

May 8, 1997

Mr. W. R. Robinson, Vice President  
Shearon Harris Nuclear Power Plant  
Carolina Power & Light Company  
Post Office Box 165, Mail Code: Zone 1  
New Hill, North Carolina 27562-0165

SUBJECT: ISSUANCE OF AMENDMENT NO. 72 TO FACILITY OPERATING LICENSE NO. NPF-63 REGARDING DESIGN DEFICIENCY IN THE PROTECTION CIRCUITRY FOR EMERGENCY DIESEL GENERATORS - SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1 (TAC NO. M98193)

Dear Mr. Robinson:

The Nuclear Regulatory Commission has issued Amendment No. 72 to Facility Operating License No. NPF-63 for the Shearon Harris Nuclear Power Plant, Unit No. 1. This amendment approves changes to the protection circuitry for the emergency diesel generators as per your request dated April 18, 1997, as supplemented April 29, 1997. The amendment also approves associated changes to the Final Safety Analysis Report.

A copy of the related Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's regular bi-weekly Federal Register notice.  
Sincerely,

Ngoc B. Le, Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-400

Enclosures:

- 1. Amendment No. 72 to NPF-63
- 2. Safety Evaluation

cc w/enclosures:

See next page

(\*See SE memo from JCalvo to MReinhart dated 4/28/97)

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OFFICE	PM:PDII-1	LA:PDII-1	D:PDII-1	OGC	BC:EELB*
NAME	NLe <i>he</i>	Dunnington <i>SD</i>	MReinhart <i>M</i>	<i>with changes</i>	JCalvo <i>JAC</i>
DATE	4/30/97	4/30/97	5/16/97	5/15/97	5/11/97
COPY	(Yes/No)	(Yes/No)	(Yes/No)	(Yes/No)	(Yes/No)

OFFICIAL RECORD

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Carolina Power & Light Company

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AMENDMENT NO. 72 TO FACILITY OPERATING LICENSE NO. NPF-63 - HARRIS, UNIT 1

Docket File  
PUBLIC  
PDII-1 Reading  
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OGC  
G. Hill (2)  
C. Grimes (11E22)  
O. Chopra  
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cc: Harris Service List



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

CAROLINA POWER & LIGHT COMPANY, et al.

DOCKET NO. 50-400

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 72  
License No. NPF-63

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Carolina Power & Light Company, (the licensee), dated April 18, 1997, as supplemented April 29, 1997, 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 hereby amended to authorize changes to the emergency diesel generators protection circuitry as set forth in the application for amendment by the Carolina Power & Light Company dated April 18, 1997, as supplemented April 29, 1997.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink that reads "Mark Reinhart". The signature is written in a cursive style with a large initial 'M'.

Mark Reinhart, Acting Director  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Date of Issuance: May 8, 1997



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

CAROLINA POWER & LIGHT COMPANY

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1

DOCKET NO. 50-400

1.0 BACKGROUND

On November 14, 1996, with the plant operating at 100 percent power, Carolina Power & Light Company identified a design deficiency in the protection circuitry for the emergency diesel generator (EDG). Section 8.3.1.1.2.14.g of the Shearon Harris plant final safety analysis report (FSAR) states, "Protection is provided for the diesel generator and the safety-related electrical system during periodic testing of the diesel generator coincident with a loss of offsite power by the voltage restrained over-current relay (51V) at the diesel generator feeder breaker. This relay senses over-current due to overloading of the diesel generator in conjunction with reduction of voltage. The relay is arranged to trip the feeder breaker of the diesel generator."

During the engineering review resulting from Generic Letter 96-01, "Testing of Safety-Related Logic Circuits," the ability of the 51V relay to provide the described protection during the loss of offsite power (LOOP) was questioned. Subsequent investigation concluded that the relay would not provide this protection. The 51V relay is set to provide backup protection for over-current conditions associated with distribution system faults and degraded voltage conditions, while the EDG is in test mode and not overload protection during a LOOP.

As a result of this condition, the licensee requested a meeting with the NRC staff on April 7, 1997. During this meeting, the licensee stated that a scenario exists while the EDG is synchronized to the off-site electrical grid during periodic testing that could result in a possible EDG overspeed or a potential for the load sequencer to not recognize a loss of off-site power condition and not initiate load sequencing onto the safety bus. The licensee then discussed a proposed modification as their solution to the EDGs protection circuitry and further stated that the proposed modification constitutes an unreviewed safety question. Thus the proposed modification would need the NRC review and approval pursuant to the requirements of 10 CFR 50.59(c) and 10 CFR 50.90. On April 18, 1997, as supplemented April 29, 1997, the licensee submitted their proposed modification and requested staff review and approval be granted under exigent circumstances pursuant to 10 CFR 50.91(a)(6).

