

62027

October 22, 1986

Docket No.: 50-366

DISTRIBUTION:

Mr. J. T. Beckham, Jr.
Vice President - Nuclear Generation
Georgia Power Company
P. O. Box 4545
Atlanta, Georgia 30302

Docket File	EJordan	
NRC PDR	BGrimes	NThompson
L PDR	WJones	DVassallo
RBernero	JPartlow	
OGC-BETH	SNorris	
OPA	GRivenbark	
LHarmon	Plant File	
ACRS-10	SECY	
TBarnhart, 4	EButcher	

Dear Mr. Beckham:

The Commission has issued the enclosed Amendment No. 64 to Facility Operating License No. NPF-5 for the Edwin I. Hatch Nuclear Plant, Unit No. 2. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated July 11, 1986.

The amendment revises Table 3.8.2.6-1, "Primary Containment Penetration Condition Overcurrent Protective Devices" to reflect the installation of two additional overcurrent protective devices.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

Sincerely,

Original signed by
George W. Rivenbark

George W. Rivenbark, Project Manager
BWR Project Directorate #2
Division of BWR Licensing

Enclosures:

1. Amendment No. 64 to NPF-5
2. Safety Evaluation

cc w/enclosures:
See next page

(5520 Document Name: 50-366 Amendment)

BB03150236 861022
PDR ADDOCK 05000366
PDR

OFC	: BWD#2/DBL	: BWD#2/DBL	: OGC-BETH	: BWD#2/DBL	:	:	:
NAME	: SNorris/dn	: GRivenbark	: <i>Don Bodenick</i>	: <i>DMDVET</i>	:	:	:
DATE	: 10/7/86	: 10/7/86	: 10/9/86	: 10/21/86	:	:	:

Mr. J. T. Beckham, Jr.
Georgia Power Company

Edwin I. Hatch Nuclear Plant,
Units Nos. 1 and 2

cc:

Bruce W. Chruchill, Esquire
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037

Mr. L. T. Gucwa
Engineering Department
Georgia Power Company
Post Office Box 4545
Atlanta, Georgia 30302

Mr. H. C. Nix, Jr., General Manager
Edwin I. Hatch Nuclear Plant
Georgia Power Company
Post Office Box 442
Baxley, Georgia 31513

Mr. Louis B. Long
Southern Company Services, Inc.
Post Office Box 2625
Birmingham, Alabama 35202

Resident Inspector
U.S. Nuclear Regulatory Commission
Route 1, Post Office Box 279
Baxley, Georgia 31513

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission,
101 Marietta Street, Suite 2900
Atlanta, Georgia 30303

Mr. Charles H. Badger
Office of Planning and Budget
Room 610
270 Washington Street, S.W.
Atlanta, Georgia 30334

Mr. J. Leonard Ledbetter, Commissioner
Department of Natural Resources
270 Washington Street, N.W.
Atlanta, Georgia 30334

Chairman
Appling County Commissioners
County Courthouse
Baxley, Georgia 31513



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

GEORGIA POWER COMPANY
OGLETHORPE POWER CORPORATION
MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA
CITY OF DALTON, GEORGIA
DOCKET NO. 50-366
EDWIN I. HATCH NUCLEAR PLANT, UNIT NO. 2
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.: 64
License No.: NPF-5

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Georgia Power Company, et al. (the licensee), dated July 11, 1986, 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-5 is hereby amended to read as follows:

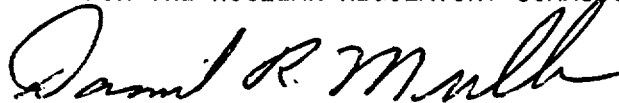
8803150238 861022
PDR ADOCK 05000366
P PDR

(2). Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 64 , 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 and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Daniel R. Muller, Director
BWR Project Directorate #2
Division of BWR Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 22, 1986

ATTACHMENT TO LICENSE AMENDMENT NO. 64

FACILITY OPERATING LICENSE NO. NPF-5

DOCKET NO. 50-366

Replace the following page of the Appendix "A" Technical Specifications with the enclosed page. The revised page is identified by Amendment number and contains a vertical line indicating the area of change. The overleaf page is provided for convenience.

