

August 5, 1994

Docket No. 50-483

Mr. Donald F. Schnell
Senior Vice President - Nuclear
Union Electric Company
Post Office Box 149
St. Louis, Missouri 63166

Dear Mr. Schnell:

SUBJECT: AMENDMENT NO. 91 TO FACILITY OPERATING LICENSE NO. NPF-30
(TAC NO. M88834)

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The Commission has issued the enclosed Amendment No. 91 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. This amendment revises the Technical Specifications (TS) in response to your application dated February 17, 1994, as supplemented by letter dated May 18, 1994.

The amendment revises Technical Specification 3/4.5.1 and associated Bases Section 3/4.5.1. A new Action Statement a. provides a 72-hour allowed outage time (AOT) for one accumulator inoperable due to boron concentration. The Action Statement b. AOT was changed to 24 hours. Surveillance Requirements 4.5.1.1.a.1 and 4.5.1.1.b were revised and 4.5.1.2 was deleted from the TS.

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

Sincerely,

Original signed by L. Raynard Wharton

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

Enclosures:

1. Amendment No. 91 to License No. NPF-30
2. Safety Evaluation

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

August 5, 1994

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

Sincerely,

A handwritten signature in black ink, reading "L. Raynard Wharton".

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

Enclosures:

1. Amendment No. 91 to
License No. NPF-30
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. D. F. Schnell
Union Electric Company

Callaway Plant
Unit No. 1

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

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 91
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by Union Electric Company (UE, the licensee) dated February 17, 1994, as supplemented by letter dated May 18, 1994, 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-30 is hereby amended to read as follows:

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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 91, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into the license. UE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance. The Technical Specifications are to be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



L. Raynard Wharton, 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: August 5, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. _____

OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE

3/4 5-1
3/4 5-2
B 3/4 5-1

B 3/4 5-2

INSERT

3/4 5-1
3/4 5-2
B 3/4 5-1
B 3/4 5-1(a)
B 3/4 5-2*

* No change to text, page no longer overleaf page

3/4.5 EMERGENCY CORE COOLING SYSTEMS

3/4.5.1 ACCUMULATORS

LIMITING CONDITION FOR OPERATION

3.5.1 Each Reactor Coolant System accumulator shall be OPERABLE WITH:

- a. The isolation valve open and power removed,
- b. A contained borated water volume of between 6061 and 6655 gallons,
- c. A boron concentration of between 2300 and 2500 ppm, and
- d. A nitrogen cover-pressure of between 602 and 648 psig.

APPLICABILITY: MODES 1, 2 AND 3*.

ACTION:

- a. With one accumulator inoperable due to boron concentration not within limits, restore the boron concentration to within the above limits within 72 hours or be in at least HOT STANDBY within the next 6 hours and reduce RCS pressure to less than 1000 psig within the following 6 hours.
- b. With one accumulator inoperable for reasons other than a., restore the inoperable accumulator to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and reduce RCS pressure to less than 1000 psig within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.5.1.1 Each accumulator shall be demonstrated OPERABLE:

- a. At least once per 12 hours by:
 - 1) Verifying that the contained borated water volume and nitrogen cover-pressure in the tanks are within their limits, and
 - 2) Verifying that each accumulator isolation valve is open.

* RCS pressure above 1000 psig.

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 31 days and within 6 hours after each solution volume increase of greater than or equal to 70 gallons by verifying the boron concentration of the accumulator solution. This latter 6 hour surveillance is not required when the volume increase makeup source is the RWST and the RWST has not been diluted since verifying that its boron concentration is within the limits of Specification 3.5.5.
- c. At least once per 31 days when the RCS pressure is above 1000 psig by verifying that the circuit breaker supplying power to the isolation valve operator is open.

3/4.5 EMERGENCY CORE COOLING SYSTEMS

BASES

3/4.5.1 ACCUMULATORS

The OPERABILITY of each Reactor Coolant System (RCS) accumulator ensures that a sufficient volume of borated water will be immediately forced into the core through each of the cold legs in the event the RCS pressure falls below the pressure of the accumulators. This initial surge of water into the core provides the initial cooling mechanism during large RCS pipe ruptures.

The limits on accumulator volume, boron concentration and pressure ensure that the assumptions used for accumulator injection in the safety analysis are met.

The accumulator power operated isolation valves are considered to be "operating bypasses" in the context of IEEE Std. 279-1971, which requires that bypasses of a protective function be removed automatically whenever permissive conditions are not met. In addition, as these accumulator isolation valves fail to meet single failure criteria, removal of power to the valves is required.

