

August 23, 1994

Docket Nos. 50-315
and 50-316

Mr. E. E. Fitzpatrick, Vice President
Indiana Michigan Power Company
c/o American Electric Power Service Corporation
1 Riverside Plaza
Columbus, Ohio 43215

Dear Mr. Fitzpatrick:

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2 - ISSUANCE OF
AMENDMENT RE: ICE CONDENSER ICE BED SURVEILLANCE REQUIREMENTS (TAC
NOS. M88273 AND M88274)

The Commission has issued the enclosed Amendment No. 180 to Facility Operating License No. DPR-58 and Amendment No. 164 to Facility Operating License No. DPR-74 for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated November 15, 1993.

The amendments change the TS surveillance requirement interval from 9 months to 18 months for chemical analysis, weighing, and flow passage inspection of the ice condenser.

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

Sincerely,

Original signed by

John B. Hickman, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 180 to DPR-58
2. Amendment No. 164 to DPR-74
3. Safety Evaluation

cc w/enclosures:
See next page

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NAME	CJamerson	JHickman: cir	CGrimes #94-071	RBarrett	CMax	LBMars
DATE	04/6/94	04/6/94	08/5/94	07/20/94	08/12/94	04/10/94

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Mr. E. E. Fitzpatrick
Indiana Michigan Power Company

Donald C. Cook Nuclear Plant

cc:

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Lansing, Michigan 48909

DATED: August 23, 1994

AMENDMENT NO. 180 TO FACILITY OPERATING LICENSE NO. DPR-58-D. C. COOK
AMENDMENT NO. 164 TO FACILITY OPERATING LICENSE NO. DPR-74-D. C. COOK

Docket File
NRC & Local PDRs
PDIII-1 Reading
J. Roe
J. Zwolinski
C. Jamerson
L. Marsh
J. Hickman
OGC-WF
D. Hagan, 3302 MNBB
G. Hill (4), P1-22
R. Barrett, 8/H/7
C. Grimes, 11/F/23
ACRS (10)
OPA
OC/LFDCB
W. Kropp, R-III
SEDB

cc: Plant Service list



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

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-315

DONALD C. COOK NUCLEAR PLANT, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 180
License No. DPR-58

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated November 15, 1993, 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.

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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-58 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 180, 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 issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 23, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 180
TO FACILITY OPERATING LICENSE NO. DPR-58
DOCKET NO. 50-315

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 area of change.

REMOVE

3/4 6-26
B 3/4 6-3*
B 3/4 6-4

INSERT

3/4 6-26
B 3/4 6-3*
B 3/4 6-4

*Overleaf page provided to maintain document completeness. No changes contained on these pages.

CONTAINMENT SYSTEMS

3/4.6.5 ICE CONDENSER

ICE BED

LIMITING CONDITION FOR OPERATION

3.6.5.1 The ice bed shall be OPERABLE with:

- a. The stored ice having boron concentration of at least 1800 ppm (the boron being in the form of sodium tetraborate), and a pH of 9.0 to 9.5 at 25°C,
- b. Flow channels through the ice condenser,
- c. A maximum ice bed temperature of $\leq 27^{\circ}\text{F}$,
- d. Each ice basket containing at least 1220 lbs of ice, and
- e. 1944 ice baskets.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With the ice bed inoperable, restore the ice bed to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.5.1 The ice condenser shall be determined OPERABLE:

- a. At least once per 12 hours by using the ice bed temperature monitoring system to verify that the maximum ice bed temperature is $\leq 27^{\circ}\text{F}$.
- b. At least once per 18 months by:
 1. Chemical analyses which verify that at least 9 representative samples of stored ice have a boron concentration of at least 1800 ppm (the boron being in the form of sodium tetraborate), and a pH of 9.0 to 9.5 at 25°C.
 2. Weighing a representative sample of at least 144 ice baskets and verifying that each basket contains at least 1220 lbs of ice. The representative sample shall include 6 baskets from each of the 24 ice condenser bays and

CONTAINMENT SYSTEMS

BASES

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analyses.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. These assumptions are consistent with the iodine removal efficiency assumed in the accident analyses.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water and 3) corrosion of metals within containment.

CONTAINMENT SYSTEMS

BASES

3/4.6.5 ICE CONDENSER

The requirements associated with each of the components of the ice condenser ensure that the overall system will be available to provide sufficient pressure suppression capability to limit the containment peak pressure transient to less than 12 psig during LOCA conditions.

3/4.6.5.1 ICE BED

The OPERABILITY of the ice bed ensures that the required ice inventory will 1) be distributed evenly through the containment bays, 2) contain sufficient boron to preclude dilution of the containment sump following the LOCA and 3) contain sufficient heat removal capability to condense the reactor system volume released during a LOCA. These conditions are consistent with the assumptions used in the accident analyses.

The minimum weight figure of 1220 pounds of ice per basket contains a 10% conservative allowance for ice loss through sublimation which is a factor of 10 higher than assumed for the ice condenser design. In the event that observed sublimation rates are equal to or lower than design predictions after three years of operation, the minimum ice baskets weight may be adjusted downward. In addition, the number of ice baskets required to be weighed each 18 months may be reduced after 3 years of operation if such a reduction is supported by observed sublimation data.

