North Atlantic

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The Northeast Utilities System

March 22, 2002

Docket No. 50-443

NYN-02024

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Seabrook Station
License Amendment Request 01-12
"Changes to Spent Fuel Assembly Storage Technical Specification 3/4.9.13"

North Atlantic Energy Service Corporation (North Atlantic) has enclosed herein License Amendment Request (LAR) 01-12. License Amendment Request 01-12 is submitted pursuant to the requirements of 10 CFR 50.90 and 10 CFR 50.4.

LAR 01-12 proposes changes to Seabrook Station Technical Specification (TS) 3/4.9.13, Spent Fuel Assembly Storage and associated TS Figures, Index and Bases. The proposed changes are reflective of a revised criticality safety analysis supporting a two-zone spent fuel pool, consisting of BORAFLEX® and BORAL® fuel assembly storage racks. Updating TS 3/4.9.13 ensures the TS is reflective of the revised criticality safety analysis and will support enhanced operational flexibility in the spent fuel pool.

The Station Operation Review Committee and the Nuclear Safety Audit Review Committee have reviewed LAR 01-12.

As discussed in the enclosed LAR Section IV, the proposed change does not involve a significant hazard consideration pursuant to 10 CFR 50.92. A copy of this letter and the enclosed LAR has been forwarded to the New Hampshire State Liaison Officer pursuant to 10 CFR 50.91(b). North Atlantic requests NRC Staff review of LAR 01-12, and issuance of a license amendment by March 22, 2003 (see Section V enclosed).

North Atlantic has determined that LAR 01-12 meets the criteria of 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement (see Section VI enclosed).

Should you have any questions regarding this letter, please contact Mr. James M. Peschel, Manager – Regulatory Programs, at (603) 773-7194.

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Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.

Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer

cc: H. J. Miller, NRC Regional Administrator
R. D. Starkey, NRC Project Manager, Project Directorate I-2
G. T. Dentel, NRC Senior Resident Inspector

Mr. Donald Bliss, Director
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State Office Park South
107 Pleasant Street
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North Atlantic

SEABROOK STATION UNIT 1

Facility Operating License NPF-86
Docket No. 50-443

License Amendment Request 01-12,
"Changes to Spent Fuel Assembly Storage Technical Specification 3/4.9.13"

North Atlantic Energy Service Corporation pursuant to 10 CFR 50.90 submits this License Amendment Request. The following information is enclosed in support of this License Amendment Request:

- Section I - Introduction and Safety Assessment for Proposed Change
- Section II - Markup of Proposed Change
- Section III - Retype of Proposed Change
- Section IV - Determination of Significant Hazards for Proposed Change
- Section V - Proposed Schedule for License Amendment Issuance And Effectiveness
- Section VI - Environmental Impact Assessment

I, Ted C. Feigenbaum, Executive Vice President and Chief Nuclear Officer of North Atlantic Energy Service Corporation hereby affirm that the information and statements contained within this License Amendment Request are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

Sworn and Subscribed
before me this
22nd day of March, 2002

Notary Public

Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer

Section I

Introduction and Safety Assessment for Proposed Change

I. INTRODUCTION AND SAFETY ASSESSMENT FOR PROPOSED CHANGE

A. Introduction

License Amendment Request (LAR) 01-12 proposes changes to Seabrook Station Technical Specification (TS) 3/4.9.13, Spent Fuel Assembly Storage and associated TS Figures, Index and Bases. The proposed changes are reflective of a revised criticality safety analysis supporting a two-zone spent fuel pool, consisting of BORAFLEX® and BORAL® fuel assembly storage racks. Updating TS 3/4.9.13 ensures the TS is reflective of the revised criticality safety analysis and will support enhanced operational flexibility in the spent fuel pool.

B. Safety Assessment of Proposed Change

The Spent Fuel Pool at Seabrook Station was designed and licensed (Ref. TS 5.6.3) for a storage cell capacity of 1236 fuel assemblies. However, at the time Seabrook Station began commercial operation, not all the spent fuel assembly storage racks were installed in the pool (the installed capacity at initial operation was 660 cells). In the mid-1990s North Atlantic investigated options for completion of the spent fuel pool storage capacity so that there would be the full complement of installed storage cell capacity of 1236 (by adding an additional 576 storage cells).

By the mid-1990s the issues with fuel assembly storage racks containing BORAFLEX® neutron absorber material were well known. BORAFLEX® is also the material used in the storage racks initially installed during Seabrook Station's construction phase. Because of the gamma radiation induced degradation problems associated with BORAFLEX® (i.e., thinning and dimensional shrinkage), North Atlantic completed the spent fuel pool racking with storage racks containing BORAL® neutron absorber material, which does not exhibit the problems associated with BORAFLEX®. A revised criticality safety analysis[1] for the spent fuel pool was performed for two loading configurations. The first loading configuration included the BORAL® storage racks and determined they could be used under the current Technical Specification requirements. The second loading configuration examined considered a two-zone spent fuel pool with both rack designs, BORAL® and BORAFLEX®.

