



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 17, 1995

Mr. John P. Stetz
Vice President - Nuclear, Davis-Besse
Centerior Service Company
c/o Toledo Edison Company
Davis-Besse Nuclear Power Station
5501 North State Route 2
Oak Harbor, OH 43449

SUBJECT: AMENDMENT NO. 194 TO FACILITY OPERATING LICENSE NO. NPF-3 -
DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1 (TAC NO. M83381)

Dear Mr. Stetz:

The Commission has issued the enclosed Amendment No. 194 to Facility Operating License No. NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1. The amendment revises the Technical Specifications (TS) in response to your application dated May 1, 1992, and with the changes included in your facsimile transmission dated January 10, 1995.

This amendment revises the following:

1. The definition of CONTAINMENT INTEGRITY, TS 1.8.c, was revised to indicate each air lock must be in compliance with the requirements of TS 3.6.1.3, the Limiting Conditions for Operation (LCO) for containment air locks.
2. The surveillance requirements for CONTAINMENT INTEGRITY, TS 4.6.1.1.b, and CONTAINMENT LEAKAGE, TS 4.6.1.2.f, were revised to indicate each air lock must be in compliance with TS 3.6.1.3, the LCO for the containment air locks, and TS 4.6.1.1, the surveillance requirements (SR) for the containment air locks. The wording was changed from the original submittal to reflect changes resulting from a recent exemption received by the licensees.
3. The footnote to TS 4.6.1.1.a was revised to require verification of valves, blind flanges, and deactivated automatic valves in the annulus only, every 92 days rather than 31 days.
4. TS 3.6.1.3 LCOs, SRs, and associated BASES were revised as discussed in the enclosed Safety Evaluation. Some changes were required that differed from the original submittal.
5. TS BASES 3/4.6.1.1, CONTAINMENT INTEGRITY, was revised to specifically address the containment air lock doors.

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J. Stetz

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January 17, 1995

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

Sincerely,
Original signed by
Linda L. Gundrum

Linda L. Gundrum, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosures: 1. Amendment No. 194 to
License No. NPF-3
2. Safety Evaluation

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J. Stetz

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January 17, 1995

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

Sincerely,



Linda L. Gundrum, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosures: 1. Amendment No. 194 to
License No. NPF-3
2. Safety Evaluation

cc w/encls: See next page

Mr. John P. Stetz
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Davis-Besse Nuclear Power Station
Unit No. 1

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

TOLEDO EDISON COMPANY

CENTERIOR SERVICE COMPANY

AND

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

DOCKET NO. 50-346

DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 194
License No. NPF-3

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Toledo Edison Company, Centerior Service Company, and the Cleveland Electric Illuminating Company (the licensees) dated May 1, 1992, as clarified by facsimile transmission dated January 10, 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. NPF-3 is hereby amended to read as follows:

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(a) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, are hereby incorporated in the license. The Toledo Edison Company shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented not later than 90 days after issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Linda L. Gundrum

Linda L. Gundrum, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of issuance: January 17, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 194

FACILITY OPERATING LICENSE NO. NPF-3

DOCKET NO. 50-346

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

<u>Remove</u>	<u>Insert</u>
1-2	1-2
3/4 6-1	3/4 6-1
3/4 6-3	3/4 6-3
3/4 6-6	3/4 6-6
-	3/4 6-6a
B 3/4 6-1	B 3/4 6-1

DEFINITIONS

REPORTABLE EVENT

1.7 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 of 10 CFR Part 50.

CONTAINMENT INTEGRITY

1.8 CONTAINMENT INTEGRITY shall exist when:

- a. All penetrations required to be closed during accident conditions are either:
 1. Capable of being closed by the Safety Features Actuation System, or
 2. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except those approved to be open under administrative controls,
- b. All equipment hatches are closed and sealed,
- c. Each air lock is in compliance with the requirements of Specification 3.6.1.3,
- d. The containment leakage rates are within the limits of Specification 3.6.1.2, and
- e. The sealing mechanism associated with each penetration (e.g., welds, bellows or O-rings) is OPERABLE.

