

September 3, 1999

Mr. Nathan L. Haskell
Director, Licensing
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT RE: PRIMARY COOLANT
SYSTEM FLOW (TAC NO. MA2112)

Dear Mr. Haskell:

The Commission has issued the enclosed Amendment No. 187 to Facility Operating License No. DPR-20 for the Palisades Plant. The amendment consists of changes to the Technical Specifications in response to your application dated June 17, 1998, and supplemented by letters dated June 23 and December 2, 1998, and March 18, 1999.

The amendment revises the minimum reactor vessel flow rate requirement. The minimum allowable flow rate requirement is reduced by approximately 4 percent and the units of the requirement are revised for consistency with the flow measurement procedure.

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

Sincerely,

/s/

Robert G. Schaaf, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosures:

- 1. Amendment No. 187 to DPR-20
- 2. Safety Evaluation

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

September 3, 1999

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Palisades Plant
27780 Blue Star Memorial Highway
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Sincerely,

A handwritten signature in black ink, appearing to read "Robert G. Schaaf".

Robert G. Schaaf, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosures:

1. Amendment No. 187 to DPR-20
2. Safety Evaluation

cc w/encls: See next page

Mr. Nathan L. Haskell
Consumers Energy Company

Palisades Plant

cc:

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Covert, Michigan 49043



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

CONSUMERS ENERGY COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. **187**

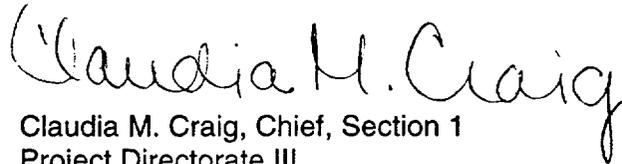
License No. DPR-20

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consumers Energy Company (the licensee) dated June 17, 1998, as supplemented by letters dated June 23 and December 2, 1998, and March 18, 1999, 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 the license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-20 is hereby amended to read as follows:

The Technical Specifications contained in Appendix A, as revised through Amendment No. **187**, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Consumers Energy Company 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 issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: **September 3, 1999**

ATTACHMENT TO LICENSE AMENDMENT NO. 187

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 amendment number and contain vertical lines indicating the areas of change.

REMOVE

3-1b

3-2

3-3

INSERT

3-1b

3-2

3-3

3.1 PRIMARY COOLANT SYSTEM

Applicability

Applies to the operable status of the primary coolant system.

Objective

To specify certain conditions of the primary coolant system which must be met to assure safe reactor operation.

Specifications

3.1.1 Operable Components

- a. At least one primary coolant pump or one shutdown cooling pump with a flow rate greater than or equal to 2810 gpm shall be in operation whenever a change is being made in the boron concentration of the primary coolant and the plant is operating in cold shutdown or above, except during an emergency loss of coolant flow situation. Under these circumstances, the boron concentration may be increased with no primary coolant pumps or shutdown cooling pumps running.
- b. Four primary coolant pumps shall be in operation whenever the reactor is operated above hot shutdown, with the following exception:

Before removing a pump from service, thermal power shall be reduced as specified in Table 2.3.1 and appropriate corrective action implemented. With one pump out of service, return the pump to service within 12 hours (return to four-pump operation) or be in hot shutdown (or below) with the reactor tripped (from the C-06 panel, opening the 42-01 and 42-02 circuit breakers) within the next 12 hours. Start-up (above hot shutdown) with less than four pumps is not permitted and power operation with less than three pumps is not permitted.

- c. The measured four primary coolant pumps operating reactor vessel flow shall be $\geq 352,000$ gpm.
- d. Both steam generators shall be capable of performing their heat transfer function whenever the average temperature of the primary coolant is above 300°F.
- e. The AXIAL SHAPE INDEX (ASI) shall be maintained within the limits specified in the COLR.

- (1) When the ASI exceeds the limits specified in the COLR, within 15 minutes initiate corrective actions to restore the ASI to the acceptable region. Restore the ASI to acceptable values within one hour or be at less than 70% of rated power within the following two hours.