The first loading configuration confirmed the current Technical Specification requirements would continue to be adequate to control placement of spent fuel within the BORAL® storage racks as well as the BORAFLEX® racks. Thus currently, the loading requirements for placement of spent fuel within the BORAL® storage racks continues to be the same loading requirements as that of the BORAFLEX® storage racks which is delineated in the current Technical Specification Figure 3.9-1.

The second loading configuration examined by the criticality safety analysis considered a spent fuel pool arrangement containing a two-storage rack design having a designated BORAL® Zone and a designated BORAFLEX® Zone. The analysis assumed criticality control for the BORAL® Zone is achieved by the flux trap principle. Due to the issues associated with BORAFLEX® degradation, the analysis of the BORAFLEX® Zone assumed no neutron absorbing material (B^{10}) in the BORAFLEX®. Thus, criticality control for the BORAFLEX® Zone will be maintained by the combination of fuel enrichment and burnup.

[1] "Criticality Analysis of Seabrook Station's New and Spent Fuel Boral and Boraflex Storage Racks," DES-NFQA-98-02, September 1998. Duke Engineering & Services (DE&S).

The criticality safety methods[2] used for Seabrook Station were developed and validated based on KENO-V.a Monte Carlo, CASMO-3 LWR lattice integral transport, and SIMULATE-3 nodal burnup credit analysis. This permits criticality analysis by several independent methods and allows the flexibility to accommodate various light water reactor (LWR) fuel types, fuel storage arrays and criticality safety assumptions. The criticality safety methodology calculates rack K_{eff} vs. fresh fuel enrichment, unit cell geometry sensitivity to mechanical tolerances, and rack K_{eff} vs. burnup with CASMO-3. KENO-V.a is used to verify the nominal K_{eff} values calculated by CASMO-3 and, where necessary, provide a bias to the CASMO-3 calculations.

To determine the maximum fresh fuel enrichment in both the BORAL® and BORAFLEX® Zones, CASMO-3 calculations utilize fresh fuel and vary the initial enrichment until the K_{eff} was less than the acceptance criterion of 0.95. The analyses were verified with KENO-V.a. To go beyond the maximum fresh fuel enrichment, credit for burnup was used in both the BORAL® and BORAFLEX® rack designs. To determine the enrichment/burnup combinations, a maximum reactivity acceptance criterion, including uncertainties, was established. Enrichment/burnup calculations were performed with CASMO-3 in the rack geometry utilizing the actual spent fuel isotopic inventory until the acceptance criterion was met. Since the burnup credit analysis was performed in two dimensions, a 2D to 3D penalty was determined. This penalty accounts for the effects of axial burnup and moderator history. The results of this analysis established the acceptable enrichment and burnup combinations for the BORAL®and BORAFLEX® Zones.

To accommodate the high enrichment in the BORAL® Zone, two types of checkerboard analyses were performed. The fresh fuel checkerboard analysis determined the criticality of fuel at various enrichments placed next to fresh fuel with an enrichment of 5.0 w/o. The fresh and burned fuel checkerboard analysis used fresh fuel at an enrichment of 5.0 w/o while the burned fuel was varied in initial enrichment from 3.5 w/o to 5.0 w/o and assembly burnup was varied from 0 to 50 GWD/MTU. These calculations were performed with SIMULATE-3 with cross section input from CASMO-3.

The results of the above analyses were used to develop the proposed Technical Specification loading curves (i.e., proposed TS Figures 3.9-1 and 3.9-2 for the BORAL® and BORAFLEX® Zones, respectively).

Because of the proposed changes to TS 3/4.9.13 changes to the corresponding TS Index and Bases have been made accordingly.

North Atlantic concludes that the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

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[2] The Seabrook Station criticality safety analysis was reviewed for NRC Regulatory Issue Summary 2001-12, "Non-Conservatism in Pressurized Water Reactor Spent Fuel Storage Pool Reactivity Equilvalencing Calculations." The criticality safety analysis performed for Seabrook Station did not utilize reactivity equivalencing as all assembly configurations are explicitly represented. Therefore, this issue does not affect the Seabrook Station spent fuel pool criticality analysis.

SECTION II

MARKUP OF PROPOSED CHANGE

Refer to the attached markup of the proposed change to the Technical Specifications. The attached markup reflects the currently issued revision of the Technical Specifications listed below. Pending Technical Specifications or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed markup.

The following Technical Specifications are included in the attached markup:

Technical Specification	Title	Page
INDEX	INDEX	ix
3/4.9.13	Spent Fuel Assembly Storage	3/4 9-16
Figure 3.9-1	Fuel Assembly Burnup vs. Initial Enrichment For Spent Fuel Assemblies In BORAL® Storage Racks	3/4 9-17
Figure 3.9-2	Fuel Assembly Burnup vs. Initial Enrichment For Spent Fuel Assemblies In BORAFLEX® Storage Racks	3/4 9-17A
Bases 3/4.9.13	Spent Fuel Assembly Storage	B 3/4 9-4

REFUELING OPERATIONS

3/4.9.13 SPENT FUEL ASSEMBLY STORAGE

LIMITING CONDITION FOR OPERATION

3.9.13 Fuel assemblies stored in the Spent Fuel Pool shall be placed in the spent fuel storage racks according to the criteria shown in ~~Figure 3.9-1.~~

APPLICABILITY: Whenever fuel is in the Spent Fuel Pool.

