

March 3, 1999

Mr. Douglas R. Gipson  
Senior Vice President  
Nuclear Generation  
Detroit Edison Company  
6400 North Dixie Highway  
Newport, MI 48166

SUBJECT: FERMI 2 - ISSUANCE OF AMENDMENT RE: ACTION STATEMENTS  
RELATED TO THE PRIMARY CONTAINMENT OXYGEN MONITORING  
INSTRUMENTATION (TAC NO. MA1569)

Dear Mr. Gipson:

The Commission has issued the enclosed Amendment No. 132 to Facility Operating License No. NPF-43 for the Fermi 2 facility. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated April 9, 1998 (NRC-98-0071).

The amendment revises TS 3.7.1.2, "Emergency Equipment Cooling Water System," Action a and TS 3.8.1.1, "A.C. Sources - Operating," Action c, to be consistent with the actions required for inoperable oxygen monitoring instrumentation in TS 3.3.7.5, "Accident Monitoring Instrumentation." The existing "\*\*\*" footnote to TS 3.7.1.2, Action a, is modified and a "\*\*\*" footnote is added to TS 3.8.1.1, Action c.

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

Sincerely,

Original signed by:

Andrew J. Kugler, Project Manager  
Project Directorate III-1  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosures: 1. Amendment No. 132 to NPF-43  
2. Safety Evaluation

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

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Sincerely,

A handwritten signature in black ink, appearing to read "A. J. Kugler".

Andrew J. Kugler, Project Manager  
Project Directorate III-1  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-341

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cc w/encl: See next page

Mr. Douglas R. Gipson  
Detroit Edison Company

Fermi 2

cc:

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Fermi 2 - 280 TAC  
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DATED: March 3, 1999

AMENDMENT NO. 132 TO FACILITY OPERATING LICENSE NO. NPF-43 - FERMI 2

Docket File (50-341)

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

DETROIT EDISON COMPANY

DOCKET NO. 50-341

FERMI 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 132  
License No. NPF-43

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Detroit Edison Company (the licensee) dated April 9, 1998 (NRC-98-0071), 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.

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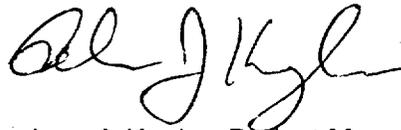
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-43 is hereby amended to read as follows:

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 132 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. DECo shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance with full implementation within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Andrew J. Kugler, Project Manager  
Project Directorate III-1  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: March 3, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 132

FACILITY OPERATING LICENSE NO. NPF-43

DOCKET NO. 50-341

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

REMOVE

3/4 7-3

3/4 8-1

3/4 8-2

INSERT

3/4 7-3

3/4 8-1\*

3/4 8-2

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\*Overleaf page provided to maintain document completeness. No changes contained on this page.

## PLANT SYSTEMS

### EMERGENCY EQUIPMENT COOLING WATER SYSTEM

#### LIMITING CONDITION FOR OPERATION

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3.7.1.2 Two independent emergency equipment cooling water (EECW) system subsystems shall be OPERABLE with each subsystem comprised of:

- a. One OPERABLE EECW pump, and
- b. An OPERABLE flow path capable of removing heat from the associated safety-related equipment.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4, and 5.

#### ACTION:

- a. In OPERATIONAL CONDITION 1, 2 or 3, with one EECW system subsystem inoperable:

1. Within 2 hours:

- a) Verify that all required systems, subsystems, trains, components and devices that depend upon the remaining OPERABLE EECW system subsystem are also OPERABLE, and
- b) Verify that the ADS\* is OPERABLE.

Otherwise\*\*, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

2. Declare the associated safety-related equipment inoperable and take the ACTIONS required by the applicable Specifications.
3. Restore the inoperable EECW system subsystem to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

- b. In OPERATIONAL CONDITION 4 or 5, determine the OPERABILITY of the safety-related equipment associated with an inoperable EECW system subsystem and take any ACTIONS required by the applicable Specifications.

---

\*ADS is not required to be OPERABLE when reactor steam dome pressure is less than or equal to 150 PSIG.

\*\*Except for an inoperable Drywell Cooling Unit, required by Specification 3.7.11 or an inoperable primary containment oxygen monitoring instrumentation channel, required by Specification 3.3.7.5, that depends on the remaining OPERABLE EECW system subsystem. In these cases, take the ACTION required by Specification 3.7.11 for the inoperability of both required Drywell Cooling Units or Specification 3.3.7.5 for the inoperability of both required primary containment oxygen monitoring instrumentation channels.

