

April 20, 1999

Mr. Garry L. Randolph
Vice President and Chief Nuclear Officer
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

SUBJECT: AMENDMENT NO. 131 TO FACILITY OPERATING LICENSE NO. NPF-30 -
CALLAWAY PLANT, UNIT 1 (TAC NO. MA3278)

Dear Mr. Randolph:

The Commission has issued the enclosed Amendment No. 131 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated June 29, 1998, as supplemented by letter dated February 19, 1999.

The amendment revises TS 3.7.1.7 operability requirements to require four atmospheric steam dump (ASD) lines to be operable. Other changes are made to TS 3.7.1.7 to address action statements and surveillance requirements for the four ASD lines.

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

Mel Gray, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosures: 1. Amendment No.131to NPF-30
2. Safety Evaluation

cc w/encls: See next page

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April 20, 1999

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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. 131
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Union Electric Company (UE, the licensee) dated June 29, 1998, as supplemented by letter dated February 19, 1999, 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 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:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 131 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 as of its date of issuance to be implemented within 30 days from the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Stephen Dembek, Chief, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: April 20, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 131

FACILITY OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

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

REMOVE

3/4 7-9b
B 3/4 7-3
B 3/4 7-3a

INSERT

3/4 7-9b
B 3/4 7-3
B 3/4 7-3a

PLANT SYSTEMS

STEAM GENERATOR ATMOSPHERIC STEAM DUMP VALVES

LIMITING CONDITION FOR OPERATION

3.7.1.7 Four steam generator atmospheric steam dump (ASD) lines shall be OPERABLE.

APPLICABILITY: Modes 1, 2 and 3.

ACTION:

- a. With one of the required ASD lines inoperable due to causes other than excessive ASD seat leakage, within 7 days restore the required ASD line to OPERABLE status, or be in HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours. The provisions of Specification 3.0.4 are not applicable.
- b. With two of the required ASD lines inoperable due to causes other than excessive ASD seat leakage, restore all but one required ASD line to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. With three or more of the required ASD lines inoperable due to causes other than excessive ASD seat leakage, restore all but two required ASD lines to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- d. With one or more of the required ASD(s) inoperable because of excessive seat leakage, close the associated manual isolation valve(s) and restore the ASD(s) to OPERABLE status within 30 days, or be in HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.1.7.1 Verify one complete cycle of each ASD in accordance with Specification 4.0.5. The provisions of Specification 4.0.4 are not applicable for entry into Mode 3.

4.7.1.7.2 Verify one complete cycle of each ASD manual isolation valve in accordance with Specification 4.0.5.

PLANT SYSTEMS

BASES

3/4.7.1.5 MAIN STEAM LINE ISOLATION VALVES

The OPERABILITY of the main steam line isolation valves ensures that no more than one steam generator will blow down in the event of a steam line rupture. This restriction is required to: (1) minimize the positive reactivity effects of the Reactor Coolant System cooldown associated with the blowdown, and (2) limit the pressure rise within containment in the event the steam line rupture occurs within containment. The OPERABILITY of the main steam line isolation valves within the closure times of the Surveillance Requirements is consistent with the assumptions used in the safety analyses.

3/4.7.1.6 MAIN FEEDWATER ISOLATION VALVES

The OPERABILITY of the main feedwater isolation valves: (1) provides a pressure boundary to permit auxiliary feedwater addition in the event of a main steam or feedwater line break; (2) limits the RCS cooldown and the mass and energy releases for secondary line breaks inside containment; and (3) mitigates steam generator overfill events such as a feedwater malfunction, with protection provided by feedwater isolation via the steam generator high-high level trip signal. The OPERABILITY of the main feedwater isolation valves within the closure times of the Surveillance Requirements is consistent with the assumptions used in the safety analyses.

3/4.7.1.7 STEAM GENERATOR ATMOSPHERIC STEAM DUMP VALVES

The OPERABILITY of the steam generator atmospheric steam dump (ASD) lines (each ASD line consists of one ASD and associated manual isolation valve) ensures that the reactor decay heat can be dissipated to the atmosphere in the event of a steam generator tube rupture and loss of offsite power and that the Reactor Coolant System can be cooled down for Residual Heat Removal System operation. The number of required ASD lines assures that the subcooling can be achieved, consistent with the assumptions used in the steam generator tube rupture analysis, to facilitate equalizing pressures between the Reactor Coolant System and the ruptured steam generator. In the event of a SGTR, two intact steam generator ASDs are required for rapid cooldown to achieve the necessary subcooling. In this case, with four ASD lines OPERABLE, if the single failure of one ASD line occurs and another ASD line is assumed to be associated with the ruptured steam generator, two intact steam generator ASD lines remain available for required heat removal.

