

April 6, 1995

Mr. C. Lance Terry
Group Vice President, Nuclear
TU Electric
Energy Plaza
1601 Bryan Street, 12th Floor
Dallas, TX 75201-3411

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT
NOS. 37 AND 23 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89
(TAC NOS. M91635 AND M91636)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 37 and 23 to Facility Operating License Nos. NPF-87 and NPF-89 for the Comanche Peak Steam Electric Station, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated February 28, 1995, (Reference LAR 95-01, TXX-95050).

The amendments replace Comanche Peak Steam Electric Station (CPSES) TS 3/4.6.2 "Depressurization and Cooling Systems - Containment Spray System" Surveillance Requirement (SR) 4.6.2.1b with the corresponding SR from NUREG-1431. Also Bases 3/4.6.2.1 "Containment Spray System" has been revised to expand the detail consistent with the corresponding Bases from NUREG-1431. The SR, and its associated Bases, for confirming the performance of the containment spray pumps is changed by replacing the specific pump head and flow values with the general requirement that the pumps provide the required head at the flow test point while the specific required values are moved to the CPSES Technical Requirements Manual.

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

Sincerely,
ORIGINAL SIGNED BY:
Timothy J. Polich, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

- Enclosures: 1. Amendment No. 37 to NPF-87
2. Amendment No. 23 to NPF-89
3. Safety Evaluation

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

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The Commission has issued the enclosed Amendment Nos. 37 and 23 to Facility Operating License Nos. NPF-87 and NPF-89 for the Comanche Peak Steam Electric Station, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated February 28, 1995, (Reference LAR 95-01, TXX-95050).

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Docket Nos. 50-445 and 50-446

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3. Safety Evaluation

cc w/encls: See next page

Mr. C. Lance Terry
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ATTN: Susan Rieff, Director
Environmental Policy
P. O. Box 12428
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TEXAS UTILITIES ELECTRIC COMPANY
COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 1
DOCKET NO. 50-445
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 37
License No. NPF-87

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Texas Utilities Electric Company (TU Electric, the licensee) dated February 28, 1995, (Reference LAR 95-01, TXX-95050), 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, as amended, 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. NPF-87 is hereby amended to read as follows:

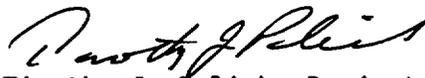
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2. Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 37, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION



Timothy J. Polich, 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: April 6, 1995



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

TEXAS UTILITIES ELECTRIC COMPANY
COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 2
DOCKET NO. 50-446
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 23
License No. NPF-89

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Texas Utilities Electric Company (TU Electric, the licensee) dated February 28, 1995, (Reference LAR 95-01, TXX-95050), 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, as amended, 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. NPF-89 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. 23, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. TU Electric 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.

FOR THE NUCLEAR REGULATORY COMMISSION



Timothy J. Polich, 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: April 6, 1995

ATTACHMENT TO LICENSE AMENDMENT NOS. 37 AND 23
FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89
DOCKET NOS. 50-445 AND 50-446

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE

3/4 6-11
B 3/4 6-3

INSERT

3/4 6-11
B 3/4 6-3

CONTAINMENT SYSTEMS

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

CONTAINMENT SPRAY SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.1 Two independent Containment Spray Systems shall be OPERABLE with each Spray System capable of taking suction from the RWST and manually transferring suction to the containment sump.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one Containment Spray System inoperable, restore the inoperable Containment Spray System to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the inoperable Containment Spray System to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.1 Each Containment Spray System shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position;
- b. Verify each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head. The surveillance frequency shall be in accordance with the Inservice Testing Program.
- c. At least once per 18 months, by:
 - 1) Verifying that each automatic valve in the flow path actuates to its correct position on a Containment Spray Actuation test signal, and
 - 2) Verifying that each spray pump starts automatically on a Containment Spray Actuation test signal and on a Safety Injection test signal.
- d. At least once per 5 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

CONTAINMENT SYSTEMS

SPRAY ADDITIVE SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.2 The Spray Additive System shall be OPERABLE with:

- a. A spray additive tank indicating a level of between 91% and 94% of between 28% and 30% by weight NaOH solution, and
- b. Four spray additive eductors each capable of adding NaOH solution from the chemical additive tank to a Containment Spray System pump flow.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With the Spray Additive System inoperable, restore the system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the Spray Additive System to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.2 The Spray Additive System shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position;
- b. At least once per 6 months by:
 - 1) Verifying the indicated solution level in the tank, and
 - 2) Verifying the concentration of the NaOH solution by chemical analysis.
- c. At least once per 18 months, by verifying that each automatic valve in the flow path actuates to its correct position on a Containment Spray Actuation test signal; and
- d. At least once per 5 years by verifying:
 - 1) The flow path through the Spray Additive supply line, and
 - 2) RWST test water flow rates of between 50 gpm and 100 gpm through the eductor test loop of each train of the Spray Additive System.

CONTAINMENT SYSTEMS

BASES

CONTAINMENT VENTILATION SYSTEM (Continued)

Leakage integrity tests with a maximum allowable leakage rate for containment ventilation valves will provide early indication of resilient material seal degradation and will allow opportunity for repair before gross leakage failures could develop. The 0.60 L_a leakage limit of Specification 3.6.1.2b. shall not be exceeded when the leakage rates determined by the leakage integrity tests of these valves are added to the previously determined total for all valves and penetrations subject to Type B and C tests.

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the Containment Spray System ensures that containment depressurization and cooling capability will be available in the event of a LOCA or steam line break. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the safety analyses.