ACTION:

a. With the requirements of the above specification not satisfied, suspend all other fuel movement within the Spent Fuel Pool and move the non-complying fuel assemblies to allowable locations in the Spent Fuel Pool in accordance with ~~Figure 3.9-1.~~

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS NOTE: GRAMMER ERROR → its, NOT it's

4.9.13.1 The burnup of each fuel assembly to be stored in the Spent Fuel Pool shall be determined from it's measured burnup history prior to storage in the Spent Fuel Pool. A complete record of each assembly shall be maintained as long as that fuel assembly is retained on-site.

4.9.13.2 After fuel assembly(ies) movement into or within the Spent Fuel Pool, the position of the fuel assembly(ies) that was (were) moved shall be checked and independently verified to be in accordance with the criteria in ~~Figure 3.9-1~~

Figures 3.9-1 and 3.9-2.

Replace with new Figures 3.9-1 (on pg 3/4 9-17) and 3.9-2 (on new pg 3/4 9-17A)

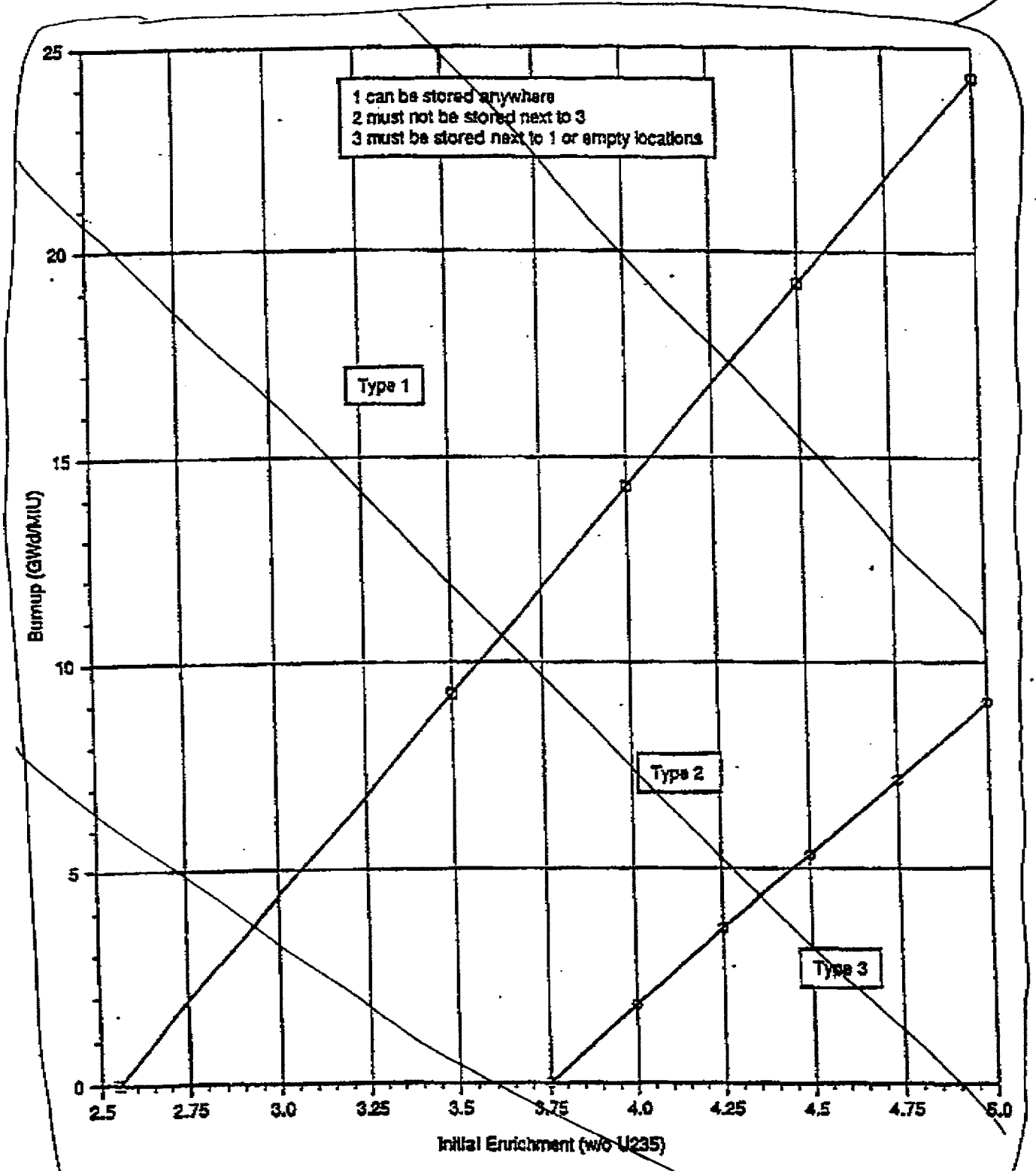

Figure 3.9-1
Fuel Assembly Burnup vs. Initial Enrichment
For Spent Fuel Assembly Storage