Each ASD line is equipped with a manual isolation valve (in the Auxiliary Building) to provide a positive shutoff capability should an ASD develop leakage or fail open. Closure of the manual isolation valves of all ASD lines, because of excessive ASD seat leakage, does not endanger the reactor core; consistent with plant accident and transient analyses, decay heat can be dissipated with the main steamline safety valves or a manual isolation valve can be opened manually in the auxiliary building and the ASD can be used to control release of steam to the atmosphere. For the steam generator tube rupture event, primary to secondary leakage can be terminated by depressurizing the Reactor Coolant System with the pressurizer power operated relief valves.

PLANT SYSTEMS

BASES

3/4.7.1.7 STEAM GENERATOR ATMOSPHERIC STEAM DUMP VALVES (Continued)

With one required ASD line inoperable due to causes other than excessive ASD seat leakage, ACTION must be taken to restore the ASD line to OPERABLE status within 7 days. The 7 day allowed outage time allows for the redundant capability afforded by the remaining OPERABLE ASD lines, a nonsafety grade backup in the condenser steam dump system, and main steam safety valves. This required ACTION is modified by a Note indicating that LCO 3.0.4 does not apply.

With two ASD lines inoperable due to causes other than excessive ASD seat leakage, ACTION must be taken to restore all but one required ASD line to OPERABLE status within 72 hours. The 72 hour allowed outage time is reasonable to repair inoperable ASD lines based on availability of the condenser steam dump system and/or main steam safety valves and low probability of an event occurring during the period that would require function of the ASD lines.

With three or more ASD lines inoperable due to causes other than excessive ASD seat leakage, ACTION must be taken to restore all but two required ASD lines to OPERABLE status within 24 hours. The 24 hour allowed outage time is reasonable to repair inoperable ASD lines based on availability of the condenser steam dump system and/or main steam safety valves and low probability of an event occurring during the period that would require function of the ASD lines.

With one or more ASD(s) inoperable because of excessive seat leakage, ACTION must be taken to close the associated manual isolation valve(s) and within 30 days to restore the ASD(s) to OPERABLE status. This 30 day allowed outage time limits the period in which a manual isolation valve is closed due to excessive seat leakage of the ASD and minimizes the delay associated with manually opening a previously closed manual isolation valve. This required ACTION is modified by a Note indicating that LCO 3.0.4 does not apply.

3/4.7.3 COMPONENT COOLING WATER SYSTEM

The OPERABILITY of the Component Cooling Water System ensures that sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions. The redundant cooling capacity of this system, assuming a single failure, is consistent with the assumptions used in the safety analyses. Each independent CCW loop contains two 100% capacity pumps and, therefore, the failure of one pump does not affect the OPERABILITY of that loop.

3/4.7.4 ESSENTIAL SERVICE WATER SYSTEM

The OPERABILITY of the Essential Service Water System ensures that sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions. The redundant cooling capacity of this system, assuming a single failure, is consistent with the assumptions used in the safety analyses.

3/4.7.5 ULTIMATE HEAT SINK

The limitations on the ultimate heat sink level and temperature ensure that sufficient cooling capacity is available either to: (1) provide normal cooldown of the facility, or (2) mitigate the effects of accident conditions within acceptable limits.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 131 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

1.0 INTRODUCTION

By letter dated June 29, 1998, as supplemented by letter dated February 19, 1999, Union Electric Company requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-30) for the Callaway Plant, Unit 1. Union Electric Company (the licensee) proposed changes to revise Callaway Technical Specification (TS) 3.7.1.7 to (1) require four operable atmospheric steam dump (ASD) valves instead of three, (2) revise operability requirements to include the ASD manual isolation valves, (3) revise and incorporate action statements for multiple inoperable ASD lines, and (4) add surveillance requirements for the ASD manual isolation valves.

The February 19, 1999, supplemental letter provided additional clarifying information, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination published in the Federal Register on September 9, 1998 (63 FR 48271).

2.0 BACKGROUND

The Callaway Plant, Unit 1 main steam supply system includes four ASD valves, with one ASD valve installed on each of the four main steam lines. The ASD valves are air operated globe valves. Each ASD valve is provided with an upstream manual isolation valve for positive shutoff capability should the ASD valve fail.

The ASD valves, in conjunction with auxiliary feedwater operation, provide a method for cooling the plant such that the residual heat removal (RHR) system can be placed into service to complete the plant cooldown. (The preferred method of cooling the unit to RHR system entry conditions is operation of the steam dump valves to condenser to provide a heat sink).

