

January 6, 1995

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Mr. Lee Liu
 Chairman of the Board and
 Chief Executive Officer
 IES Utilities Inc.
 Post Office Box 351
 Cedar Rapids, IA 52406

SUBJECT: AMENDMENT NO. 206 TO FACILITY OPERATING LICENSE NO. DPR-49 - DUANE
 ARNOLD ENERGY CENTER (TAC NO. M90076)

Dear Mr. Liu:

The Commission has issued the enclosed Amendment No. 206 to Facility Operating License No. DPR-49 for the Duane Arnold Energy Center. This amendment consists of changes to the Technical Specifications in response to your application dated July 29, 1994.

The amendment revises the Technical Specifications by deleting the reference to written relief from ASME Code requirements being granted by the NRC. The revised Technical Specifications refer to the provision in NRC regulations concerning the ASME Code. The amendment also clarifies that surveillance frequency maximum time intervals are applicable to ISI and IST activities.

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

Sincerely,

Original signed by
 Glenn B. Kelly

Glenn B. Kelly, Project Manager
 Project Directorate III-3
 Division of Reactor Projects III/IV
 Office of Nuclear Reactor Regulation

- Enclosures: 1. Amendment No. 206 to License No. DPR-49
 2. Safety Evaluation

cc w/encls: See next page

DOCUMENT NAME: G:\DUANEARN\DUA90076.AM1

* See previous concurrence

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Handwritten initials/signature



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 6, 1995

Mr. Lee Liu
Chairman of the Board and
Chief Executive Officer
IES Utilities Inc.
Post Office Box 351
Cedar Rapids, IA 52406

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Sincerely,

A handwritten signature in cursive script, appearing to read "Glenn B. Kelly".

Glenn B. Kelly, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-331

Enclosures: 1. Amendment No. 206 to
License No. DPR-49
2. Safety Evaluation

cc w/encls: See next page

Mr. Lee Liu
IES Utilities Inc.

Duane Arnold Energy Center

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

IES UTILITIES INC.

CENTRAL IOWA POWER COOPERATIVE

CORN BELT POWER COOPERATIVE

DOCKET NO. 50-331

DUANE ARNOLD ENERGY CENTER

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 206
License No. DPR-49

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by IES Utilities Inc., et al., dated July 29, 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. DPR-49 is hereby amended to read as follows:

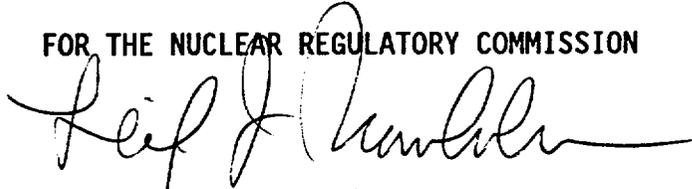
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(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 206, 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 the date of issuance and shall be implemented within 120 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Leif J. Norrholm, Director
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of issuance: January 6, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 206

FACILITY OPERATING LICENSE NO. DPR-49

DOCKET NO. 50-331

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by vertical lines.

Remove
3.6-11
3.6-28

Insert
3.6-11
3.6-28

LIMITING CONDITIONS FOR OPERATION

- F. Jet Pump Flow Mismatch
1. With core power greater than or equal to 80% RATED POWER with both recirculation pumps at steady state operation, the speed of the faster pump may not exceed 122% of the speed of the slower pump.
 2. With core power less than 80% RATED POWER with both recirculation pumps at steady state operation, the speed of the faster pump may not exceed 135% of the speed of the slower pump.
 3. With the recirculation pump speeds different by more than the specified limits:
 - a. restore the recirculation pump speeds to within the specified limit within 2 hours, or
 - b. one recirculation pump shall be tripped. See Specification 3.3.F.4 for SLO requirements.
- G. Structural Integrity
1. At all times, the structural integrity of the ASME Section XI Code Class 1, 2, and 3 components shall be maintained in accordance with Surveillance Requirement 4.6.G.1.
 2. With the structural integrity of any ASME Section XI Code Class 1 or Class 2 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature above 212°F.
 3. With the structural integrity of any ASME Section XI Code Class 3 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) from service.