3/4.6.5.2 ICE BED TEMPERATURE MONITORING SYSTEM

The OPERABILITY of the ice bed temperature monitoring system ensures that the capability is available for monitoring the ice temperature. In the event the monitoring system is inoperable, the ACTION requirements provide assurance that the ice bed heat removal capacity will be retained within the specified time limits.



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

INDIANA MICHIGAN POWER COMPANY

DOCKET NO. 50-316

DONALD C. COOK NUCLEAR PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 164
License No. DPR-74

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Indiana Michigan Power Company (the licensee) dated November 15, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-74 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 164, 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 issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 23, 1994

CONTAINMENT SYSTEMS

3/4.6.5 ICE CONDENSER

ICE BED

LIMITING CONDITION FOR OPERATION

3.6.5.1 The ice bed shall be OPERABLE with:

- a. The stored ice having boron concentration of at least 1800 ppm (the boron being in the form of sodium tetraborate), and a pH of 9.0 to 9.5 at 25°C,
- b. Flow channels through the ice condenser,
- c. A maximum ice bed temperature of $\leq 27^{\circ}\text{F}$,
- d. Each ice basket containing at least 1220 lbs of ice, and
- e. 1944 ice baskets.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With the ice bed inoperable, restore the ice bed to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.5.1 The ice condenser shall be determined OPERABLE:

- a. At least once per 12 hours by using the ice bed temperature monitoring system to verify that the maximum ice bed temperature is $\leq 27^{\circ}\text{F}$.
- b. At least once per 18 months by:
 1. Chemical analyses which verify that at least 9 representative samples of stored ice have a boron concentration of at least 1800 ppm (the boron being in the form of sodium tetraborate), and a pH of 9.0 to 9.5 at 25°C.
 2. Weighing a representative sample of at least 144 ice baskets and verifying that each basket contains at least 1220 lbs of ice. The representative sample shall include 6 baskets from each of the 24 ice condenser bays and

CONTAINMENT SYSTEMS

BASES

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analyses.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a pH value of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. These assumptions are consistent with the iodine removal efficiency assumed in the accident analyses.

The contained water volume limit includes an allowance for water not usable because of tank discharge location or other physical characteristics.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

CONTAINMENT SYSTEMS

BASES

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water and 3) corrosion of metals within containment. These hydrogen control systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following A LOCA," March 1971.

3/4.6.5 ICE CONDENSER

The requirements associated with each of the components of the ice condenser ensure that the overall system will be available to provide sufficient pressure suppression capability to limit the containment peak pressure transient to less than 12 psig during LOCA conditions.

3/4.6.5.1 ICE BED

The OPERABILITY of the ice bed ensures that the required ice inventory will 1) be distributed evenly through the containment bays, 2) contain sufficient boron to preclude dilution of the containment sump following the LOCA and 3) contain sufficient heat removal capability to condense the reactor system volume released during a LOCA. These conditions are consistent with the assumptions used in the accident analyses.

The minimum weight figure of 1220 pounds of ice per basket contains a 10% conservative allowance for ice loss through sublimation which is a factor of 10 higher than assumed for the ice condenser design. In the event that observed sublimation rates are equal to or lower than design predictions after three years of operation, the minimum ice baskets weight may be adjusted downward. In addition, the number of ice baskets, required to be weighed each 18 months may be reduced after 3 years of operation if such a reduction is supported by observed sublimation data.

3/4.6.5.2 ICE BED TEMPERATURE MONITORING SYSTEM

The OPERABILITY of the ice bed temperature monitoring system ensures that the capability is available for monitoring the ice temperature. In the event the monitoring system is inoperable, the ACTION requirements provide assurance that the ice bed heat removal capacity will be retained within the specified time limits.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 180 TO FACILITY OPERATING LICENSE NO. DPR-58
AND AMENDMENT NO. 164 TO FACILITY OPERATING LICENSE NO. DPR-74

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-315 AND 50-316

1.0 INTRODUCTION

By letter dated November 15, 1993, the Indiana Michigan Power Company (the licensee) requested amendments to the Technical Specifications (TS) appended to Facility Operating License Nos. DPR-58 and DPR-74 for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2. The proposed amendments would modify the TS for the ice condenser ice bed. Specifically, the surveillance requirement interval in TS 4.6.5.1.b. would be changed from 9 months to 18 months. TS 4.6.5.1.b. requires: performance of chemical analyses to verify sufficient boron concentration in the ice and appropriate pH, weighing a representative sample of ice baskets to verify sufficient weight, and visual inspection of flow passages for blockage. The licensee stated that improvements in ice bed inspection results due to modified maintenance techniques and design changes that have been implemented since 1984 provide adequate assurance that the ice condenser can meet its design function without performing the surveillances on a 9-month frequency. Also, increasing the surveillance interval would reduce the stresses put on the baskets and their supports due to repeated weighing evolutions.

