

August 21, 1992

Mr. Gerald B. Slade
Plant General Manager
Palisades Plant
Consumers Power Company
27780 Blue Star Memorial Highway
Covert, Michigan 49043

*see connection letter of
11/13/92*

Dear Mr. Slade:

SUBJECT: PALISADES PLANT - AMENDMENT NO. 152 TO FACILITY OPERATING LICENSE
NO. DPR-20 (TAC NO. M73819)

The Commission has issued the enclosed Amendment No. 152 to Facility Operating License No. DPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated July 31, 1989.

This amendment revises Facility Operating License No. DPR-20 by adding a new license condition in Section 2.C.(3), removes fire protection TS 3.22, 4.17, 6.2.2.c and 6.4.2 and revises TS 4.2.2 and 6.5.2.4.1. Generic Letter 86-10, dated April 24, 1986 and Generic Letter 88-12, dated August 2, 1988, provided guidance to licensees for removal of the fire protection TS. This amendment is in response to these Generic Letters.

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,

/s/

Armando Masciantonio, Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No152 DPR-20
2. Safety Evaluation

cc w/enclosures:
See next page

OFFICE	LA:PD31	PM:PD31 <i>asm</i>	OGC	D:PD31 <i>WRT</i>	DST:SPLB <i>WRT</i>
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DATE	7/16/92	7/19/92	8/17/92	8/21/92	8/11/92

DPR 8/11/92

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

Docket No. 50-255

August 21, 1992

Mr. Gerald B. Slade
Plant General Manager
Palisades Plant
Consumers Power Company
27780 Blue Star Memorial Highway
Covert, Michigan 49043

Dear Mr. Slade:

SUBJECT: PALISADES PLANT - AMENDMENT NO. 152 TO FACILITY OPERATING LICENSE
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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,

A handwritten signature in cursive script, appearing to read "A.S. Masciantonio".

Armando Masciantonio, Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.152 DPR-20
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. Gerald B. Slade
Consumers Power Company

Palisades Plant

cc:

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Resident Inspector Office
Palisades Plant
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Covert, Michigan 49043



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

CONSUMERS POWER COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 152
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 July 31, 1989, 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;
 - 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-20 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. 152, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

Additionally, the license is amended by adding a new Section 2.C.(3) to page 3 of Facility Operating License No. DPR-20 as follows:¹

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¹Amended pages and new pages are attached for convenience and for the composite license to reflect this change.

(3) The licensee shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SERs dated 09/01/78, 03/19/80, 02/10/81, 05/26/83, 07/12/85, 01/29/86, 12/03/87 and 05/19/89 and subject to the following provisions:

- a. The licensee 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.
- b. The licensee may alter specific features of the approved fire protection program provided:
 - Such changes do not otherwise involve a change in a license condition or technical specification or result in an unreviewed safety question (see 10 CFR 50.59);
 - Such changes do not result in failure to complete the fire protection program as approved by the Commission. The licensee shall maintain in auditable form, a current record of all such changes, including an analysis of the effects of the change on the fire protection program and shall make such records available to Nuclear Regulatory Commission Inspectors upon request. All changes to the approved program shall be reported annually, along with the FSAR revision; and
 - Temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

William O. Long

for Ledyard B. Marsh, Director
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Attachments:

1. Amended pages 3 and 4, and new page 5 to Facility Operating License Number DPR-20
2. Changes to the Technical Specifications

Date of Issuance: August 21, 1992

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is authorized to operate the facility at steady-state reactor core power levels not in excess of 2530 Megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

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

(3) The licensee shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SERs dated 09/01/78, 03/19/80, 02/10/81, 05/26/83, 07/12/85, 01/29/86, 12/03/87 and 05/19/89 and subject to the following provisions:

- a. The licensee 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.
- b. The licensee may alter specific features of the approved fire protection program provided:
 - Such changes do not otherwise involve a change in a license condition or technical specification or result in an unreviewed safety question (see 10 CFR 50.59);
 - Such changes do not result in failure to complete the fire protection program as approved by the Commission. The licensee shall maintain in auditable form, a current record of all such changes, including an analysis of the effects of the change on the fire protection program and shall make such records available to Nuclear Regulatory Commission Inspectors upon request. All changes to the approved program shall be reported annually, along with the FSAR revision; and

- Temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented.