## 2.0 INTRODUCTION

In order to perform the required Technical Specification surveillance requirement of the EDGs, it is necessary to connect an EDG in parallel with the offsite power system. This is accomplished by connecting a running EDG through its output breaker (for example, output breaker 106 for EDG A) while the safety bus remains connected to its associated non-safety bus through the two tie breakers (104 and 105). In the current design, if an EDG is in this mode of operation and a loss of offsite power (LOOP) occurs, the existing logic will utilize the safety-related 6.9-kV bus undervoltage relays to detect a LOOP. The premise of the logic is that if the offsite power source is lost, then the load on the diesel from connected loads would be in excess of the EDG's capacity, and therefore an undervoltage condition would occur. To ensure that the connected load is large, the existing logic inhibits, if the EDG in the test configuration, the tripping of the 105 tie breaker by a LOOP detection relay (CR1/1748) after it has detected a LOOP occurrence during either of the following two events:

- (a) The startup transformer (SUT) and the unit auxiliary transformer (UAT) output breakers (101 and 102) to the auxiliary bus 1D are OPEN.
- (b) The SUT output breaker (101) to the 6.9-kV auxiliary bus 1D is OPEN and either of the main generator lockouts (86G1A or 86G1B) is actuated.

The design objective of the inhibit logic is to ensure that the load on the non-safety bus that is tied to the safety bus during EDG testing remains connected to the safety bus, providing an overall load in excess of the EDG capacity that would lead to an undervoltage/overcurrent condition. This is accomplished by holding the tie breaker 105 closed with the objective of creating an overload condition on the safety bus while dragging the voltage down to allow operation of the bus undervoltage (UV) relay or the 51V relay. The 51V relay, however, requires approximately 2000 amps in order to pick up in less than a second. And thus, even with the tie breakers held closed, the additional balance of plant loading does not represent the amount of load necessary to generate 2000 amps. The above possible loading revealed that the EDG will not respond as described in the FSAR when distribution system load is insufficient to actuate the 51V or UV relays.

Currently the licensee is declaring the EDG inoperable when the EDG is in the test mode.

The above concern of Division A of the onsite power system is also applicable to the onsite power system of Division B.

## 3.0 PROPOSED CHANGE

In order to bring the onsite power system into compliance with its design basis as described in the FSAR during periods when the EDG is in the test mode, the licensee has proposed the following design modifications to the EDG circuitry:

- (a) Provide a direct trip of the EDG output breaker 106 when an EDG is in the test mode and a LOOP is detected by the LOOP relay CR1/1748 (which energizes on conditions stated above)
- (b) Provide a direct trip of the bus cross tie breaker 105 on detection of a LOOP as detected by the LOOP relay CR1/1748.

The proposed design provides the most direct indicator of a LOOP. The LOOP relay will perform the following additional safety functions when an EDG is in test mode:

- (a) Ensure the EDG is disconnected from the safety bus immediately on detection of a LOOP concurrent with the EDG in test mode; and
- (b) Ensure the cross tie between the non-safety bus and safety bus is opened immediately on detection of a LOOP.

Completion of these safety functions will ensure that safety bus undervoltage occurs and EDG load shedding and load sequencing is initiated.

The changes to be made for Division A (Safety bus 1A-SA) and Division B (Safety bus 1B-SB) are as follows:

- (a) The logic for the 105 tie breaker between the 1D bus and the 1A-SA bus (Division A) and the 125 tie breaker between the 1E bus and 1B-SB bus (Division B) will be modified to remove contacts 2B-2C of relays SM/SA and SM/SB from 105 and 125 breaker trip coil logic.
- (b) The logic for the EDG breaker 106 (Division A) and EDG breaker 126 (Division B) will be modified to add another parallel path for tripping the breakers when the EDGs are in the test mode. For Division 1, this additional trip path will utilize contact 1G-1H from relay CR2/1727 that is in the breaker 105 logic to complete path through the test mode relay contact (1B-1A of relay SM/SA) energizing relay CR2/1702. Energizing relay CR2/1702 closes contact 1A-1B and completes a circuit path energizing the EDG breaker 106 trip coil.

For Division 2, this additional trip path will utilize contact 1G-1H from relay CR2/1752 that is in the breaker 125 logic to complete a circuit path through the test mode relay contact (1B-1A of relay SM/SB) energizing relay CR2/1750. Energizing relay CR2/1750 closes contact 1A-1B and completes a path energizing the EDG breaker 126 trip relay coil.

- (b) Mechanism Operated Cell (MOC) switches (52S/a) of tie breaker 105 (Division A) and 125 (Division B) are bypassed by adding jumpers to eliminate a relay race between breaker MOC 105 switch contact and relay CR2/1702 in the trip logic of circuit of EDG breaker 106 (Division A) and breaker 125 MOC switch contact and relay CR2/1750 in the trip logic of circuit of EDG breaker 126.

