March 4, 1991

Docket No. 50-305

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Mr. Ken H. Evers
Manager - Nuclear Power
Wisconsin Public Service Corporation
Post Office Box 19002
Green Bay, Wisconsin 54307-9002

Dear Mr. Evers:

SUBJECT: AMENDMENT NO. 91 TO FACILITY OPERATING LICENSE NO. DPR-43 (TAC NO. 77650)

The Commission has issued the enclosed Amendment No. 91 to Facility Operating License No. DPR-43 for the Kewaunee Nuclear Power Plant. This amendment revises the license and the Technical Specifications (TSs) in response to your application dated September 17, 1990.

Facility Operating License DPR-43 is amended by deleting condition 2.C(3) and replacing it with the standard fire protection license condition statement as shown in Generic Letter 86-10, Section F, and as recommended by Generic Letter 88-12. The amendment also deletes TS sections 3.15, "Fire Protection System Limiting Conditions for Operation," and 4.15 "Fire Protection System Surveillance Requirements," and relocates the requirements in the KNPP Fire Protection Plan. The amendment also relocates the following requirements to the KNPP Fire Protection Plan and deletes the associated TSs: TS 4.6.a.7, the 18-month test of emergency lighting required by 10 CFR Part 50, Appendix R; item 7 of TS Table 4.1-3, surveillance requirements for fire detection systems, fire suppression systems, and fire barriers; and TS 6.2.2.g and 6.4.2 which concern fire response team requirements. The amendment also adds the KNPP Fire Plan to the list of plans in TS 6.5.1.6.e, which the Plant Operational Review Committee is responsible for reviewing.

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

Sincerely,
original signed by

Michael J. Davis, Project Manager
Project Directorate III-3
Division of Reactor Projects - III, IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 91 to License No. DPR-43
2. Safety Evaluation

cc w/enclosures:
See next page

Office:	LA/PDIII-3	PM/PDIII-3	PD/PDIII-3	OGC-WF1
Surname:	PKreutzer	MDavis:rc	JHannon	
Date:	1/16/91	1/17/91	1/17/91	2/5/91

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2. Safety Evaluation

cc w/enclosures:
See next page

Office:	LA/PDIII-3	PM/PDIII-3	PD/PDIII-3	OGC-WF1
Surname:	PKreutzer	MDavis:rc	JHannon	
Date:	1/16/91	1/17/91	1/17/91	2/5/91

cc:
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Mr. Robert S. Cullen
Chief Engineer
Wisconsin Public Service Commission
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Madison, Wisconsin 53707

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

WISCONSIN PUBLIC SERVICE CORPORATION

WISCONSIN POWER AND LIGHT COMPANY

MADISON GAS AND ELECTRIC COMPANY

DOCKET NO. 50-305

KEWAUNEE NUCLEAR POWER PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 91
License No. DPR-43

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Wisconsin Public Service Corporation, Wisconsin Power and Light Company, and Madison Gas and Electric Company (the licensees) dated September 17, 1990, 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. DPR-43 is hereby amended to read as follows:

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(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 91, are hereby incorporated in the license. The licensees shall operate the facility in accordance with the Technical Specifications.

3. Also, paragraph 2.C(3) of Facility Operating License No. DPR-43 is hereby amended to read as follows:

(3) Fire Protection

The licensees shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the KNPP Fire Plan, and as referenced in the Updated Safety Analysis Report, and as approved in the Safety Evaluation Reports dated November 25, 1977, and December 12, 1978 (and supplement dated February 13, 1981) subject to the following provision:

The licensees may make changes to the approved Fire Protection Program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

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

FOR THE NUCLEAR REGULATORY COMMISSION

John N. Hannon

John N. Hannon, Director
Project Directorate III-3
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 4, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 91

FACILITY OPERATING LICENSE NO. DPR-43

DOCKET NO. 50-305

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change.

