

May 26, 1988

Docket Nos. 50-338
and 50-339

Mr. D. S. Cruden
Vice President - Nuclear
Virginia Electric and Power Company
Post Office Box 26666
Richmond, Virginia 23261

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Dear Mr. Cruden:

SUBJECT: NORTH ANNA UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: MINIMUM
SHIFT CREW COMPOSITION, COMPLIANCE WITH 10 CFR 50.49(g) AND
SPECIAL REPORTS (TAC NOS. 67600 AND 67601)

The Commission has issued the enclosed Amendment Nos. 103 and 90 to Facility
Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station,
Units No. 1 and No. 2 (NA-1&2). The amendments revise the NA-1&2 Technical
Specifications (TS) and the NA-2 License Conditions 4.a, 4.b, 4.d and 4.e in
response to your letter dated March 18, 1988.

The amendments revise the NA-1&2 Table 6.2.1, Minimum Shift Crew Composition
in accordance with your commitment in the NA-1&2 10 CFR 50, Appendix R Report.
Also, the NA-1 TS 6.13 and the NA-2 Facility Operating License Conditions
4.a, 4.b, 4.d and 4.e are deleted in accordance with 10 CFR 50.49(g).
Finally, a more complete list of special reports has been provided for the
NA-1&2 TS 6.9.2, Special Reports.

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

Sincerely,

Original signed by

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

Enclosures:

1. Amendment No. 103 to NPF-4
2. Amendment No. 90 to NPF-7
3. Safety Evaluation

cc w/enclosures:

See next page

*See previous concurrences

LA:PDII-2* PM:PDII-2*
DMiller LEngle:bd
05/09/88 05/09/88

D:PDII-2*
HBerkow
05/12/88

SPLB*
JWCraig
05/11/88

OGC-WF
05/18/88

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PDR

Mr. D. S. Cruden
Virginia Electric & Power Company

North Anna Power Station
Units 1 and 2

cc:

Mr. William C. Porter, Jr.
County Administrator
Louisa County
P.O. Box 160
Louisa, Virginia 23093

Michael W. Maupin, Esq.
Hunton and Williams
P. O. Box 1535
Richmond, Virginia 23212

Mr. W. T. Lough
Virginia Corporation Commission
Division of Energy Regulation
P. O. Box 1197
Richmond, Virginia 23209

Ellyn R. Weiss, Esq.
Harmon, Weiss and Jordan
2001 S Street NW
Washington, DC 20009

Mr. W. L. Stewart
Senior Vice President - Power
Virginia Electric and Power Co.
Post Office Box 26666
Richmond, Virginia 23261

Mr. Patrick A. O'Hare
Office of the Attorney General
Supreme Court Building
101 North 8th Street
Richmond, Virginia 23219

Resident Inspector/North Anna
c/o U.S. NRC
Senior Resident Inspector
Route 2, Box 78
Mineral, Virginia 23117

James B. Kenley, M.D., Commissioner
Department of Health
109 Governor Street
Richmond, Virginia 23219

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30323

Mr. G. E. Kane
P. O. Box 402
Mineral, Virginia 23117

Old Dominion Electric Cooperative
c/o Executive Vice President
Innsbrook Corporate Center
4222 Cox Road, Suite 102
Glen Allen, Virginia 23060



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

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

DOCKET NO. 50-338

NORTH ANNA POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 103
License No. NPF-4

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company et al., (the licensee) dated March 18, 1988, 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.

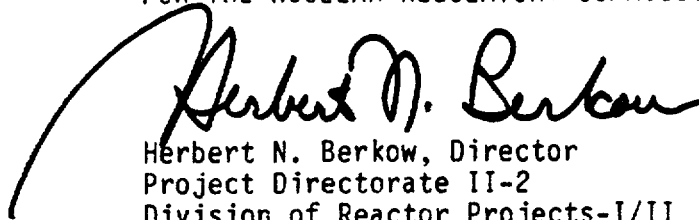
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. NPF-4 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 103, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance and shall be implemented within 14 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 26, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 103

TO FACILITY OPERATING LICENSE NO. NPF-4

DOCKET NO. 50-338

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages as indicated. The revised pages are identified by amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

Page

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6-21
6-22
6-25

DELETED

TABLE 6.2-1^a

MINIMUM SHIFT CREW COMPOSITION

Total Staffing Requirements for Station Operation

With Either or Both Units in Mode 1, 2, 3 or 4

POSITION - NUMBER - CONDITIONS

<u>SS</u>	-	ONE	(Shift Supervisor may fulfill duties for both units).
<u>SRO</u>	-	ONE	(If ONE unit is in MODE 5, 6 OR DEFUELED, Senior Reactor Operator is assigned to the Unit in MODE 1, 2, 3 or 4).
<u>RO</u>	-	THREE	(ONE Reactor Operator is assigned to each unit <u>PLUS</u> one is shared by both units).
<u>AO</u>	-	FOUR	(TWO Auxiliary Operators are assigned to each unit).
<u>STA</u>	-	ONE	(Shift Technical Advisor may fulfill duties for both units).