CHANNEL CALIBRATION

1.9 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

CHANNEL CHECK

1.10 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that:
 1. All penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except those valves that may be opened under administrative controls per Specification 3.6.3.1, and
 2. All equipment hatches are closed and sealed.
- b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3

*Except valves, blind flanges, and deactivated automatic valves which are located inside the Shield Building (including the annulus and containment) and are locked, sealed, or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that verification of these penetrations being closed need not be performed more often than once per 92 days.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. If any periodic Type A test fails to meet $0.75 L_a$, the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet $0.75 L_a$, a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet $0.75 L_a$ at which time the above test schedule may be resumed.
- c. The accuracy of each Type A test shall be verified by a supplemental test which:
 - 1. Confirms the accuracy of the Type A test by verifying that the difference between supplemental and Type A test data is within $0.25 L_a$.
 - 2. Has a duration sufficient to establish accurately the change in leakage between the Type A test and the supplemental test.
 - 3. Requires that the rate at which gas is injected into the containment or bled from the containment during the supplemental test is between $0.75 L_a$ and $1.25 L_a$.
- d. Type B and C tests shall be conducted with gas at P_a , 38 psig, at intervals no greater than 24 months except for tests involving air locks.
- e. The combined bypass leakage rate shall be determined to be $< 0.03 L_a$ by applicable Type B and C tests at least once every 24 months except for penetrations which are not individually testable; penetrations not individually testable shall be determined to have no detectable leakage when tested with soap bubbles while the containment is pressurized to P_a , 38 psig, during each Type A test.
- f. Air locks shall be in compliance with the requirements of Specification 3/4.6.1.3.

CONTAINMENT SYSTEMS

CONTAINMENT AIR LOCKS

LIMITING CONDITION FOR OPERATION

3.6.1.3 Each containment air lock shall be OPERABLE with:

- a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed, and
- b. An overall air lock leakage rate of $\leq 0.002 L_a$ at P_a , 38 psig.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- *a. With one air lock door inoperable in one or more containment air locks, or with the containment air lock interlock mechanism inoperable in one or more containment air locks:
 1. Verify an OPERABLE door in each affected air lock is closed within one hour, and
 2. Lock an OPERABLE door closed in each affected air lock within 24 hours, and
 3. Operation may then continue provided that an OPERABLE door in each affected air lock is maintained closed and is verified to be locked closed at least once per 31 days, and provided that the containment air lock passes each scheduled performance of SR 4.6.1.3b.
 4. Otherwise, be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- *b. With one or more containment air locks inoperable except as a result of an inoperable air lock door or air lock interlock mechanism:
 1. Verify at least one door in each affected air lock is closed within one hour, and
 2. Restore air lock(s) to OPERABLE status within 24 hours.
 3. Otherwise, be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

*Entry and exit through the OPERABLE door is permissible if necessary to perform repairs of the affected air lock components. After each entry and exit, the OPERABLE door must be closed without delay.

CONTAINMENT SYSTEMS

CONTAINMENT AIR LOCKS

SURVEILLANCE REQUIREMENTS

4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:

- a. By verifying either no detectable seal leakage when the volume between the door seals is pressurized to 10 psig, or by verifying a seal leakage rate of $\leq 0.0015 L_g$ when the volume between the door seals is pressurized to P_a , 38 psig, and the air lock door holddowns are installed:
 1. #Within 72 hours after each opening, (in MODES 1, 2, 3 and 4) except when the air lock is being used for multiple entries, then at least once per 72 hours, and
 2. *Prior to establishing CONTAINMENT INTEGRITY when maintenance has not been performed on the air lock that could affect the air lock sealing capability. Reperformance of this test is not required prior to entering MODE 4 if the air lock has not been opened since the previous test.
- b. By conducting an overall air lock leakage test at P_a , 38 psig, and by verifying that the overall air lock leakage rate is within its limit:
 1. #At least once per 6 months, and
 2. *Prior to establishing CONTAINMENT INTEGRITY when maintenance has been performed on the air lock that could affect the air lock sealing capability.
- c. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

*Exemption to Appendix "J" of 10 CFR 50.

#The provisions of Specification 4.0.2 are not applicable.