The allowed outage time limit for operation with one accumulator inoperable due to boron concentration not within limits reflects the fact that no credit is taken in the accident analysis for boron concentration in the accumulators during the LOCA blowdown phase. Injection of borated water provides the fluid medium for heat transfer from the core and prevents excessive clad temperatures, contributing to the filling of the reactor vessel downcomer. The downcomer water elevation head provides the driving force required for the reflooding of the reactor core. Negative reactivity is initially a function of the void formation in the core. One accumulator below the minimum boron concentration limit will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood. Boiling of ECCS water in the core during reflood concentrates boron in the saturated liquid that remains in the core. Boron concentration during the sump recirculation phase is dominated by the RWST boron concentration.

The allowed outage time limit for operation with one accumulator inoperable for any other reason has been determined to have an insignificant effect on the Callaway core damage frequency. The accumulator fault tree was quantified using an accumulator test and maintenance unavailability of 100 hours per calendar year.

The requirement to verify accumulator isolation valves shut with power removed from the valve operator when the pressurizer is solid ensures the accumulators will not inject water and cause a pressure transient when the Reactor Coolant System is on solid plant pressure control.

3/4.5 EMERGENCY CORE COOLING SYSTEMS

BASES

3/4.5.2, 3/4.5.3, and 3/4.5.4 ECCS SUBSYSTEMS

The OPERABILITY of two independent ECCS subsystems ensures that sufficient emergency core cooling capability will be available in the event of a LOCA assuming the loss of one subsystem through any single failure consideration. Either subsystem operating in conjunction with the accumulators is capable of supplying sufficient core cooling to limit the peak cladding temperatures within acceptable limits for all postulated break sizes ranging from the double ended break of the largest RCS cold leg pipe downward. In addition, each ECCS subsystem provides long-term core cooling capability in the recirculation mode during the accident recovery period.

With the RCS temperature below 350°F, one OPERABLE ECCS subsystem is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the limited core cooling requirements.

EMERGENCY CORE COOLING SYSTEMS

BASES

ECCS SUBSYSTEMS (Continued)

The limitation for a maximum of one centrifugal charging pump to be OPERABLE and the Surveillance Requirement to verify all charging pumps except the required OPERABLE charging pump to be inoperable in MODES 4 and 5 and in MODE 6 with the reactor vessel head on, provides assurance that a mass addition pressure transient can be relieved by the operation of a single PORV or RHR suction relief valve. In addition, the requirement to verify all Safety Injection pumps to be inoperable in MODE 4, in MODE 5 with the water level above the top of the reactor vessel flange, and in MODE 6 with the reactor vessel head on and with the water level above the top of the reactor vessel flange, provides assurance that the mass addition can be relieved by a single PORV or RHR suction relief valve.

With the water level not above the top of the reactor vessel flange and with the vessel head on, Safety Injection pumps may be available to mitigate the effects of a loss of decay heat removal during partially drained conditions.

The Surveillance Requirements, which are provided to ensure the OPERABILITY of each component, ensure that, at a minimum, the assumptions used in the safety analyses are met and that subsystem OPERABILITY is maintained. The safety analyses make assumptions with respect to: (1) both the maximum and minimum total system resistance, (2) both the maximum and minimum branch injection line resistance, and (3) the maximum and minimum ranges of potential pump performance. These resistances and ranges of pump performance are used to calculate the maximum and minimum ECCS flows assumed in the safety analyses.

The centrifugal charging pump minimum flow Surveillance Requirement provides the absolute minimum injected flow assumed in the safety analyses. The maximum total system resistance defines the range of minimum flows (including the minimum flow Surveillance Requirement), with respect to pump head, that is assumed in the safety analyses. Therefore, the centrifugal charging pump total system resistance $((P_d - P_{RCS})/Q_d^2)$ must not be greater than $1.004E-02$ ft/gpm², where P_d is pump discharge pressure in feet, P_{RCS} is RCS pressure in feet, and Q_d is the total pump flow rate in gpm.