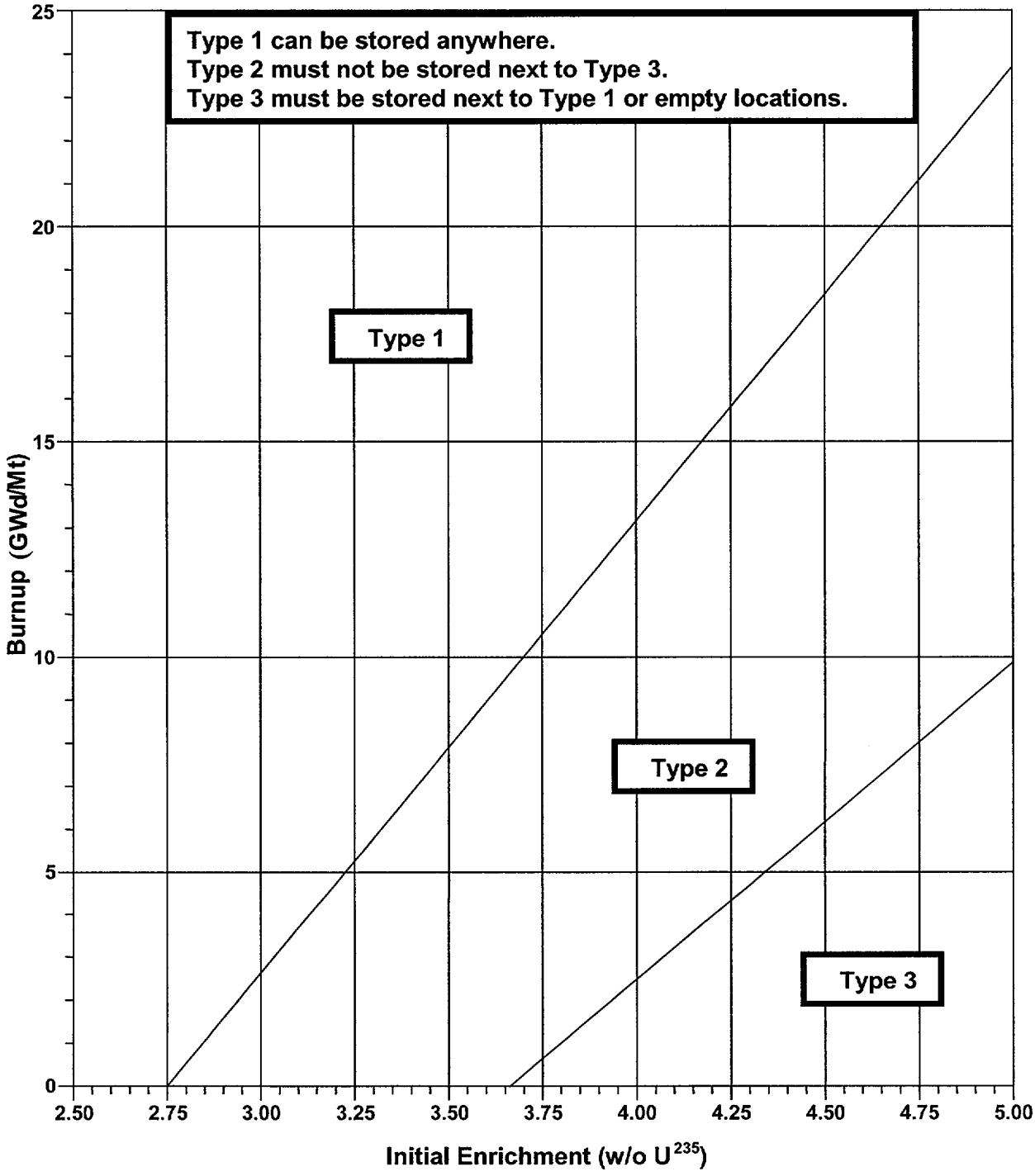

Figure 3.9-1
Fuel Assembly Burnup vs. Initial Enrichment
For Spent Fuel Assemblies in BORAL® Storage