### 3/4.8 ELECTRICAL POWER SYSTEMS

#### 3/4.8.1 A.C. SOURCES

##### A.C. SOURCES - OPERATING

##### LIMITING CONDITION FOR OPERATION

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and
- b. Two separate and independent onsite A.C. electrical power sources, Division I and Division II, each consisting of two emergency diesel generators, each diesel generator with:
  1. A separate day fuel tank containing a minimum of 210 gallons of fuel,
  2. A separate fuel storage system containing a minimum of 35,280 gallons of fuel, and
  3. A separate fuel transfer pump.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

##### ACTION:

- a. With one or both offsite circuits of the above required A.C. electrical power sources inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours; demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1 within one hour and at least once per 8 hours thereafter and,
- b. With one or both diesel generators in one of the above required onsite A.C. electrical power divisions inoperable;
  1. Demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1 within one hour and at least once per 8 hours thereafter, and if the diesel generator(s) became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, by performing Surveillance Requirement 4.8.1.1.2.a.4 for one diesel generator at a time within 24 hours, unless the absence of any potential common mode failure for the remaining diesel generators is determined, and

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

2. Verify within 8 hours and at least once per 8 hours thereafter, that CTG 11-1 is OPERABLE. Restore the inoperable division to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
  3. If the requirements of ACTION b.2. above for CTG 11-1 cannot be met, either restore the inoperable division to OPERABLE status within 72 hours (not to exceed 7 days from the time the division became inoperable); or, satisfy the requirements of ACTION b.2 above within 72 hours and restore the inoperable division to OPERABLE status within 7 days from the time the division became inoperable; or, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- c. With one or both diesel generators in one of the above required onsite A.C. electrical power divisions inoperable, in addition to ACTION b. above, verify within 2 hours that all required systems, subsystems, trains, components and devices\* that depend on the remaining onsite A.C. electrical power division as a source of emergency power are also OPERABLE; otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- d. With both of the above required onsite A.C. electrical power divisions inoperable;
1. Demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1 within one hour and at least once per 8 hours thereafter; and
  2. Restore at least one of the above required inoperable divisions to OPERABLE status within 2 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours; and
  3. Restore the second of the above required divisions to OPERABLE status within the time required by Action b above from the time of initial loss or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

\*Except for an inoperable primary containment oxygen monitoring instrumentation channel, required by Specification 3.3.7.5, that depends on the remaining OPERABLE onsite A.C. electrical power division. In this case, take the ACTION required by Specification 3.3.7.5 for the inoperability of both required primary containment oxygen monitoring instrumentation channels.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 132 FACILITY OPERATING LICENSE NO. NPF-43

DETROIT EDISON COMPANY

FERMI 2

DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated April 9, 1998 (NRC-98-0071), the Detroit Edison Company (DECo or the licensee) requested an amendment to the Technical Specifications (TSs) appended to Facility Operating License No. NPF-43 for Fermi 2. The proposed amendment would revise TS 3.7.1.2, "Emergency Equipment Cooling Water System," Action a, for the emergency equipment cooling water (EECW) system and TS 3.8.1.1, "A.C. Sources - Operating," Action c, for emergency diesel generators (EDGs) to be consistent with the actions required for inoperable primary containment oxygen monitoring instrumentation in TS 3.3.7.5, "Accident Monitoring Instrumentation." The existing "\*\*\*\*" footnote to TS 3.7.1.2, Action a, would be modified and a "\*\*\*\*" footnote would be added to TS 3.8.1.1, Action c.

2.0 EVALUATION

2.1 Current TS Requirements

Fermi TS 3.7.1.2, Action a, currently requires that:

Within 2 hours: a) verify that all required systems, subsystems, trains, components and devices that depend upon the remaining OPERABLE EECW system subsystem are also OPERABLE ... Otherwise\*\*, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

The "\*\*\*\*" footnote provides an exception for an inoperable drywell cooling unit (TS 3.7.11) in the opposite division. It allows the action for Specification 3.7.11 to be taken for the inoperable drywell cooling units rather than requiring an immediate entry into the 12-hour shutdown statement of Specification 3.7.1.2, Action a.

Current TS 3.8.1.1, Action c, states

With one or both diesel generators in one of the above required onsite A.C. electrical power divisions inoperable, in addition to ACTION b, above, verify within 2 hours that all required systems, subsystems, trains, components and devices that depend on the remaining onsite A.C. electrical power division as a

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source of emergency power are also OPERABLE; otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

Under TS 3.3.7.5, Table 3.3.7.5-1, Action 83, if both primary containment oxygen monitors are inoperable, the licensee is required to restore the inoperable channel(s) to operable status within 48 hours or be in at least hot shutdown within the next 12 hours.

Under current TS 3.7.1.2, Action a, if, for example, the Division I primary containment oxygen monitor is inoperable and the Division II EECW system becomes inoperable, Action a.1.a cannot be satisfied and the licensee is required to place the plant in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours. The shutdown action is entered in this case because both primary containment oxygen monitors are inoperable (with the Division II monitor inoperable because its associated EECW system is inoperable). However, this action is more restrictive than the action required by TS 3.3.7.5 which specifically addresses the primary containment oxygen monitors.

