

April 11, 1994

Docket Nos. 50-373
and 50-374

Mr. D. L. Farrar, Manager
Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III, Suite 500
1400 OPUS Place
Downers Grove, Illinois 60515

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Docket File
J. Roe
J. Dyer
A. Gody, Jr.
D. Hagan
C. Grimes
OPA
G. Hill (4)
P. Kang

C. Berlinger
NRC & Local PDRs
J. Zwolinski
T. Clark
OGC
PDIII-2 r/f
ACRS (10)
OC/LFDCB
B. Clayton RIII

Dear Mr. Farrar:

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. M85628 AND M85629)

The Commission has issued the enclosed Amendment No. 99 to Facility Operating License No. NPF-11 and Amendment No. 83 to Facility Operating License No. NPF-18 for the LaSalle County Station, Units 1 and 2, respectively. The amendments are in response to your application dated February 22, 1993 as supplemented by letter dated August 16, 1993.

The amendments allow continued operation of one unit for a period of 7 days while the common plant (Division 1) emergency diesel generator ("O" DG) is out of service for the performance of specified Technical Specification surveillance requirements and the performance of planned maintenance and/or modification work. Also, the amendments clarify Surveillance Requirement 4.8.1.1.2.a.7 to allow an emergency diesel generator to remain OPERABLE with only one air start subsystem pressurized.

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

Sincerely,

Original signed by:

Anthony T. Gody, Jr., Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 99 to NPF-11
- 2. Amendment No. 83 to NPF-18
- 3. Safety Evaluation

cc w/enclosures:

See next page

OFC	LA:PDIII-2	PM:PDIII-2	D:PDIII-2 <i>[Handwritten initials]</i>	OGC <i>[Handwritten initials]</i>		
NAME	TCLARK <i>[Handwritten initials]</i>	AGODY <i>[Handwritten initials]</i>	JDYER <i>[Handwritten initials]</i>			
DATE	3/17/94	3/18/94	3/18/94	3/16/94	1/94	1/94
COPY	(YES/NO)	(YES/NO)	YES/NO	YES/NO	YES/NO	YES/NO

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DFOI

Mr. D. L. Farrar
Commonwealth Edison Company

LaSalle County Station
Unit Nos. 1 and 2

cc:

Phillip P. Steptoe, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Robert Cushing
Chief, Public Utilities Division
Illinois Attorney General's Office
100 West Randolph Street
Chicago, Illinois 60601

Assistant Attorney General
100 West Randolph Street
Suite 12
Chicago, Illinois 60601

Michael I. Miller, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60690

Resident Inspector/LaSalle, NPS
U. S. Nuclear Regulatory Commission
Rural Route No. 1
P. O. Box 224
Marseilles, Illinois 61341

Chairman
LaSalle County Board of Supervisors
LaSalle County Courthouse
Ottawa, Illinois 61350

Attorney General
500 South 2nd Street
Springfield, Illinois 62701

Chairman
Illinois Commerce Commission
Leland Building
527 East Capitol Avenue
Springfield, Illinois 62706

Illinois Department of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Regional Administrator
U. S. NRC, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

LaSalle Station Manager
LaSalle County Station
Rural Route 1
P.O. Box 220
Marseilles, Illinois 61341



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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-373

LASALLE COUNTY STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 99
License No. NPF-11

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by the Commonwealth Edison Company (the licensee), dated February 22, 1993, as supplemented by letter dated August 16, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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 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 set forth in 10 CFR Chapter I;
 - 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 enclosure to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-11 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 99, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective immediately, to be implemented 30 days from date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

for *S. F. Dyer*

James E. Dyer, Director
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: April 11, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 99

FACILITY OPERATING LICENSE NO. NPF-11

DOCKET NO. 50-373

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain a vertical line indicating the area of change.

REMOVE

3/4 8-1a

3/4 8-4

INSERT

3/4 8-1a

3/4 8-4

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

*For the purposes of completing maintenance, modification, and/or technical specification surveillance requirements, on the 0 diesel generator and its support systems during a refuel outage, as part of pre-planned maintenance, modifications, and/or the surveillance program, the requirements of action statement b are modified to:

1. Eliminate the requirement for performing technical specification surveillance requirements 4.8.1.1.1.a on each operable AC source, immediately and once per 8 hours thereafter, when the 0 diesel generator is declared inoperable.
2. Allow an additional 96 hours in excess of the 72 hours allowed in action statement b for the 0 diesel generator to be inoperable.