SURVEILLANCE REQUIREMENTS

- F. Jet Pump Flow Mismatch
1. Recirculation pump speed mismatch shall be verified at least once per day.
 2. See Surveillance Requirement 4.3.F.4 for SLO requirements.
- G. Structural Integrity
1. Inservice inspection of ASME Section XI Code Class 1, Class 2, and Class 3 components and inservice testing of ASME Section XI Code Class 1, Class 2, and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50, Section 50.55a.
 2. The augmented inspection program for piping identified in NRC Generic Letter 88-01 shall be performed in accordance with the staff positions on schedule, methods, personnel, and sample expansion included in this Generic Letter.
 3. The provisions of Definition 26 [SURVEILLANCE FREQUENCY] are applicable to the frequencies for performing inservice inspection and inservice testing activities.

3.6.G & 4.6.G BASES:

Structural Integrity

A pre-service inspection of Nuclear Class I Components was conducted to assure freedom from defects greater than code allowance; in addition, this served as a reference base for future inspections. Prior to operation, the Reactor Coolant System as described in Article IS-120 of Section XI of the ASME Boiler and Pressure Vessel Code was inspected to provide assurance that the system was free of gross defects. In addition, the facility was designed such that gross defects should not occur throughout plant life. The pre-service inspection program was based on the 1970 Section XI of the ASME Code for in-service inspection. This inspection plan was designed to reveal problem areas (should they occur) before a leak in the coolant system could develop. The program was established to provide reasonable assurance that no LOCA would occur at the DAEC as a result of leakage or breach of pressure-containing components and piping of the Reactor Coolant System, portions of the ECCS, and portions of the reactor coolant associated auxiliary systems.

A pre-service inspection was not performed on Nuclear Class II Components because it was not required at that stage of DAEC construction when it would have been used. For these components, shop and in-plant examination records of components and welds will be used as a basis for comparison with in-service inspection data.

Visual examinations for leaks will be made periodically on ASME Section XI Class 1, 2 and 3 systems. The inspection program specified encompasses the major areas of the vessel and piping systems within the ASME Section XI boundaries.

The type of examination planned for each component depends on location, accessibility, and type of potential defect. Direct visual examination is proposed wherever possible since it is fast and reliable. Surface examinations are planned where practical, and where added sensitivity is required. Ultrasonic examination or radiography shall be used where defects can occur in concealed surfaces. Section 5.2.4 of the Updated FSAR provides details of the inservice inspection program.

Starting with the Cycle 9/10 Refueling Outage, an augmented inspection program was implemented to address concerns relating to Intergranular Stress Corrosion Cracking (IGSCC) in reactor coolant piping made of austenitic stainless steel. The augmented inspection program conforms to the NRC staff's positions set forth in Generic Letter 88-01 and NUREG-0313, Revision 2 for inspection schedule, inspection methods and personnel, and inspection sample expansion.

The first 10-year interval for inservice testing of pumps and valves in accordance with the ASME Code, Section XI commenced on February 1, 1975 and ended on January 31, 1985. The second 10-year inservice testing interval commenced on February 1, 1985 and is scheduled to end on January 31, 1995. The second 10-year testing program addresses the requirements of the ASME Code, Section XI, 1980 Edition with Addenda through Winter 1981, subject to the limitations and modifications of 10 CFR 50.55a. Section 3.9.6 of the Updated FSAR describes the inservice testing program.

Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 206 TO FACILITY OPERATING LICENSE NO. DPR-49

IES UTILITIES INC.

CENTRAL IOWA POWER COOPERATIVE

CORN BELT POWER COOPERATIVE

DUANE ARNOLD ENERGY CENTER

DOCKET NO. 50-331

1.0 INTRODUCTION

In its letter dated July 29, 1994, IES Utilities Inc., the licensee, proposed that Facility Operating License DPR-49 be amended to revise the Duane Arnold Energy Center Technical Specifications (TS). Specifically, the proposed amendment would change TS 4.6.G.1, "Structural Integrity," which specifies the surveillance requirements for implementation of the regulations for inservice inspection (ISI) and inservice testing (IST) in accordance with 10 CFR 50.55a. The proposed change is consistent with the revised standard technical specifications for General Electric BWR/4 Plants (NUREG-1433). The licensee has also proposed to add TS 4.6.G.3 which states that TS Definition 26, "Surveillance Frequency," will be applicable to the performance of ISI and IST.

