARDS CONSIDERATION**

According to 10 CFR 50.92, "Issuance of Amendment," paragraph (c) a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated; or,
- (2) Create the possibility of a new or different kind of accident from any previously analyzed; or,
- (3) Involve a significant reduction in a margin of safety.

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," AmerGen Energy Company, LLC (i.e., AmerGen), proposes a change to Facility Operating License No. NPF-62 for the Clinton Power Station (CPS). The proposed change is to modify the AmerGen commitment to American Society for Testing and Materials (ASTM) Standard E 185-82, "Conducting Surveillance Tests for Light Water Cooled Nuclear Power Reactor Vessels," such that the vessel exposure limit on the first set of vessel surveillance specimens is 10.4 effective full power years (EFPY). This will allow CPS to defer specimen withdrawal until the fall of 2003, i.e. the ninth refueling outage, by the exposure corresponding to one operating cycle. The CPS Technical Specifications (TS) are not impacted, but CPS TS Bases and Updated Safety Analysis Report (USAR) are impacted.

Information supporting the determination that the criteria set forth in 10 CFR 50.92 are met for this amendment request is indicated below.

Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The withdrawal in Fall 2003 refueling outage vice the March 2002 refueling outage and the deferral of the withdrawal of the vessel surveillance specimens are not initiators of or precursors to any of the accident scenarios presented in the USAR. This schedular adjustment will not increase the likelihood of equipment failure, will not defeat the design reactor protection functions, and will not increase the likelihood of a catastrophic failure of any plant structure, system or component. The vessel surveillance specimens are used as the basis for the pressure-temperature (P/T) curves. However, despite the deferral for one cycle of withdrawal of the vessel surveillance specimens, the P/T curves will continue to conservatively be established in accordance with Regulatory Guide (RG) 1.99, "Radiation Embrittlement of Reactor Vessel Materials," Revision 2, as described in the USAR. Therefore, this change does not involve an increase in the probability of any accident previously evaluated.

The proposed change to the withdrawal schedule for the vessel surveillance specimens postpones the collection of one of two sets of data needed to confirm

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the basis of the P/T curves with no change to the currently allowed P/T curves. The P/T curves that are in the TS will continue to be based on RG 1.99. The deferral of the removal of the first set of specimens will not affect the confirmation of the bases for the P/T curves because the withdrawal schedule for the second set of specimens is not being changed with this request. Because the basis for the P/T curves is maintained, this proposed change does not impact or increase the assumed radionuclide source term and will not result in an unacceptable reduction in reactor vessel toughness. Therefore, this change does not involve an increase in consequences of any accident previously evaluated.

In summary, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed deferral for one cycle of the removal of the vessel surveillance specimens does not involve a change to the plant design or operation. No new equipment will be installed or utilized, and no new operating conditions will be initiated as a result of this change. Because the P/T curves are not impacted, the safety function of the reactor vessel to mitigate the release of radioactive steam and limit reactor inventory loss under normal, accident, and transient conditions is not affected. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

Does the change involve a significant reduction in a margin of safety?

The deferral for one cycle of the withdrawal of the vessel surveillance specimens does not affect the P/T curves, and therefore does not affect the margin to safety for brittle fracture. Because two sets of specimens are needed to confirm the basis for the P/T temperatures and because the schedule for the withdrawal of the second set of specimens is not changing, the P/T curves continue in the interim to conform to RG 1.99. The proposed change does not challenge the integrity of the fuel cladding, reactor coolant pressure boundary that includes the reactor vessel, or the primary containment.

Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above evaluation, we have concluded that the proposed changes do not involve a significant hazards consideration.

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

AmerGen Energy Company, LLC (i.e., AmerGen) has evaluated this proposed change against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." AmerGen has determined that this proposed change meets the criteria for a categorical exclusion set forth in 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," paragraph (c)(9), and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92, "Issuance of amendment," paragraph (b). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," which changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation," or that changes an inspection or surveillance requirement, and the amendment meets the following specific criteria.

(i) The proposed changes involve no significant hazards consideration.

As demonstrated in Attachment B, this proposed change does not involve any significant hazards consideration.

(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

The proposed change that defers the withdrawal of the vessel surveillance specimens is consistent with the design basis of the plant. As documented in Attachment A, there will be no increase in the amounts of any effluents released offsite. This proposed change does not result in an increase in power level, do not increase the production, nor alter the flow path or method of disposal of radioactive waste or byproducts. Therefore, the proposed change will not affect the types or increase the amounts of any effluents released offsite.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed change will not result in changes in the configuration of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels in the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from these changes.