REMOVE	INSERT
TS ii	TS ii
TS iii	TS iii
TS vi	TS vi
TS 3.15-1	TS 3.15-1
TS 3.15-2	----
TS 3.15-3	----
TS 3.15-4	----
Table TS 3.15-1	Table TS 3.15-1 and 2
Table TS 3.15-2	
Table TS 4.1-3 (Page 1 of 2)	Table TS 4.1-3 (Page 1 of 2)
TS 4.6-2	TS 4.6-2
TS 4.15-1	TS 4.15-1
TS 4.15-2	----
TS 4.15-3	----
TS 4.15-4	----
TS 6-2	TS 6-2
TS 6-2a	TS 6-2a
TS 6-4	TS 6-4

Section	Title	Page TS
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3.3.a	Accumulators	3.3-1
3.3.b	Safety Injection and Residual Heat Removal Systems	3.3-2
3.3.c	Containment Cooling Systems	3.3-4
3.3.d	Component Cooling System	3.3-6
3.3.e	Service Water System	3.3-6
3.4	Steam and Power Conversion System	3.4-1
3.5	Instrumentation System	3.5-1
3.6	Containment System	3.6-1
3.7	Auxiliary Electrical Systems	3.7-1
3.8	Refueling	3.8-1
3.9	Deleted	
3.10	Control Rod and Power Distribution Limits	3.10-1
3.10.a	Shutdown Reactivity	3.10-1
3.10.b	Power Distribution Limits	3.10-1
3.10.c	Quadrant Power Tilt Limits	3.10-5
3.10.d	Rod Insertion Limits	3.10-5
3.10.e	Rod Misalignment Limitations	3.10-6
3.10.f	Inoperable Rod Position Indicator Channels	3.10-6a
3.10.g	Inoperable Rod Limitations	3.10-6a
3.10.h	Rod Drop Time	3.10-7
3.10.i	Rod Position Deviation Monitor	3.10-7
3.10.j	Quadrant Power Tilt Monitor	3.10-7
3.10.k	Inlet Temperature	3.10-7a
3.10.l	Operating Pressure	3.10-7a
3.10.m	Coolant Flow Rate	3.10-7a
3.11	Core Surveillance Instrumentation	3.11-1
3.12	Control Room Postaccident Recirculation System	3.12-1
3.14	Shock Suppressors (Snubbers)	3.14-1
3.15	Deleted	3.15-1
3.15.a	Deleted	3.15-1
3.15.b	Deleted	3.15-1
3.15.c	Deleted	3.15-2
3.15.d	Deleted	3.15-2
3.15.e	Deleted	3.15-3
3.15.f	Deleted	3.15-3
4.0	Surveillance Requirements	4.1-1
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4.2.a	ASME Code Class 1, 2, and 3 Components and Supports	4.2-1
4.2.b	Steam Generator Tubes	4.2-3
4.2.b.1	Steam Generator Sample Selection and Inspection	4.2-3
4.2.b.2	Steam Generator Tube Sample Selection and Inspection	4.2-4

Section	Title	Page TS
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	4.2.b.4 Plugging Limit Criteria	4.2-6
	4.2.b.5 Reports	4.2-7
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	4.4.b Local Leak Rate Tests (Type B and C)	4.4-3
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	4.5.a.3 Containment Fan Coil Units	4.5-2
	4.5.b Component Tests	4.5-2
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	4.5.b.2 Valves	4.5-3
4.6	Periodic Testing of Emergency Power System	4.6-1
	4.6.a Diesel Generators	4.6-1
	4.6.b Station Batteries	4.6-2
4.7	Main Steam Isolation Valves	4.7-1
4.8	Auxiliary Feedwater System	4.8-1
4.9	Reactivity Anomalies	4.9-1
4.10	Deleted	
4.11	Deleted	
4.12	Spent Fuel Pool Sweep System	4.12-1
4.13	Radioactive Materials Sources	4.13-1
4.14	Testing and Surveillance of Shock Suppressors (Snubbers)	4.14-1
4.15	Deleted	4.15-1
	4.15.a Deleted	4.15-1
	4.15.b Deleted	4.15-1
	4.15.c Deleted	4.15-2
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4.16	Reactor Coolant Vent System Tests	4.16-1
4.17	Control Room Postaccident Recirculation System	4.17-1