Remove

3/4 8-21

Insert

3/4 8-21

TABLE 3.8.2.6-1 (Continued)

PRIMARY CONTAINMENT PENETRATION CONDUCTOR
OVERCURRENT PROTECTIVE DEVICES

<u>DEVICE NUMBER AND LOCATION*</u>	<u>SYSTEM/COMPONENT POWERED</u>
c. Type 3:	
1. 600 VAC, MCB, T.M. 2R24-S014, COMPT. 5E	RECIRC. PUMP MOTOR HEATER 2B31-C001B
2. 600 VAC, MCB, T.M. 2R24-S013, COMPT. 5B	REACTOR RECIRC. PUMP MOTOR HEATER 2B31-C001A
3. 600 VAC, MCB, T.M. 2R24-S013, COMPT. 3B	DRYWELL COOLING UNIT 2T47-B010A
4. 600 VAC, MCB, T.M. 2R24-S014, COMPT. 8A	DRYWELL COOLING UNIT 2T47-B010B
d. Type 4:	
1. 120 VAC, MCB, T.M. 2R25-S102, CKT. 10	CABLES BHE805M01 AND BHE808M02
2. 120 VAC, MCB, T.M. 2R25-S101, CKT. 10	CKTS, BGE708M01 AND BGE708M02
e. Type 5:	
1. 600 VAC, MCB, M.O. 2R24-S014, COMPT. 2A	DRYWELL EQUIP. DR. SUMP DISCH. MOV 2G11-F018
2. 600 VAC, MCB, M.O. 2R24-S014, COMPT. 6C	DRYWELL EQUIP. DRAIN SUMP RECIRC. MOV 2G11-F015
3. 600 VAC, MCB, M.O. 2R24-S012B, COMPT. 4A	RCIC STEAMLIN INBOARD ISO. MOV. 2E51-F007
4. 600 VAC, MCB, M.O. 2R24-S011, COMPT. 9A	RHR HEAD SPRAY ISOLATION MOV. 2E11-F022
5. 600 VAC, MCB, M.O. 2R24-S011A, COMPT. 4A	HPCI STEAM LINE INBOARD ISOLATION MOV. 2E41-F002
6. 600 VAC, MCB, M.O. 2R24-S011, COMPT. 14C	RWCU INBOARD ISOLATION MOV. 2G31-F001
7. 600 VAC, MCB, M.O. 2R24-S011, COMPT. 15B	MAIN STEAM LINE DRAIN MOV. 2B21-F016

*M.C.B. - molded case circuit breaker
M.O. - magnetic only
T.M. - thermal magnetic

TABLE 3.8.2.6-1 (Continued)

PRIMARY CONTAINMENT PENETRATION CONDUCTOR
OVERCURRENT PROTECTIVE DEVICES

<u>DEVICE NUMBER</u> <u>AND LOCATION*</u>	<u>SYSTEM/COMPONENT</u> <u>POWERED</u>
c. Type 6:	
1. 600 VAC, MCB, M.O. 2R24-S018A, COMPT. 2A	LOOP 'A' PUMP SUCTION MOV 2B31-F023A
2. 600 VAC, MCB, M.O. 2R24-S018A, COMPT. 2B	LOOP 'A' PUMP DISCH. MOV 2B31-F031A
3. 600 VAC, MCB, M.O. 2R24-S018B, COMPT. 3A	LOOP 'B' PUMP SUCTION MOV 2B31-F023B
4. 600 VAC, MCB, M.O. 2R24-S018B, COMPT. 3B	LOOP 'B' PUMP DISCH. MOV 2B31-F031B
5. 600 VAC, MCB, M.O. 2R24-S014, COMPT. 1B	DRYWELL EQUIP. DRAIN PUMP B 2G11-C006B
6. 600 VAC, MCB, M.O. 2R24-S014, COMPT. 7D	DRYWELL FLOOR DRAIN SUMP PUMP 'B' 2G11-C001B
7. 600 VAC, MCB, M.O. 2R24-S013, COMPT. 4A	DRYWELL FLOOR DRAIN SUMP PUMP 1A 2G11-C001A
8. 600 VAC, MCB, M.O. 2R24-S013, COMPT. 4B	DRYWELL EQUIP. DRAIN SUMP PUMP A 2G11-C006A
9. 600 VAC, MCB, M.O. 2R24-S012, COMPT. 18B	DRYWELL COOLING UNIT 2T47-B007B
10. 600 VAC, MCB, M.O. 2R24-S012, COMPT. 19A	DRYWELL COOLING UNIT 2T47-C001B
11. 600 VAC, MCB, M.O. 2R24-S011, COMPT. 6C	RHR SHUTDOWN COOLING ISO. MOV 2E11-F009
12. 600 VAC, MCB, M.O. 2R24-S011, COMPT. 18A	DRYWELL COOLING UNIT 2T47-B007A
13. 600 VAC, MCB, M.O. 2R24-S011, COMPT. 18C	DRYWELL COOLING RETURN AIR FAN 2T47-C001A

