

March 1, 1988

Docket No. 50-255

Mr. Kenneth W. Berry
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Consumers Power Company
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Dear Mr. Berry:

SUBJECT: AMENDMENT NO. 111 TO PROVISIONAL OPERATING LICENSE NO. DPR-20:
CONTROL OF HEAVY LOADS (TAC NO. 66139)

The Commission has issued the enclosed Amendment No. 111 to Provisional Operating License No. DPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications in response to your application dated September 1, 1987.

This amendment revises the Technical Specifications for the movement of heavy loads, consolidates all of these specifications in one section (3.21), and expands the scope beyond the shipping cask, which was previously covered, to all heavy loads.

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

Sincerely,

Original signed by

Thomas V. Wambach, Project Manager
Project Directorate III-1
Division of Reactor Projects - III, IV, V
& Special Projects

Enclosures:

1. Amendment No. 111 to License No. DPR-20
2. Safety Evaluation

cc w/enclosures:
See next page

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

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 111
License No. DPR-20

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consumers Power Company (the licensee) dated September 1, 1987, 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 3.B. of Provisional Operating License No. DPR-20 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 111, 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 the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Martin J. Virgilio, Director
Project Directorate III-1
Division of Reactor Projects - III, IV, V
& Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 1, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 111

PROVISIONAL OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

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

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3.21 MOVEMENT OF HEAVY LOADS

Applicability

Applies to limitations in the movement of heavy loads over the 649' level of the auxiliary building and inside containment. A heavy load is a load, other than a fuel assembly, which weighs more than 1300 lbs.

Objective

To minimize the probability of and the consequences of a heavy load drop.

Specifications

3.21.1 Inside Containment

- a. Heavy loads shall not be moved over the primary coolant system if the temperature of the coolant or the steam in the pressurizer exceeds 225°F.
- b. Heavy loads shall not be moved unless the potential for a load drop is extremely small as defined by Generic Letter 85-11 or an evaluation in compliance with section 5.1 of NUREG-0612 has been completed.

3.21 MOVEMENT OF HEAVY LOADS (Continued)

3.21.2 Over the 649' Level of the Auxiliary Building

The surface of the floor adjacent to the spent fuel pool is at the 649' level of the auxiliary building. The spent fuel pool is made up of two (2) zones. They are the main pool zone and the north tilt pit zone.

- a. Heavy loads shall not be moved over fuel stored in the main pool zone.
- b. Heavy loads shall not be moved over areas of the main pool zone which do not contain fuel unless the fuel stored in the main pool zone has decayed a minimum of 30 days when the charcoal filter is operating, or the fuel stored in the main pool zone has decayed a minimum of 90 days when the charcoal filter is not operating.
- c. Heavy loads shall not be moved over the north tilt pit zone unless the fuel stored in the north tilt pit zone has decayed a minimum of 22 days when the charcoal filter is operating; or, the fuel in the north tilt pit zone has decayed a minimum of 77 days when the charcoal filter is not operating.
- d. Heavy loads shall not be moved over the 649' level of the auxiliary building unless:
 - (1) The fuel storage building crane interlocks are operable or they are bypassed and the crane is under administrative control of a supervisor, and
 - (2) No fuel handling operations are in progress.
- e. Loads weighing more than 25 tons shall not be moved over the main pool zone unless an evaluation in compliance with Section 5.1 of NUREG-0612 has been completed.
- f. Heavy loads shall not be moved unless the potential for a load drop is extremely small as defined by Generic Letter 85-11 or an evaluation in compliance with section 5.1 of NUREG-0612 has been completed.

Bases

Reference (7) defines a heavy load as a load which weighs more than a fuel assembly and its handling tool. The lightest Palisades fuel assemblies weigh approximately 1298 lbs and the heaviest weigh approximately 1375 lbs. The handling tool weighs 60-70 lbs. For conservatism, loads weighing more than 1300 lbs, except for fuel assemblies, are classified as heavy loads.

Heavy loads are not allowed over the pressurized primary coolant system to preclude dropping objects which could rupture the boundary of the primary coolant system allowing loss of coolant and overheating of the core.

MOVEMENT OF HEAVY LOADS (Continued)Bases (Continued)

Prohibiting movement of heavy loads over fuel stored in the main pool zone minimizes the criticality and radiological effects of a load drop.

Heavy loads are allowed over the fuel stored in the north tilt pit zone because the maximum number of fuel bundles which can be stored in that zone is relatively small and the north tilt pit lies under the only possible safe load path for moving heavy loads into and out of containment without passing over the main pool zone.

Requiring that the spent fuel pool crane interlocks are operable ensures that heavy loads or the unloaded crane will not drift over or be inadvertently moved over fuel stored in the main pool area.