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3.1-1	WPS (136) Reactor Vessel Toughness Data
3.1-2	Reactor Coolant System Pressure Isolation Valves
3.5-1	Engineered Safety Features Initiation Instrument Setting Limits
3.5-2	Instrument Operation Conditions for Reactor Trip
3.5-3	Emergency Cooling
3.5-4	Instrument Operating Conditions for Isolation Functions
3.5-5	Instrument Operation Conditions for Safeguards Bus Power Supply Functions
3.5-6	Instrumentation Operating Conditions for Indication
3.14-1	Deleted
3.15-1	Deleted
3.15-2	Deleted
4.1-1	Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels
4.1-2	Minimum Frequencies for Sampling Tests
4.1-3	Minimum Frequencies for Equipment Tests
4.2-1	Deleted
4.2-2	Steam Generator Tube Inspection
4.10-1	Deleted
4.10-2	Deleted
4.11-1	Deleted
4.11-2	Deleted
6.4-1	Deleted

PAGES TS 3.15-1 through 3.15-4 have been deleted.

Table TS 3.15-1 and Table TS 3.15-2

have been deleted

TABLE 4.1-3

MINIMUM FREQUENCIES FOR EQUIPMENT TESTS
(Page 1 of 2)

Equipment Tests***	Test	Frequency	Maximum Time Between Test (Days)
1. Control Rods	Rod drop times of all full length rods	Each refueling outage	N.A.
	Partial movement of all rods	Every 2 weeks	17
1a. Reactor Trip Breakers	Independent Test(1) Shunt & Undervoltage Trip Attachments	Monthly	37
1b. Reactor Coolant Pump Breakers-Open-Reactor Trip	Operability	Each refueling outage	N.A.
1c. Manual Reactor Trip	Open Trip Reactor(2) Trip & Bypass Bkr	Each refueling outage	N.A.
2. Deleted			
3. Deleted			
4. Containment Isolation Trip	Operability	Each refueling outage	N.A.
5. Refueling System Interlocks	Operability	Prior to fuel movement each refueling outage	N.A.
6. Deleted			
7. Deleted			
8. RCS Leak Detection	Operability	Weekly	8
9. Diesel Fuel Supply	*Fuel Inventory	Weekly	8
10. Turbine Stop and Governor Valves	Operability	Annually	365
11. Fuel Assemblies	Visual Inspection	Each refueling outage	N.A.
12. Guard Pipes	Visual Inspection	Each refueling outage	N.A.

Amendment No. ~~63~~,~~75~~,~~84~~,~~86~~, 91

6. Safeguard Bus Undervoltage and Safeguard Bus Second Level Undervoltage relays shall be calibrated at least once per operating cycle (not to exceed 18 months).

b. Station Batteries

1. The voltage of each cell shall be measured to the nearest hundredth volt each month. An equalizing charge shall be applied if the lowest cell in the battery falls below 2.13 volts. The temperature and specific gravity of a pilot cell in each battery shall be measured.
2. The following additional measurements shall be made every three months: the specific gravity and height of electrolyte in every cell and the temperature of every fifth cell.
3. All measurements shall be recorded and compared with previous data to detect signs of deterioration.
4. The batteries shall be subjected to a load test during the first refueling and once every five years thereafter. Battery voltage shall be monitored as a function of time to establish that the battery performs as expected during heavy discharge and that all electrical connections are tight.

BASIS TECHNICAL SPECIFICATION 4.6, PERIODIC TESTING OF EMERGENCY POWER SYSTEMS

Each diesel generator can start and be ready to accept full load within 10 seconds, and will sequentially start and supply the power requirements for one complete set of engineered safety features equipment in approximately one minute.(1)

The specified test frequencies provide reasonable assurance that any mechanical or electrical deficiency will be detected and corrected before it can result in failure of one emergency power supply to respond when called upon to function. Its possible failure to respond is, of course, anticipated by providing two diesel generators, each supplying through an independent bus, a complete and adequate set of engineered safety features equipment. Further, both diesel generators are provided as backup to multiple sources of external power, and this multiplicity of sources should be considered with regard to adequacy of test frequency.