2.0 EVALUATION

Currently, TS 4.6.5.1.b. requires three aspects of the ice condenser ice bed to be checked once every 9 months. The proposed change would require the performance of the surveillances every 18 months instead of every 9 months. The change is proposed in order to decrease the number of containment entries required during power operations. An 18-month surveillance would allow verification of ice basket boron concentrations, weights, and flow area blockage during refueling outages. In addition, increasing the surveillance interval would reduce the stresses put on the baskets and their supports due to repeated weighing evolutions.

The first surveillance, TS 4.6.5.1.b.1, requires a chemical analysis to verify that at least nine representative samples of stored ice have a boron concentration of at least 1800 ppm (the boron being in the form of sodium tetraborate), and a pH of 9.0 to 9.5 at 25°C. The licensee has stated that

the borated water source used to make the ice is sampled to verify that the boron concentration and pH levels are met. Also, the licensee reviewed ice condenser basket boron concentration and pH sample data for Units 1 and 2 since 1986 and identified no problems in meeting this surveillance requirement. In addition, NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," issued September 1992, proposed an 18-month frequency for the surveillance of boron concentration and pH. The bases in NUREG-1431 state that the 18-month frequency was based on the following:

- a. Long-term ice storage tests have determined that the chemical composition of the stored ice is extremely stable;
- b. Operating experience has demonstrated that meeting the boron concentration and pH requirements has never been a problem; and
- c. Someone would have to enter the containment to take the sample, and, if the unit is at power, that person would receive a radiation dose.

Based on the above, the proposed surveillance interval extension for subsection 1 of TS 4.6.5.1.b is acceptable.

The second surveillance, TS 4.6.5.1.b.2, requires weighing a representative sample of ice baskets and verifying that each contains a minimum weight of ice. The specification also contains specific guidance on selecting a representative sample, level of confidence requirements, and resampling requirements if individual baskets do not meet required weights. The licensee reviewed licensee event reports back through 1978 for this surveillance. Although eight occurrences were noted where some portion of this surveillance was not met, the licensee has since taken corrective actions. These actions include installing a programmable defrost controller for air handling units to ensure that heat loads are distributed evenly, installing debris screens to preclude clogging of duct work, and flow balancing the duct work to distribute cooling more evenly to the crane wall to reduce localized sublimation rates. Maintenance techniques were also enhanced to increase the ice weights in baskets to ensure minimum TS requirements would be met without having to shut down the reactor during the mid-cycle surveillance to replenish ice inventory. Weekly tours by operations personnel have also been implemented to monitor system performance. In addition, existing surveillance 4.6.5.1.a. requires verification of an adequately low ice bed temperature every 12 hours. The licensee assessed the need for increasing the minimum ice bed weights to support the increased surveillance interval and determined that it was unnecessary, as previous weighings through 1986 required no mid-cycle ice additions to meet surveillance requirements. When the Technical Specifications for the ice bed were developed, the staff included a level of conservatism to account for expected variances in sublimation rates. The bases as issued for D.C. Cook Unit 1 state: "The minimum weight figure of 1220 pounds of ice per basket contains a 10% conservative allowance for ice loss through sublimation which is a factor of 10 higher than assumed for the ice condenser design. In the event that observed sublimation rates are equal to or lower than design predictions after three years of operation, the minimum ice baskets weight may be adjusted downward. In addition, the number of ice baskets required to be weighted each 18 months may be reduced after 3 years of

operation if such a reduction is supported by observed sublimation data." In addition, the staff has extended the ice bed surveillance interval where observed sublimation rates have supported the change. Based on the licensee's improvements to the ice condenser, the existing surveillances and tours, and that the request is consistent with previous staff positions, we find the proposed surveillance interval extension for subsection 2 of TS 4.6.5.1.b to be acceptable.

The third surveillance, TS 4.6.5.1.b.3, requires verification by visual inspection that flow passages in the ice condenser have less than the specified level of frost or ice accumulation. A licensee review indicated several occurrences between 1983 and 1988 where flow passage requirements were not met, but assessments performed found that none of the degradations would have prohibited the ice condenser from performing its design functions. Since there have been no further failures to meet the surveillance requirements after 1988, the design and maintenance changes discussed above may have had some effect in improving the performance of this aspect of the ice condenser. In addition the licensee has implemented new methods to perform localized defrosting of the ice condenser bays which has reduced frost buildup on the ice condenser lattice framework along the crane and containment walls. Based on the licensee's improvements to the ice condenser, the existing surveillances and tours, and the consistent satisfactory performance for the last three cycles, we find the proposed surveillance interval extension for subsection 3 of TS 4.6.5.1.b to be acceptable.

A typographical error in Bases section 3/4.6.5.1 of both units has been corrected changing "weighted" to "weighed."

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change surveillance requirements. The staff has determined that the amendments involve 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 amendments involve no significant hazards consideration and there has been no public comment on such finding (58 FR 67849). Accordingly, the amendments meet 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 amendments.

5.0 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: John B. Hickman

Date: August 23, 1994