

November 3, 1997

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, Kansas 66839

SUBJECT: WOLF CREEK GENERATING STATION - AMENDMENT NO. 114 TO FACILITY
OPERATING LICENSE NO. NPF-42 (TAC NO. M99809)

Dear Mr. Maynard:

The Commission has issued the enclosed Amendment No. 114 to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated October 17, 1997.

The amendment revises TS 4.5.2b and associated Bases to eliminate the requirement to vent the centrifugal charging pump casings.

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

Kristine M. Thomas, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosures: 1. Amendment No. 114 to NPF-42
2. Safety Evaluation

cc w/encs: See next page

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Mr. Otto L. Maynard

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November 3, 1997

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

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 114
License No. NPF-42

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Wolf Creek Generating Station (the facility) Facility Operating License No. NPF-42 filed by the Wolf Creek Nuclear Operating Corporation (the Corporation), dated October 17, 1997, 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-42 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 114, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. The Corporation 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

Kristine M. Thomas

Kristine M. Thomas, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: November 3, 1997

ATTACHMENT TO LICENSE AMENDMENT NO. 114

FACILITY OPERATING LICENSE NO. NPF-42

DOCKET NO. 50-482

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 5-4
B 3/4 5-2

INSERT

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

EMERGENCY CORE COOLING SYSTEMS

3/4.5.2 ECCS SUBSYSTEMS - $T_{avg} \geq 350^{\circ}\text{F}$

LIMITING CONDITION FOR OPERATION

3.5.2 Two independent Emergency Core Cooling System (ECCS) subsystems shall be OPERABLE with each subsystem comprised of:

- a. One OPERABLE centrifugal charging pump,
- b. One OPERABLE Safety Injection pump,
- c. One OPERABLE RHR heat exchanger,
- d. One OPERABLE RHR pump, and
- e. An OPERABLE flow path capable of taking suction from the refueling water storage tank on a Safety Injection signal and automatically transferring suction to the containment sump during the recirculation phase of operation.

APPLICABILITY: MODES 1, 2, and 3.*

ACTION:

- a. With one ECCS subsystem inoperable, restore the inoperable subsystem 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.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected Safety Injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

*The provisions of Specifications 3.0.4 and 4.0.4 are not applicable for entry into MODE 3 for the centrifugal charging pumps and the Safety Injection pumps declared inoperable pursuant to Specification 4.5.3.2 provided the centrifugal charging pumps and the Safety Injection pumps are restored to OPERABLE status within 4 hours or prior to the temperature of one or more of the RCS cold legs exceeding 375°F, whichever comes first.

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the following valves are in the indicated positions with power to the valve operators removed:

<u>Valve Number</u>	<u>Valve Function</u>	<u>Valve Position</u>
BN-HV-8813	Safety Injection to RWST Isolation Vlv	Open
EM-HV-8802A(B)	SI Pump Discharge Hot Leg Iso Vlvs	Closed
EM-HV-8835	Safety Injection Cold Leg Iso Valve	Open
EJ-HV-8840	RHR/SI Hot Leg Recirc Iso Valve	Closed
EJ-HV-8809A	RHR to Accum Inj Loops 1 & 2 Iso Vlv	Open
EJ-HV-8809B	RHR to Accum Inj Loops 3 & 4 Iso Vlv	Open

- b. At least once per 31 days by:
 - 1) Verifying that the ECCS piping is full of water by venting the RHR and SI pump casings and accessible ECCS discharge piping high points, and
 - 2) 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.
- c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suction during LOCA conditions. This visual inspection shall be performed:
 - 1) For all accessible areas of the containment prior to establishing CONTAINMENT INTEGRITY, and
 - 2) At least once daily of the areas affected within containment by containment entry and during the final entry when CONTAINMENT INTEGRITY is established.
- d. At least once per 18 months by:
 - 1) Verifying automatic interlock action of the RHR System from the Reactor Coolant System by ensuring that with a simulated or actual Reactor Coolant System pressure signal greater than or equal to 425 psig, the interlocks prevent the valves from being opened.