Specific decay times with and without the charcoal filters operating are necessary to ensure that heavy loads are moved within analyzed conditions.

The charcoal filter is operating when at least one Fuel Handling Area exhaust fan is drawing suction through the charcoal filter and the Fuel Handling Area ventilation system is in the refueling mode.

Assuring that no fuel handling operations are in progress while heavy loads are being moved allows operator attention to be focused on the heavy load movement.

The objectives of the Guidelines of Section 5.1 of NUREG-0612 are to assure that (1) the potential for a load drop is extremely small, or (2) for each area addressed, the following evaluation criteria are satisfied:

- (1) Releases of radioactive material that may result from damage to spent fuel based on calculations involving accidental dropping of a postulated heavy load produce doses that are well within 10 CFR Part 100 limits of 300 rem thyroid and 25 rem whole body;
- (2) Damage to fuel and fuel storage racks based on calculations involving accidental dropping of a postulated heavy load does not result in a configuration of the fuel such that k_{eff} is larger than 0.95;
- (3) Damage to the reactor vessel or the spent fuel pool based on calculations of damage following accidental dropping of a postulated heavy load is limited so as not to result in water leakage that could uncover the fuel, (makeup water provided to overcome leakage shall be from a borated source of adequate concentration); and

3.21 MOVEMENT OF HEAVY LOADS (Continued)

Bases (Continued)

- (4) Damage to equipment in redundant or dual safe shutdown paths, based on calculations assuming the accidental dropping of a postulated heavy load, will be limited so as not to result in loss of required safe shutdown functions.

Generic Letter 85-11 defines the potential for a heavy load drop as extremely small when a heavy load is moved in compliance with the Guidelines of section 5.1.1 of NUREG-0612.

References

- (1) Palisades Plant Evaluation of Postulated Cask Drop Accidents by Bechtel Associates Professional Corporation, August 1974.
- (2) Palisades Plant Final Safety Analysis Report - Appendix J - Evaluation of Postulated Cask Drop Accidents, submitted to the NRC on August 9, 1974. (Structural Analysis only)
- (3) Letter dated January 16, 1978 from D P Hoffman, CPC to Director NRR, entitled "Palisades Plant - Movement of Shielded Shipping Cask."
- (4) Letter dated November 1, 1976 from D A Bixel, CPC, to Director NRR entitled "Spent Fuel Pool Modifications."
- (5) SER supporting License Amendment No. 35 dated February 8, 1978.
- (6) SER supporting License Amendment No. 81 dated May 22, 1981.
- (7) NUREG-0612 - Control of Heavy Loads in Nuclear Power Plants.
- (8) Safety Analysis Report (Rev. 1) dated October 16, 1986 attached to letter dated October 16, 1986 from K W Berry, CPC, to NRC.
- (9) Generic Letter 85-11 dated June 28, 1985.

5.4.2 Spent Fuel Storage

- a. Irradiated fuel bundles will be stored, prior to off-site shipment in the stainless steel-lined spent fuel pool.
- b. (Deleted)
- c. The spent fuel storage pool and spare (north) tilt pit are divided into two regions identified as Region I and Region II as illustrated in Figure 5.4-1. Region I racks are designed and shall be maintained with a nominal 10.25" center-to-center distance between fuel assemblies with the exception of the single Type E rack which has a nominal 11.25" center-to-center distance between fuel assemblies. The Region I spent fuel storage racks are designed such that fuel having a maximum U-235 loading of 3.27 w/o of U-235 placed in the racks would result in a K_{eff} equivalent to ≤ 0.95 when flooded with unborated water. The K_{eff} of ≤ 0.95 includes a conservative allowance for uncertainties.
- d. Region II racks have a 9.17 inch center-to-center spacing. Because of this smaller spacing, strict controls are employed to evaluate burnup of the fuel assembly prior to its placement in Region II cell locations. Upon determination that the fuel assembly meets the burnup requirements of Table 5.4-1, placement in a Region II cell is authorized. These positive controls assure the fuel enrichment limits assumed in the safety analyses will not be exceeded.
- e. After installation of the two-region high density spent fuel racks, the maximum loading for fuel assemblies in the spent fuel racks is 3.27 w/o of U-235.
- f. The minimum spent fuel pool water boron concentration shall be 1720 ppm. Boron concentration shall be verified at least once monthly.
- g. The spent fuel racks are designed as a Class I structure.
- h. (Deleted)
- i. Storage in Region II of the spent fuel pool and spare (north) tilt pit shall be restricted by burnup and enrichment limits specified in Table 5.4-1.