With Both Units in Mode 5 or 6 (or DEFUELED)

POSITION - NUMBER - CONDITIONS

<u>SS</u>	-	ONE	(Shift Supervisor may fulfill duties for both units).
<u>SRO</u>	-	NONE	
<u>RO</u>	-	TWO	(ONE Reactor Operator is assigned to each unit).
<u>AO</u>	-	TWO	(ONE Auxiliary Operator is assigned to each unit).
<u>STA</u>	-	ONE	(Shift Technical Advisor may fulfill duties for both units).

a - This Table and Table 6.2.1 of Unit 2 Technical Specifications represent Total Station Staffing and ARE NOT ADDITIVE.

ADMINISTRATIVE CONTROLS (Continued)

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator, Region II, within the time period specified for each report. These reports shall be submitted pursuant to the requirement of the applicable specification:

- a. Inservice Inspection Reviews, Specification 4.0.5, shall be reported within 90 days of completion.
- b. MODERATOR TEMPERATURE COEFFICIENT. Specification 3.1.1.4.
- c. RADIATION MONITORING INSTRUMENTATION. Specification 3.3.3.1, TABLE 3.3-6, Action 35.
- d. SEISMIC INSTRUMENTATION. Specifications 3.3.3.3 and 4.3.3.3.2.
- e. METEOROLOGICAL INSTRUMENTATION. Specification 3.3.3.4.
- f. FIRE DETECTION INSTRUMENTATION. Specification 3.3.3.7.
- g. LOOSE PARTS MONITORING SYSTEMS. Specification 3.3.3.9.
- h. REACTOR COOLANT SYSTEM SPECIFIC ACTIVITY. Specification 3.4.8.
- i. OVERPRESSURE PROTECTION SYSTEMS. Specification 3.4.9.3.
- j. EMERGENCY CORE COOLING SYSTEMS. Specification 3.5.2 and 3.5.3.
- k. SETTLEMENT OF CLASS 1 STRUCTURES. Specification 3.7.12.
- l. GROUND WATER LEVEL - SERVICE WATER RESERVOIR. Specification 3.7.13.
- m. FIRE SUPPRESSION SYSTEMS. Specifications 3.7.14.1, 3.7.14.2, 3.7.14.3, 3.7.14.4, and 3.7.14.6.
- n. RADIOACTIVE EFFLUENTS. Specifications 3.11.1.2, 3.11.1.3, 3.11.2.2, 3.11.2.3, 3.11.2.4 and 3.11.4.
- o. RADIOLOGICAL ENVIRONMENTAL MONITORING. Specification 3.12.1.b.
- p. SEALED SOURCE CONTAMINATION. Specification 4.7.11.1.3.
- q. REACTOR COOLANT SYSTEM STRUCTURAL INTEGRITY. Specification 4.4.10. For any abnormal degradation of the structural integrity of the reactor vessel or the Reactor Coolant System pressure boundary detected during the performance of Specification 4.4.10, an initial report shall be submitted within 10 days after detection and a detailed report submitted within 90 days after the completion of Specification 4.4.10.

ADMINISTRATIVE CONTROLS

- r. CONTAINMENT STRUCTURAL INTEGRITY. Specification 4.6.1.6. For any abnormal degradation of the containment structure detected during the performance of Specification 4.6.1.6, an initial report shall be submitted within 10 days after the completion of Specification 4.6.1.6. A final report, which includes (1) a description of the condition of the liner plate and concrete, (2) inspection procedure, (3) the tolerance on cracking, and (4) the corrective actions taken, shall be submitted within 90 days after the completion of Specification 4.6.1.6.

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE EVENTS and Special Reports.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to Operating Procedures.
- f. Records of radioactive shipments.
- g. Records of sealed source leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.
- i. Records of the annual audit of the Station Emergency Plan and implementing procedures.
- j. Records of the annual audit of the Station Security Plan and implementation procedures.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

ADMINISTRATIVE CONTROLS

6.13 DELETED

6.14 PROCESS CONTROL PROGRAM (PCP)

6.14.1 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
 - b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the SNSOC.
2. Shall become effective upon review and acceptance by the SNSOC.

ADMINISTRATIVE CONTROLS

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.15.1 The ODCM shall be approved by the Commission prior to implementation.

6.15.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);
 - b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the SNSOC.
2. Shall become effective upon review and acceptance by the SNSOC.

