

July 12, 1995

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

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2 - ISSUANCE OF
AMENDMENTS RE: CONTAINMENT PERSONNEL AIRLOCK REQUIREMENTS (TAC NOS.
M91960 AND M91961)

Dear Mr. Fitzpatrick:

The Commission has issued the enclosed Amendment No. 197 to Facility Operating License No. DPR-58 and Amendment No. 182 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 march 31, 1995.

The amendments revise TS section 3.9.4 to allow, under certain conditions, both containment personnel airlocks to be open during core alterations.

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

Docket Nos. 50-315 and 50-316

- Enclosures: 1. Amendment No. 197 to DPR-58
- 2. Amendment No. 182 to DPR-74
- 3. Safety Evaluation

cc w/encl: See next page

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Mr. E. E. Fitzpatrick
Indiana Michigan Power Company

Donald C. Cook Nuclear Plant

cc:

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DATED: July 12, 1995

AMENDMENT NO. 197 TO FACILITY OPERATING LICENSE NO. DPR-58-D. C. COOK-UNIT 1
AMENDMENT NO. 182 TO FACILITY OPERATING LICENSE NO. DPR-74-D. C. COOK-UNIT 2

Docket File

PUBLIC

PDIII-1 Reading

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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. 197
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 March 31, 1995, 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.

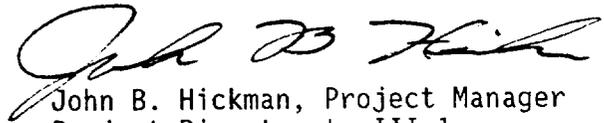
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-58 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 197, 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



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

Attachment: Changes to the Technical
Specifications

Date of Issuance: July 12, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 197
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 9-4
B 3/4 9-1

INSERT

3/4 9-4
B 3/4 9-1

CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPERATION

- 3.9.4 The containment building penetrations shall be in the following status:
- a. The equipment door closed and held in place by a minimum of four bolts,
 - b. The airlock doors are controlled in the following manner:
 1. A minimum of one door in each airlock is closed, or
 2. Both airlock doors may be open provided:
 - a. One door in each airlock is OPERABLE*,
 - b. Refueling cavity level is greater than 23 feet above the fuel, and
 - c. A designated individual is available at all times to close the airlock if required.
 - c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:
 1. Closed by an isolation valve, blind flange, or manual valve, or
 2. Be capable of being closed by an OPERABLE automatic Containment Purge and Exhaust isolation valve.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

- 4.9.4 Each of the above required containment building penetrations shall be determined to be either in its closed/isolated condition or capable of being closed by an OPERABLE automatic Containment Purge and Exhaust isolation valve within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building by:
- a. Verifying the penetrations are in their closed/isolated condition, or
 - b. Testing the Containment Purge and Exhaust isolation valves per the applicable portions of Specification 4.6.3.1.2.

* For the purpose of this Specification, an OPERABLE airlock door is a door that is capable of being closed and secured. Cables or hoses transversing the airlock shall be designed to allow for removal in a timely manner (e.g., quick disconnects).

3/4 BASES
3/4.9 REFUELING OPERATIONS

3/4.9.1 BORON CONCENTRATION

The limitations on reactivity conditions during REFUELING ensure that: 1) the reactor will remain subcritical during CORE ALTERATIONS, and 2) a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the accident analyses. The value of 0.95 or less for K_{eff} includes a 1 percent delta k/k conservative allowance for uncertainties. Similarly, the boron concentration value of 2000 ppm or greater includes a conservative uncertainty allowance of 50 ppm boron. The boron concentration requirement of specification 3.9.1.b has been conservatively increased to 2400 ppm to agree with the minimum concentration of the RWST.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the source range neutron flux monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor pressure vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the accident analyses.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment building penetration closure and OPERABILITY ensure that a release of radioactive material within containment will be restricted from leakage to the environment. The OPERABILITY and closure restrictions are sufficient to restrict radioactive material release from a fuel element rupture based upon the lack of containment pressurization potential while in the REFUELING MODE.

The specific guidelines to allow both airlock doors to remain open during CORE ALTERATIONS were developed to ensure that the assumptions for restricting radioactive leakage to the environment remained valid. The guidelines established for maintaining both airlock doors open include: 1) one door in each airlock is OPERABLE, 2) refueling cavity level is greater than 23 feet above the fuel, and 3) a designated individual is continuously available to close an airlock door (if required). An OPERABLE airlock door consists of a door capable of being closed and secured. Additionally, cables or hoses transversing the airlock must be designed in a manner that allows timely removal (e.g., quick disconnects). The requirement that the refueling cavity level is greater than 23 feet above the fuel ensures consistency with the assumptions of Specifications 3/4.9.10 and 3/4.9.11.

3/4.9.5 COMMUNICATIONS

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS.



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. 182
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 March 31, 1995, 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 1;
 - 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.