NOTE: Until needed for fuel storage, one Region II rack in the northeast corner of the spent fuel pool may be removed and replaced with the cask anti-tipping device.

References

FSAR Update Chapter 5
FSAR Update Chapter 9



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 111 TO PROVISIONAL OPERATING LICENSE NO. DPR-20

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

INTRODUCTION

By letter dated September 1, 1987, the licensee for the Palisades Plant, Consumers Power Company (CPC), proposed changes in the Technical Specifications related to the use of the containment building crane and the fuel storage building crane for movement of heavy loads. The licensee proposed to eliminate present Technical Specifications 3.13, "Containment Building and Fuel Storage Building Cranes," and 3.21, "Movement of Shielded Shipping Casks in Fuel Handling Areas," in their entirety and to replace these with new Technical Specification 3.21, "Movement of Heavy Loads."

EVALUATION

1. Present Technical Specification 3.13, "Containment Building and Fuel Storage Building Cranes."

This specification, which restricts the use of the overhead cranes in both the containment and fuel storage building, has been eliminated in its entirety. However, the requirements of this specification have been retained in new proposed Technical Specification 3.21 as follows:

- a. Proposed Technical Specification 3.21.1.a

Present Technical Specification 3.13.a requires that the containment polar crane not be used to transport loads over the primary coolant system (PCS) if the temperature of the coolant or steam in the pressurizer exceeds 225°F. Proposed Technical Specification 3.21.1.a does not allow heavy loads over the PCS when the coolant or the steam in the pressurizer exceeds 225°F. Further, the proposed specification is more restrictive since it does not permit any heavy load to be transported over the primary coolant system with the PSC at temperatures over 225°F by any means while the present Specification restricts only the use of the containment polar crane in transporting heavy loads over the PSC under those conditions. Therefore, the NRC staff finds proposed Technical Specification 3.21.1.a to be acceptable.

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b. Proposed Specifications 3.21.2.d(1) and 3.21.2.d(2)

Present Technical Specification 3.13.b states:

"The fuel storage building crane shall not be used to move material past the fuel storage pool unless the crane interlocks are operable or they are bypassed and the crane is under administrative control of a supervisor."

Proposed Specification 3.21.2.d(1) does not allow the movement of heavy loads over the 649 foot level of the auxiliary building, i.e. the surface of the floor adjacent to the spent fuel pool, unless the fuel storage building crane interlocks are operable or they are bypassed and the crane is under administrative control of a supervisor. Proposed Specification 3.21.2.d(2) adds to that by requiring that no fuel handling operations be in progress when heavy loads are moved over the auxiliary building 649 foot level in order to focus the operator's attention on cask movement. Therefore, the NRC staff finds proposed Technical Specification 3.21.2.d(1) and 3.21.2.d(2) to be acceptable.

c. Proposed Specifications 3.21.2.a, 3.21.2.b and 3.21.2.f

Present Technical Specification 3.13.c relates to the use of the fuel storage building overhead crane for movement of heavy loads over the spent fuel storage pool. The present specification requires the operation of the fuel storage building ventilation system when the overhead crane is used to move heavy loads over the spent fuel storage pool with irradiated fuel in the pool which has decayed less than 90 days. Proposed Specification 3.21.2.a does not allow movement of heavy loads over fuel stored in the main pool zone. Proposed Specification 3.21.2.b does not allow heavy loads to be moved over allowable areas of the main pool zone unless the charcoal filter of the ventilating systems is in operation and fuel stored in the main pool has decayed for a minimum of 30 days. It further restricts movement of heavy loads over allowable areas of the main pool zone when the charcoal filter is not operating unless the spent fuel in the pool has decayed a minimum of 90 days.

As noted, while these proposed specifications do permit the movement of heavy loads over the spent fuel pool, such movement is limited to those portions of the spent fuel pool which do not contain spent fuel. In addition, the licensee has proposed to add Specification 3.21.2.f which states "Heavy loads shall not be moved unless the potential for a load drop is extremely small as defined by Generic Letter 85-11 or an evaluation in compliance with section 5.1 of NUREG-0612 has been completed." The licensee notes that Generic Letter 85-11 indicates the

potential for a load drop to be extremely small when heavy loads are handled in compliance with the guidelines of Section 5.1.1 of NUREG-0612. These guidelines include, among others, the definition of safe load paths and the development of procedures for moving heavy loads in those paths. The alternative, i.e., an evaluation in compliance with Section 5.1, provides assurance that a heavy load drop will not cause damage which results in release of radioactivity in excess of allowable limits. On the basis of the foregoing, the NRC staff finds proposed Technical Specifications 3.21.2.a, 3.21.2.b, and 3.21.2.f to be acceptable.