Provided that the following conditions are met:

- A. Unit 2 is in operational condition 4 or 5 or defueled prior to taking the 0 diesel generator out of service.
- B. Surveillance requirements 4.8.1.1.1a and 4.8.1.1.2a.4 are successfully completed, for the offsite power sources and the 1A or 2A diesel generators, within 48 hours prior to removal of the 0 diesel generator from service.
- C. No maintenance is performed on the offsite circuits or the 1A or 2A diesel generators, while the 0 diesel generator is inoperable.
- D. Technical specification requirement 4.8.1.1.1a is performed daily, while the 0 diesel generator is inoperable.
- E. The control circuit for the unit cross-tie circuit breakers between buses 142Y and 242Y are temporarily modified to allow the breakers to be closed with a diesel generator feeding the bus, while the 0 diesel generator is inoperable.

The provisions of technical specification 3.0.4 are not applicable.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
7. Verifying the pressure in required diesel generator air start receivers to be greater than or equal to 200 psig.
- b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the day fuel tanks.
- c. By sampling and analyzing stored and new fuel oil in accordance with the following:
 1. At least once per 92 days, and for new fuel oil prior to addition to the storage tanks, that a sample obtained and tested in accordance with the applicable ASTM Standards has:
 - a) A water and sediment content within applicable ASTM limits.
 - b) A kinematic viscosity at 40°C within applicable ASTM limits.
 2. At least every 31 days, and for new fuel oil prior to addition to the storage tanks, that a sample obtained in accordance with the applicable ASTM Standard has a total particulate contamination of less than 10 mg/l when tested in accordance with the applicable ASTM Standard.
- d. At least once per 18 months during shutdown by:
 1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
 2. Verifying the diesel generator capability* to reject a load of greater than or equal to 1190 kW for diesel generator 0, greater than or equal to 638 kW for diesel generators 1A and 2A, and greater than or equal to 2421 kW for diesel generator 1B while maintaining engine speed less than or equal to 75% of the difference between nominal speed and the overspeed trip setpoint or 15% above nominal, whichever is less.
 3. Verifying the diesel generator capability* to reject a load of 2600 kW without tripping. The generator voltage shall not exceed 5000 volts during and following the load rejection.
 4. Simulating a loss of offsite power* by itself, and:

*All planned diesel generator starts performed for the purpose of meeting these surveillance requirements may be preceded by an engine prelube period, as recommended by the manufacturer.



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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-374

LASALLE COUNTY STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 83
License No. NPF-18

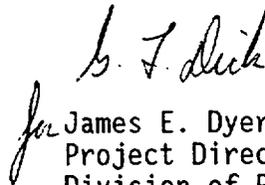
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by the Commonwealth Edison Company (the licensee), dated February 22, 1993, as supplemented by letter dated August 16, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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 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 set forth in 10 CFR Chapter I;
 - 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 enclosure to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-18 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 83 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective immediately, to be implemented 30 days from date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


for James E. Dyer, Director
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 11, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 83

FACILITY OPERATING LICENSE NO. NPF-18

DOCKET NO. 50-374

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain a vertical line indicating the area of change.

REMOVE

3/4 8-1a

3/4 8-4

INSERT

3/4 8-1a

3/4 8-4

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

*For the purposes of completing maintenance, modification, and/or technical specification surveillance requirements, on the 0 diesel generator and its support systems during a refuel outage, as part of pre-planned maintenance, modifications, and/or the surveillance program, the requirements of action statement b are modified to:

1. Eliminate the requirement for performing technical specification surveillance requirements 4.8.1.1.1.a on each operable AC source, immediately and once per 8 hours thereafter, when the 0 diesel generator is declared inoperable.
2. Allow an additional 96 hours in excess of the 72 hours allowed in action statement b for the 0 diesel generator to be inoperable.

Provided that the following conditions are met:

- A. Unit 1 is in operational condition 4 or 5 or defueled prior to taking the 0 diesel generator out of service.
- B. Surveillance requirements 4.8.1.1.1a and 4.8.1.1.2a.4 are successfully completed, for the offsite power sources and the 1A or 2A diesel generators, within 48 hours prior to removal of the 0 diesel generator from service.
- C. No maintenance is performed on the offsite circuits or the 1A or 2A diesel generators, while the 0 diesel generator is inoperable.
- D. Technical specification requirement 4.8.1.1.1a is performed daily, while the 0 diesel generator is inoperable.
- E. The control circuit for the unit cross-tie circuit breakers between buses 142Y and 242Y are temporarily modified to allow the breakers to be closed with a diesel generator feeding the bus, while the 0 diesel generator is inoperable.