*M.C.B. - molded case circuit breaker
M.O. - magnetic only
T.M. - thermal magnetic



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 64 TO FACILITY OPERATING LICENSE NO. NPF-5

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

EDWIN I. HATCH NUCLEAR PLANT, UNIT NO. 2

DOCKET NO. 50-366

1.0 INTRODUCTION

By application dated July 11, 1986, Georgia Power Company (GPC) proposed a change to the Technical Specifications to Facility Operating License No. NPF-5, for Edwin I. Hatch Unit 2. The proposed change would update the Hatch Unit 2 Technical Specification Table 3.8.2.6-1 "Primary Containment Penetration Conductor Overcurrent Protective Devices", to reflect the addition of new equipment to be installed during the current refueling outage.

2.0 EVALUATION

A design modification scheduled for implementation during the current Unit 2 refueling outage will result in the installation of two new drywell cooler units. In order to provide electrical power to the new cooler units, it is necessary to add two primary containment penetration conductor overcurrent protective devices to the plant and to the listing in the Hatch Unit 2 Technical Specification Table 3.8.2.6-1 "Primary Containment Penetration Conductor Overcurrent Protective Devices".

This change is consistent with the guidelines of Regulatory Guide 1.63, Revision 2, "Electrical Penetration Assemblies in Containment Structures for Light-Water-Cooled Nuclear Power Plants".

Based on the above, the staff has concluded that the proposed change to the Hatch Unit 2 Technical Specifications to reflect the installation of two primary containment penetration conductor overcurrent protective devices is consistent with the plant safety analysis. Accordingly, the staff finds the proposed change to the Hatch Unit 2 Technical Specifications to be acceptable.

8803150239 861022
PDR ADDCK 05000366
P PDR

3.0 ENVIRONMENTAL CONSIDERATIONS

The amendment changes a requirement with respect to 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 amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

4.0 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: B. Marcus

Dated: October 22, 1986

TAC 62-7

accident previously evaluated. The change in enrichment would only affect an unplanned criticality event. As indicated in the licensee's analyses, an unplanned criticality event will not occur as Keff will not exceed .95 even with Pool B fully loaded with the highest enrichment fuel and flooded with cold unborated water, or dry storage racks immersed in a water mist of 7.5% moderator density. Criticality is possible for a mist environment only if the higher enriched fuel occupies all of the locations in the dry storage racks including those which are required to be vacant. To prevent this occurrence, the licensee has taken measures to preclude improper fuel storage.

3. This proposed amendment will not involve a significant reduction in a margin of safety.

While the increased enrichment in Pool B and the dry storage racks may lessen the margin to criticality, this reduction is not significant because the overall safety margin is within NRC criteria of Keff less than or equal to .95 (NRC Standard Review Plan, Section 9.1.2).

Based on the above, the Commission's staff proposes to determine that the requested amendment does not involve significant hazards considerations.

Local Public Document Room
location: Crystal River Public Library, 668 NW. First Avenue, Crystal River, Florida 32629.

Attorney for licensee: R.W. Neiser, Senior Vice President and General Counsel, Florida Power Corporation, P.O. Box 14042, St. Petersburg, Florida 33733.

NRC Project Director: John F. Stolz.

Georgia Power Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, City of Dalton, Georgia, Docket No. 50-366, Edwin I. Hatch Nuclear Plant, Unit No. 2, Appling County, Georgia

Date of amendment request: July 11, 1986.

Description of amendment request: The amendment would modify the Technical Specifications to add two new overcurrent protective devices to Table 3.8.2.6-1 to reflect the installation during the upcoming refueling outage of new drywell cooler units.

Basis for proposed no significant hazards consideration determination: The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (51 FR 7751). An example (ii) of actions involving no significant hazards considerations is an amendment involving a change that constitutes an additional limitation,

restriction, or control not presently included in the Technical Specifications. The proposed Technical Specification modification imposes additional limitations, restrictions and controls and therefore falls within this example.

Therefore, since the application for amendment involves a proposed change that is similar to an example (ii) for which no significant hazards considerations exists, the Commission has made a proposed determination that the application for amendment involves no significant hazards considerations.