NEW INSERT

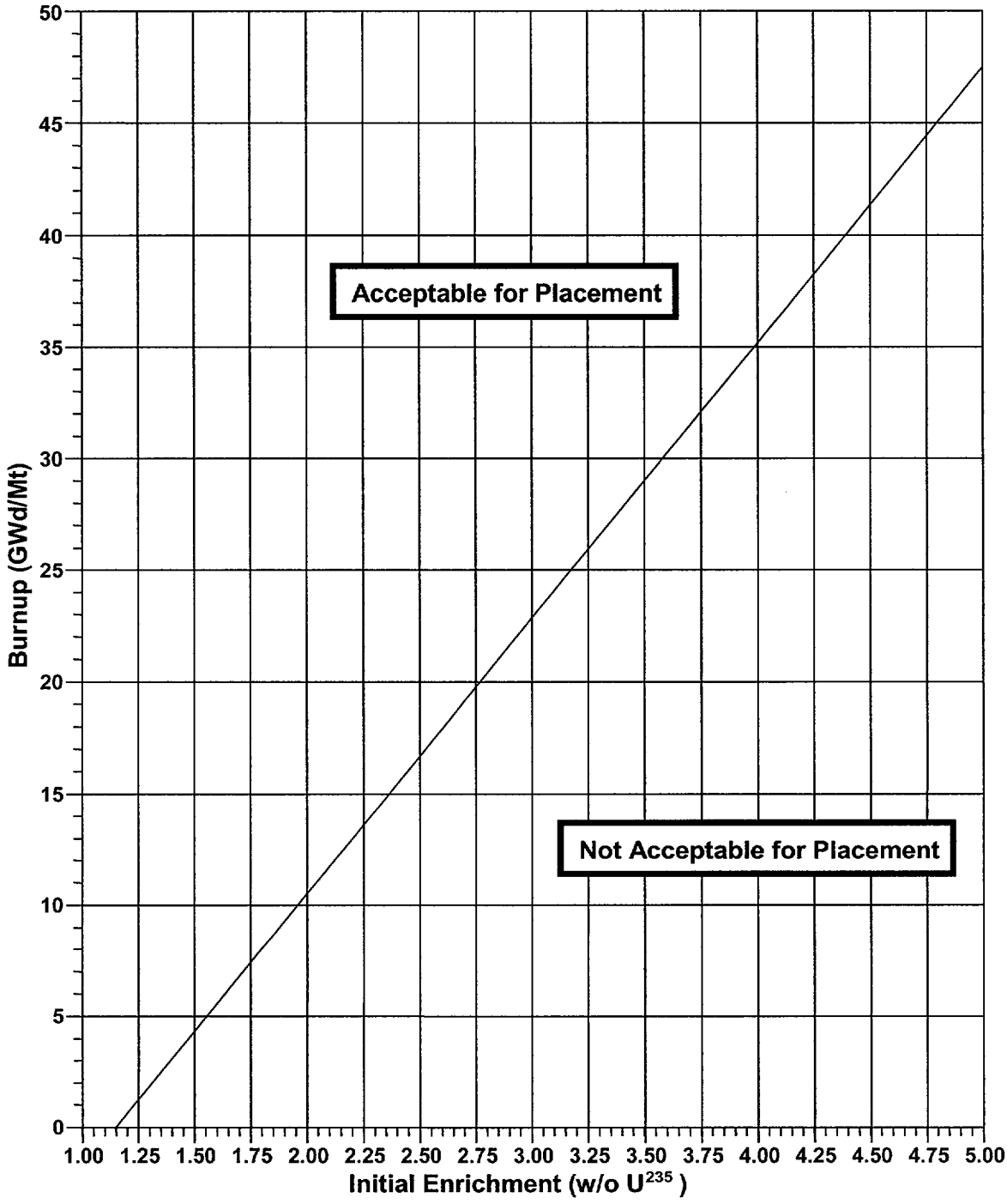

Figure 3.9-2
Fuel Assembly Burnup vs. Initial Enrichment
For Spent Fuel Assemblies in BORAFLEX® Storage

New Insert

3/4.9.9 CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM

The OPERABILITY of this system ensures that the containment vent and purge penetrations will be automatically isolated upon detection of high radiation levels within the containment. The OPERABILITY of this system is required to restrict the release of radioactive material from the containment atmosphere to the environment.

3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL and STORAGE POOL

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the safety analysis.

3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM

The limitations on the Fuel Storage Building Emergency Air Cleaning System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. Operation of the system with the heaters operating for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

3/4.9.13 SPENT FUEL ASSEMBLY STORAGE

Figures 3.9-1 and 3.9-2.

Restrictions on placement of fuel assemblies of certain enrichments within the Spent Fuel Pool is dictated by ~~Figure 3.9-1.~~ These restrictions ensure that the K_{eff} of the Spent Fuel Pool will always remain less than 0.95 assuming the pool to be flooded with unborated water. The restrictions delineated in ~~Figure 3.9-1~~ and the action statement are consistent with the criticality safety analysis performed for the Spent Fuel Pool as documented in the FSAR. (U)

Figures 3.9-1 and 3.9-2

3/4.9.14 NEW FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the New Fuel Storage Vault is dictated by Specification 3/4.9.14. These restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.95 assuming the area to be flooded with unborated water. In addition, these restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.98 when aqueous foam moderation is assumed. The restrictions delineated in Specification 3/4.9.14 and the action statement are consistent with the criticality safety analysis performed for the New Fuel Storage Vault as documented in the FSAR.

(U)

Add U To FSAR To Reflect Updated FSAR

No.