2. Present Technical Specification 3.21, "Movement of Shielded Shipping Cask in Fuel Handling Areas."

The licensee proposes to replace existing Technical Specification 3.21 as follows:

a. Proposed Specifications 3.21.1.b, 3.21.2.a, 3.21.2.b, 3.21.2.f

Present Specification 3.21.1.a limits cask movement to areas outside of the periphery of the spent fuel pool and the reactor vessel. In addition, it requires that the vertical clearance between the cask bottom and the operating floor or obstructing structure not exceed six inches. Present Technical Specification 3.21.1.b does not allow movement of the shipping cask closer than about 60 inches from the edge of the main pool, while present Specification 3.21.1.d does not permit movement of the cask within 19 feet of the centerline of the reactor vessel.

The proposed Technical Specifications do not contain specific prohibition to prevent movement of heavy loads closer to the reactor vessel than 19 feet nor to prevent movement of heavy loads over the main spent fuel pool. However, they do contain prohibitions against moving heavy loads in containment (3.21.1.b) or over those portions of the spent fuel pool which do not contain spent fuel (3.21.2.f) "...unless the potential for a load drop is extremely small...or an evaluation in compliance with section 5.1 of NUREG-0612 has been completed." As noted in the previous discussion (see 1.c above), these provisions will reduce the potential for a load drop to acceptably small levels or will demonstrate that acceptable consequences result.

In addition, as noted above, the proposed Technical Specifications do not allow the movement of heavy loads over fuel stored in the main pool zone (proposed Specification 3.21.2.a) and allow such movement over the main pool zone only when sufficient radioactive decay has taken place (proposed Specification 3.21.2.b). The requirement of a maximum of six inches between the floor or obstructions and the cask bottom during cask movement has been incorporated into the plant procedures which are provided in accordance with the guidelines of NUREG-0612. The NRC staff finds this to be an acceptable alternative.

b. Proposed Technical Specification 3.21.2.c

Present Technical Specification 3.21.1.c allows the movement of heavy loads over fuel stored in the north tilt pit zone provided the fuel has decayed a minimum of 22 days when the charcoal filter is operating or a minimum of 77 days when the charcoal filter is not operating. Proposed Technical Specification 3.21.2.c maintains this requirement, and therefore, the NRC staff finds it to be acceptable.

c. Proposed Technical Specification 3.21.2.d(2)

Present Technical Specification 3.21.1.e requires that movement of the shielded shipping cask be made only after all other fuel handling operations have been halted. Proposed Technical Specification 3.21.d.(2) states that no fuel handling operations are to be in progress when heavy loads are moved over the 649 foot level of the auxiliary building. The NRC staff finds this consistent with the previous specification requirements and, therefore, acceptable.

d. Proposed Technical Specification 3.21.2.e

Proposed Specification 3.21.2.e prohibits loads over 25 tons from being moved over the cask laydown area of the main pool fuel zone. The NRC staff finds this restriction acceptable with the additional provision that no loads in excess of 25 tons be carried over the main pool zone until an analysis of the consequences of the effects of a postulated drop of that load is completed, and acceptable results are demonstrated in accordance with the guidelines of Section 5.1 of NUREG-0612. Loads of 25 tons or less are permitted over the allowable areas of the main pool zone since the licensee has conducted an analysis of a postulated drop of a 25-ton cask and demonstrated acceptable consequences. The staff finds proposed Specification 3.21.2.e, together with the licensee's commitment to demonstrate acceptable results of potential drops of heavy loads in excess of 25 tons, to be acceptable as agreed to by the licensee's staff. This provision was added to Specification 3.21.2.e.

3. Present Technical Specification 5.4.2.h

Technical Specification 5.4.2.h specifies that spent fuel shipping casks are not to be handled until the NRC has reviewed and approved the postulated spent fuel cask drop analysis. The licensee has deleted this provision based on the requirements of proposed Specification 3.21.2.e above. The staff, therefore, finds this deletion acceptable.

Based on the above, the NRC staff concludes that proposed Technical Specification 3.21, "Movement of Heavy Loads", is consistent with the guidelines of NUREG-0612 and Generic Letter 85-11 concerning safe handling of heavy loads and is therefore,

acceptable in conjunction with the licensee's commitment to the provision that no loads in excess of 25 tons be moved over the main pool zone until an analysis of a postulated load drop demonstrating acceptable consequences is performed in accordance with the guidelines of Section 5.1 of NUREG-0612.

ENVIRONMENTAL CONSIDERATION

This amendment involves a change in 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 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

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.

Date: March 1, 1988

Principal Contributor: N. Wagner, NRR