Local Public Document Room
location: Appling County Public Library, 301 City Hall Drive, Baxley, Georgia.

Attorney for licensee: Bruce W. Churchill, Esquire, Shaw, Pittman, Potts and Trowbridge, 1800 M Street, NW., Washington, DC 20036.

NRC Project Director: Daniel R. Muller.

Georgia Power Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, City of Dalton, Georgia, Docket No. 50-366, Edwin I. Hatch Nuclear Plant, Unit No. 2, Appling County, Georgia

Date of amendment request: July 18, 1986.

Description of amendment request: The amendment would modify the Technical Specifications to (1) revise allowable values (and trip setpoints, which are the same as the allowable values) for the reactor vessel water levels 1, 2, and 3; the shroud water level; the HPCI and RCIC steam line high flow; and the reactor steam dome low-pressure instruments to provide for the use of Rosemount as well as Barton transmitters as the analogue transmitter trip system instruments for these parameters; (2) provide clarifications and corrections; (3) revise the analytical limits and the corresponding allowable values for instruments which actuate on high drywell pressure, and (4) lower the core spray (CS) and residual heat removal low pressure coolant injection (RHR-LPCI) low reactor pressure injection permissive setpoints to allow for increased flexibility in the use of Rosemount transmitters for this trip function.

Basis for proposed no significant hazards consideration determination: The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (51 FR 7751). One of these examples (i) of actions involving no significant hazards considerations relates to a purely administrative change to Technical Specifications.

Change item 2 would (a) correct parts numbers and the description of the

reactor shroud water level trip in Table 3.3.3-1, (b) change the value used to indicate the suppression chamber high water level trip (actual level is unchanged), and (c) change a 42.5 °F area differential temperature allowable value to 42 °F for simplification. These changes are clarifications and corrections to the existing Technical Specifications and involve no changes in the actual requirements. These are administrative changes similar to example (i).

The Commission has also provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility 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 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.

We have evaluated proposed changes (1), (3) and (4) above against these criteria. None of these three proposed changes to the Technical Specifications involves or results in a change in the design function of equipment or in the mode of operating the plant. Instead the changes involve setpoint changes that the licensee states have been determined using the criteria of NRC Regulatory Guide 1.105 and methodology previously approved by the NRC in Amendment 39 to the Hatch Unit 2 Technical Specifications. Changes 1 and 3 preserve appropriate margins to the current analytical limits for the parameters involved. For change (4), it was necessary to relax the analytical limit for the RHR-LPCI and core spray injection value permissives. However the licensee has provided an analysis performed by General Electric Company that shows that the impact of the change in the analytical limits on the resultant accident analyses, and hence safety of the plant, is negligible.

On the basis of the above, we have determined that:

1. Since the changes do not create new modes of operation or change the design functions of equipment, they do not create the possibility of a new or different kind of accident from any previously evaluated.

2. Since no new modes of operation are created and since the analytical limits are maintained or, where changed, the impact on accident analysis results has been shown to be negligible, the

originally built using comparable codes and criteria.

The proposed amendments will not involve a significant reduction in a margin of safety. Changes to instrument response times and uncertainties have been determined, through test and analysis, to be consistent with, or not significantly different from, current values. The increased response time of the RTDs is partially offset by the elimination of the delay associated with the bypass manifold piping, and partly by the reduction of the RTD electronic filter time constant. Licensee evaluations of uncertainties associated with the modification confirm that the setpoints defined in the McGuire Technical Specifications remain valid.

From our preliminary review of the licensee's evaluation, we agree with the above determination. Based on the above, the Commission proposes to determine that the changes do not involve a significant hazards consideration.

Local Public Document Room location: Atkins Library, University of North Carolina, Charlotte (UNCC Station), North Carolina 28223.

Attorney for licensee: Mr. Albert Carr, Duke Power Company, 422 South Church Street, Charlotte, North Carolina 28242.

NRC Project Director: B.J. Youngblood.

Duquesne Light Company, Docket No. 50-334, Beaver Valley Power Station, Unit No. 1, Shippingport, Pennsylvania

Date of amendment request: July 28, 1986.