Similarly, under current TS 3.8.1.1, Action c, if the Division I primary containment oxygen monitor is inoperable and one or both of the Division II EDGs becomes inoperable, Action c requires the licensee to place the plant in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours. Again, the shutdown action is entered because both primary containment oxygen monitors are inoperable (with the Division II monitor inoperable because its associated EDG(s) are inoperable). However, this action is also more restrictive than the action required by TS 3.3.7.5 which specifically addresses the primary containment oxygen monitors.

## 2.2 Proposed TS Requirements

The licensee proposed to revise the "\*\*\*" footnote to TS 3.7.1.2, Action a, to provide relief for an inoperable primary containment oxygen monitor similar to the relief already provided for the drywell cooling units. Specifically, the footnote would be revised to read:

Except for an inoperable Drywell Cooling Unit, required by Specification 3.7.11 or an inoperable primary containment oxygen monitoring instrumentation channel, required by Specification 3.3.7.5, that depends on the remaining OPERABLE EECW system subsystem. In these cases, take the ACTION required by Specification 3.7.11 for the inoperability of both required Drywell Cooling Units or Specification 3.3.7.5 for the inoperability of both required primary containment oxygen monitoring instrumentation channels.

With this proposed change, if the Division I primary containment oxygen monitor is inoperable and the Division II EECW system becomes inoperable, the licensee would be required to take the action prescribed by TS 3.3.7.5 (i.e., Action 83, restore the inoperable channel(s) to operable status within 48 hours or be in at least hot shutdown within the next 12 hours) for the two inoperable channels of primary containment oxygen monitoring instrumentation. The licensee would also be required to take the actions required by TS 3.7.1.2 for the inoperable EECW subsystem.

Similarly, a "\*\*\*" footnote would be added to TS 3.8.1.1, Action c, to provide relief for an inoperable primary containment oxygen monitor similar to the relief provided for in TS 3.7.1.2. Specifically, the new footnote would read:

Except for an inoperable primary containment oxygen monitoring instrumentation channel, required by Specification 3.3.7.5, that depends on the remaining OPERABLE onsite A.C. electrical power division. In this case, take the ACTION required by Specification 3.3.7.5 for the inoperability of both required primary containment oxygen monitoring instrumentation channels.

With this proposed change, if the Division I primary containment oxygen monitor is inoperable and one or both of the Division II EDGs becomes inoperable, the licensee would be required to take the action prescribed by TS 3.3.7.5 (i.e., Action 83, restore the inoperable channel(s) to operable status within 48 hours or be in at least hot shutdown within the next 12 hours) for the two inoperable channels of primary containment oxygen monitoring instrumentation. The licensee would also be required to take the actions required by TS 3.8.1.1 for the inoperable EDG(s).

### 2.3 Evaluation and Conclusion

The primary containment oxygen monitors provide indication and alarms to the operators. But they do not initiate any automatic functions. The data from the oxygen monitors is used by the operators to determine whether actions are necessary to reduce the oxygen concentration. TS 3.6.6.2 requires the licensee to maintain drywell and suppression chamber atmosphere oxygen concentrations at less than 4 percent by volume. However, grab samples of the atmosphere could also be used to determine oxygen concentrations if the oxygen monitors were not available. In addition, the data from these instruments is not critical for entry into the Emergency Operating Procedures. The entry conditions for post-accident hydrogen control are based on containment hydrogen concentrations, which are monitored separately.

Based on these factors, and as documented in existing TS 3.3.7.5, Action 83, the staff has previously determined that it is acceptable for both primary containment oxygen monitoring instrumentation channels to be inoperable for up to 48 hours before entering a 12-hour shutdown action statement. The reason the channels are inoperable is irrelevant to this finding. However, the current wording in TSs 3.7.1.2 and 3.8.1.1 would lead to the more restrictive action of immediately entering a 12-hour shutdown action statement if a second channel of primary containment oxygen monitoring instrumentation is declared inoperable because of an inoperable EDG or EECW subsystem. Therefore, the action statements in TSs 3.7.1.2 and 3.8.1.1 are inconsistent with, and more restrictive than, Action 83 in TS 3.3.7.5. The revised "\*\*\*" footnote to TS 3.7.1.2, Action a, and the new "\*\*\*" footnote to TS 3.8.1.1, Action c, eliminate this inconsistency by referring the operators back to TS 3.3.7.5. The staff concludes that the proposed changes are acceptable. The staff also notes that the proposed changes result in actions that are consistent with the intent of the Safety Function Determination Program that is a part of the improved standard TSs (NUREG-1433, Revision 1, "Standard Technical Specifications, General Electric Plants, BWR/4," April 1995).

### 3.0 STATE CONSULTATION

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

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to 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 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 (63 FR 50937). 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.

### 5.0 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 Contributor: Andrew Kugler

Date: March 3, 1999

March 3, 1999

Mr. Douglas R. Gipson  
Senior Vice President  
Nuclear Generation  
Detroit Edison Company  
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