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 limits for operation with an accumulator inoperable for any reason except an isolation valve closed minimizes the time exposure of the plant to a LOCA event occurring concurrent with failure of an additional accumulator which may result in unacceptable peak cladding temperatures. If a closed isolation valve cannot be immediately opened, the full capability of one accumulator is not available and prompt action is required to place the reactor in a mode where this capability is not required.

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 Requirements 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 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 affects of a loss of decay heat removal during a reduced RCS inventory condition.

The Surveillance Requirements provided to ensure OPERABILITY of each component ensures that at a minimum, the assumptions used in the safety analyses are met and that subsystem OPERABILITY is maintained. Surveillance Requirements for throttle valve position stops and flow balance testing provide assurance that proper ECCS flows will be maintained in the event of a LOCA. Maintenance of proper flow resistance and pressure drop in the piping system to each injection point is necessary to: (1) prevent total pump flow from exceeding runout conditions when the system is in its minimum resistance configuration, (2) provide the proper flow split between injection points in accordance with the assumptions used in the ECCS-LOCA analyses, and (3) provide an acceptable level of total ECCS flow to all injection points equal to or above that assumed in the ECCS-LOCA analyses. The Surveillance Requirements for leakage testing of ECCS check valves ensures that a failure of one valve will not cause an intersystem LOCA. The Surveillance Requirements to vent the RHR and SI pump casings and accessible, i.e., can be reached without personnel hazard or high radiation dose, ECCS discharge piping ensures against inoperable pumps caused by gas binding or water hammer in ECCS piping.

3/4.5.5 REFUELING WATER STORAGE TANK

The OPERABILITY of the refueling water storage tank (RWST) as part of the ECCS ensures that a sufficient supply of borated water is available for injection by the ECCS in the event of a LOCA. The limits on RWST minimum volume and boron concentration ensure that: (1) sufficient water is available within containment to permit recirculation cooling flow to the core, and (2) the reactor will remain subcritical in the cold condition following mixing of the RWST and the RCS water volumes assuming all the control rods are out of the core. These assumptions are consistent with the LOCA analyses.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 114 TO FACILITY OPERATING LICENSE NO. NPF-42

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

1.0 INTRODUCTION

By letter dated October 17, 1997, Wolf Creek Nuclear Operating Corporation (WCNOC, the licensee) requested changes to the Technical Specifications (TS) (Appendix A to Facility Operating License No. NPF-42) for the Wolf Creek Generating Station (WCGS). The proposed changes would revise TS 4.5.2b and associated Bases to eliminate the requirement to vent the centrifugal charging pump casings.

2.0 EVALUATION

The emergency core cooling system (ECCS) pumps are normally in a standby, non-operating mode. As such, flow path piping has the potential to develop voids and pockets of entrained gases. Maintaining the piping from the ECCS pumps to the reactor coolant system (RCS) full of water by venting pump casings and accessible discharge piping high point vents ensures that the system will perform properly, injecting its full capacity into the RCS upon demand. Venting of the non-operating subsystems ensures that the piping is full of water and provides confidence that a potential water hammer event which could result from voiding would not result in unacceptable dynamic loads.

The proposed TS amendment would eliminate the requirement to vent the centrifugal charging pump casings. TS 4.5.2b requires verifying that the ECCS piping is full of water by venting the ECCS pump casings and accessible discharge piping high points at least once every 31 days. However, the centrifugal charging pumps, which are ECCS pumps, were designed and installed to be self-venting, and are not provided with casing vent valves. The design of the pump places the suction and discharge piping at the top of the pump casing. The centrifugal charging pump suction piping is in communication with either the refueling water storage tank or the volume control tank. Both of these sources provide a net positive suction pressure for the pumps. The design of the centrifugal charging pumps is such that significant noncondensable gases do not collect in the pumps, whether they are running or not. The suction and discharge lines are on the top of the pumps and the internal cavities in the pump that do not communicate with the nozzles are small enough that significant gas accumulation in the pump casings will not

occur. Noncondensable gases that may collect in the discharge piping will be vented at the discharge piping high points every 31 days per TS 4.5.2b.1).