~~Revised by NRC letter dated 6/8/01~~ e

SECTION III

RETYPE OF PROPOSED CHANGE

Refer to the attached retype of the proposed change to the Technical Specifications. The attached retype reflects the currently issued version of the Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

3/4.9.13 SPENT FUEL ASSEMBLY STORAGE

LIMITING CONDITION FOR OPERATION

3.9.13 Fuel assemblies stored in the Spent Fuel Pool shall be placed in the spent fuel storage racks according to the criteria shown in Figures 3.9-1 and 3.9.2.

APPLICABILITY: Whenever fuel is in the Spent Fuel Pool.

ACTION:

a. With the requirements of the above specification not satisfied, suspend all other fuel movement within the Spent Fuel Pool and move the non-complying fuel assemblies to allowable locations in the Spent Fuel Pool in accordance with Figures 3.9-1 and 3.9.2.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.13.1 The burnup of each fuel assembly to be stored in the Spent Fuel Pool shall be determined from its measured burnup history prior to storage in the Spent Fuel Pool. A complete record of each assembly shall be maintained as long as that fuel assembly is retained on-site.

4.9.13.2 After fuel assembly(ies) movement into or within the Spent Fuel Pool, the position of the fuel assembly(ies) that was (were) moved shall be checked and independently verified to be in accordance with the criteria in Figures 3.9-1 and 3.9.2.

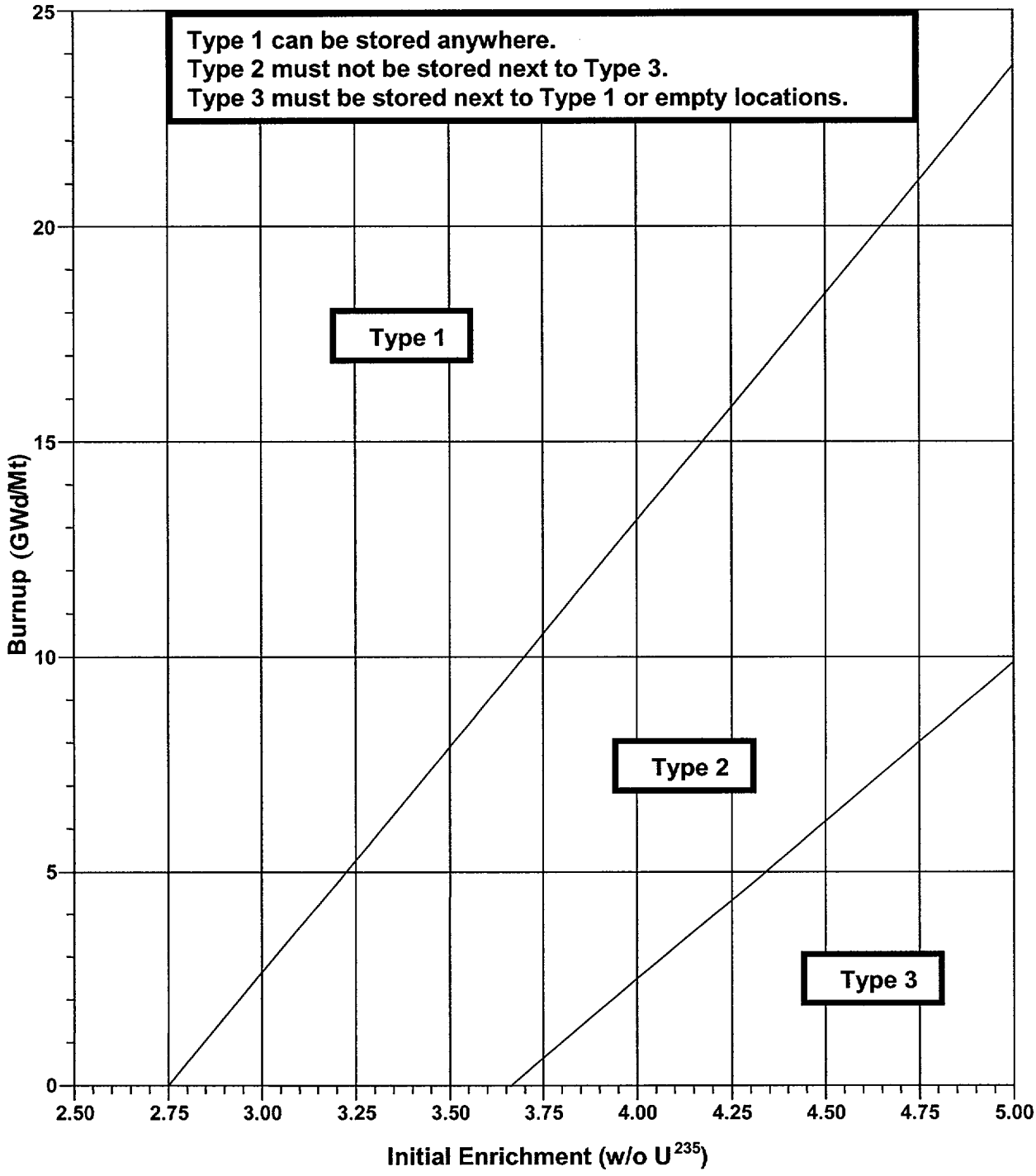

Figure 3.9-1
Fuel Assembly Burnup vs. Initial Enrichment
For Spent Fuel Assemblies in BORAL® Storage

