



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

November 23, 1993

Docket Nos. 50-338  
and 50-339

Mr. W. L. Stewart  
Senior Vice President - Nuclear  
Virginia Electric and Power Company  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

Dear Mr. Stewart:

SUBJECT: ISSUANCE OF AMENDMENTS RE: EMERGENCY TECHNICAL SPECIFICATION  
CHANGE FOR SURVEILLANCE REQUIREMENTS FOR SIMULATED REACTOR  
COOLANT PUMP SEAL INJECTION FLOW REQUIREMENTS-NORTH ANNA  
POWER STATION, UNITS NO. 1 AND NO. 2 (NA-1&2)  
(TAC NOS. M88200 AND M88201)

The Commission has issued the enclosed Amendment Nos. 176 and 157 to Facility Operating License Nos. NPF-4 and NPF-7 for NA-1&2 respectively. The amendments revise the Technical Specifications (TS) in response to your letter dated November 10, 1993, as supplemented by letter dated November 16, 1993. The amendments eliminate the simulated reactor coolant pump seal injection flow requirement for cold leg flow injection balancing in the NA-1&2 TS 4.5.2.h.1.c.

The staff reviewed your request for emergency license amendments and concluded that you provided a sufficient basis for finding that the situation could not have been avoided. Therefore, in accordance with 10 CFR 50.91(a)(5), a valid emergency existed.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance of Amendments to Facility Operating Licenses and Final Determination of No Significant Hazards Consideration and Opportunity for Hearing will be included in the Commission's biweekly Federal Register notice.

Sincerely,

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

Enclosures:

1. Amendment No. 176 to NPF-4
2. Amendment No. 157 to NPF-7
3. Safety Evaluation

cc w/enclosures:  
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Mr. W. L. Stewart  
Senior Vice President - Nuclear  
Virginia Electric and Power Company  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

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CHANGE FOR SURVEILLANCE REQUIREMENTS FOR SIMULATED REACTOR  
COOLANT PUMP SEAL INJECTION FLOW REQUIREMENTS-NORTH ANNA  
POWER STATION, UNITS NO. 1 AND NO. 2 (NA-1&2)  
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The Commission has issued the enclosed Amendment Nos. 176 and 157 to Facility Operating License Nos. NPF-4 and NPF-7 for NA-1&2 respectively. The amendments revise the Technical Specifications (TS) in response to your letter dated November 10, 1993, as supplemented by letter dated November 16, 1993. The amendments eliminate the simulated reactor coolant pump seal injection flow requirement for cold leg flow injection balancing in the NA-1&2 TS 4.5.2.h.1.c.

The staff reviewed your request for emergency license amendments and concluded that you provided a sufficient basis for finding that the situation could not have been avoided. Therefore, in accordance with 10 CFR 50.91(a)(5), a valid emergency existed.

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(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. 176 to NPF-4
2. Amendment No. 157 to NPF-7
3. Safety Evaluation

cc w/enclosures:

See next page Document Name - C:\AUTOS\WPDOCS\NA88200.AMD

OFC	LA:PDII-2	PM:PDII-2	RSXB <i>to</i>	D:PDII-2
NAME	ETana <i>ETT</i>	LEngle <i>h</i>	RJones <i>for</i>	HBerkow <i>h</i>
DATE	11/18/93	11/18/93	11/19/93	11/18/93
OFC	ADR2	OGC <i>h</i>		
NAME	GLainas	<i>h</i>		
DATE	11/18/93	11/22/93		

Mr. W. L. Stewart  
Virginia Electric & Power Company

North Anna Power Station  
Units 1 and 2

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DATED: November 23, 1993

AMENDMENT NO. 176 TO FACILITY OPERATING LICENSE NO. NPF-4-NORTH ANNA UNIT 1  
AMENDMENT NO. 157 TO FACILITY OPERATING LICENSE NO. NPF-7-NORTH ANNA UNIT 2

**Docket File**

NRC & Local PDRs

PDII-2 Reading

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

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. 176

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 November 10, 1993, as supplemented by letter dated November 16, 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.

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. 176, 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 its date of issuance.

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: November 23, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 176

TO FACILITY OPERATING LICENSE NO. NPF-4

DOCKET NO. 50-338

Replace the following page of the Appendix "A" Technical Specifications with the enclosed page as indicated. The revised page is identified by amendment number and contains a vertical line indicating the area of change. The corresponding overleaf page is also provided to maintain document completeness.