The ASD valves and associated manual isolation valves are credited in the Callaway licensing basis for a postulated steam generator tube rupture and loss of offsite power (SGTR/LOP) event. During a postulated SGTR/LOP, two ASD valves on intact steam generators are

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assumed to operate to cooldown and depressurize the reactor coolant system. The Callaway Final Safety Analysis Report (FSAR) also assumes a single ASD valve on the ruptured steam generator fails in the open position. The associated manual isolation valve is credited to be closed to isolate the failed open ASD on the ruptured steam generator within a specified period assumed in the accident analysis.

Callaway Technical Specification (TS) 3.7.1.7, "Steam Generator Atmospheric Steam Dump Valves," provides operability and surveillance requirements for the ASD valves. TS 3.7.1.7 requires three ASD valves to be operable. In reviewing the SGTR evaluation, the licensee identified that the Callaway licensing basis is more restrictive than TS 3.7.1.7 in that it requires four ASD valves to be operable during a postulated SGTR event. For example, during a postulated SGTR/LOP, if a single active failure renders one ASD valve inoperable, and the second ASD valve associated with the ruptured steam generator is unavailable, then the two remaining ASD valves on intact steam generators would be required to rapidly cooldown the reactor coolant system as a necessary step to terminate primary to secondary coolant flow. The licensee therefore proposed changes to TS 3.7.1.7 to require four ASD valves to be operable.

TS 3.7.1.7 does not currently provide requirements for the ASD manual isolation valves, which are credited in the SGTR event. The licensee proposed changes to TS 3.7.1.7 to include operability and surveillance requirements for the ASD manual isolation valves. In the interim, the licensee has implemented administrative controls to address four operable ASD valves and their associated manual isolation valves.

The proposed changes to require four ASD valves and associated manual isolation valves to be maintained operable will make Callaway TS 3.7.1.7, "Steam Generator Atmospheric Steam Dump Valves," consistent with the Callaway licensing basis. The licensee also proposed changes to revise and incorporate action statements for multiple inoperable ASD lines. The licensee further proposed changes to add surveillance requirements for each ASD manual isolation valve and clarify TS 3.0.4 applicability. Each proposed change is described and evaluated below.

3.0 EVALUATION

The licensee proposed the following changes to TS 3.7.1.7, "Steam Generator Atmospheric Steam Dump Valves":

1. Limiting Condition for Operation (LCO) 3.7.1.7 currently identifies operability requirements in terms of ASD valves. The licensee proposed to extend operability requirements to ASD lines such that the associated manual isolation valve would be included in LCO 3.7.1.7. The licensee further proposed to revise LCO 3.7.1.7 to require four, rather than three ASD lines to be operable.
2. TS Action Statement (AS) 3.7.1.7.b provides an allowed outage time (AOT) of 24 hours for inoperability of more than one ASD, due to causes other than excessive seat leakage. The 24 hour AOT therefore currently addresses inoperability of two or more ASD lines, for causes other than excessive leakage.

The proposed change would limit the applicability of AS 3.7.1.7.b to two inoperable ASD lines, for causes other than excessive leakage, and increase the AOT for two inoperable ASD lines from the current 24 hours to 72 hours.

3. The licensee proposed new AS 3.7.1.7.c that would provide an AOT of 24 hours for inoperability of three or more ASD lines, for causes other than excessive seat leakage.
4. The licensee proposed new Surveillance Requirement (SR) 4.7.1.7.2 to verify one complete cycle of the ASD manual isolation valves in accordance with SR 4.0.5 (Inservice Testing Program).
5. The licensee proposed to renumber current SR 4.7.1.7 as SR 4.7.1.7.1 and revise it to make explicit the Inservice Testing Program requirements for the ASD valves in accordance with SR 4.0.5.
6. The licensee proposed to limit the applicability of the current exception to LCO 3.0.4 in TS 3.7.1.7 to current AS 3.7.1.7.a and 3.7.1.7.d.

3.1 TS LCO 3.7.1.7 - Revisions to Include Manual Isolation Valves and Four ASD lines

The licensee performed an evaluation of the number of operable ASD valves required during the design basis SGTR accident, as well as the number required for other scenarios. The licensee's review determined that four operable ASD valves are required during a postulated SGTR event. For example, with four operable ASD valves, if the single active failure is assumed on one ASD valve and a second ASD valve on the ruptured steam generator is unavailable, then the two remaining ASDs are available and required for rapid reactor coolant system cooldown. The evaluation concluded that the FSAR scenario represents the limiting case with respect to maximizing the offsite dose consequences of the SGTR event. An evaluation of SGTR scenarios with respect to steam generator overfill concluded that overfill would not occur and there exists a margin to steam generator overfill.

Since the safety analysis is based on the requirement that four steam generator ASD valves be operable, the proposed change would revise LCO 3.7.1.7 to require four ASD lines, rather than the current three, to be operable. This is more restrictive and is consistent with the licensing basis. The staff therefore finds this change to be acceptable.