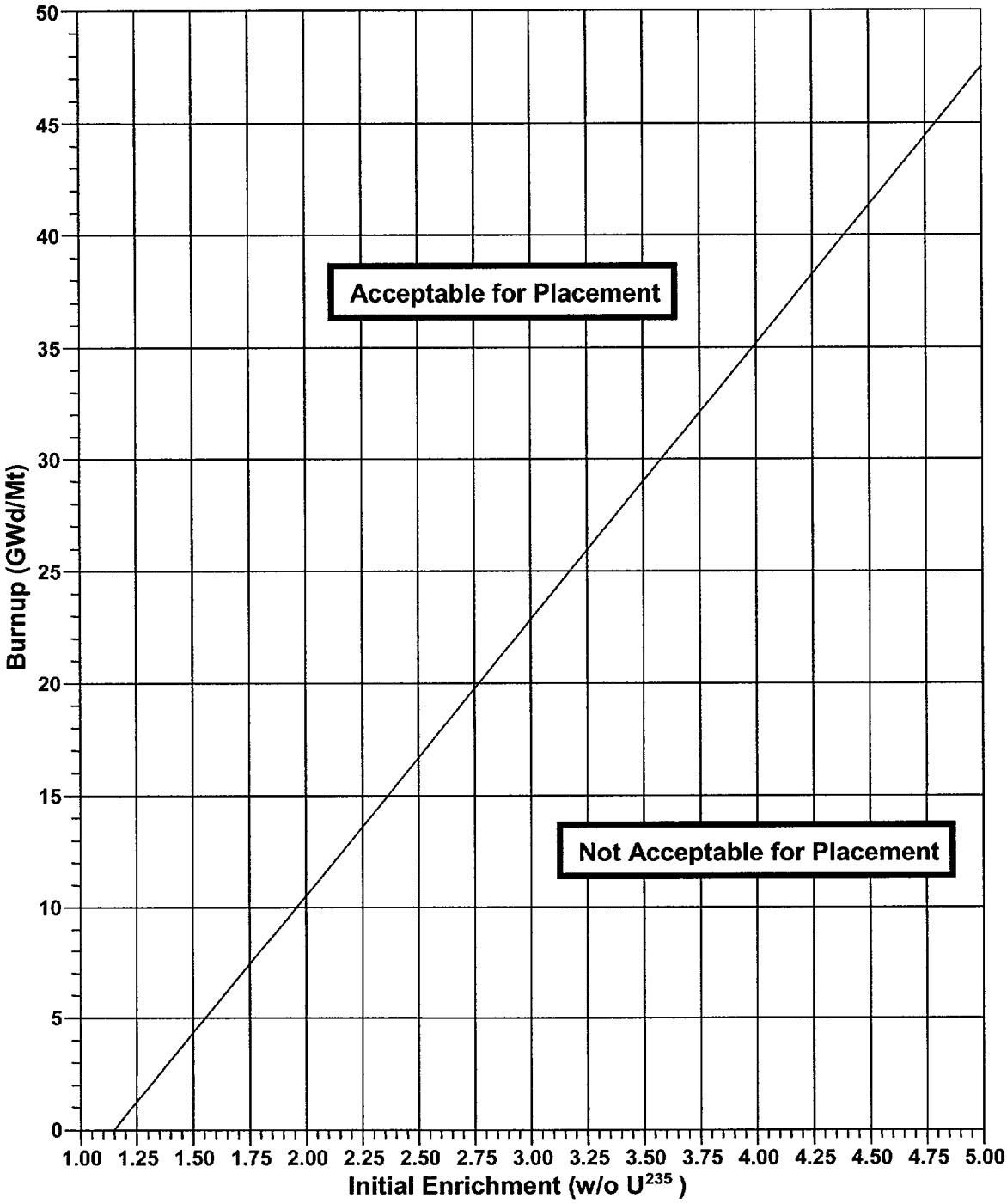

Figure 3.9-2
Fuel Assembly Burnup vs. Initial Enrichment
For Spent Fuel Assemblies in BORAFLEX® Storage

3/4.9.9 CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM

The OPERABILITY of this system ensures that the containment vent and purge penetrations will be automatically isolated upon detection of high radiation levels within the containment. The OPERABILITY of this system is required to restrict the release of radioactive material from the containment atmosphere to the environment.

3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL and STORAGE POOL

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the safety analysis.

3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM

The limitations on the Fuel Storage Building Emergency Air Cleaning System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. Operation of the system with the heaters operating for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

3/4.9.13 SPENT FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the Spent Fuel Pool is dictated by Figures 3.9-1 and 3.9-2. These restrictions ensure that the K_{eff} of the Spent Fuel Pool will always remain less than 0.95 assuming the pool to be flooded with unborated water. The restrictions delineated in Figures 3.9-1 and 3.9-2 and the action statement are consistent with the criticality safety analysis performed for the Spent Fuel Pool as documented in the UFSAR.