Remove Page

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## EMERGENCY CORE COOLING SYSTEM

### SURVEILLANCE REQUIREMENTS (Continued)

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2. Verifying that each of the following pumps start automatically upon receipt of a safety injection test signal:
  - a) Centrifugal charging pump, and
  - b) Low head safety injection pump.
- f. By verifying that each of the following pumps develops the indicated discharge pressure (after subtracting suction pressure) on recirculation flow when tested pursuant to Specification 4.0.5.
  1. Centrifugal charging pump  $\geq 2410$  psig.
  2. Low head safety injection pump  $\geq 156$  psig.
- g. By verifying that the following manual valves requiring adjustment to prevent pump "runout" and subsequent component damage are locked and tagged in the proper position for injection:
  1. Within 4 hours following completion of any repositioning or maintenance on the valve when ECCS systems are required to be OPERABLE.
  2. At least once per 18 months.
    1. 1-SI-188 Loop A Cold Leg
    2. 1-SI-191 Loop B Cold Leg
    3. 1-SI-193 Loop C Cold Leg
    4. 1-SI-203 Loop A Hot Leg
    5. 1-SI-204 Loop B Hot Leg
    6. 1-SI-205 Loop C Hot Leg
- h. By performing a flow balance test, during shutdown, following completion of modifications to the ECCS subsystems that alter the subsystem flow characteristics and verifying that:
  1. For high head safety injection lines, with a single pump running:
    - a) The sum of the injection line flow rates, excluding the highest flow rate, is  $\geq 359$  gpm, and
    - b) The total pump flow rate is  $\leq 660$  gpm.



## EMERGENCY CORE COOLING SYSTEMS

### ECCS SUBSYSTEMS - $T_{avg} < 350^{\circ}\text{F}$

#### LIMITING CONDITION FOR OPERATION

3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE centrifugal charging pump#,
- b. One OPERABLE low head safety injection pump#, and
- c. An OPERABLE flow path capable of automatically transferring fluid to the reactor coolant system when taking suction from the refueling water storage tank or from the containment sump when the suction is transferred during the recirculation phase of operation or from the discharge of the outside recirculation spray pump.

APPLICABILITY: MODE 4.

#### ACTION:

- a. With no ECCS subsystem OPERABLE because of the inoperability of either the centrifugal charging pump or the flow path from the refueling water storage tank, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. With no ECCS subsystem OPERABLE because of the inoperability of the low head safety injection pump, restore at least one ECCS subsystem to OPERABLE status or maintain the Reactor Coolant System  $T_{avg}$  less than  $350^{\circ}\text{F}$  by use of alternate heat removal methods.
- c. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

# A maximum of one centrifugal charging pump and one low head safety injection pump shall be OPERABLE whenever the temperature of one or more of the RCS cold legs is less than or equal to  $316^{\circ}\text{F}$ .



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

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. 157  
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 November 10, 1993, as supplemented by letter dated November 16, 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.

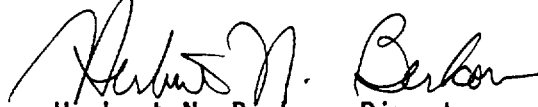
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-7 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 157, 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 its date of issuance.

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: November 23, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 157

TO FACILITY OPERATING LICENSE NO. NPF-7

DOCKET NO. 50-339

Replace the following page of the Appendix "A" Technical Specifications with the enclosed page as indicated. The revised page is identified by amendment number and contains a vertical line indicating the area of change. The corresponding overleaf page is also provided to maintain document completeness.

Remove Page

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Insert Page

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## EMERGENCY CORE COOLING SYSTEM

### SURVEILLANCE REQUIREMENTS (Continued)

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- f. By verifying that each of the following pumps develop the indicated discharge pressure (after subtracting suction pressure) on recirculation flow when tested pursuant to Specification 4.0.5.
  - 1. Centrifugal charging pump greater than or equal to 2410 psig.
  - 2. Low head safety injection pump greater than or equal to 156 psig.
- g. By verifying that the following manual valves requiring adjustment to prevent pump "runout" and subsequent component damage are locked and tagged in the proper position for injection:
  - 1. Within 4 hours following completion of any repositioning or maintenance on the valve when the ECCS systems are required to be OPERABLE.
  - 2. At least once per 18 months.
    - 1. 2-SI-89      Loop A Cold Leg
    - 2. 2-SI-97      Loop B Cold Leg
    - 3. 2-SI-103     Loop C Cold Leg
    - 4. 2-SI-116     Loop A Hot Leg
    - 5. 2-SI-111     Loop B Hot Leg
    - 6. 2-SI-123     Loop C Hot Leg
- h. By performing a flow balance test, during shutdown, following completion of modifications to the ECCS subsystems that alter the subsystem flow characteristics and verifying that:
  - 1. For high head safety injection lines, with a single pump running:
    - a) The sum of the injection line flow rates, excluding the highest flow rate, is  $\geq 359$  gpm, and
    - b) The total pump flow rate is  $\leq 660$  gpm.