3.1 PRIMARY COOLANT SYSTEM
3.1.1 Operable Components (continued)

Basis

When primary coolant boron concentration is being changed, the process must be uniform throughout the primary coolant system volume to prevent stratification of primary coolant at lower boron concentration which could result in a reactivity insertion. Sufficient mixing of the primary coolant is assured if one shutdown cooling or one primary coolant pump is in operation.⁽¹⁾ The shutdown cooling pump will circulate the primary system volume in less than 60 minutes when operated at rated capacity. By imposing a minimum shutdown cooling pump flow rate of 2810 gpm, sufficient time is provided for the operator to terminate the boron dilution under asymmetric flow conditions.⁽⁵⁾ The pressurizer volume is relatively inactive, therefore it will tend to have a boron concentration higher than the rest of the primary coolant system during a dilution operation. Administrative procedures will provide for use of pressurizer sprays to maintain a nominal spread between the boron concentration in the pressurizer and the primary system during the addition of boron.⁽²⁾

The 57% pressurizer level, in section 3.1.1h(4), is not an analytical result, but simply a decision point between having and not having a bubble. It was chosen to agree with the maximum programmed level during power operation.

The limitation, in section 3.1.1i, on operating P-50A and P-50B together with T_c below 300°F allows the Pressure Temperature limits of Figures 3-1 and 3-2 to be higher than they would be without this limit.

The FSAR safety analysis was performed assuming four primary coolant pumps were operating for accidents that occur during reactor operation. Therefore, reactor startup above hot shutdown is not permitted unless all four primary coolant pumps are operating. Operation with three primary coolant pumps is permitted for a limited time to allow the restart of a stopped pump or for reactor internals vibration monitoring and testing.

Requiring the plant to be in hot shutdown with the reactor tripped from the C-06 panel, opening the 42-01 and 42-02 circuit breakers, assures an inadvertent rod bank withdrawal will not be initiated by the control room operator. Both steam generators are required to be operable whenever the temperature of the primary coolant is greater than the design temperature of the shutdown cooling system to assure a redundant heat removal system for the reactor.

The transient analyses which require a minimum vessel flow rate assumption were performed assuming a vessel volumetric flow rate of 352,000 gpm, which corresponds to an analytical limit of 341,400 gpm when adjusted for 3% flow measurement uncertainty. For calculations which require a core flow rate, the analytical limit is further reduced by 3% to account for core bypass, to 331,200 gpm.⁽³⁾

A DNB analysis was performed for the limiting AOO which is not protected by a reactor trip, in a parametric fashion to determine the core inlet temperature as a function of pressure and flow for which the minimum DNBR is equal to the DNB correlation safety limit. Subsequent confirming analyses include the following uncertainties and allowances: 2% of rated power for power measurement; ± 0.06 for ASI measurement; ± 22 psi for pressurizer pressure; $\pm 7^\circ\text{F}$ for inlet temperature; and 3% measurement and 3% bypass for core flow⁽⁴⁾. In addition, transient biases were included in the determination of the allowable reactor inlet temperature.

3.1 PRIMARY COOLANT SYSTEM

Basis (continued)

The limits of validity of the T_c equation are:

1800 \leq pressure \leq 2200 psia
100.0 $\times 10^6 \leq$ Vessel Flow \leq 150 $\times 10^6$ lb/h
ASI as shown in the COLR.

With measured primary coolant system flow rates > 150 M lbm/hr, limiting the maximum allowed inlet temperature to the T_c LCO at 150 M lbm/hr increases the margin to DNB for higher PCS flow rates⁽⁴⁾.

The Axial Shape Index alarm channel is being used to monitor the ASI to ensure that the assumed axial power profiles used in the development of the inlet temperature LCO bound measured axial power profiles. The signal representing core power (Q) is the auctioneered higher of the neutron flux power and the Delta-T power. The measured ASI calculated from the excore detector signals and adjusted for shape annealing (Y_1) and the core power constitute an ordered pair (Q, Y_1). An alarm signal is activated before the ordered pair exceed the boundaries specified in the COLR.

The requirement that the steam generator temperature be \leq the PCS temperature when forced circulation is initiated in the PCS ensures that an energy addition caused by heat transferred from the secondary system to the PCS will not occur. This requirement applies only to the initiation of forced circulation (the start of the first primary coolant pump) when the PCS cold leg temperature is $< 430^\circ\text{F}$. However, analysis (Reference 6) shows that under limited conditions when the Shutdown Cooling System is isolated from the PCS, forced circulation may be initiated when the steam generator temperature is higher than the PCS cold leg temperature.