The Containment Spray System which is composed of redundant trains, provides post-accident cooling of the containment atmosphere. However, the Containment Spray System also provides a mechanism for removing iodine from the containment atmosphere and therefore the time requirements for restoring an inoperable Spray System to OPERABLE status have been maintained consistent with that assigned other inoperable ESF equipment.

Verifying each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head as defined in the Technical Requirements Manual (TRM), ensures that the spray pump performance has not degraded during the cycle. Flow and differential pressure are normal tests of centrifugal pump performance required by Section XI of the ASME Code. Since the containment spray pumps cannot be tested with flow through the spray headers, they are tested via a test line. This test confirms one point on the analytical pump curve and is indicative of overall performance. Such inservice inspections confirm component OPERABILITY, trend performance, and detect incipient failures by abnormal performance. The frequency of the surveillance is in accordance with the Inservice Testing Program.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the Spray Additive System ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a long term pH value of between 8.5 and 10.5 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. The contained solution volume limit includes an allowance for solution not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the safety analyses.

The required indicated level band of 91% to 94% for the Spray Additive Tank corresponds to an analytical limit band of 4900 gallons to 5314 gallons, respectively, and includes a 3.36% measurement uncertainty.

CONTAINMENT SYSTEMS

BASES

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment and is consistent with the requirements of General Design Criteria 54 through 57 of 10 CFR 50 Appendix A. Containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with: (1) zirconium-water reactions, (2) radiolytic decomposition of water, and (3) corrosion of metals within containment. These Hydrogen Control Systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA," March 1971.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 37 AND 23 TO
FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89
TEXAS UTILITIES ELECTRIC COMPANY
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION

By application dated February 28, 1995, (Reference LAR 95-01, TXX-95050), Texas Utilities Electric Company (TU Electric/the licensee) requested changes to the Technical Specifications (TS) (Appendix A to Facility Operating License Nos. NPF-87 and NPF-89) for the Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The proposed changes would revise Surveillance Requirement (SR) 4.6.2.1b by removing the acceptance criteria values for flow and differential pressure (head) for the containment spray pump with the general acceptance criterion that the pump develop the required head at the flow test point. The licensee proposed placing the actual required flow and head values in the licensee-controlled Technical Requirements Manual (TRM) where they may be revised pursuant to 10 CFR 50.59.

Along with this change, the licensee proposed to revise the associated Bases for TS 3/4.6.2.1 "Containment Spray System," to explain that (1) the CPSES containment spray pumps are tested via a special test line which allows testing at flows higher than that allowed by the miniflow recirculation line, (2) the "pump design curve" is termed the "analytical pump curve," and (3) the specific flow and head values required to satisfy the containment spray pump SR are defined in the TRM.

2.0 BACKGROUND

10 CFR 50.36 specifies the TSs to be included as part of each nuclear power plant operating license, in accordance with Section 182a of the Atomic Energy Act ("the Act"). That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS. The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993). The Final Policy Statement identified four criteria to be used in determining whether a particular matter

is required to be included in the TS, as follows: (1) Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.¹ As a result, existing TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to licensee-controlled documents.

3.0 EVALUATION

Applying the criteria and other guidance in the Final Policy Statement to existing TS requirements, the staff previously determined that existing TS requirements for systems such as the containment spray system must be retained in the TS. In making this determination, however, the staff also concluded that certain details of system design, operation, and SRs, may be relocated to licensee-controlled documents where various means could be used to achieve the safety function and the level of protection would not be significantly altered if those details were changed pursuant to 10 CFR 50.59.

The SRs for the containment spray pump demonstrate that the pump is capable of performing the safety functions demonstrated by the CPSES safety analyses. The two design basis accidents, which define the performance requirements for these pumps, are the loss-of-coolant accident (LOCA) and the main steam line break (MSLB) inside containment. The spray flow provided by these pumps limit the temperature and pressure peak inside containment and reduce the radioactivity of the containment atmosphere. In order to perform their safety function, the pumps must meet or exceed the analytical pump curves assumed in the safety analyses.

The present SR confirms this required level of performance by verifying that the pumps provide a flow greater than or equal to a specified value (6600 gpm) at a specific head (245 psid) using a specific flow path. The proposed change would replace these specific acceptance criteria with a general criterion that each pump develop the required head at the flow test point, so that any

¹ The Commission recently promulgated a proposed change to 10 CFR 50.36, pursuant to which the rule would be amended to codify and incorporate these criteria (59 FR 48180). The Commission's Final Policy Statement specified that Reactor Core Isolation Cooling, Isolation Condenser, Residual Heat Removal, Standby Liquid Control, and Recirculation Pump Trip are included in the TS under Criterion 4.

appropriate combination of flow, pressure and head corresponding to the analytical pump curves consistent with the safety analyses may be used to demonstrate the performance of the pumps.

The effectiveness of this SR for confirming containment spray pump operability is not altered by specifying a general criterion. This SR will continue to be performed separately for each spray pump in accordance with the frequency required by the inservice testing program. This SR will also continue to confirm that each pump meets or exceeds the analytical pump curve assumed in the safety analyses. Thus, the capability of the spray pumps to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, in the event of a design basis accident, will not be affected by this change.

These design details, which underlie the general criterion, will be maintained in the TRM in accordance with the provisions in 10 CFR 50.59, TS 6.5.1.6 and TS 6.8.1.

In accordance with the guidance in the Final Policy Statement, the staff concludes that these design details may be removed from SR 4.6.2.1b and placed in the TRM. In addition, the provisions of 10 CFR 50.59, TS 6.5.1.6, and TS 6.8.1 provide an acceptable means to control changes to these design details. Therefore, the proposed change is acceptable.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change 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 change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (60 FR 12255). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

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

Principal Contributor: T. Polich
C. Harbuck

Date: April 6, 1995