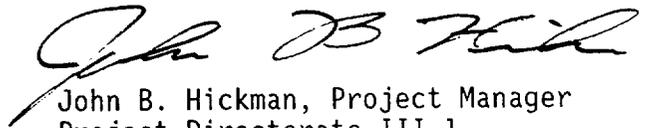
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-74 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 182, 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



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

Attachment: Changes to the Technical
Specifications

Date of Issuance: July 12, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 182

FACILITY OPERATING LICENSE NO. DPR-74

DOCKET NO. 50-316

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 9-4
B 3/4 9-1

INSERT

3/4 9-4
B 3/4 9-1

CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPERATION

3.9.4 The containment building penetrations shall be in the following status:

- a. The equipment door closed and held in place by a minimum of four bolts,
- b. The airlock doors are controlled in the following manner:
 1. A minimum of one door in each airlock is closed, or
 2. Both airlock doors may be open provided:
 - a. One door in each airlock is OPERABLE* ,
 - b. Refueling cavity level is greater than 23 feet above the fuel, and
 - c. A designated individual is available at all times to close the airlock if required.
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:
 1. Closed by an isolation valve, blind flange, or manual valve, or
 2. Be capable of being closed by an OPERABLE automatic Containment Purge and Exhaust isolation valve.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.4 Each of the above required containment building penetrations shall be determined to be either in its closed/isolated condition or capable of being closed by an OPERABLE automatic Containment Purge and Exhaust isolation valve within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building by:

- a. Verifying the penetrations are in their closed/isolated condition, or
- b. Testing the Containment Purge and Exhaust isolation valves per the applicable portions of Specification 4.6.3.1.2.

* For the purpose of this Specification, an OPERABLE airlock door is a door that is capable of being closed and secured. Cables or hoses transversing the airlock shall be designed to allow for removal in a timely manner (e.g., quick disconnects).

3/4 BASES
3/4.9 REFUELING OPERATIONS

3/4.9.1 BORON CONCENTRATION

The limitations on reactivity conditions during REFUELING ensure that: 1) the reactor will remain subcritical during CORE ALTERATIONS, and 2) a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the accident analyses. The value of 0.95 or less for K_{eff} includes a 1 percent delta k/k conservative allowance for uncertainties. Similarly, the boron concentration value of 2000 ppm or greater includes a conservative uncertainty allowance of 50 ppm boron. The boron concentration requirement of specification 3.9.1.b has been conservatively increased to 2400 ppm to agree with the minimum concentration of the RWST.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the source range neutron flux monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor pressure vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the accident analyses.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment building penetration closure and OPERABILITY ensure that a release of radioactive material within containment will be restricted from leakage to the environment. The OPERABILITY and closure restrictions are sufficient to restrict radioactive material release from a fuel element rupture based upon the lack of containment pressurization potential while in the REFUELING MODE.

The specific guidelines to allow both airlock doors to remain open during CORE ALTERATIONS were developed to ensure that the assumptions for restricting radioactive leakage to the environment remained valid. The guidelines established for maintaining both airlock doors open include: 1) one door in each airlock is OPERABLE, 2) refueling cavity level is greater than 23 feet above the fuel, and 3) a designated individual is continuously available to close an airlock door (if required). An OPERABLE airlock door consists of a door capable of being closed and secured. Additionally, cables or hoses transversing the airlock must be designed in a manner that allows timely removal (e.g., quick disconnects). The requirement that the refueling cavity level is greater than 23 feet above the fuel ensures consistency with the assumptions of Specifications 3/4.9.10 and 3/4.9.11.

3/4.9.5 COMMUNICATIONS

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 197 TO FACILITY OPERATING LICENSE NO. DPR-58
AND AMENDMENT NO. 182 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 March 31, 1995, the Indiana Michigan Power Company (the licensee) requested amendments to the Technical Specifications (TSs) 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 revise TS Section 3.9.4 to allow, under certain conditions, both containment personnel airlocks to be open during core alterations.

The current TSs require that a minimum of one containment personnel airlock door, as well as other containment penetrations, be closed during fuel movement and core alterations. This requirement is to prevent the release of radioactive material in the event of a fuel handling accident. The licensee stated that during refueling outages, other work in the containment continues concurrently with fuel movement and core alterations. The licensee estimated that during the 1994 refueling outage, for the period bounding core alterations, there were 10,200 entries to and exits from containment. The licensee indicated that assuming an average of five persons per containment personnel airlock cycle, the containment personnel airlock doors were cycled 200 times a day and the heavy use of the containment personnel airlock during refueling has led to problems in the gear and interlock alignments of the doors' locking mechanism and handwheel failures, raising the concern that the doors may not be operable in the event of an accident. The licensee further stated that there are large numbers of people in the containment during a refueling outage and in the event of an accident, it would take a number of containment personnel airlock cycles to evacuate personnel from the containment, releasing more containment air with each containment personnel airlock cycle.

2.0 EVALUATION

The proposed change would revise the TSs to permit both doors of a containment personnel airlock to be simultaneously open during Mode 6 operations under certain conditions. Those conditions would be:

- a. One door in each airlock is OPERABLE,
- b. Refueling cavity level is greater than 23 feet above the fuel, and
- c. A designated individual is available at all times to close the airlock if required.