Operating experience has shown that no significant voiding has occurred in the affected piping which will continue to be vented at a high point every 31 days per TS 4.5.2b.1). The pump vendor informed the licensee that small amounts of gases can be swept through the pump without causing damage to the pump. Wolf Creek has had the pumps disassembled and inspected by the vendor. Only normal signs of marking and wear were observed on the pump impeller.

The centrifugal charging pump is designed to be self venting and noncondensibles will collect in high points which are vented every 31 days. As a result, the removal of this venting requirement will not affect the operability of the centrifugal charging pump. The limiting condition for operation (LCO) associated with the pump is not affected and removal of the requirement does not meet any of the four criteria for retention in TS as defined by 10 CFR 50.36.

Based on the above, the staff concludes that the elimination of the requirement to vent the centrifugal charging pump casings will make the TS surveillance requirements consistent with the design of the ECCS system, and that the TS surveillance, as modified, will provide continued confidence that unacceptable accumulations of gases will not occur.

3.0 DESCRIPTION OF EXIGENT CIRCUMSTANCES

WCGS shut down on October 4, 1997, for a refueling outage and is currently in Mode 6. On October 14, 1997, WCNOG personnel determined that WCGS was not being operated in compliance with the technical specifications in that the centrifugal charging pump casings were not being vented as required by Technical Specification 4.5.2b. The pump casings are designed without casing vents since noncondensable gases can escape through the top-mounted suction and discharge nozzles. Therefore, a change to TS 4.5.2b and associated Bases is needed to specify that only the safety injection and residual heat removal pumps require vent of the pump casings. The licensee promptly submitted the amendment request.

Restart of WCGS is planned for early November, with Mode 4 expected on November 10, 1997 (changed from November 4, 1997, as stated in the October 17, 1997, letter due to an extension in the outage). Technical Specification LCO 3.5.3 requires one operable centrifugal charging pump in Mode 4 and Surveillance Requirement 4.5.3.2 requires the centrifugal charging pump be demonstrated operable per the requirements of Specification 4.5.2, which currently includes venting of the pump casings.

The exigent situation exists and cannot be avoided because (1) the TS noncompliance was not identified by WCNOG until October 14, 1997, and (2) WCGS cannot be returned to Mode 4 without the change.

The staff finds the licensee acted in a timely manner, the licensee has not abused the exigent provisions and there is not sufficient time to process this amendment request in the routine manner as described in 10 CFR 50.91 without causing an unnecessary delay in startup of WCGS.

4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has made a final determination that the amendment involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92(c), this means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The staff evaluated the proposed changes against the above standards as required by 10 CFR 50.91(a) and has concluded that:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change will align the surveillance requirements with the installed system design and normal operating conditions. The conduct of surveillances required by technical specifications is not postulated to initiate an accident. The intent of the surveillance ensures operability of the centrifugal charging pumps by verifying that the emergency core cooling system (ECCS) piping is full of water and not subjected to gas binding or water hammer. The design of the centrifugal charging pumps is such that significant noncondensable gases do not collect in the pumps, whether they are running or not. Therefore, it is unnecessary to require periodic pump casing venting to ensure the equipment will remain operable. In addition, operating experience has shown that no significant voiding has occurred in the affected piping which will continue to be vented at a high point every 31 days per Surveillance Requirement 4.5.2b.1). Therefore, no increase in the probability or consequences of an accident will occur as a result of this change.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change will not result in new failure modes because no new equipment is installed and installed equipment is not operated in a new or different manner. The design of the centrifugal charging pumps is such that significant noncondensable gases do not collect in the pumps, whether they are running or not. Therefore, it is unnecessary to require periodic pump casing venting to ensure the equipment will remain operable. Manual venting operations have been performed which minimizes the potential for voids in system piping. Accordingly, this change will not create the possibility of a new or different kind of accident.

