

September 20, 1996

Mr. Jerry W. Yelverton
Vice President, Operations ANO
Entergy Operations, Inc.
1448 S. R. 333
Russellville, AR 72801

SUBJECT: ISSUANCE OF AMENDMENT NO. 184 TO FACILITY OPERATING LICENSE
NO. DPR-51 - ARKANSAS NUCLEAR ONE, UNIT NO. 1 (TAC NO. M92151)

Dear Mr. Yelverton:

The Commission has issued the enclosed Amendment No. 184 to Facility Operating License No. DPR-51 for the Arkansas Nuclear One, Unit No. 1 (ANO-1). This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated May 19, 1995, as supplemented by letters dated July 21, 1995, and June 10, September 10 and 13, 1996.

The amendment revises the technical specifications to permit the reactor building personnel airlocks to be open during fuel handling operations.

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

Sincerely,

ORIGINAL SIGNED BY:
Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-313

Enclosures: 1. Amendment No. 184 to DPR-51
2. Safety Evaluation

cc w/encls: See next page

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

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Entergy Operations, Inc.
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Dear Mr. Yelverton:

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The amendment revises the technical specifications to permit the reactor building personnel airlocks to be open during fuel handling operations.

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Sincerely,

A handwritten signature in cursive script that reads "Thomas W. Alexion".

Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-313

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2. Safety Evaluation

cc w/encls: See next page

Mr. Jerry W. Yelverton
Entergy Operations, Inc.

Arkansas Nuclear One, Unit 1

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

ENTERGY OPERATIONS INC.

DOCKET NO. 50-313

ARKANSAS NUCLEAR ONE, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 184
License No. DPR-51

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (the licensee) dated May 19, 1995, as supplemented by letters dated July 21, 1995, and June 10, September 10 and 13, 1996, 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 license 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-51 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 184, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: September 20, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 184

FACILITY OPERATING LICENSE NO. DPR-51

DOCKET NO. 50-313

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.

REMOVE PAGES

59
59b

INSERT PAGES

59
59b

- 3.8.6 During the handling of irradiated fuel in the reactor building, at least one door on the personnel and emergency hatches shall be capable of being closed. The equipment hatch cover shall be in place with a minimum of four bolts securing the cover to the sealing surfaces. At least 23 feet of water shall be maintained over the top of irradiated fuel assemblies seated within the reactor pressure vessel.
- 3.8.7 Isolation valves in lines containing automatic containment isolation valves shall be operable, or at least one shall be closed.
- 3.8.8 When two irradiated fuel assemblies are being moved simultaneously by the bridges within the fuel transfer canal, a minimum of 10 feet separation shall be maintained between the assemblies at all times.
- 3.8.9 If any of the above specified limiting conditions for fuel loading and refueling are not met, movement of fuel into the reactor core shall cease; action shall be initiated to correct the conditions so that the specified limits are met, and no operations which may increase the reactivity of the core shall be made. The provisions of Specification 3.0.3 are not applicable.
- 3.8.10 The reactor building purge isolation system, including the radiation monitors shall be tested and verified to be operable within 7 days prior to refueling operations. The provisions of Specification 3.0.3 are not applicable.
- 3.8.11 Irradiated fuel shall not be removed from the reactor until the unit has been subcritical for at least 100 hours. In the event of a complete core offload, a full core to be discharged shall be subcritical a minimum of 175 hours prior to discharge of more than 70 assemblies to the spent fuel pool. The provisions of Specification 3.0.3 are not applicable.
- 3.8.12 All fuel handling in the Auxiliary Building shall cease upon notification of the issuance of a tornado watch for Pope, Yell, Johnson, or Logan counties in Arkansas. Fuel handling operations in progress will be completed to the extent necessary to place the fuel handling bridge and crane in their normal parked and locked position. The provisions of Specification 3.0.3 are not applicable.
- 3.8.13 No loaded spent fuel shipping cask shall be carried above or into the Auxiliary Building equipment shaft unless atmospheric dispersion conditions are equal to or better than those produced by Pasquill Type D stability accompanied by a wind velocity of 2 m/sec. In addition, the railroad spur door of the Turbine Building shall be closed and the fuel handling area ventilation system shall be in operation. The provisions of Specification 3.0.3 are not applicable.
- 3.8.14 Loads in excess of 2000 pounds shall be prohibited from travel over fuel assemblies in the storage pool. The provisions of Specification 3.0.3 are not applicable.

* Administrative controls shall ensure that appropriate personnel are aware that both personnel airlock doors are open, a specific individual(s) is designated and available to close an airlock door following a required evacuation of containment, and any obstruction(s) (e.g., cables and hoses) that could prevent closure of an airlock door be capable of being quickly removed.

replacement. The keff with all rods in the core and with refueling boron concentration is approximately 0.9. Specification 3.8.5 allows the control room operator to inform the reactor building personnel of any impending unsafe condition detected from the main control board indicators during fuel movement.