The safety injection pump minimum flow Surveillance Requirement provides the absolute minimum injected flow assumed in the safety analyses. The maximum total system resistance defines the range of minimum flows (including the minimum flow Surveillance Requirement), with respect to pump head, that is assumed in the safety analyses. Therefore, the safety injection pump total system resistance $((P_d - P_{RCS})/Q_d^2)$ must not be greater than $0.423E-02$ ft/gpm², where P_d is pump discharge pressure in feet, P_{RCS} is RCS pressure in feet, and Q_d is the total pump flow rate in gpm.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 91 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

1.0 INTRODUCTION

By application for license amendment dated February 17, 1994, Union Electric Company (the licensee), requested changes to Technical Specification (TS) for Callaway Plant, Unit 1. The proposed amendment would revise Section 3/4.5.1, "Accumulators," and associated Bases 3/4.5.1. The revision adds a new Action Statement a. to TS 3.5.1 permitting a 72 hour allowed outage time (AOT) for the condition where one accumulator is inoperable when its boron concentration does not fall within the 2300-2500 ppm band. If an accumulator is inoperable for any other reason, Action Statement b. must be followed. Action Statement b. is revised to replace the current 1 hour AOT with a 24 hour AOT. The licensee stated that the current AOT is insufficient to perform maintenance and restoration on accumulator subsystems.

The revision to TS Limiting Condition for Operation (LCO) 3.5.1 is consistent with NUREG-1431 (September 1992), "Standard Technical Specifications for Westinghouse Power Plants," with the exception of the 24 hour AOT for Action Statement b., which is supported by a licensee plant-specific PRA evaluation.

Surveillance Requirements (SR) 4.5.1.1.a.1 and 4.5.1.1.b are revised and SR 4.5.1.2 is deleted from the TS, but retained in FSAR Chapter 16. These changes are consistent with guidance provided in NRC Generic Letter 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation", dated September 27, 1993. The revised Bases 3/4.5.1 discusses the rationale for the 72 hour and 24 hour AOTs for Action Statements a. and b. above.

The supplemental information contained in the May 18, 1994, letter was within the scope of the initial notice, and did not affect the NRC staff's proposed no significant hazards consideration.

2.0 EVALUATION

The total core damage frequency (CDF) reported in the Callaway IPE (ULNRC-2703, September 28, 1992) is $5.8E-05$ r-yr⁻¹. The licensee stated that based on plant operating experience, that an accumulator test and maintenance unavailability of 100 hr/calendar-yr ($q_{tm}=1.1E-04$) provides a conservative upper bound on q_{tm} in support of a 24 hour AOT for the proposed new Action Statement b. of LCO 3.5.1. The staff agrees with this assessment.

The licensee requantified core damage sequence AS04 of the large LOCA event tree in support of the proposed 24 hour AOT. The original (as reported in the Callaway IPE) AS04 sequence frequency was $3.00 E-09$ r-yr⁻¹. The new AS04

sequence frequency with $q_{tm} = 100$ hours/yr is $3.87 \text{ E-09 r-yr}^{-1}$ resulting in an increase in this sequence frequency of $8.7 \text{ E-10 r-yr}^{-1}$. This results in no measurable impact on the overall CDF reported in the IPE of $5.8 \text{ E-05 r-yr}^{-1}$. The staff requested additional information of three types:

1. The impact of assuming one accumulator unavailable for a year.
2. The impact of human error-driven events representing improper alignment of the system.
3. The impact of the requested 24 hour accumulator AOT on a typical intermediate LOCA sequence.

The licensee modeled the configuration with one accumulator out of service for an entire year by including a house event in the PRA that removed the events associated with accumulator A from the fault tree, reducing the top event for the fault tree to "Two of Three Accumulators Fail to Inject into the Cold Legs." The computed increase in core damage frequency, including a LOCA and a non-LOCA fault tree (with removal of redundant cutsets) was 0.1 percent.

The licensee examined a number of possible errors which were examined to determine the events constituting improper system alignment. The possibility that normally open accumulator discharge MOVs could be misaligned was examined. These valves are opened by procedure and the power to the valves is isolated by opening and locking their supply breakers. Additionally, valve alarms actuate if the valves are not fully open, and position is indicated on the main control board. SR 4.5.1.1.a.2) and 4.5.1.1.c require that these valves be verified open with their power isolated for each accumulator. Then, the valves get an open signal on an SIS. In its response to staff questions, the licensee stated that, because of these precautions, a misalignment of the isolation valves was not considered a credible event. The staff agrees with this assessment.

The licensee considered inadvertent venting of the accumulators. In order for this to occur, an MOV must be actuated from the main control board, since there is no automatic actuation feature for these valves. The operator must consciously operate these valves to vent the accumulators. The licensee stated that conscious venting of multiple accumulators is not a credible action. The staff agrees with this assessment.

The licensee also examined the drain and fill lines off the accumulators. These small diameter lines incorporate either check valves to prevent backflow or valves with no automatic features that must be consciously operator-actuated. The licensee's position is that errors associated with filling and draining multiple accumulators are not credible. The staff agrees with this assessment.