TS LCO 3.7.1.7 currently provides operability requirements in terms of ASD valves. The proposed change would broaden the applicability of LCO 3.7.1.7 to address operability of ASD lines, which includes both ASD valves and associated manual isolation valves. Likewise, AS 3.7.1.7.a, b, and c would be revised to refer to ASD lines rather than ASD valves. This change is consistent with the assumptions made in the safety analysis and licensing basis in regard to isolating a failed open ASD valve with the associated manual isolation valve during a SGTR event. Therefore, the staff finds this change to be acceptable.

3.2 TS AS 3.7.1.7.b - Revision to Increase AOT for Two Inoperable ASD Lines

The licensee proposed to revise AS 3.7.1.7.b to address two inoperable ASD lines rather than the current "more than one" ASD valve, due to causes other than excessive ASD seat leakage.

AS 3.7.1.7.b currently allows two ASD valves to be inoperable for 24 hours for causes other than excessive seat leakage. The licensee proposed to increase the AOT for two inoperable ASD lines, for causes other than excessive seat leakage, from 24 hours to 72 hours (AS 3.7.1.7.a provides an AOT of 7 days for one ASD valve inoperable due to causes other than excessive seat leakage). With two ASD lines inoperable, the licensee indicated that the increase in AOT from 24 hours to 72 hours would not be significant when balanced against the availability of the condenser steam dump system, and the low probability of an event occurring during the restoration period that would require the ASD lines. The staff finds this proposed change to be acceptable.

3.3 TS AS 3.7.1.7.c - New Action Statement to Provide 24 Hour AOT for Three or More Inoperable ASD Lines

The licensee proposed to add new AS 3.7.1.7.c to address inoperability of three or more ASD lines, due to causes other than excessive ASD seat leakage. With three or more ASD lines inoperable due to causes other than excessive ASD seat leakage, the allowed outage time for restoration of all but two required ASD lines would remain 24 hours, consistent with the current action statement requirements. NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, permits two or more ASD lines to be inoperable with a required action of returning all but one to operable status within 24 hours. Since the AOT provided in AS 3.7.1.7.c is consistent with NUREG-1431, Revision 1, the staff finds this change to be acceptable.

3.4 TS SR 4.7.1.7.2 - New Surveillance Requirement for ASD Manual Isolation Valves

The ASD manual isolation valve function is credited in the licensing basis and the licensee proposed to include them in LCO 3.7.1.7 (see Section 3.1). The licensee further proposed a surveillance requirement for ASD manual isolation valves. The proposed surveillance requirement would require verification of one complete cycle of each manual isolation valve in accordance with SR 4.0.5, (Inservice Testing Program of Pumps and Valves). TS 3.7.1.7 currently includes SR 4.7.1.7.1 for ASD valves. SR 4.7.1.7.1 specifies no additional tests beyond those required by SR 4.0.5. Since the surveillance frequency for the ASD valves is provided in accordance with SR 4.0.5, Inservice Testing Program, it is consistent and acceptable for the associated manual isolation valves to be likewise surveillance tested at a frequency provided by SR 4.0.5. Additionally, the surveillance to verify one complete cycle of each manual isolation valve is consistent with corresponding surveillance requirements in NUREG-1431, Revision 1. Therefore, the staff finds this change to be acceptable.

3.5 TS SR 4.7.1.7.1 - Revision to Clarify Inservice Testing Program Requirements

TS 4.7.1.7.1 currently states that the ASD valves are subject to no additional surveillance requirements beyond those required by SR 4.0.5. The licensee proposed to remove this statement and describe explicitly the surveillance requirement to verify one complete cycle of each ASD valve in accordance with SR 4.0.5. The requirement to verify one complete cycle of each ASD valve is consistent with corresponding surveillance requirements in NUREG-1431, Revision 1. The frequency of surveillance testing remains in accordance with SR 4.0.5 and is not altered. The staff finds this change to be acceptable.

3.6 TS LCO 3.7.1.7 - Application of LCO 3.0.4 Exception

TS 3.7.1.7 currently includes the provision that LCO 3.0.4 is not applicable (LCO 3.0.4 precludes mode entry relying on action statement requirements in lieu of meeting the LCO requirements). The licensee proposed to maintain this exception to LCO 3.0.4, but limit its applicability to current AS 3.7.1.7.a and 3.7.1.7.d. The licensee does not propose to expand the LCO 3.0.4 exemption to new proposed AS 3.7.1.7.b and 3.7.1.7.c. Since this proposed change is consistent with the current Callaway TS and licensing basis, the staff finds the change to be acceptable.

4.0 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 to offer.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation and 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 changes 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 amendment involves no significant hazards consideration, and there has been no public comment on such finding (63 FR 48271). 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.

6.0 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: H. Balukjian

Date: April 20, 1999