3/4.6 CONTAINMENT SYSTEMS

BASES

3/4.6.1 PRIMARY CONTAINMENT

3/4.6.1.1 CONTAINMENT INTEGRITY

Primary CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the safety analyses. This restriction, in conjunction with the leakage rate limitation and air lock door requirements, will limit the site boundary radiation doses to within the limits of 10 CFR 100 during accident conditions.

3/4.6.1.2 CONTAINMENT LEAKAGE

The limitations on containment leakage rates ensure that the total containment leakage volume will not exceed the value assumed in the safety analyses at the peak accident pressure of 38 psig, P_a . As an added conservatism, the measured overall integrated leakage rate is further limited to $\leq 0.75 L_a$, during performance of the periodic tests to account for possible degradation of the containment leakage barriers between leakage tests.

The surveillance testing for measuring leakage rates are consistent with the requirements of 10 CFR Part 50, Appendix J with the following exemption. The third test of each Type A testing set need not be conducted when the plant is shutdown for the 10-year plant inservice inspections. The operational readiness of the vessel is considered proven by the ILRT, and in accordance with license requirements, when completed per the 40 ± 10 months frequency.

The special test for the containment purge and exhaust isolation valves is intended to detect gross degradation of seals on the valve seats. The special test is performed in addition to the Appendix J requirements.

USAR 6.2.4 identifies all penetrations that are secondary containment bypass leakage paths.

3/4.6.1.3 CONTAINMENT AIR LOCKS

The limitations on closure and leak rate for the containment air locks are required to meet the restrictions on CONTAINMENT INTEGRITY and containment leak rate. Surveillance testing of the air lock seals provides assurance that the overall air lock leakage will not become excessive due to seal damage during the intervals between air lock leakage tests.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 194 TO FACILITY OPERATING LICENSE NO. NPF-3
TOLEDO EDISON COMPANY
CENTERIOR SERVICE COMPANY
AND
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1
DOCKET NO. 50-346

1.0 INTRODUCTION

By letter dated May 1, 1992, Toledo Edison Company requested a revision to the Technical Specifications (TS) for the Davis-Besse Nuclear Power Station (DBNPS). By facsimile transmission dated January 10, 1995, the licensee transmitted revised TS pages to reflect clarifications to the amendment application. The clarifications were the result of telephone conversations with the staff, as discussed in the evaluation below, and were not outside the scope of the original no significant hazards determination. The proposed amendment would modify: TS 1.8, "Containment Integrity;" TS BASES for 3.6.1.1, "Containment Integrity;" TS 4.6.1.1.b, "Containment Integrity," and TS 4.6.1.2.f, "Containment Leakage," to meet TS 3/4.6.1.3, "Containment Air Locks." Additionally, changes were proposed to the LIMITING CONDITIONS FOR OPERATION and SURVEILLANCE REQUIREMENTS (SR) of TS 3/4.6.1.3, "Containment Air Lock."

2.0 EVALUATION

The containment structure houses the nuclear steam supply system at DBNPS. The containment design, along with the engineered safety features systems, ensures that the public's radiation exposure from an accident will be below the guidelines of 10 CFR Part 100. There are two air locks, a personnel air lock and an emergency air lock, which provide personnel access into containment. The air lock doors are double-gasketed and designed for testing by pressurizing the space between the gaskets. A mechanical interlock mechanism is designed to prevent the opening of one air lock door, before the other door has sealed closed. The interlock mechanisms are tested every 6 months for proper operation. Each door in an air lock is designed so that, with the other door in the same air lock open, the closed door can withstand and seal against the design pressures of the containment vessel.

The first proposed change is to TS Definition 1.8, "CONTAINMENT INTEGRITY," Item c. This changes the statement from "each air lock is OPERABLE" to "each air lock is in compliance with the requirements of Specification 3.6.1.3." The change will clarify that with an inoperable air lock, it is appropriate to enter the TS 3.6.1.3 ACTION statement which allows 24 hours for air lock restoration rather than the TS 3.6.1.1 ACTION statement which allows only one-hour for containment integrity restoration. The NRC staff has reviewed the proposed change and finds it acceptable.