The specification requiring testing reactor building purge termination is to verify that these components will function as required should a fuel handling accident occur which resulted in the release of significant fission products.

Because of physical dimensions of the fuel bridges, it is physically impossible for fuel assemblies to be within 10 feet of each other while being handled.

Per specification 3.8.6, the reactor building personnel and/or emergency airlock doors may be open during movement of irradiated fuel in the reactor building provided at least one door is capable of being closed in the event of a fuel handling accident and the plant is in REFUELING SHUTDOWN with 23 feet of water above the fuel seated within the reactor pressure vessel. Should a fuel handling accident occur inside the reactor building, at least one of the personnel and/or emergency airlock doors will be closed following evacuation of the reactor building.

Specification 3.8.11 is required as: 1) the safety analysis for the fuel handling accident was based on the assumption that the reactor had been shutdown for 100 hours (³); and, 2) to assure that the maximum design heat load of the spent fuel pool cooling system will not be exceeded during a full core offload.

Specification 3.8.14 will assure that damage to fuel in the spent fuel pool will not be caused by dropping heavy objects onto the fuel. Administrative controls will prohibit the storage of fuel in locations adjoining the walls at the north and south ends of the pool, in the vicinity of cask storage area and fuel tilt pool access gates.

Specifications 3.8.15 and 3.8.16 assure fuel enrichment and fuel burnup limits assumed in the spent fuel safety analyses will not be exceeded.

Specification 3.8.17 assures the boron concentration in the spent fuel pool will remain within the limits of the spent fuel pool accident and criticality analyses.

REFERENCES

- (1) FSAR, Section 9.5
- (2) FSAR, Section 14.2.2.3
- (3) FSAR, Section 14.2.2.3.3



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 184 TO

FACILITY OPERATING LICENSE NO. DPR-51

ENERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT NO. 1

DOCKET NO. 50-313

1.0 INTRODUCTION

By letter dated May 19, 1995, as supplemented by letters dated July 21, 1995, and June 10, September 10 and 13, 1996, Entergy Operations, Inc. (the licensee) submitted a request for changes to the Arkansas Nuclear One, Unit No. 1 (ANO-1) Technical Specifications (TSs). The requested changes would revise the technical specifications to permit the reactor building personnel airlocks to be open during fuel handling operations.

The July 21, 1995, and June 10, September 10 and 13, 1996, letters provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

The containment at ANO-1 is provided with a personnel airlock, a personnel escape (emergency) airlock, an equipment hatch and other penetrations for piping and cables. The airlocks are provided with double doors to permit access while maintaining containment integrity. The double doors are provided with interlocks to ensure that only one door at a time can be open. Per the existing specification, during cold shutdown and refueling the interlocks may be disabled and both doors may be opened, if irradiated fuel is not being moved in containment.

2.0 BACKGROUND

On August 31, 1994, the staff issued amendments to the Calvert Cliffs Nuclear Power Plant TSs revising the TSs to permit both doors in the personnel airlock to be open during fuel handling. Prior to issuance of that amendment, at least one of the two doors was required to be closed during fuel handling. Approval of the Calvert Cliffs amendments was based on: (1) the findings of an analysis of radiological consequences of a fuel handling accident (FHA) that the calculated radiological doses are acceptable, and (2) commitments by the licensee that would ensure that containment closure would be promptly established following containment evacuation, in the event of an FHA. Subsequently, similar applications were received and approved for other facilities. It is the staff's policy to approve such applications if (1) confirmatory dose calculations by the staff indicate acceptable

radiological consequences and (2) the licensee has committed to implement administrative procedures that ensure that the open airlock can and will be promptly closed following containment evacuation in the event of a refueling accident (even though the containment fission product control function is not required to meet acceptable dose consequences criteria).

By application dated May 19, 1995, Entergy Operations, Inc. (the licensee) requested similar amendments for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2). Following review of supporting calculations associated with the consequences of a fuel handling accident, the staff on September 28, 1995, issued the amendment for ANO-2. By letter dated July 21, 1995, the licensee provided a commitment for ANO-1 and ANO-2 to designate an individual at the open door to monitor the condition of the opened airlock during fuel handling and to assure closure of the airlock following containment evacuation. This commitment was acceptable for ANO-2, however, since that time, the NRC has decided that the commitment should be properly codified in the TSs. By letter dated September 10, 1996, the licensee provided the proposed TSs for ANO-1.

Additional information was needed for the ANO-1 review and by letters dated June 10 and September 13, 1996, the licensee provided analyses to support the assumption that only six rows of rods (82 fuel rods) are damaged in the drop.