The provisions of technical specification 3.0.4 are not applicable.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
 7. Verifying the pressure in required diesel generator air start receivers to be greater than or equal to 200 psig.
- b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the day fuel tanks.
- c. By sampling and analyzing stored and new fuel oil in accordance with the following:
1. At least once per 92 days, and for new fuel oil prior to addition to the storage tanks, that a sample obtained and tested in accordance with the applicable ASTM Standards has:
 - a) A water and sediment content within applicable ASTM limits.
 - b) A kinematic viscosity at 40°C within applicable ASTM limits.
 2. At least every 31 days, and for new fuel oil prior to addition to the storage tanks, that a sample obtained in accordance with the applicable ASTM Standard has a total particulate contamination of less than 10 mg/l when tested in accordance with the applicable ASTM Standard.
- d. At least once per 18 months during shutdown by:
1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
 2. Verifying the diesel generator capability* to reject a load of greater than or equal to 1190 kW for diesel generator 0, greater than or equal to 638 kW for diesel generators 1A and 2A, and greater than or equal to 2421 kW for diesel generator 2B while maintaining engine speed less than or equal to 75% of the difference between nominal speed and the overspeed trip setpoint or 15% above nominal, whichever is less.
 3. Verifying the diesel generator capability* to reject a load of 2600 kW without tripping. The generator voltage shall not exceed 5000 volts during and following the load rejection.
 4. Simulating a loss of offsite power* by itself, and:

*All planned diesel generator starts performed for the purpose of meeting these surveillance requirements may be preceded by an engine prelube period, as recommended by the manufacturer.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 99 TO FACILITY OPERATING LICENSE NO. NPF-11 AND
AMENDMENT NO. 83 TO FACILITY OPERATING LICENSE NO. NPF-18
COMMONWEALTH EDISON COMPANY
LASALLE COUNTY STATION, UNITS 1 AND 2
DOCKET NOS. 50-373 AND 50-374

1.0 INTRODUCTION

In a letter dated February 22, 1993, as supplemented August 16, 1993, Commonwealth Edison Company (CECo), the licensee, proposed an amendment to the Technical Specifications (TS) for LaSalle County Station (LaSalle) Units 1 and 2. With the proposed amendment, LaSalle has requested that TS 3.8.1.1 footnote (*) be revised to include the continued operation of one unit for a period of 7 days while emergency diesel generator (EDG) 0 is out of service for the performance of planned maintenance and/or modification work. Currently, the footnote permits the 7-day allowed outage time only to perform two surveillance requirements (SRs) prescribed in TS.

In addition, CECo requested that SR 4.8.1.1.2.a.7 be clarified to allow an EDG to remain operable with only one air start subsystem pressurized. At present, SR 4.8.1.1.2.a.7 only requires "verifying the pressure in all diesel generator air start receivers to be greater than or equal to 200 psig." This means that a failure of one air start receiver (subsystem) could be interpreted as an EDG failure, and that interpretation requires (according to the unit TS) that the other three EDGs be started. The August 16, 1993 supplemental letter provided clarifying information and did not change the original no significant hazards consideration determination.

2.0 EVALUATION

The Nuclear Regulatory Commission staff (the staff or NRC) has reviewed the proposed 7-day limiting condition for operation (LCO) provision in TS 3.8.1.1 footnote (*) for EDG 0 and SR 4.8.1.1.2.a.7 for EDG starting air system. Our evaluation of each proposed TS change follows:

TS 3.8.1.1 footnote (*) on page 3/4 8-1a

Because EDG 0 is designed to supply the safety-related equipment of both units (i.e., a shared or swing EDG), action statement b of TS 3.8.1.1 requires shutdown of both units after three days when EDG 0 is found to be inoperable. By an amendment approved on February 7, 1989, NRC approved a footnote (*) on TS 3.8.1.1. With EDG 0 out of service, the footnote allows the continued

operation of one unit while the other unit is in cold shutdown, refueling, or defueled modes from three days to seven days only, for the purpose of performing two SRs prescribed in the TS. However, other EDG-related work, such as pre-planned maintenance and modification, and corrective maintenance which resulted from a valid EDG failure, remained in action statement b of the TS, which still requires the work to be completed within a 3-day LCO. The two SRs, which permitted the 7-day LCO with the footnote, are: SR 4.8.1.1.2.d.1, which allows disassembly and inspection of the diesel engine every 18 months per manufacturer's recommendations, and 4.8.1.1.2.f.1, which involves draining and cleaning the diesel fuel oil storage tank once every 10 years.

The licensee stated in its application that SR 4.8.1.1.2.d.1 is overly limiting, as the inspection scope covers only diesel engine work. It does not include any EDG support system work, such as generator, cooling water system, heat exchanger, generator breaker, ventilation, fuel transfer system, air start system, or protection system.

Also, the licensee stated that as the EDGs and their supporting systems accumulate more service time, the type of maintenance and recommended preventive maintenance becomes more involved, thus making it more difficult to complete the work within 72 hours. For work that takes longer than 72 hours, the licensee states that either the operational unit is required to be shut down or the work has to be divided into parts that could be completed within 72 hours. However, such division of work leads to EDG re-assembly and operability runs, followed by EDG teardown for the next parcel of work. The licensee finds that performing necessary work for EDG 0 within one 7-day outage, rather than within two shorter (3-day) outages, could eliminate redundant preparatory work, thus avoiding needless rework and unnecessary EDG operability test runs.