In the submittal, the licensee proposed deleting Surveillance Requirements (SRs) 4.6.1.1.b and 4.6.1.2.f. These items require surveillance testing to determine the containment air locks are OPERABLE to meet the LIMITING CONDITIONS FOR OPERATIONS (LCO) for CONTAINMENT INTEGRITY and containment leakage. The licensee proposed deleting both items. However, based on telephone conversations between the staff and the licensee, both items will remain, but will be changed to clarify that each containment air lock shall meet the requirements of TS 3.6.1.3. This allows the requirements of SR 4.6.1.1.b and 4.6.1.2.f to be met, when the licensee is in an ACTION statement for TS 3.6.1.3. The TS Bases change adds the air lock door requirements to the containment integrity definition. These changes are consistent with previous staff positions and are acceptable.

Another change is proposed to SR 4.6.1.1.a.1 exception for containment penetration status verification. This change makes the exception applicable to those valves, blind flanges, and deactivated automatic valves located inside the shield building annulus, in addition to the containment. The licensee's reason for proposing the change is the inaccessibility of components inside the annulus, due to high radiation. This is the same basis for the current SR exception for those components in containment. The valves, blind flanges, and deactivated automatic valves located in the annulus will be verified closed during each COLD SHUTDOWN, except that verification need not be performed more often, than once per 92 days. The NRC staff has reviewed the addition of the shield building annulus to the SR 4.6.1.1.a.1 exception, and finds that it is acceptable.

The current ACTION statement for TS 3.6.1.3, "Containment Air Locks" is replaced with two separate ACTION statements. The first ACTION allows continued plant operation with an inoperable containment air lock door or inoperable air lock door interlock, as long as a door in the affected air lock is verified as operable, and closed within one-hour, and locked closed within 24 hours. The plant can continue to operate with one air lock door, if it is verified to be locked closed, once per 31 days and passes each scheduled surveillance test. The second ACTION statement addresses if one or more air locks are inoperable, for reasons other than an inoperable air lock door, or air lock interlock mechanism. The ACTION statement requires verification that, at least one door in each affected air lock is closed within one-hour and the air lock(s) restored to OPERABLE status within 24 hours. Otherwise, the unit must be in HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours. This second change essentially retains the current TS ACTION. A footnote is proposed for both ACTION statements to allow entry and exit through the operable door, if necessary, to perform repairs of

the affected air lock components. After each entry and exit, the operable door must be closed without delay. The NRC staff has reviewed the proposed changes, and finds the changes consistent with previous staff positions. Therefore, the NRC staff finds the proposed changes to be acceptable. TS SR 4.6.1.3.a.2 and b.2 were added to address the requirements to leak test the air locks before entering a MODE where CONTAINMENT INTEGRITY is required. An exemption was recently granted that allows reduced pressure-testing, if no maintenance was performed that affects the containment air lock sealing capabilities. If maintenance work was performed during the period when CONTAINMENT INTEGRITY was not required, then a full pressure test at P_a is required. The licensee agreed to the incorporation of the requirements of the exemption into TS SR 4.6.1.3.a and b. The NRC staff finds the changes to be acceptable.

TS 4.6.1.3.a.1 was revised to clarify that within 72 hours after opening, each containment air lock will be demonstrated OPERABLE, except when the air lock is being used for multiple entries, then it will be tested at least once per 72 hours. This is consistent with 10 CFR 50 Appendix J. The licensee originally proposed to remove the exception for multiple entries. However, after discussions with the staff, the licensee agreed the requirement should be retained.

Finally, a change is proposed to add a footnote to SRs 4.6.1.3.a and 3.b, which states that TS 4.0.2 is not applicable. TS 4.0.2 allows a 25 percent extension in surveillance intervals. The NRC staff has reviewed this change and finds that the SRs are 10 CFR Part 50, Appendix J requirements. As such, the SRs should not have a 25 percent interval extension, in order to be consistent with 10 CFR 50, Appendix J. Therefore, the NRC staff finds the proposed change to be acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (57 FR 40221). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

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

Principal Contributors: J. Hopkins
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Date: January 17, 1995