The proposed ANO-1 amendment would revise the TSs to permit both doors in the personnel airlock to be open during handling of irradiated fuel in the containment as follows:

- TS 3.8.6 will be revised to reflect that at least one door on the emergency and personnel airlocks shall be capable of being closed during handling of irradiated fuel in the reactor building.

Administrative procedures must be established to:

- a. ensure that appropriate personnel are aware of the OPEN status of the containment during core alterations and fuel handling,
 - b. ensure that an open airlock is capable of rapid closure with quick disconnect and removal capability for hoses, cables, ramps, and door seal protective covers, and
 - c. ensure that an individual is designated and readily available to close the airlock following the evacuation that would occur in the event of an accident.
- TS 3.8.6 is also revised to require at least 23 feet of water be maintained over the top of irradiated fuel seated within the pressure vessel during irradiated fuel handling.
 - TS 3.8.11 is revised to require that irradiated fuel not be removed from the reactor vessel until the unit has been subcritical for at least 100 hours. The previous limit was 72 hours.

- The bases are modified to reflect the above changes.

The staff has evaluated the application to confirm that (1) confirmatory dose calculations indicate acceptable radiological consequences without taking credit for the containment's fission product control function, and (2) the licensee has adequate TSs that ensure that the open airlock can and will be promptly closed, following containment evacuation, in the event of a refueling accident.

The licensee's initial application did not explicitly confirm that administrative controls would be implemented to ensure that an open airlock can and would be promptly closed in the event of a fuel handling accident in the containment. After discussions with the staff, the licensee provided a letter dated July 21, 1995, stating that when the airlocks are opened during fuel handling and core alterations, an individual will be assigned to monitor the status of the door and close it following containment evacuation. Procedures will be implemented to ensure that the airlock passages are not obstructed in such a manner as to inhibit prompt closure. ANO-2 received its September 28, 1995, amendment to operate on the basis of a commitment, however, the NRC now requires these provisions as part of the TSs. The licensee has proposed TSs in the September 10, 1996, letter for ANO-1.

3.0 EVALUATIONS

The NRC staff has established the following generic criteria for the acceptance of proposed amendments that would allow both doors of the containment personnel airlock (PAL) to be open during fuel movement and core alterations:

1. The radiological consequences for a fuel handling accident in containment (FHAIC) must meet Standard Review Plan (SRP) 15.7.4 acceptance criteria without credit for the mitigation effects of the primary containment.
2. Administrative procedures must be established to:
 - a. ensure that appropriate personnel are aware of the OPEN status of the containment during core alterations and fuel handling,
 - b. ensure that an open airlock is capable of rapid closure with quick disconnect and removal capability for hoses, cables, ramps, and door seal protective covers, and
 - c. ensure that an individual is designated and readily available to close the airlock following the evacuation that would occur in the event of an accident.

During core alterations and refueling operations, a FHAIC is the limiting event postulated for the purpose of design of accident mitigation features. This design basis accident assumes that a spent fuel bundle is dropped and fuel rods are ruptured. The licensee performed an analysis of a FHAIC with the airlock doors open. In performing the analysis, the licensee used the assumptions in Regulatory Guide (RG) 1.4, and the review procedures specified in RG 1.25, "Assumptions Used for Evaluating the Potential Radiological Consequences of a Fuel Handling Accident in the Fuel Handling and Storage Facility for Boiling and Pressurized Water Reactors." The licensee provided an analysis showing that only six rows of fuel pins (82 pins) would be damaged in the drop. The staff reviewed the licensee's analysis in the ANO-1 Safety Analysis Report (SAR), Section 14.2.2.3, Fuel Handling Accident.

The staff concludes that the licensee's analysis is adequate to justify the number of fuel rods (six rows) assumed to be damaged in the fuel handling accident. A 100-hour decay time (TS 3.8.11), and 23 feet of water coverage (TS 3.8.6) are assumed in the analysis. No credit is taken for the potential mitigating effects of the engineered safety feature (ESF) filtration system provided for the auxiliary building. The licensee's analysis demonstrated that the 0-2 hour site boundary thyroid dose will be 64 rem and the 0-2 hour whole body site boundary dose will be 0.9 rem. These calculated doses are within the SRP criteria of 75 rem to the thyroid and 6 rem to the whole body (WB). The licensee initially reported the doses to the control room personnel as being bounded by the loss-of-coolant-accident (LOCA) analysis for both ANO units. The LOCA doses are reported in Table 15.1.13-2 in the ANO-2 Safety Analysis Report as 20.7 rem to the thyroid and 1.12 rem to the whole body. In discussions, the licensee indicated that the fuel handling accident in ANO-1 with 82 pins damaged in the fall would give control room doses of 3.28 rem to the thyroid and 0.026 rem to the whole body. These calculated doses to the control room personnel are within the appropriate dose acceptance criteria of General Design Criterion (GDC) 19.