- D. The facility has been granted certain exemptions from the requirements of Section III.G of Appendix R to 10 CFR Part 50, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." This section relates to fire protection features for ensuring the systems and associated circuits used to achieve and maintain safe shutdown are free of fire damage. These exemptions were granted and sent to the licensee in letters dated February 8, 1983, July 12, 1985 and July 23, 1985.

In addition, the facility has been granted certain exemptions from Appendix J to 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors." This section contains leakage test requirements, schedule and acceptance criteria for tests of the leak-tight integrity of the primary reactor containment and systems and components which penetrate the containment. These exemptions were granted and sent to the licensee in a letter dated December 6, 1989.

These exemptions granted pursuant to 10 CFR 50.12, are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

E. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21 are entitled: "Palisades Plant Physical Security Plan," through Revisions 25, dated June 4, 1990, approved June 13, 1990; "Palisades Plant Suitability Training and Qualification Plan," through Revision 9, dated November 22, 1989, approved December 18, 1989; and "Palisades Plant Safeguards Contingency Plan," through Revision 2, dated September 30, 1988, approved November 8, 1988. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

- F. Except as otherwise provided in the Technical Specifications or Environmental Protection Plan, the licensee shall report any violations of the requirements contained in Section 2.C of this license in the following manner: initial notification shall be made within 24 hours to the NRC

Operations Center via the Emergency Notification System with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c), and (e).

- G. The licensee shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- H. This license is effective as of the date of issuance and shall expire at midnight on March 14, 2007.

FOR THE NUCLEAR REGULATORY COMMISSION

Thomas E. Murley/Signed/

Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

Attachments:

- 1. Appendix A-Technical Specifications
- 2. Appendix B-Environmental Protection Plan

Date of Issuance: February 21, 1991

Amendment No 152
August 21, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 152

FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

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

REMOVE

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PALISADES PLANT TECHNICAL SPECIFICATIONS
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PALISADES PLANT TECHNICAL SPECIFICATIONS
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3.22 FIRE PROTECTION SYSTEM (Deleted)

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Amendment No 37.
80, 152

Table 4.2.2

Minimum Frequencies for Equipment Tests

	<u>Test</u>	<u>Frequency</u>	<u>FSAR Section Reference</u>	
1.	Control Rods	Drop Times of All Full-Length Rods	Each Refueling Shutdown	7.4.1.3
2.	Control Rods	Partial Movement of All Rods (Minimum of 6 In)	Every Two Weeks	7.4.1.3
3.	Pressurizer Safety Valves	Set Point	One Each Refueling Shutdown	7.3.7
4.	Main Steam Safety Valves	Set Point	Five Each Refueling Shutdown	4.3.4
5.	Refueling System Interlocks	Functioning	Prior to Refueling Operations	9.11.3
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7.	Primary System Leakage	Evaluate	Daily	4 Amend 15, Ques 4.3.7
8.	Diesel Fuel Supply	Fuel Inventory	Daily	8.4.1
9.	Critical Headers Service Water System	150 Psig Hydro-static Test	Every Five Years	9.1.2

4.17 FIRE PROTECTION SYSTEM (Deleted)

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Amendment No. 37,60,152

ADMINISTRATIVE CONTROLS

6.2.2 PLANT STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Senior Reactor Operator shall be in the control room at all times during conditions other than cold shutdown or refueling. In addition to this Senior Reactor Operator, at least one licensed Reactor Operator or Senior Reactor Operator shall be present at the controls at all times when fuel is in the reactor.
- c. A Radiation Safety Technician shall be on site when fuel is in the reactor.*
- d. All core alterations, after the initial fuel loading, shall either be performed under the direct supervision of a licensed Senior Reactor Operator or Senior Operator holding a license limited to fuel handling. During this time, no other responsibilities shall be assigned to this individual.
- e. (Deleted)
- f. Administrative procedures shall limit the working hours of Plant staff who perform safety-related functions.

In the event that overtime is used, the following guidelines shall be followed:

- A. An individual shall not be permitted to work more than 16 hours straight (excluding shift turnover time).
- B. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven-day period (all excluding shift turnover time).
- C. A break of at least eight hours shall be allowed between work periods (including shift turnover time).

*The Radiation Safety Technician may be absent for a period of time not to exceed two hours in order to accommodate unexpected absence provided immediate action is taken to restore the minimum requirements.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the plant staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 (Deleted) |

6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW COMMITTEE (PRC)

6.5.1.1 FUNCTION

The Plant Review Committee (PRC) shall function to advise the Plant General Manager on all matters related to nuclear safety.