3/4.9.14 NEW FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the New Fuel Storage Vault is dictated by Specification 3/4.9.14. These restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.95 assuming the area to be flooded with unborated water. In addition, these restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.98 when aqueous foam moderation is assumed. The restrictions delineated in Specification 3/4.9.14 and the action statement are consistent with the criticality safety analysis performed for the New Fuel Storage Vault as documented in the UFSAR.

SECTION IV

DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGE

IV. DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGE

License Amendment Request (LAR) 01-12 proposes changes to Seabrook Station Technical Specification (TS) 3/4.9.13, Spent Fuel Assembly Storage and associated TS Figures, Index and Bases. The proposed changes are reflective of a revised criticality safety analysis supporting a two-zone spent fuel pool, consisting of BORAFLEX® and BORAL® fuel assembly storage racks. Updating TS 3/4.9.13 ensures the TS is reflective of the revised criticality safety analysis and will support enhanced operational flexibility in the spent fuel pool.

In accordance with 10 CFR 50.92, North Atlantic has concluded that the proposed changes do not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed changes do not involve a SHC is as follows:

1. *The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.*

   The proposed changes to TS Index, TS 3/4.9.13, TS Figure 3.9-1, and TS Figure 3.9-2 do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, and configuration of the facility. In addition, the proposed changes do not affect the manner in which the plant responds in normal operation, transient or accident conditions. The changes reflect the design capability of the BORAL® storage racks to safely store spent fuel. The proposed changes do not alter or prevent the ability of structures, systems and components (SSCs) to perform their intended function to mitigate the consequences of an initiating event within the acceptance limits assumed in the Updated Final Safety Analysis Report (UFSAR). Though the placement of specific spent fuel assemblies into storage racks may vary, administrative control measures (e.g., procedures) will continue to be in place to ensure the safe placement of fuel assemblies within the spent fuel pool.

   The proposed changes do not affect the source term, containment isolation or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated in the Seabrook Station UFSAR. Further, the proposed changes do not increase the types and amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposures.

   It is concluded that these proposed changes to TS Index, TS 3/4.9.13, TS Figure 3.9-1, and TS Figure 3.9-2 do not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. *The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.*

   The proposed changes to TS Index, TS 3/4.9.13, TS Figure 3.9-1, and TS Figure 3.9-2 do not change the operation or the design basis of any plant system or component during normal or accident conditions. The proposed changes do not include any physical changes to the plant. In addition, the proposed changes do not change the function or operation of plant equipment or introduce any new failure mechanisms. The plant equipment will continue to respond per the design and analyses and there will not be a malfunction of a new or different type introduced by the proposed changes. Though the placement of specific spent fuel assemblies into storage racks

may vary, administrative control measures (e.g., procedures) will continue to be in place to ensure the safe placement of fuel assemblies within the spent fuel pool.

The proposed changes do not modify the facility nor do they affect the plant's response to normal, transient or accident conditions. The changes do not introduce a new mode of plant operation. The changes reflect the design capability of the BORAL® storage racks to safely store spent fuel. The plant's design and design basis are not revised and the current safety analyses remains in effect.

The proposed changes to TS Index, TS 3/4.9.13, TS Figure 3.9-1, and TS Figure 3.9-2 do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *The proposed changes do not involve a significant reduction in the margin of safety.*

The proposed changes to TS Index, TS 3/4.9.13, TS Figure 3.9-1, and TS Figure 3.9-2 do not adversely affect the safety margins established through Limiting Conditions for Operation, Limiting Safety System Settings and Safety Limits as specified in the Technical Specifications nor is the plant design revised by the proposed changes. The safety margins established through Limiting Conditions for Operation, Limiting Safety System Settings and Safety Limits as specified in the Technical Specifications are not revised nor is the plant design or its method of operation revised by the proposed changes. The changes reflect the design capability of the BORAL® storage racks to safely store spent fuel. Administrative control measures (e.g., procedures) will continue to be in place to ensure the safe placement of fuel assemblies within the spent fuel pool so as to remain less than or equal to 0.95 K_{eff} as required by TS 5.6.1.1 for spent fuel storage.

It is concluded that these proposed changes to TS Index, TS 3/4.9.13, TS Figure 3.9-1, and TS Figure 3.9-2 do not involve a significant reduction in a margin of safety.

Based on the above evaluation, North Atlantic concludes that the proposed changes to TS Index, TS 3/4.9.13, TS Figure 3.9-1, and TS Figure 3.9-2 do not constitute a significant hazard.

SECTION V and VI

PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS, AND ENVIRONMENTAL IMPACT ASSESSMENT

V. PROPOSED SCHEDULE FOR LICENSE AMENDMENT ISSUANCE AND EFFECTIVENESS

North Atlantic requests NRC review of License Amendment Request 01-12, and issuance of a license amendment by March 22, 2003, having immediate effectiveness and implementation within 90 days. The requested issuance date is based on NRC average turnaround time for non-outage related LARs.

VI. ENVIRONMENTAL IMPACT ASSESSMENT

North Atlantic has reviewed the proposed license amendment against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluent that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed changes meet the criteria delineated in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.