2.0 EVALUATION

The regulations for nuclear industry codes and standards are stated in 10 CFR 50.55a. By rulemaking published June 12, 1971, effective July 12, 1971, 10 CFR 50.55a was issued to establish minimum quality standards for the design, fabrication, erection, construction, testing, and inspection of certain systems and components of boiling and pressurized water-cooled nuclear power reactor plants by requiring conformance with appropriate industry codes and standards. The regulations have been revised a number of times since first promulgated, including adding design requirements for assuring access for inspection and testing. Before March 15, 1976, the regulations contained no requirements for IST of pumps and valves. The ASME Code first included Subsections IWP and IWV to Section XI in the Summer 1973 Addenda. The rules effective March 15, 1976 (41 Federal Register 6256, published February 12, 1976), required that an operating license for a utilization facility be subject to the conditions specified in 10 CFR 50.55a(g), which included requirements for the ISI of components, and the new IST of pumps and valves. The regulations provide for alternatives to the requirements, if compliance would result in hardship without a compensating increase in the level of quality and safety, or if the proposed alternatives would give an acceptable

level of quality and safety. Also, because a number of plants were designed prior to the inservice inspection and testing requirements were imposed, and therefore, may not have included all the necessary access provisions, the regulations provide for relief from Code requirements, if a licensee determines that conformance is impractical for its facility. These provisions are stated in 10 CFR 50.55a, paragraphs (a)(3)(i), (a)(3)(ii), (f)(6)(i), and (g)(6)(i).

After publishing the rules that took effect March 15, 1976, the NRC issued letters to licensees informing them of the rule change and recommending that they propose technical specification changes for both ISI and IST with the following standard statements:

The following language should be substituted, as appropriate, into the Technical Specifications where existing surveillance requirements are superseded by ASME Section XI inservice inspection and testing requirements:

- a. Inservice inspection of ASME Code Class 1, Class 2, and Class 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, and applicable Addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Inservice testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

In the letters issued to then current operating plants, the NRC further discussed the regulation which, at that time, required updates of the inservice inspection programs at 40-month intervals and the IST programs at 20-month intervals. The NRC suggested that licensees submit requests for relief from ASME Code requirements, as far in advance as possible of the start of any 20-month period for testing pumps and valves, but at least 90 days before that period (these inspection and testing periods were later changed to 120-month intervals for both ISI and IST). The NRC stressed the need to incorporate 10 CFR 50.55a(g) by reference in technical specifications (1) to avoid duplication of requirements, (2) to alleviate the need for technical specification changes, whenever a testing program is updated, and (3) to simplify the process for obtaining relief from impractical ASME Code requirements.

The NRC discussed relief requests as follows in the letters to licensees:

Generally, the licensee will know well in advance of the beginning of any inspection period, whether or not a particular ASME Code requirement will be impractical for his facility. Thus, the licensee should request relief from ASME Code requirements, as far as possible, in advance of, but not less than 90 days before, the start of the inspection period. Early submittals are particularly important for the first 40-month inservice and 20-month pump and valve testing period, because they will enable the NRC staff to evaluate the information received from all licensees and determine, which ASME Code requirements may be generally impractical for various classes of plants. Early submittals, will thereby facilitate earlier feedback to licensees regarding the acceptability of their requests.

The NRC staff recognizes that it will not be possible, in all cases, for a licensee to determine, in advance, that any particular ASME Code requirement will be impractical for his facility. In cases where, during the process of inservice testing, certain requirements are found to be impractical, due to unforeseen circumstances, the licensee may request relief at that time. These occurrences are not expected to be many, and are expected to result in only minor changes to an inservice testing program.

All relief from ASME Code requirements that are determined to be impractical for a facility will be granted in the form of a letter, within the provisions of §50.55a(g)(6)(i). This written relief should be incorporated into the document describing the inservice inspection and testing program retained by the licensee...the written relief itself will not become an explicit part of the facility license...

During development of the revised standard technical specifications, the NRC approved a change from the ISI and IST surveillance requirements, as originally proposed in the 1976 letters to licensees. The standard technical specification change corrected what appeared to be a more restrictive limitation than the regulatory requirements of 10 CFR 50.55a in prohibiting the licensee from implementing relief for impractical Code requirements, before obtaining approval from the NRC. The administrative section of the revised standard technical specifications includes the following applicable requirements for the ISI and IST programs:

5.7.2.11 Inservice Inspection Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components, including applicable supports. The program shall include the following:

- a. Provisions that inservice inspection of ASME Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;...