The last area of potential human error examined was related to the accumulator instrument loops. Each accumulator has two level and two pressure transmitters, providing indication and alarm to the operators on accumulator pressure and level. The licensee determined that, despite miscalibration of the level transmitters, a sufficient volume of borated water to prevent core damage still exists. Therefore, miscalibration of the level transmitters was not considered in the PRA analyses. Miscalibration of the pressure transmitters was, however, still considered to be a credible error. As a

result, a new basic event was added to the fault tree to model this error and assigned a failure probability of 3.0×10^{-4} , based on values used in the Surry PRA (NSAC-152, Volume 3). The miscalibration led to an accumulator unavailability of 3.0×10^{-4} for the large LOCA and non-large LOCA cases, showing that such errors for the accumulator pressure transmitters may have a substantially larger impact on accumulator unavailability than does the proposed AOT increase, since these unavailabilities without the pressure transmitter miscalibration errors were 1.5×10^{-4} for the large LOCA case and 6.0×10^{-6} for the non-large LOCA case. The licensee determined that, the impact on the CDF of these errors is negligible. The staff finds this analysis acceptable.

In response to the staff's request, the licensee, quantified an intermediate LOCA sequence to examine the impact upon it of the requested 24 hour AOT. The sequence has an intermediate LOCA initiating event, followed by failure of all four high head ECCS pumps, and injection failure of two accumulators. Two sets of analyses were performed to determine the impact of the proposed 24 hour AOT on the CDF due to this sequence, one containing the accumulator pressure miscalibration error as discussed above, and the other without the miscalibration error. The results of these calculations show no discernible increase in accumulator injection unavailability or accident sequence frequency whether there is no accumulator test and maintenance (TM) included or the accumulator is in TM for 100 hr/yr (corresponds to 24 hr AOT). In the case where the accumulator is in TM all year, with no miscalibration error, there is a barely discernible increase (less than 1%) in injection unavailability and sequence frequency. Even with this gross overestimate of the requested 24 hour AOT, the increase in sequence frequency is in the $E-14$ range. Again, the licensee determined this insignificant, and the staff finds this analysis acceptable.

The licensee's FSAR large break LOCA analysis assumed that borated water from one accumulator is diverted through the line break, and that successful accumulator injection occurs from two of the remaining three intact accumulators injecting into the Reactor Coolant System cold legs. This success criterion is also used in the licensee's PRA analyses.

2.1 TECHNICAL SPECIFICATION CHANGES

The staff has reviewed the information submitted by the licensee, and concludes that the licensee's requested changes to Technical Specification 3/4.5.1 and Bases Section 3/4.5.1. are consistent with the plant design and safety analysis limits and are, therefore, acceptable as discussed below.

The new Action Statement 3.5.1.a. provides 72 hours allowed outage time (AOT) for one accumulator inoperable due to boron concentration. This approach is consistent with guidance provided in NUREG-1431, "Standard Technical Specifications for Westinghouse Power Plants", regarding boron concentration limits to ensure core subcriticality during reflood.

The new AOT for Action Statement 3.5.1.b. provides 24 hours in lieu of the current 1 hour AOT. The PRA analysis provided the justification for the increased AOT since, there was only a very insignificant effect on the overall core damage frequency (CDF). Plant operating experience supports the determination that a 1 hour AOT does not allow enough time to perform maintenance and restoration on the accumulator subsystems.

Surveillance 4.5.1.1.a.1) is revised consistent with the guidance of NRC Generic Letter 93-05 regarding removal of surveillance requirements for instrumentation. The basis for this revision is to eliminate ineffective tests that place undue burden on plant personnel without commensurate safety benefit.

Surveillance 4.5.1.1.b is revised consistent with GL 93-05 guidance regarding the surveillance clarification that was added for RWST boron concentration. The basis for this clarification is that an inadvertent dilution cannot occur if the normal makeup (RWST) boron concentration is greater than the accumulator boron concentration.

Surveillance 4.5.1.2 is deleted from the TS consistent with GL 93-05 guidance for removing requirements that should be retained in existing plant procedures. The basis for this deletion is to reduce unnecessary radiation exposure to plant personnel resulting from testing instruments that do not initiate safety actions.

Bases Section 3/4.5.1 is revised to discuss the 72 hour and 24 hour AOTs for Action Statements a. and b.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes 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 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 (59 FR 14898). Accordingly, this 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 this 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: M. Wohl
L. R. Wharton

Date: August 5, 1994