6.16 MAJOR CHANGES TO RADIOACTIVE SOLID WASTE TREATMENT SYSTEMS*

6.16.1 Licensee initiated major changes to the radioactive solid waste systems:

1. Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by SNSOC. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59.
 - b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;

*Licensees may chose to submit the information called for in this Specification as part of the annual FSAR update.



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

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

DOCKET NO. 50-339

NORTH ANNA POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 90
License No. NPF-7

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company, et al., (the licensee) dated March 18, 1988, 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.

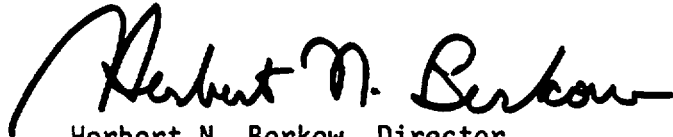
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-7 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 90 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. In addition, Facility Operating License NPF-7 is amended by deleting License Conditions 4.a, 4.b, 4.d, and 4.e.
4. This license amendment is effective as of the date of issuance and shall be implemented within 14 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 26, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 90
TO FACILITY OPERATING LICENSE NO. NPF-7
DOCKET NO. 50-339

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages as indicated. The revised pages are identified by amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

Page

6-4
6-21

DELETED

TABLE 6.2-1^aMINIMUM SHIFT CREW COMPOSITIONTotal Staffing Requirements for Station OperationWith Either or Both Units in Mode 1, 2, 3 or 4POSITION - NUMBER - CONDITIONS

<u>SS</u>	-	ONE	(Shift Supervisor may fulfill duties for both units).
<u>SRO</u>	-	ONE	(If ONE unit is in MODE 5, 6 OR DEFUELED, Senior Reactor Operator is assigned to the Unit in MODE 1, 2, 3 or 4).
<u>RO</u>	-	THREE	(ONE Reactor Operator is assigned to each unit <u>PLUS</u> one is shared by both units).
<u>AO</u>	-	FOUR	(TWO Auxiliary Operators are assigned to each unit).
<u>STA</u>	-	ONE	(Shift Technical Advisor may fulfill duties for both units).

With Both Units in Mode 5 or 6 (or DEFUELED)POSITION - NUMBER - CONDITIONS

<u>SS</u>	-	ONE	(Shift Supervisor may fulfill duties for both units).
<u>SRO</u>	-	NONE	
<u>RO</u>	-	TWO	(ONE Reactor Operator is assigned to each unit).
<u>AO</u>	-	TWO	(ONE Auxiliary Operator is assigned to each unit).
<u>STA</u>	-	ONE	(Shift Technical Advisor may fulfill duties for both units).

a - This Table and Table 6.2.1 of Unit 1 Technical Specifications represent Total Station Staffing and ARE NOT ADDITIVE.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator, Region II, within the time period specified for each report. These reports shall be submitted pursuant to the requirement of the applicable specification:

- a. Inservice Inspection Reviews, Specification 4.0.5, shall be reported within 90 days of completion.
- b. MODERATOR TEMPERATURE COEFFICIENT. Specification 3.1.1.4.
- c. FIRE DETECTION INSTRUMENTATION. Specification 3.3.3.7.
- d. RADIATION MONITORING INSTRUMENTATION. Specification 3.3.3.1, TABLE 3.3-6 Action 35.
- e. REACTOR COOLANT SYSTEM SPECIFIC ACTIVITY. Specification 3.4.8.
- f. OVERPRESSURE PROTECTION SYSTEMS. Specification 3.4.9.3.
- g. EMERGENCY CORE COOLING SYSTEMS. Specification 3.5.2 and 3.5.3.
- h. SETTLEMENT OF CLASS 1 STRUCTURES. Specification 3.7.12.
- i. GROUND WATER LEVEL - SERVICE WATER RESERVOIR. Specification 3.7.13.
- j. FIRE SUPPRESSION SYSTEMS. Specifications 3.7.14.1, 3.7.14.2, 3.7.14.3, 3.7.14.4, 3.7.14.5 and 3.7.14.6.
- k. PENETRATION FIRE BARRIERS. Specification 3.7.15.
- l. RADIOACTIVE EFFLUENTS. Specifications 3.11.1.2, 3.11.1.3, 3.11.2.2, 3.11.2.3, 3.11.2.4 and 3.11.4.
- m. RADIOLOGICAL ENVIRONMENTAL MONITORING. Specification 3.12.1.b.
- n. SEALED SOURCE CONTAMINATION. Specification 4.7.11.1.3.
- o. REACTOR COOLANT SYSTEM STRUCTURAL INTEGRITY. Specification 4.4.10. For any abnormal degradation of the structural integrity of the reactor vessel or the Reactor Coolant System pressure boundary detected during the performance of Specification 4.4.10, an initial report shall be submitted within 10 days after detection and a detailed report submitted within 90 days after the completion of Specification 4.4.10.
- p. CONTAINMENT STRUCTURAL INTEGRITY. Specification 4.6.1.6. For any abnormal degradation of the containment structure detected during the performance of Specification 4.6.1.6, an initial report shall be submitted within 10 days after completion of Specification 4.6.1.6. A final report, which includes (1) a description of the condition of the liner plate and concrete, (2) inspection procedure, (3) the tolerance on cracking, and (4) the corrective actions taken, shall be submitted within 90 days after the completion of Specification 4.6.1.6.