References

- (1) Updated FSAR, Section 14.3.2.
- (2) Updated FSAR, Section 4.3.7.
- (3) EMF 97-051, Revision 1, Table 2.1.
- (4) EMF-98-013, Revision 0, Section 15.0.7.1
- (5) ANF-90-078
- (6) Consumers Power Company Engineering Analysis EA-A-NL-89-14-1



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 187 TO FACILITY OPERATING LICENSE NO. DPR-20

CONSUMERS ENERGY COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated June 17, 1998, as supplemented by letters dated June 23 and December 2, 1998, and March 18, 1999, the Consumers Energy Company (the licensee) requested an amendment to the Technical Specifications (TSs) appended to Facility Operating License No. DPR-20 for the Palisades Plant. The proposed amendment requested a reduction in the minimum reactor vessel flow rate limiting condition for operation (LCO). Conforming changes to the Bases were also proposed.

The December 2, 1998, letter provided additional clarifying information and the March 18, 1999, letter requested a 60-day allowance for implementation of the amendment. The additional information and proposed change to the implementation period were within the scope of the original *Federal Register* notice and did not change the staff's initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

In September of 1997, Palisades installed ultra-sonic flow measurement (UFM) devices on the steam generator feedwater piping and incorporated use of them into the secondary system calorimetric-based reactor power calculation. Calorimetric heat balance calculations since installation of UFM indicate that actual reactor power was approximately 2 percent less than previous venturi-based feedwater flow measurements. Since the reactor vessel flow rate measurement is determined using a primary system calorimetric (solving the equation $Q=mc_p\Delta T$ for m)¹, the measured reactor vessel flow rate has also been reduced by 2 percent. The difference between measured reactor vessel flow rate and the associated TS requirement has been reduced to approximately 1 percent. This is due, primarily, to incorporation of the UFM into the calorimetric power calculation. However, steam generator tube plugging levels of 3-4 percent and changes in fuel assembly design have also had small contributions.

The current and proposed TSs read as follows:

¹Where Q is the core heat output, m is the core mass flow rate, c_p is the coolant specific heat constant, and ΔT is the increase in reactor coolant temperature across the core.

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Current TS 3.1.1c

The measured four primary coolant pumps operating reactor vessel flow shall be 140.7×10^6 lb/hr or greater, when corrected to 532 °F.

Proposed TS 3.1.1c

The measured four primary coolant pumps operating reactor vessel flow shall be $\geq 352,000$ gpm.

The results of this proposed change will be to (1) reduce the minimum allowable reactor vessel flow rate requirement by approximately 4 percent, and (2) revise the units of the TS requirement from mass flow rate (lb/hr) to volumetric flow rate (gpm) for consistency with the flow measurement procedure.

3.0 EVALUATION

Because of the small margin between the Palisades-measured vessel flow and the TS requirement, a new minimum flow rate is proposed. Also, the units of the new flow rate would be revised from mass flow rate (lb/hr) to volumetric flow rate (gpm).

The proposed TS minimum reactor vessel flow rate is reduced approximately 4 percent from 140.7×10^6 lb/hr to a new flow rate of 135×10^6 lb/hr at 532 °F. This corresponds respectively to a change in volumetric flow rate from 366,623 gpm to 352,000 gpm at 532 °F. When adjusted for a 3 percent flow measurement uncertainty, this corresponds to the analytical limit of 341,400 gpm.

The licensee stated that each of the applicable Palisades Final Safety Analysis Report (FSAR) Chapter 14 events were re-evaluated incorporating the new minimum flow rate. The licensee examined each event for the impact of changes for the cycle. Each event was assigned to one of the four following categories:

- (1) The event is not a part of the plant licensing basis and no analysis is required.
- (2) The factors which determine the sequence of events and consequences of the event are either unchanged or bounded by the existing analysis and no analysis is required.
- (3) The consequences of the event are bounded by another event with the same or more demanding acceptance criteria and no analysis is required.
- (4) The factors which determine the sequence of events and consequences of the event are changed in such a manner that the existing analysis is no longer bounding and a new analysis is required.