## EMERGENCY CORE COOLING SYSTEMS

### ECCS SUBSYSTEMS - Tavg LESS THAN 350°F

#### LIMITING CONDITION FOR OPERATION

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3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE centrifugal charging pump<sup>#</sup>,
- b. One OPERABLE low head safety injection pump<sup>#</sup>, and
- c. An OPERABLE flow path capable of automatically transferring fluid to the reactor coolant system when taking suction from the refueling water storage tank or from the containment sump when the suction is transferred during the recirculation phase of operation.

APPLICABILITY: MODE 4.

ACTION:

- a. With no ECCS subsystem OPERABLE because of the inoperability of either the centrifugal charging pump or the flow path from the refueling water storage tank, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. With no ECCS subsystem OPERABLE because of the inoperability of the low head safety injection pump, restore at least one ECCS subsystem to OPERABLE status or maintain the Reactor Coolant System Tavg less than 350°F by use of alternate heat removal methods.
- c. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected safety injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

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<sup>#</sup> A maximum of one centrifugal charging pump and one low head safety injection pump shall be OPERABLE whenever the temperature of one or more of the RCS cold legs is less than or equal to 358°F.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 176 AND 157 TO

FACILITY OPERATING LICENSE NOS. 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

1.0 INTRODUCTION

By letter dated November 10, 1993, as supplemented by letter dated November 16, 1993, Virginia Electric and Power Company (the licensee) requested emergency Technical Specification (TS) changes for the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2). The proposed changes would eliminate the simulated reactor coolant pump (RCP) seal injection flow requirement of 48.3 gallons per minute (gpm) for cold leg flow injection balancing for the NA-1&2 TS 4.5.2.h.1.c. The licensee found that the specific value of TS 4.5.2.h.1.c was too large and resulted in difficulty meeting TS 4.5.2.h.1.a, addressing required minimum high head safety injection (HHSI) delivered flow ( $\geq 359$  gpm), and TS 4.5.2.h.1.b, addressing HHSI runout flow ( $\leq 660$  gpm).

2.0 EVALUATION

The NA-1&2 HHSI system licensing safety analyses require that at least 359 gpm be delivered to the reactor by each HHSI pump, excluding the flow rate of the highest injection flow line (of three lines). This is accomplished in the present NA-1&2 TS 4.5.2.h.1.a. Surveillance requirements associated with this TS measure the actual in-plant flow balance in the HHSI lines, and do not take credit for seal injection flow which reaches the reactor in meeting safety analysis requirements.

The NA-1&2 HHSI pump design requires that the individual HHSI pump flow rate be maintained at or below 660 gpm. This is enforced in the present NA-1&2 TS 4.5.2.h.1.b. Surveillance requirements for this TS require that the value assumed for seal injection flow be consistent with that provided in TS 4.5.2.h.1.c.

The present North Anna TS 4.5.2.h.1.c requires that, for cold leg injection balancing, a value of greater than or equal to 48.3 gpm will be used for simulated seal injection flow during balancing.

In its submittal of November 10, 1993, as clarified in a letter of November 16, 1993, the licensee indicated that, with deletion of TS 4.5.2.h.1.c, seal injection will continue to be accounted for in the surveillances associated with TS 4.5.2.h.1.a and TS 4.5.2.h.1.b, and that the value used will be consistent with the projected seal injection flow for accident conditions based on the actual in-plant setting. The reference by surveillances associated with TS 4.5.2.h.1.a and TS 4.5.2.h.1.b to actual plant settings makes TS 4.5.2.h.1.c unnecessary. We therefore find the proposed change to delete TS 4.5.2.h.1.c to be acceptable.

Finally, wordings of TS 4.5.2.h.1.a and TS 4.5.2.h.1.b are also changed in the proposed TS change to reflect deletion of TS 4.5.2.h.1.c. The content of these TSs are not changed and, therefore, these clerical changes are acceptable.