As the basis for the proposed amendment request, the licensee has referred to the comparative probabilistic risk assessment (PRA) study which CECO submitted for its previous amendment request. The study has demonstrated that replacing two shorter outages (three days) with one 7-day outage does not reduce overall EDG availability and poses no significant hazards. The staff reviewed the results of the study in CECO's previous amendment request and concurs with the licensee that no safety-significant additional risk would incur by extending the outage from the 3-day period to seven days.

With this request, the licensee has not elaborated on the scope of EDG support system work that would be performed during the planned maintenance and modification. In response to a staff request for information, the licensee, in a letter of August 16, 1993, submitted the scope and description for the planned maintenance and/or modification work, and the approximate time needed to complete the job. After reviewing the proposed TS change and its supplemental information, the staff finds that:

- (1) By complementing the EDG engine work already permitted under SR 4.8.1.1.2.d.1, the proposed pre-planned (preventive) maintenance and/or modification activities represent the total EDG work necessary

for improving overall EDG availability. Our review of the time needed indicates that the work could take more than three days and the requested seven days would give the licensee a larger work window. According to the PRA study, no safety-significant additional risk would incur by extending the LCO from three days to seven days.

- (2) The extended allowed outage time could provide an opportunity to perform more comprehensive preventive maintenance, modifications, or inspection for EDG 0 and its supporting systems for any potential problems. This could reduce any potential failures expected while in operation or could minimize any repairs required under the corrective maintenance. This, in turn, would increase long-term reliability and the safety margin.
- (3) Before performing the pre-planned maintenance or modification, the licensee will retain the existing five compensatory conditions, which was committed to in the licensee's previous SR amendment request, shown on TS page 3/4 8-1a. Should any of the five conditions not be met, the appropriate TS action would be taken. This is to ensure that the plant can be safely shut down with the EDGs that remained operable.
- (4) Work necessitated as a result of EDG valid failures during a routine surveillance would not be allowed under this proposed amendment request.

On this basis, we conclude that the proposed TS 3.8.1.1 footnote (*), to include continued operation of one unit for a period of seven days for the performance of planned maintenance and/or modification while EDG 0 is out of service, is acceptable.

Surveillance Requirement 4.8.1.1.2.a.7

At present, SR 4.8.1.1.2.a.7 requires that the pressure in all diesel generator air start receivers be verified as greater than or equal to 200 psig. Since a failure of one air start receiver (subsystem) could be interpreted as an EDG failure, the unit TS requires that the other three EDGs must be started.

CECo proposes to change SR 4.8.1.1.2.a.7 so that the EDG remains operable during repairs, maintenance, modification, or surveillance on one air start subsystem, provided the other subsystem remains in service and meets the SR. The licensee based this request on the following: (1) there are two full-capacity air start subsystems for each EDG, (2) only one air start subsystem is required to ensure that the EDG will meet its design function, and (3) the required essential service system redundancy is met by each EDG, not by the redundancy of the supporting systems for each EDG. On this basis, the licensee contends that the failure of one air start subsystem should not be interpreted as a "failure to start" of the associated EDG or should not make the associated EDG "inoperable." Therefore, the licensee proposed that SR 4.8.1.1.2.a.7 be changed to "verifying the pressure in required diesel generator air start receivers to be greater than or equal to 200 psig."

We have reviewed Section 9.5.6, "Diesel-Generator Starting Air System," of the updated Final Safety Analysis Report (UFSAR) for the acceptance criteria and Section 9.6.3.3 of NUREG-0519 (the original LaSalle SER) basis for its acceptance. The acceptance of the EDG starting air system in NUREG-0519 has been based on the commitment of CECO to perform tests to ascertain the "five starts" capability acceptance criteria outlined in the UFSAR.

Our review of CECO's TS amendment correspondence of March 22, 1984, indicates that the licensee sought to delete a TS provision (item 13 of earlier TS) which required that all EDG air starting receivers be verified by starting up the EDG at least five times. The basis for deleting this TS requirement was that the five EDG startups on the stored air requirement has already been fulfilled during the preoperational test program, and the staff concurred that no additional periodic testing of the EDG associated with the starting air receivers is necessary as it was consistent with a GL 84-15 recommendation which reduces additional EDG startups.

On the basis of this information, we find that each air start subsystem meets the design requirement for the associated divisional EDG system. Thus, we concur with the licensee that the failure of one air start subsystem should not be considered as a "failure to start" of the associated EDG. On this basis, we conclude that the licensee's proposed SR 4.8.1.1.2.a.7, "verifying the pressure in required diesel generator air start receivers to be greater than or equal to 200 psig," is acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC 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 36430). 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 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: P. Kang, EELB

Date: April 11, 1994