As previously noted, this would reduce containment personnel airlock door wear and facilitate personnel access. The licensee proposes that a designated individual be stationed at the auxiliary building side of the containment personnel airlock to ensure that the doors are kept unblocked and to be available to close the containment personnel airlock doors in the event of an accident and evacuation of the containment is required.

Each of the D.C. Cook containments contains two containment personnel airlocks connecting the containment interior with the auxiliary building. The containment personnel airlock is provided for the purpose of permitting personnel to enter and exit the containment while maintaining the integrity of the containment pressure boundary. Each containment personnel airlock contains two airlock doors with a personnel chamber between the doors. In reactor operational modes 1, 2, 3, and 4, at least one of the two doors must be closed. Mechanical interlocks ensure that both doors cannot be opened at the same time. During shutdown and refueling operations, both doors may be opened at the same time (the interlock mechanism is intentionally disabled) unless core alterations or movements of irradiated fuel in containment are in progress.

The applicable staff positions regarding opening of containment personnel airlock doors during Mode 6 (Refueling Operations) are stated in Bases Section 3.9.4 of the *improved* Standard Technical Specifications, NUREG-1431, "Standard Technical Specifications Westinghouse Plants" (*i*STS). Text excerpted from the *i*STS states:

The containment air locks, which are part of the containment pressure boundary, provide a means for personnel access during MODES 1, 2, 3, and 4 operation.... Each air lock has a door at both ends. The doors are normally interlocked to prevent simultaneous opening when containment OPERABILITY is required. During periods of unit shutdown when containment closure is not required, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, containment closure is required; therefore, the door interlock mechanism may remain disabled, but one air lock door must always remain closed.

The requirements on containment penetration closure ensure that a release of fission product radioactivity within containment will be restricted from escaping to the

environment. The closure restrictions are sufficient to restrict fission product radioactivity release from containment due to a fuel handling accident during refueling.

During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, the most severe radiological consequences result from a fuel handling accident. The fuel handling accident is a postulated event that involves damage to irradiated fuel. Fuel handling accidents include dropping a single irradiated fuel assembly and handling tool or a heavy object onto other irradiated fuel assemblies. The minimum decay time of 100 hours [168 hours at Cook] prior to CORE ALTERATIONS ensure that the release of fission product radioactivity, subsequent to a fuel handling accident, results in doses that are well within the guideline values specified in 10 CFR 100. The acceptance limits for offsite radiation exposure (contained in Standard Review Plan [SRP] Section 15.7.4, Rev. 1) will be 25% of 10 CFR 100 values or the NRC staff approved licensing basis.

As noted above, the basis for the staff position against simultaneous opening of both airlock doors during core alterations is to limit fission product leakage in the event of a fuel handling accident. In performing analyses of the radiological consequences of a fuel handling accident, the containment isolation criteria of SRP Section 15.7.4 are used. If fuel handling is prohibited when the containment is open, radiological consequences need not be calculated. If the containment will be open during fuel handling operations, automatic isolation by radiation detection instrumentation must be provided for penetrations, and calculations must demonstrate acceptable consequences. However, automatic isolation of airlock doors is not practicable. Thus, the iSTS specify that airlock integrity be maintained during fuel handling in containment. However, the licensee has shown by analysis comparison that the D.C. Cook licensing basis is not changed by the proposed amendments.

The licensee reviewed the dose consequences of a fuel handling accident as documented in the Updated Final Safety Analysis Report (UFSAR). The design basis accident is the complete rupture of the highest rated spent fuel assembly. The fuel handling accident inside containment was considered to provide the bounding conditions. This was based on the fact that no reduction in the potential thyroid dose was assumed since charcoal filtration was not considered and no credit was taken for containment isolation. In addition the analyzed case was assumed to occur 100 hours after shutdown although Cook TSs require 168 hours before fuel handling. The accident inside containment gave a 0-2 hour site boundary thyroid dose of 82.3 rem, and a whole-body dose of 1.3 rem. These values, both of which are below the 300-rem thyroid and 25-rem whole-body limits established in 10 CFR Part 100, established the design basis for the plant. The proposed changes do not adversely affect the assumptions in the UFSAR accident analysis.

3.0 SUMMARY

The licensee's analysis of radiological consequences of a fuel handling accident with the containment personnel airlock open confirms that design-basis dose acceptance criteria for the analyzed fuel handling accident are met. Also, standard controls are in place to ensure that the potential for other, more severe events which could occur during outages, such as reactivity increases or a heavy load drop on irradiated fuel, need not be postulated and analyzed. Accordingly, based on the details discussed in Section 2.0, the staff finds that the requested revisions to the D.C. Cook Nuclear Power Plant, Units Nos. 1 and 2, TSs are acceptable.

4.0 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.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change the requirements 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 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 (60 FR 29879). 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.

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

Principal Contributors: W. Long (by precedent)
J. Lee (by precedent)
J. Hickman

Date: July 12, 1995