ADMINISTRATIVE CONTROLS (Continued)

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE EVENTS and Special Reports.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to Operating Procedures.
- f. Records of radioactive shipments.
- g. Records of sealed source leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.
- i. Records of the annual audit of the Station Emergency Plan and implementing procedures.
- j. Records of the annual audit of the Station Security Plan and implementing procedures.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material release to the environs.
- f. Records of transient or operational cycles for those facility components identified in Table 5.7-1.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 103 AND 90 TO
FACILITY OPERATING LICENSE NO. NPF-4 AND NPF-7
VIRGINIA ELECTRIC AND POWER COMPANY
OLD DOMINION ELECTRIC COOPERATIVE
NORTH ANNA POWER STATION, UNITS NO. 1 AND NO. 2
DOCKET NOS. 50-338 AND 50-339

INTRODUCTION

By letter dated March 18, 1988, the Virginia Electric and Power Company (the licensee) proposed changes to the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2) Technical Specifications (TS) and the NA-2 Facility Operating License No. NPF-7. These changes are itemized as follows. Item 1 would revise the NA-1&2 TS Table 6.2.1, Minimum Shift Crew Composition. Item 2 would delete the NA-1 TS 6.13 and the NA-2 Facility Operating License Conditions 4.a, 4.b, 4.d, and 4.e, regarding the schedule for identification of environmental qualification of equipment important to safety. Item 3 would revise the NA-1&2 TS 6.9.2, Special Reports. Our discussion and evaluation of these changes are provided below.

DISCUSSION

The Item 1 change would simplify the Shift Composition requirements of the NA-1&2 TS Table 6.2-1 by eliminating the reduced staffing allowances for operations with one unit in Modes 5 and 6 and by combining the requirements of the currently independent but interrelated NA-1&2 TS into a single comprehensive table. This change would not reduce the requirements from those presently specified in the NA-1&2 TS and would increase the staffing requirements when one unit is in Mode 1, 2, 3, or 4 and the other unit is in Mode 5 or 6. In addition, the change would add the requirement for an additional Auxiliary Operator (AO), which is in accordance with the licensee's commitment in the NA-1&2 10 CFR 50 Appendix R Report.

The Item 2 change would delete NA-1 TS 6.13 and NA-2 Facility Operating License Conditions 4.a, 4.b, 4.d, and 4.e in accordance with 10 CFR 50.49(g), which provides the schedule for identification of qualified equipment important to safety and the replacement of equipment important to safety that is not qualified and 10 CFR 50.49(j), which requires the maintenance of an auditable record of the equipment qualification. In addition, 10 CFR 50.49(g) also states, "The schedule in this paragraph supersedes the June 30, 1982, deadline, or any other previously imposed date, for environmental qualification of electrical equipment contained in certain nuclear power operating licenses."

The Item 3 change would provide a more complete list of Special Reports required by the NA-1&2 TS. The purpose of this change would achieve consistency between TS 6.9.2 and the various Limiting Conditions for Operations (LCOs) that require the submission of Special Reports.

EVALUATION

Item 1, as discussed above, would increase the staffing requirements when one unit is in Mode 1, 2, 3, or 4 and the other unit is in Mode 5 or 6. In addition, the Item 1 change would increase the Minimum Shift Crew Composition in accordance with the licensee's commitments for 10 CFR 50, Appendix R compliance. The staff finds the Item 1 change to be acceptable. Item 2, as discussed above, is in compliance with 10 CFR 50.49(g) and is therefore acceptable. Item 3, as discussed above, would achieve consistency between the NA-1&2 TS 6.9.2 and the various LCOs that require the submission of Special Reports. The staff finds the Item 3 change to be acceptable. Therefore, based on all of the above, the proposed changes are acceptable.

ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve 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 published a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Further, these amendments only change "recordkeeping, reporting, or administrative procedures or requirements." Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(9) and/or (10). Therefore, pursuant to 10 CFR §51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

CONCLUSION

We have 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, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Date: May 26, 1988

Principal Contributor:

Leon Engle