Upon completion of the modification, the proposed design will satisfy the commitment made in the FSAR section 8.3.1.1.2.8(e), which requires:

On receipt of a LOOP during the diesel generator (D/G) test mode:

- 1) Trip the offsite breaker feeding the engineered safety feature (ESF) bus and the D/G breaker if closed.
- 2) The D/G remains running, and governor control transfers to 'isochronous' mode from 'droop' mode.
- 3) Load shed all breakers from the ESF buses except the 6.9-kV breaker feeding 480V power center 1A2-SA and 1B2-SB.
- 4) Close D/G breaker, upon attaining voltage and frequency.
- 5) Connect ESF loads as required in sequence.

External fault protection for the EDGs and the safety-related electrical system during periodic testing of the EDGs will still be relied on the 51V voltage-controlled overcurrent relay. This relay senses overcurrent due to overloading of the EDGs in conjunction with a reduction in voltage.

#### 4.0 EVALUATION

The proposed modification revises the EDGs output breakers logic when the EDGs are in the test mode (parallel with the grid) to provide an anticipatory trip to the EDG output breakers to trip open based on a signal from the LOOP detection logic to ensure proper start of the emergency sequencers upon LOOP. This LOOP detection trip of the EDG output breaker is a safety function that is necessary to ensure the safety bus is deenergized, and thus to ensure that an undervoltage condition would occur on the safety bus. However, the proposed logic utilizes signal inputs and power supply that are non-Class 1E. The use of the non-Class 1E signals to support completion of a safety action has introduced a new failure mode or failure type that was not previously analyzed by the licensee. When the EDG is in test mode, the proper functioning of the LOOP relay (CR1/1748) is essential to the immediate opening of the EDG breaker to ensure the protection of the EDG and the starting of the EDG load sequencing process. Therefore, the failure of the LOOP relay to properly function becomes essential and must be analyzed since it is a single relay and its failure could cause the EDG breaker to function improperly.

The licensee states that the LOOP relay is installed in the associated Division isolation cabinet and is a Class 1E relay. Its current safety function is as an isolation device between non-Class 1E trip logic of breaker 105 (offsite power feeder breaker). A new safety function has been added, in that the relay must now energize and properly function to initiate the trip of EDG output breaker 106 when an EDG is in test mode. The non-Class 1E inputs are the closure of the associated SUT and UAT breaker open position switch, and the energization and proper function of the main generator lockout relays. Since there are two main generator lockout relays with each having a contact, in parallel, in the logic of each LOOP relay, a functional failure of a single lockout relay would not be a concern. However, a single failure of the UAT or SUT position switches could result in a failure of the LOOP relay to function.

Also, the LOOP relay coil in each division is supplied power from the non-safety-related uninterruptible power system. The power is supplied from separate circuits for each LOOP relay (Division A and Division B) with breakers for both circuits in the same distribution panel. The failure of an individual circuit breaker would result in failure of the LOOP relay for the division being tested. A loss of power to the distribution panel itself would affect only the Division being tested because only one EDG is tested at any given time; therefore, the other division will be unaffected. However, the loss of power to the distribution panel will be annunciated in the main control room. The licensee will revise the EDG surveillance test procedures to require that operations personnel verify that this annunciator is not in prior to paralleling an EDG.

In the event the LOOP relay fails to function, operator action may be required to trip the EDG output breaker. Overspeed of the EDG is not expected due to the fact that the EDG is fuel limited to approximately 7.3 MW and testing during parallel operation is limited to 7.0 MW. Although the Harris EDGs have not been tested to reject 7.2 MW, the licensee provided with their submittal test data from Comanche Peak which indicates that load rejecting 7.2 MW results in a maximum speed of 467 rpm. In comparison, Harris and Comanche Peak are equipped with Delaval DSRV-16-4 diesels with factory-specified overspeed protection set at 517 rpm. In any case, the other division of EDG is unaffected and would function to provide the needed emergency power.

Due to the use of the non-Class 1E inputs to support completion of a safety function, the staff requested the licensee to perform a failure modes and effects analysis (FMEA) of the modification to assure that the failure of the non-safety circuitry does not impair the capability of the EDGs to perform their safety function and a total failure of the proposed circuitry affects only one safety Division. Subsequently, the licensee submitted the above analysis for staff review. Based on our review, we conclude that the failure of the proposed EDG circuitry modification affects only the Division being tested while the other Division of EDG remains unaffected.