The staff has completed its evaluation of the potential radiological consequences of a FHA at ANO-1 based upon the conditions of the proposed TS changes. In addition to reviewing the licensee's submittal, the staff performed an independent analysis to confirm conformance with the acceptance criteria of 10 CFR Part 100 and GDC 19 of Appendix A to 10 CFR Part 50. The staff's analysis utilized the accident source term given in RG 1.4, the assumptions contained in RG 1.25, and the review procedures specified in SRP Sections 15.7.4 and 6.4. The staff further assumed an instantaneous puff release of noble gases and radioiodines from the gap and plenum of the broken fuel rods. These released gas bubbles will pass through at least 23 feet of water covering the fuel, prior to reaching the containment atmosphere. All airborne activity reaching the containment atmosphere is assumed to exhaust to the environment within 2 hours. As stipulated in the proposed TS change, the activity of the gases in the fuel gap and plenum is assumed to have decayed for a period of 100 hours.

The staff computed the offsite doses for ANO-1 using the assumptions described above and NRC's ACTICODE computer code. Control room operator doses were determined using the methodology in Section 6.4, including the use of the Murphy-Campe meteorological factors. The computed offsite doses and control room operator doses are within the acceptance criteria given in SRP Section 15.7.4 and GDC 19. The resulting calculated values and the assumptions used in calculating those doses are presented in Tables 1 and 2.

The staff's dose calculation was based on the assumption that all of the radioactive material released to the containment escapes the containment within 2 hours. However, the staff has historically required plant TSs to maintain containment closure during core alterations and fuel handling as a defense-in-depth measure. Recently the staff has allowed changes to plant TSs to keep both doors to a containment airlock open during core alterations and fuel handling. These changes contained provisions to close one door quickly, thereby reestablishing containment closure. The licensee proposed similar controls to reestablish containment closure for ANO-1. Administrative controls for TS 3.8.6 will ensure (1) that appropriate personnel will be readily available to close the airlock in the event of a FHA and (2) that any cables or hoses running through the open airlock will be designed for quick removal. Therefore, the proposed administrative controls provide reasonable assurance that containment closure as a defense-in-depth measure can be reestablished quickly to limit releases much lower than assumed in the dose calculations.

TABLE 1
CALCULATED RADIOLOGICAL CONSEQUENCES

<u>Exclusion Area Boundary</u>	<u>(rem)</u> <u>Dose</u>	<u>SRP 15.7.4 Guidelines</u>
Thyroid	52	75
Whole Body	0.2	6
<u>Control Room Operator</u>	<u>Dose</u>	<u>GDC-19 Guidelines</u>
Thyroid	2.5	Equivalent to 5 rem whole body*
Whole Body	<0.1	5

* Guideline doses provided in SRP 6.4 define the dose-equivalent as 30 rem to the thyroid.

TABLE 2

ASSUMPTIONS USED FOR CALCULATING RADIOLOGICAL CONSEQUENCES

<u>Parameters</u>	<u>Quantity</u>
Power Level (Mwt)	2568
Number of Fuel Rods Damaged	82
Total Number of Fuel Rods	36816
Shutdown time, hours	100
Power Peaking Factor*	1.65
Fission Product Release Duration	2 hours
Release Fractions*	
Iodine	12%
Noble Gases	10%
Krypton Gas	30%
Iodine Forms*	
Elemental	75%
Organic	25%

Core Fission Product Inventories per TID-14844

Receptor Point Variables

Exclusion Area Boundary*

Atmosphere Relative Concentration, X/Q (sec/M³)
0-2 hours 6.8 x 10⁻⁴

Control Room

Atmospheric Relative Concentration, X/Q (sec/m³) 5.6 x 10⁻³
Control Room Volume, cubic feet 1.8 x 10⁶
Recirculation Flow, cubic feet minute 1667
Unfiltered inleakage cubic feet minute 10
Iodine Protection Factor 144
Geometry Factor 33

* Regulatory Guide 1.25

Note: Dose conversion factor from ICRP-30 were utilized for all calculations.

4.0 TECHNICAL SUMMARY

The staff concluded that the radiological consequences associated with a FHA at ANO-1 during refueling operations with the containment airlocks open are within the acceptance criteria set forth in 10 CFR Part 100 and GDC 19 of Appendix A to 10 CFR Part 50. Additionally, administrative controls are in place to reduce the calculated radiological release substantially, if not completely, by closing the open airlock doors promptly after a FHA. The staff, therefore, concludes that the proposed amendment is acceptable for ANO-1.

5.0 STATE CONSULTATION

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

6.0 ENVIRONMENTAL CONSIDERATION

The 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 NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluent 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 amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 39437). 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.

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

Principal Contributor: J. Minns

Date: September 20, 1996