Description of amendment request: The proposed amendment would update the pump testing surveillance requirements to comply with the requirements of 10 CFR 50.55a(g)4(i). The Inservice Testing program must be updated, in accordance with 10 CFR 50.55(g)4(i), every 120 months to the latest edition and addenda of the Code (ASME Section XI) referenced in paragraph (b) of that section twelve (12) months prior to the start of the interval. Paragraph (b) references the 1983 edition through the summer 1983 addenda. The 1983 ASME Section XI code edition allows quarterly pump testing, however, the current surveillance requirements require pump testing on a monthly basis. The revised surveillance requirements are proposed in accordance with 10 CFR 50.55a(g)5(ii) which states, "If a revised inservice inspection program for a facility conflicts with the technical specifications for a facility, the licensee shall apply to the Commission for amendment of the technical

specifications to conform the technical specification to the revised program." The proposed changes incorporate applicable portions of the standard Technical Specification surveillance requirements and reference testing in accordance with specification 4.0.5.

Basis for proposed no significant hazards consideration determination: As stated above, the requested changes will be done in compliance with a regulation, and the end product, the revised technical specifications, will be in compliance with an edition and addenda of the ASME Code Section XI which is endorsed by a regulation. There is no change of hardware or operating procedures. Thus, requested changes do not create the possibility of an accident or malfunction of a different type from those previously evaluated, do not involve a significant increase in the probability or consequences of an accident previously evaluated, and do not decrease a margin of safety. Therefore, the staff proposes to determine that the proposed amendment involves no significant hazards consideration.

Local Public Document Room location: B.F. Jones Memorial Library, 663 Franklin Avenue, Aliquippa, Pennsylvania 15001.

Attorney for licensee: Gerald Charnoff, Esquire, Jay E. Silberg, Esquire, Shaw, Pittman, Potts, and Trowbridge, 1800 M Street, NW., Washington, DC 20036.

NRC Project Director: Lester S. Rubenstein.

Florida Power Corporation, et al., Docket No. 50-302, Crystal River Unit No. 3 Nuclear Generating Plant, Citrus County, Florida

Date of amendment request: December 10, 1985.

Description of amendment request: This proposed amendment would allow increasing the Uranium-235 loading limit in the Crystal River Unit 3 spent fuel pool B and the dry fuel storage rack from 3.5 weight percent to 4.0 weight percent. This minor increase in the loading limit would allow the licensee to utilize fuel which is slightly higher in U-235 in future fuel cycles with a slight improvement in fuel economy for operation of the facility.

Basis for proposed no significant hazards consideration determination: The purpose of limiting allowable fuel enrichment of assemblies stored in the wet and dry racks is to assure sufficient safety margin exists to prevent inadvertent criticality. This is done by assuring that a Keff equal to or less than 0.95 would be maintained conservatively assuming the racks fully

loaded with fuel of the highest anticipated reactivity and flooded with unborated water at a temperature corresponding to the highest reactivity. The analysis submitted by the licensee indicates that storage of 4.0% (nominal) enriched fuel in Pool B will not cause Keff to exceed 0.95 under the conditions above. A second analysis for the dry storage racks was performed. The racks will be loaded in three 6 x 3 arrays such that every fourth row in the 6 x 11 rack is vacant. The analyses include margins for uncertainty in reactivity calculations and in mechanical tolerances.

Using the standards in 10 CFR 50.92, the licensee has concluded and the Commission's staff agrees that the proposed amendment involves no significant hazards considerations for the following reasons:

1. This proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The probability of a previously evaluated accident is not affected by an increase in fuel enrichment. For example, positioning a fuel assembly outside the rack, or dropping one on top of the rack has negligible reactivity effects. Also, any effect is offset by the fact that no credit is taken for soluble boron in the water which would reduce reactivity significantly below the .95 criterion. To reduce the probability of an unplanned criticality event, the licensee has physically blocked 12 storage locations in the dry fuel storage rack. An increase in fuel enrichment will not by itself affect the mixture of fission product nuclides. A change in fuel cycle design which makes use of an increased enrichment may result in fuel burnup consisting of a somewhat different mixture of nuclides. The effect in this instance is insignificant for the following reasons.

(a) The isotopic mixture of the irradiated assembly is relatively insensitive to the assembly's initial enrichment.

(b) Because most accident doses are such a small fraction of 10 CFR 100 limits, a large margin exists before any change becomes significant.

(c) The change in plutonium content which would result from an increase in burnup would produce more of some fission product nuclides and less of other nuclides. Small increases in some doses are offset by reductions in other doses. The radiological consequences of accidents are not significantly changed.

2. This proposed amendment will not create the possibility of a new or different kind of accident from any