In the course of our review, the staff was also concerned about the adequacy of testing proposed by the licensee to ensure the portions of the circuits that are modified will function as intended by the design. Specifically, the staff required that an integrated testing of the LOOP logic be performed which should include simulating a LOOP (open breaker 101 and breaker 102 or open breaker 101 and either generator lockout initiates) and verify that the EDG output breaker opens. Subsequently, the licensee has proposed the following test program. Acceptance testing on each train will consist of verifying that the LOOP logic (breaker 101 and breaker 102 open or breaker 101 and either generator lockout initiates) will result in CR1/1748 relay contact closure. Once the modification is installed, CR1/1748 relay will be actuated in order to verify that the installed circuitry functions as designed up to and including trip signals to the EDG output breaker and the non-safety bus to the safety bus tie breakers. Additionally, the licensee will periodically perform an integrated test of the LOOP logic every other refueling outage on each train. This test will include simulating a LOOP to verify the circuitry functions as designed up to and including trip signals to the EDG output

breaker and the non-safety bus to safety bus tie breakers. The staff finds the above overlapping testing and the periodic integrated test program that verifies that the LOOP logic functions as designed to be acceptable.

Based on the above, the staff concludes that the proposed modification to the EDG circuitry using the LOOP relay and associated non-Class 1E equipment to perform a safety function, coupled with the use of operator action as a backup to the LOOP relay function, and its associated changes to the FSAR are acceptable, even though the proposed design deviates from design requirements and licensing assumptions specified in the Harris FSAR. Our conclusion is based on the proposed logic that precludes the possibility of overloading the EDGs (which could be harmful to the machines) during testing in the event of a LOOP. Although the proposed logic utilizes signal inputs and power supply that are non-Class 1E, the signal inputs from the non-Class 1E devices are through isolation devices so that a failure of the non-Class 1E components will not affect the safety operation of the Class 1E circuits.

The currently in-place administrative controls ensure that both EDGs are not tested simultaneously. The EDG will only be paralleled to offsite power for short periods of time during testing and will not be paralleled to the offsite power system during expected adverse weather conditions. If the EDG output breaker does not automatically trip due to LOOP detection circuitry failure, operator action will be taken to manually trip the breaker. The licensee will revise operating procedures to describe the required actions and conduct operator training for these actions. These compensatory measures provide reasonable assurance that power will be made available to one of the redundant safety buses in a timely manner following a LOOP coincident with EDG testing and a single failure of the other Division EDG.

Additionally, the proposed design does not compromise the independence of the redundant EDGs because the inputs to the LOOP relay for Division B EDG comes from breaker contacts associated with different UAT and SUT than those used for Division A.

Finally, there is no impact on safe shutdown due to this modification during normal plant operation because in non-test mode the EDG is not running and connected to the safety bus.

## 5.0 EXIGENT CIRCUMSTANCES

The licensee submitted the application for amendment on April 18, 1997, and requested that the proposed amendment be issued under exigent circumstances as provided in 10 CFR 50.91(a)(6)(i)(A). The application for amendment was noticed in the Federal Register on April 23, 1997 (62 FR 19818), at which time the staff made the exigency finding and a proposed no significant hazards consideration determination. The licensee did not request emergency treatment of the application and the staff does not believe that an emergency situation existed.

There were no public comments in response to the exigent notice published in the Federal Register.

## 6.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92(c) 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.

(1) Operation of the facility in accordance with the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed design change does not change the overall design, layout, and functional performance of the plant structures, systems, and components (SSC), nor does it lower the quality class of any SSC. Specifically, the probability of loss of both divisions of onsite power remains unchanged because the safety-related electrical isolation feature of the LOOP relays is not affected and the Technical Specification and FSAR requirement to test only one EDG at a time is retained. Thus, the staff concludes that the modification to the EDG protection circuitry will not increase the onsite or offsite radiological effects previously evaluated in the FSAR as a consequence of an accident.

(2) Operation of the facility in accordance with the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed modification does not create any new accident initiators. The proposed modification restores the ability of the EDG to respond to a bona fide LOOP as described in the FSAR. The consequences of failure of any circuit components associated with this modification would not result in accidents other than those already addressed in the FSAR. Thus, there is no new or different kind of accident from any accident previously evaluated.

(3) Operation of the facility in accordance with the proposed change will not involve a significant reduction in the margin of safety. The margins of safety defined in the Technical Specification Bases are not changed by the proposed modification. The proposed modification restores the ability of the EDG to respond to a bona fide LOOP as described in the FSAR and does not change the acceptance limits defined in the Technical Specifications or the FSAR. Thus, the proposed change will not involve a significant reduction in the margin of safety.

Based upon the above considerations, the staff concludes that the modification to the EDG protection circuitry meets the three criteria of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendment does not involve a significant hazards consideration.

## 7.0 STATE CONSULTATION

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

## 8.0 ENVIRONMENTAL CONSIDERATION

The amendment (modification to the EDG protection circuitry) 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 NRC 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding (62 FR 19818). 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.

## 9.0 CONCLUSION

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) 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 Contributors: Om Chopra  
N. Le

Date: May 8, 1997