The minimum departure from nucleate boiling ratio (MDNBR) was recalculated for all limiting events using a reduced primary flow, since they fall in category 4 above. Hydraulic compatibility and melt limits were evaluated and found to be unaffected by the reduced flow. The trip setpoint

confirmation for Cycle 14 was reviewed and margin was demonstrated for the TM/LP trip and the T_{inlet} LCO.

A listing entitled "Standard Review Plan Events Reanalyzed or Dispositioned with Revised Reactor Vessel Flow Rate" was provided in Attachment 3 of the June 17, 1998, letter. The licensee indicated that the 4 percent reduction in reactor vessel flow rate was incorporated in the re-evaluation or reanalysis of the listed items. The licensee provided a correlation between the Standard Review Plan (SRP) listed items and the corresponding FSAR items.

The licensee stated that all Palisades FSAR Chapter 14 events were analyzed or dispositioned using (1) approved codes and methodologies and (2) appropriate conservative inputs consistent with the applicable approved methodologies. Details of these analyses were provided in the Siemens Power Corporation reports EMF-98-013, "Palisades Cycle 14: Disposition and Analysis of Standard Review Plan Chapter 15 Events," and EMF-98-042, "Palisades Cycle 14: Disposition and Analysis of Standard Review Plan Chapter 15 Events for Reduced Primary Coolant Flow." These reports were provided by the licensee in its June 23 and December 2, 1998, submittals.

The large and small break loss-of-coolant accident (LOCA) reanalyses were examined by the licensee for the effect of the proposed reduction in minimum primary coolant system flow rate. The licensee stated that this will cause the T_{hot} temperature to increase by at most 1 - 2 °F. A small change in this value is within a typical uncertainty range and does not represent a significant change to the overall LOCA mass and energy and accompanying containment pressure/temperature response.

The licensee reported in a June 1, 1998, letter that a reanalysis of the large break LOCA for fuel Cycle 14 resulted in a new peak clad temperature (PCT) of 1869 °F. This is a 23 °F drop in calculated PCT between Cycle 13 and Cycle 14. This change was due primarily to revised core fuel design (pellet diameter and clad thickness) and neutronics values (radial peaking factors), which were used to reflect the Cycle 14 core design and reload "R" fuel. The results of confirmatory calculations for Cycle 14 indicate that when the RELAP4 model is corrected for excessive variability, the predicted PCT will be lower by about 70 °F. This is greater than 50 °F, which constitutes a significant change in accordance with Section 50.46 of Title 10 of the *Code of Federal Regulations* (10 CFR 50.46). However, the resulting changes in the PCT for fuel Cycles 13 and 14 will be in the conservative direction and are acceptable.

The licensee reported that the reanalysis for the small break LOCA resulted in a new PCT of 2,025.8 °F. This is acceptable in accordance with 10 CFR 50.46.

The limiting MDNBR event was found to be the Single Rod Withdrawal event for which the MDNBR value is 1.17. This is an acceptable value as it is equal to or greater than the MDNBR correlation limit of 1.164. The limiting pressure event was found to be the Loss of External Load event for which the pressure is 2,614.9 psia. This is acceptable as it is less than 110 percent of the design limit of 2,500 psia, which is equal to 2,750 psia.

The results of the reanalyses showed that the reduction of the assumed minimum reactor vessel flow rate did not result in:

- (1) unacceptable values in peak clad temperature in the results of the Loss Of Coolant Accident Emergency Core Cooling System analyses for the large and small break LOCAs
- (2) penetration of TS DNB limits or additional fuel failures for non-LOCA events
- (3) exceeding the pressure limits
- (4) a change in the results of the LOCA or Main Steamline Break containment response analyses
- (5) a change to the radiological consequences of the SRP events with respect to 10 CFR Part 100 offsite dose or SRP 6.4 control room habitability requirements

As a result of the above evaluation, the reanalyses were found to be acceptable. Therefore, the staff finds the proposed reduction of the minimum reactor vessel flow rate to be 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 Michigan 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. 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* 36271). 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.

6.0 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: H. Balukjian

Date: September 3, 1999