DELETED

Pages TS 4.15-1 through 4.15-4 have been deleted.

d. At least one licensed operator shall be in the control room when fuel is in the reactor.

e. Two licensed operators, one of which shall be an SRO, shall be present in the control room when the unit is in an operational mode other than cold shutdown or refueling.

f. Refueling operations shall be directed by a licensed Senior Reactor Operator assigned to the refueling operation who has no other concurrent responsibilities during the refueling operation.

g. Deleted

h. When the reactor is above the cold shutdown condition, a qualified Shift Technical Advisor shall be within 10 minutes of the control room.

ORGANIZATIONAL CHANGES

6.2.3 Changes not affecting safety may be made to the offsite and facility staff organizations. Such changes shall be reported to the Commission in the form of an application for license amendment within 60 days of the implementation of the change.

6.3 PLANT STAFF QUALIFICATIONS

6.3.1 Qualification of each member of the Plant Staff shall meet or exceed the minimum acceptable levels of ANSI N18.1-1971 for comparable positions, except for the Superintendent-Plant Radiation Protection who shall meet or exceed the recommendation of Regulatory Guide 1.8, Revision 1-R, September 1975, or their equivalent as further clarified in Attachment 1 to the Safety Evaluation Report enclosed with Amendment No. 46 to Facility Operating License DPR-43.

6.3.2 The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in the design of the Kewaunee Plant and plant transient and accident analysis.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the Plant Staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI-N18.1-1971 and 10 CFR Part 55.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PORC shall be composed of, but not necessarily limited to:

Chairman:	Plant Manager
Required Members:	Assistant Manager-Plant Maintenance Assistant Manager-Plant Operations Assistant Manager-Plant Services Superintendent-Plant Operations Plant Reactor Supervisor Supervisor-Plant Quality Programs Superintendent-Plant Instrument and Control Superintendent-Plant Information Systems (Secretary)

ALTERNATES

6.5.1.3 Alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PORC meetings at any one time.

RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

a. Review of operating, maintenance and other procedures including emergency operating procedures which affect nuclear safety as determined by the plant manager. Changes to those procedures are made in accordance with the provisions of TS 6.8.1.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to the Technical Specifications.

d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

e. Review of all proposed changes to the Security Plan, Emergency Plan, Fire Plan, and their respective implementing procedures.

f. Review all reports covering the investigation of all violations of the Technical Specifications and the recommendations to prevent recurrence.

g. Review plant operations to detect potential safety hazards.

h. Performance of special reviews and investigations and prepare reports thereon as requested by the Chairman of the Nuclear Safety Review and Audit Committee.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATING TO AMENDMENT NO. 91 TO FACILITY OPERATING LICENSE NO. DPR-43

WISCONSIN PUBLIC SERVICE CORPORATION
WISCONSIN POWER AND LIGHT COMPANY
MADISON GAS AND ELECTRIC COMPANY

KEWAUNEE NUCLEAR POWER PLANT

DOCKET NO. 50-305

INTRODUCTION

By letter dated September 17, 1990, Wisconsin Public Service Corporation (the licensee) requested an amendment to change Facility Operating License No. DPR-43 license condition 2.C(3) to add the NRC standard fire protection license condition, and to relocate fire protection requirements from the Technical Specifications (TSs) appended to Facility Operating License No. DPR-43 for the Kewaunee Nuclear Power Plant (KNPP) to the KNPP Fire Protection Program. The KNPP Fire Protection Program has been incorporated by reference into the KNPP Updated Final Safety Analysis Report. The changes were developed in accordance with guidance contained in NRC Generic Letters 86-10 and 88-12 and are consistent with NRC and industry efforts to simplify the TS.

BACKGROUND

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the Fire Protection Programs for all power reactor facilities. Because of the extensive modification of Fire Protection Programs and the number of open issues resulting from staff evaluations, a number of revisions and alterations occurred in these programs over the years. Consequently, licensees were requested by Generic Letter 86-10 to incorporate the final NRC-approved Fire Protection Program in their Final Safety Analysis Reports (FSARs). In this manner, the Fire Protection Program -- including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection -- would have a status consistent with that of other plant features described in the FSAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the Fire Protection Program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements. Finally, the Commission stated that with the requested actions, licensees may request an amendment to delete the fire protection TS that would now be unnecessary.