5.7.2.12 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:

- a. Provisions that inservice testing of ASME Code Class 1, 2, and 3 pumps, valves, and snubbers shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;...

The revised standard technical specifications reflect the position that the licensee must establish and implement the program in accordance with 10 CFR 50.55a. For preparing an updated ISI or IST program, the regulations allow a licensee, up to a full year, after the beginning of the updated interval, to obtain NRC approval of relief from those Code requirements that the licensee has determined are impractical for its facility and are not included in the revised ISI or IST program. The regulations state that the need for relief be demonstrated to the satisfaction of the Commission, no later than 12 months from the interval start date. If later in the interval, a licensee finds a specific need for relief, the request should be submitted for NRC approval after identification of the impractical requirement.

The licensee proposes to delete the phrase "except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(i)." The revised technical specification will also eliminate the reference to "Section 50.55a(g)" and reference "Section 50.55a" to reflect the separation between ISI and IST, that was effective in the most recent rulemaking to Section 50.55a. Requirements for IST, are now addressed in Section 50.55a(f) while requirements for ISI remain in Section 50.55a(g). The bases for the technical specification have been changed accordingly. Technical Specification 4.6.G.1 will read as follows:

Inservice inspection of ASME Section XI Code Class 1, Class 2, and Class 3 components and inservice testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.

For 120-month updated programs, relief requests should be submitted prior to the interval start date to allow a period for NRC review twelve months after the interval start date (i.e., submit the updated program three to six months prior to the start date, or earlier). Upon determining an impractical

requirement and not including that requirement in the revised inservice test or inspection program, the licensee must follow the requirements of 10 CFR 50.55a(f)(5)(iv) or (g)(5)(iv), as applicable. The change to the specification does not allow the licensee to implement alternative testing under 10 CFR 50.55a, paragraphs (a)(3)(i) and (a)(3)(ii), until the NRC has determined that such alternatives are authorized, and has issued a safety evaluation to the licensee. However, this technical specification change will enable licensees to avoid situations where compliance with the current technical specifications cannot be achieved, for the period between preparation and submittal of a relief request as part of a revised inservice test or inspection program during the first 12 months of the program, and when the NRC has issued a safety evaluation and granted the relief. This situation could occur at the beginning of a new interval.

Following implementation of the TS change, when a Code requirement is practical, but an alternate method is requested, approval from the NRC is required before implementing the alternative method of testing (1) proposed to achieve levels of quality and safety equivalent to those of the Code method or (2) proposed to avoid an undue hardship without, yielding a compensating increase in the level of quality and safety. Additionally, for IST, the licensee may use the guidance in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," for alternatives, that the staff has determined are acceptable for implementation.

In the letter dated July 29, 1994, accompanying the amendment application, the licensee discussed the guidance in draft NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants." Draft NUREG-1482 was published for comment in consideration of publishing the report in final form to give guidance on IST issues. The staff is evaluating the comments received and has not published the report in the final form yet. Additional staff guidance, if any, on IST and ISI issues will be published in an appropriate document at such time as such guidance or recommendations are available. However, notwithstanding any guidance or recommendations published by the staff, NRC requirements regarding the ASME Boiler and Pressure Vessel Code are as set out in the regulations at 10 CFR Section 50.55a.

The licensee has also proposed to add TS 4.6.G.3, "Surveillance Frequency," which states that the provision of TS Definition 26, "Surveillance Frequency," are applicable to the performance of ISI and IST. This would allow the licensee to extend the ISI and IST surveillance frequencies to 25% of the surveillance interval. Definition 26 in the TS states, that this provision is not intended to be used repeatedly as a convenience to extend non-outage related surveillance intervals. This change is consistent with language in the General Electric BWR/4 Standard Technical Specifications Section SR 3.0.2. The extension facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance, for example, under transient conditions or other ongoing surveillance or maintenance activities. The use of the allowance to extend surveillance intervals, can also result in a significant safety benefit for surveillances that are performed on a routine basis, during plant

operations to accommodate operating conditions, that are not suitable for performing the surveillance. Based on these reasons, the change is acceptable for implementation.

2.1 TECHNICAL CONCLUSION

The proposed changes to the Duane Arnold Energy Center TS 4.6.G.1 and the associated bases are acceptable. The proposed addition of TS 4.6.G.3, is also acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATIONS

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any 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 (59 FR 45026). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Colaccino

Date: January 6, 1995