### 3.0 EMERGENCY CIRCUMSTANCES

NRC regulations (10 CFR 50.91(a)(5)) require that whenever an emergency situation exists, a licensee must explain why this emergency situation occurred and why it could not avoid this situation, and the NRC will assess the licensee's reasons for failing to file an application sufficiently in advance of the event. An emergency situation exists when the NRC's failure to act in a timely way would result in derating or shutdown of a nuclear plant, or in prevention of either resumption of operation or of increase in power output up to the plant's licensed power level. In such cases, the NRC may issue a license amendment involving no significant hazards consideration without prior notice and opportunity for a hearing or for public comment. Also, in such cases, the regulations require that the NRC be particularly sensitive to environmental considerations. Our discussion of why this proposed change meets the conditions necessary for emergency consideration is provided below.

At 09:30 hours and again at 14:45 hours on November 8, 1993, NA-2 entered an action statement to be in hot standby within six hours as required by TS 3.0.3. The licensee determined that TS 3.5.2, which requires two operable HHSI pumps, could not be met. The HHSI pumps were determined to be inoperable because the total pump flow rate required by TS 4.5.2.h.1.b may not have been met. As noted above, the limitation on seal injection flow specified by TS 4.5.2.h.1.c contributed to this determination by the licensee.

On November 8, 1993, the NRC verbally granted an enforcement discretion to eliminate the simulated reactor coolant pump seal injection flow requirement of  $\geq 48.3$  gpm in the NA-2 TS 4.5.2.h.1.c and to allow the licensee a 24-hour period to readjust seal injection flows in order to return the total pump flow rate to within TS limits. The licensee's letter dated November 9, 1993 documented the requested enforcement discretion. By letter dated November 10, 1993, the NRC provided written documentation of the verbal approval granted on November 8, 1993, and requested the licensee to submit an emergency TS change by November 12, 1993. Consistent with NRC policy on enforcement discretion, the licensee submitted an emergency TS change to permanently implement the



change initially supported through NRC's exercise of enforcement discretion on November 8, 1993.

Therefore, the staff concludes that failure to act in these circumstances could be reasonably expected to result in an unnecessary shutdown of NA-2 and, therefore, the request meets the criteria in 10 CFR 50.91(a)(5) for an emergency situation.

#### 4.0 Final No Significant Hazards Consideration Determination

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the 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 license proposed that the requested TS changes did not involve a significant hazards consideration, stating as follows:

Continued operation of North Anna Power Station in accordance with the proposed Technical Specification changes will not:

1. Involve an increase in the probability or consequences of an accident or malfunction previously evaluated. The proposed Technical Specification changes continue to require that with one HHSI pump running, the sum of the flows through the two lowest flow branch lines shall be  $\geq 359$  gpm and the total HHSI pump flow rate shall be  $\leq 660$  gpm. These requirements ensure the correct flow balance alignment and flow rates required to meet the safety analysis.

Likewise, the consequences of the accidents or malfunctions previously evaluated will not increase as a result of the proposed Technical Specification changes. The system performance will remain bounded by the existing safety analysis for all postulated accident conditions.

2. Create the possibility of a new or different kind of accident or malfunction from any previously evaluated. The proposed Technical Specification changes will not affect the capability of the HHSI System to perform its intended function. The proposed Technical Specification changes are bounded by the existing safety analysis and do not involve operation of plant equipment in a different

manner from which it was designed to operate. Since a new failure mode is not created, a new or different type of accident or malfunction is not created.

3. Involve a reduction in a margin of safety. The system performance will remain bounded by the existing safety analysis at the specified flow rates, therefore, safety margins are not reduced.

Based on its evaluation of the above, the staff concurs with the licensee's analysis and, therefore, concludes that these amendments meet the criteria, and do not involve a significant hazards consideration.

#### 5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Virginia State official was notified of the proposed issuance of the amendment. The State official had no comment.

#### 6.0 ENVIRONMENTAL CONSIDERATION

These amendments change the surveillance requirements. The NRC 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 made a final no significant hazards finding with respect to these amendments. Accordingly, these amendments meet 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 these amendments.

#### 7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) the amendments do not (a) significantly increase the probability or consequences of an accident previously evaluated, (b) increase the possibility of a new or different kind of accident from any previously evaluated or (c) significantly reduce a safety margin and, therefore, the amendments do not involve a significant hazards consideration; (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (3) such activities will be conducted in compliance with the Commission's regulations; and (4) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: F. Orr  
L. Engle

Date: November 23, 1993