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The licensees for the Callaway and Wolf Creek plants submitted lead-plant proposals to remove fire protection requirements from their TS. This action was an industry effort to obtain NRC Guidance on an acceptable format for license amendment requests to remove fire protection requirements from TS.

Additionally, in the licensing review of new plants, the staff has approved applicant requests to remove fire protection requirements from TS issued with the operating license. Thus, on the basis of the lead-plant proposals and the staff's experience with TS for new licenses, Generic Letter 88-12 was issued to provide guidance on removing fire protection requirements from TS.

EVALUATION

Generic Letter 86-10 recommended the removal of fire protection requirements from the TS. Although a comprehensive Fire Protection Program is essential to plant safety, the basis for this recommendation is that many details of this program that are currently addressed in TS can be modified without affecting nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, that are presently included in TS and which are removed by this amendment, do not constitute performance requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being included in TS. At the same time, suitable administrative controls ensure that there will be careful review and analysis by competent individuals of any changes in the Fire Protection Program including those technical and administrative requirements removed from the TS to ensure that nuclear safety is not adversely affected. These controls include: (1) the TS administrative controls that are applicable to the Fire Protection Program; (2) the license condition on implementation of, and subsequent changes to, the Fire Protection Program; and (3) the 10 CFR 50.59 criteria for evaluating changes to the Fire Protection Program as described in the FSAR.

The specific details relating to fire protection requirements removed from TS by this amendment include the following:

1. Specification 3.15, "Fire Protection System," concerning the operability requirements for fire protection and detection systems and the associated bases is being deleted in its entirety. The specifications in this section have been incorporated into the KNPP Fire Plan.

2. Specification 4.6.a.7, which states that during each operating cycle (not to exceed 18 months), a checkout of emergency lighting will be performed, is being removed. The requirement to periodically test the Appendix R emergency lighting has been incorporated into the KNPP Fire Plan as a 12-month operability test, with an 8-hour minimum load test being performed at least once per 5 years. Testing the battery-powered lamps once every 12 months is more conservative than the original 18-month TS requirement and thus provides an equivalent level of protection.

3. Specification 4.15, "Fire Protection System," concerning the surveillance and testing requirements for fire detection systems, fire suppression systems, and fire barriers and their associated bases is being deleted in its entirety. The specifications in this TS section have been incorporated in the KNPP Fire Plan.

4. Item number 7 in TS Table 4.1-3, "Minimum Frequencies for Equipment Tests," concerning the monthly operability test of the Fire Protection Pump and Power Supply is being deleted. The requirement has been incorporated in the KNPP Fire Plan.

5. Specifications 6.2.2.g and 6.4.2 concerning fire response team requirements are being deleted. The requirements have been incorporated into the KNPP Fire Plan.

6. Specification 6.5.1.6.e is being revised to add the KNPP Fire Plan to the list of plans which the Plant Operational Review Committee (PORC) is responsible for reviewing.

As required by Generic Letter 86-10, the licensee confirmed that the NRC-approved Fire Protection Program has been incorporated into the USAR. Also, the licensee has proposed that the existing license condition on the Fire Protection Program be replaced with the standard condition noted in Generic Letter 86-10.

The licensee confirmed that the operational conditions, remedial actions, and test requirements associated with the removed fire protection TS have been included in the Fire Protection Program and incorporated by reference into the USAR. This is in accordance with the guidance of Generic Letter 88-12.

On the basis of its review of the above items, the staff concludes that the licensee has met the guidance of Generic Letter 88-12. Therefore, the staff finds the proposed changes acceptable.

ENVIRONMENTAL CONSIDERATION

This amendment involves a change to 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 or changes a surveillance requirement. 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, this 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 this amendment.

CONCLUSION

On the basis of the considerations discussed above, the staff concludes 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 this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Michael J. Davis

Dated: March 4, 1991