6.5.1.2 COMPOSITION

The PRC is composed of nine regular members from either the Palisades staff or the Nuclear Engineering and Construction Organization (NECO) staff. The qualification level for PRC members shall be at least equivalent to those described in Section 4.4 of ANSI N18.1-1971. The PRC shall include representatives from the Operations, Radiological Services, Maintenance and Engineering Departments. The members shall be designated in administrative procedures by the Plant General Manager. The Plant General Manager shall also designate the Chairman and alternates in writing.

6.5.1.3 ALTERNATES

Alternate members of the PRC shall be appointed in writing by the PRC Chairman to serve on a temporary basis. No more than two alternates shall participate as voting members at any one time in PRC activities.

ADMINISTRATIVE CONTROLS

6.5.2.4.1 REVIEW (Continued)

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Proposed changes to Technical Specifications or the Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affects nuclear safety.
- g. All reportable events having nuclear safety significance.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- i. Reports and meeting minutes of the Plant Review Committee.
- j. Fire Protection Program and Implementing Procedure Changes. |

6.5.2.4.2 AUDITS

Audits of operational nuclear safety-related facility activities shall be performed by the NPAD staff under the cognizance of the Nuclear Performance Specialists. These audits shall encompass:

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- c. The performance of activities required by the Quality Assurance Program Description for Operational Nuclear Power Plants (CPC-2A) to meet the criteria of 10 CFR 50, Appendix B at least once per 24 months.
- d. The Site Emergency Plan and implementing procedures at least once per 12 months.
- e. The Site Security Plan and implementing procedures (as required by the Site Security Plan) at least once per 12 months.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 152 TO FACILITY OPERATING LICENSE NO. DPR-20
CONSUMERS POWER COMPANY
PALISADES PLANT
DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated July 31, 1989, Consumers Power Company (the licensee) proposed that the existing license condition on fire protection be replaced with the standard condition noted in Generic Letter 86-10 and also proposed changes to the Appendix A Technical Specifications (TS) for Palisades. The proposed changes would remove requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements as recommended by Generic Letter 86-10. The proposed changes would also modify the administrative control requirements of the TS to add requirements for the Fire Protection Program that are similar to requirements for other programs implemented by license condition. Guidance on these proposed changes to TS was provided to all power reactor licensees and applicants by Generic Letter 88-12, dated August 2, 1988.

2.0 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 evaluation, 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.

3.0 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 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 change 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 those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The administrative control requirements have been modified to include Fire Protection Program implementation as an element for which written procedures must be established, implemented, and maintained. In addition, the audit responsibilities of the Plant Review Committee were expanded to include the review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Nuclear Performance Assessment Department.

The TS changes proposed by the licensee are in accordance with the guidance provided by Generic Letter 88-12, as described in the items below.

- (1) Section 3.22, FIRE PROTECTION SYSTEM, Delete entire section to be incorporated into FSAR.

- (2) Table 4.2.2, Minimum Frequencies for Equipment Tests, Delete item 7, renumber remaining items to be incorporated into FSAR.
- (3) Section 4.17, FIRE PROTECTION SYSTEM, Delete entire section to be incorporated into FSAR.
- (4) Section 6.2.2, PLANT STAFF, page 6-2, Delete Section "e" to be incorporated into FSAR.

Footnote at the bottom of page 6-1
Delete the words "and the Fire Brigade"

- (5) Section 6.4, TRAINING, page 6-5, Delete Section 6.4.2 to be incorporated into FSAR.
- (6) Section 6.5.2.8.1, REVIEW, page 6-7, Add the following item: Fire Protection Program and Implementing Procedure Changes.
- (7) Table of Contents, Delete Section 3.22 and 4.17, "Fire Protection Systems"

As required by Generic Letter 86-10, the licensee confirmed that the NRC-approved Fire Protection Program has been incorporated into the FSAR. The licensee confirmed that the current license condition on fire protection is the standard condition provided 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 incorporated into the FSAR. 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.

4.0 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.

5.0 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 and a change in 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 (54 FR 37044). Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 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.

6.0 CONCLUSION

The staff 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: T. Dunning
B. Holian

Dated: August 21, 1992

DATED: August 21, 1992

AMENDMENT NO. 152 TO FACILITY OPERATING LICENSE NO. DPR-20-PALISADES

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