3. The proposed change does not involve a significant reduction in a margin of safety.

The margin of safety is not significantly reduced because the proposed change provides assurance that locations where noncondensable gases can collect will be vented. Eliminating the requirement to vent the centrifugal charging pump casings where gases cannot collect has no functional effect on the system. This assures proper system functioning. Additionally, operating experience has shown that no significant voiding has occurred in the affected piping which will continue to be vented at a high point every 31 days per Surveillance Requirement 4.5.2b.1). Therefore, this change will not involve a significant reduction in the margin of safety.

Accordingly, the Commission has determined that this amendment involves no significant hazards consideration.

5.0 PUBLIC COMMENTS

The NRC received comments from two members of the public questioning the exigency of the TS amendment. In addition, one of the members of the public asked (1) how many times the licensee performed the surveillance, (2) were the centrifugal charging pumps originally designed without casing vents, and (3) is the licensee at fault for not having detected the TS problem in the past. Further, it was requested that the NRC not grant the license amendment request until it has been processed in accordance with federal regulations.

As discussed in 10 CFR 50.91(a)(2)(ii), under the normal amendment process, a 30 day comment period is required after publication of the proposed amendment in the Federal Register. Section 50.91(a)(6) indicates that when the Commission finds that exigent circumstances exist, in that time does not permit the Commission to publish a Federal Register notice allowing 30 days for prior public comment, the Commission may process the request under exigent circumstances and provide a two week prior comment period if the Commission determines that the licensee acted in a timely manner, did not abuse the exigent provisions, and there was not sufficient time to process the amendment request in a routine manner. In lieu of the two week notice, Section 50.91(a)(6) further states that the Commission may use local media to provide reasonable notice to the public in the area surrounding the facility and a reasonable opportunity for the public to comment.

As discussed in Section 3.0 of the Safety Evaluation, on October 14, 1997, WCNO identified that WCGS was not being operated in compliance with the TS in that the centrifugal charging pump casings were not being vented as required by TS 4.5.2b. This situation was not identified until WCNO became aware of a similar situation at another licensed facility and initiated a review to determine the applicability to WCGS. The pumps were not designed with casing vents since noncondensable gases can escape through the top-mounted suction and discharge nozzles. Without casing vents, venting of the pump casings is not possible and further, is not needed. As such, the TS surveillance has never been performed.

Based on the above, WCNOC submitted a request for a TS amendment on October 17, 1997. At the time of the request, WCGS was in a refueling outage, with Mode 4 (the first Mode at which compliance with TS 4.5.2b would be needed) expected to be entered on November 4, 1997 (however, due to a change in the refueling schedule, Mode 4 is currently expected on November 10, 1997). The licensee requested that the amendment be processed under exigent circumstances to allow startup of WCGS at the end of the outage, since processing the amendment in a routine manner would delay startup of WCGS. As such, on October 24, 1997, the Commission used local media (Coffey County Today newspaper) to provide reasonable notice to the public in the area surrounding the facility and a reasonable opportunity (5 days) for the public to comment on the proposed TS amendment.

Based on the above, and the staff's determination (see Section 3.0 of the Safety Evaluation) that the licensee acted in a timely manner, did not abuse the exigent provisions, and there was not sufficient time to process the request in a routine manner, the staff has concluded that processing the licensee's TS amendment request under exigent circumstances is in accordance with the regulations.

6.0 STATE CONSULTATION

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

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final no significant hazards consideration with respect to this amendment. 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.

8.0 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: K. Thomas

Date: November 3, 1997