

November 30, 2004

Mr. James E. Ellis
Manager, Morris Operation
General Electric Company
7555 East Collins Road
Morris, IL 60450

SUBJECT: PRELIMINARY LICENSE AND SAFETY EVALUATION REPORT FOR
AMENDED MATERIALS LICENSE SNM-2500 FOR THE GENERAL ELECTRIC
MORRIS OPERATION INDEPENDENT SPENT FUEL STORAGE
INSTALLATION (TAC NO. L23767)

Dear Mr. Ellis:

By letter dated July 30, 2004, as supplemented August 13, 2004, General Electric (GE) submitted an application to the U.S. Nuclear Regulatory Commission, in accordance with 10 CFR Part 72, for the review and approval of amendment to Materials License No. SNM-2500. This amended license, when approved, will supercede in its entirety Materials License SNM-2500, Amendment 9, dated June 16, 1995. Please note that this proposed approval is denoted as amendment 12 since requests for approval of proposed amendment 10 and amendment 11 were withdrawn by your letter dated March 4, 2004. Changes made to the enclosed preliminary amended Materials License and Technical Specifications are indicated by vertical lines in the margin.

As a result of our review of your application and its supplements, the staff has prepared a preliminary License and Safety Evaluation Report (SER) pursuant to the requirements of 10 CFR Part 72. Enclosed is a copy of the preliminary License and SER for GE's review and identification of inaccuracies and omissions. GE is requested to respond with any comments by close of business on December 6, 2004.

GE requested changes to the License and Technical Specifications to better reflect the current condition of the Morris Operation Independent Spent Fuel Storage Installation. Please continue to reference Docket No. 72-1 and TAC No. L23767 in future correspondence related to this request. If you have any comment or questions concerning this request, please contact me at 301-415-1179.

Sincerely,
/RA/
Christopher M. Regan, Senior Project Manager
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No.: 72-1
TAC No. L23767
Enclosures: 1. Preliminary License
2. Preliminary SER

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GENERAL ELECTRIC COMPANY
DOCKET NO. 72-1
MORRIS OPERATION INDEPENDENT SPENT FUEL STORAGE INSTALLATION
AMENDMENT TO MATERIALS LICENSE

Amendment 12
License SNM-2500

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The amendment application dated July 30, 2004, as supplemented August 1, 2004, complies with the standards 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 General Electric Morris Operation Independent Spent Fuel Storage Installation will continue to 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 that (i) the activities authorized by this amendment can be conducted without endangering public health and safety, and (ii) such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of the amendment will not be inimical to the common defense and security or to public health and safety; 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, based on the foregoing findings, the license is amended by the enclosed changes to Materials License SNM-2500.
3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

John Monninger, Chief
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Enclosed: (1) Revised License Pages
(2) Revised Technical Specification Pages

Date of Issuance: _____

SAFETY EVALUATION REPORT

Docket 72-1
Materials License SNM-2500
General Electric Morris Operation
Independent Spent Fuel Storage Installation
Amendment 12 to the Technical Specification

SUMMARY

This Safety Evaluation Report (SER) documents the U.S. Nuclear Regulatory Commission (NRC) staff's review and evaluation of amendment 12 to the license for the General Electric, Morris Operation (GE-MO) Independent Spent Fuel Storage Installation (ISFSI) license, Special Nuclear Materials License (SNM) number SNM-2500. The application for an amended 10 CFR Part 72 license under the provisions of 10 CFR 72.16 was filed, July 30, 2004, by the General Electric Company (GE), license holder and principle owner and company with the responsibility for maintaining the Morris Operation. By letter dated March 1, 2004, GE requested the withdrawal of proposed Amendment 10 dated April 10, 1998, and proposed Amendment 11 dated August 13, 2001. The Amendment 12 request included the necessary engineering and technical evaluations for each proposed revision.

The NRC has reviewed the Amendment 12 request and accompanying documentation; the updated Consolidated Safety Analysis Report (CSAR) dated August 6, 2004; and the September 24, 2004, response to the NRC's Request for Additional Information (RAI). Based on the information furnished by GE-MO, the staff concludes that the proposed Amendment 12 to license number SNM-2500 and Technical Specifications for the GE-MO facility meets the requirements of 10 CFR Part 72.

1.0 General Information

General Electric Company (GE) operates an ISFSI near Morris, Illinois. The facility was originally designed to reprocess spent nuclear fuel but was converted to an ISFSI when the original pre-operational testing proved unsuccessful. GE has operated the facility as an ISFSI under its current license since 1982. During this time, GE has submitted, and the NRC has approved, nine license amendments and Technical Specification modifications. These amendments have identified changes and modifications in the plant, its personnel, and operating procedures. The modifications have been completed to reduce operating expenses, update to more modern equipment, and identify changes in procedures and personnel during the operation of the facility. Proposed Amendments 10 and 11 were submitted but later withdrawn by the licensee.

2.0 Amendment Evaluation

Title 10 of the Code of Federal Regulations, Part 72 (10 CFR 72) contains the regulations for the licensing requirements of ISFSIs. The NRC has assessed the modifications proposed by GE-MO in Amendment 12 to the Technical Specifications and evaluated whether or not the proposed changes comply with the requirements of the regulations. The NRC's evaluation is discussed in Section 3. The staff has determined that all of the proposed changes are acceptable and do not adversely impact the safety of the GE-MO ISFSI.

3.0 Evaluation of Proposed Technical Specification Changes

This section provides a detailed evaluation of the proposed Amendment 12 changes. Included is a comparison between the proposed changes and the Technical Specifications, as approved in Amendment 9, for the GE-MO ISFSI.

Section 1.0 Introduction

Approved Version: States that the Technical Specifications govern the safety of the *receipt*, possession, storage, and transfer of irradiated fuel from light-water reactors at the Morris Operation.”

Amendment 12, Proposed Revision: The word “*receipt*” has been deleted.

GE-MO Justification for Change: GE-MO has no plans to receive additional spent fuel.

NRC Finding: Acceptable — This change does not impact the current safety of the facility. The Current Licensing Basis (CLB) allows GE-MO to receive additional spent nuclear fuel. Eliminating this ability from the CLB limits the site to current inventory which has been in storage since 1989.

Section 1.2.1 Quality Assurance

Approved Version: GE-MO activities will be conducted in accordance with requirements of Appendix B, 10 CFR 50.

Amendment 12, Proposed Revision: GE-MO activities will be conducted in accordance with 10 CFR 72 Subpart G.

GE-MO Justification for Change: The Quality Assurance (QA) Plan should not be an attachment to the Consolidated Safety Analysis Report (CSAR). It should be a stand-alone document that can be reviewed by the NRC staff. This change is in accordance with the requirements of 10 CFR Part 72.

NRC Finding: Acceptable — The quality assurance requirements of both 10 CFR Part 50, Appendix B and 10 CFR Part 72, Subpart G are equivalent. This change is editorial in nature and does not impact the safety of the facility.

Section 1.2.2 Fuel Transfer Canal Closure

Approved Version: Refers to Figure 1-5 in the Consolidated Safety Analysis Report (CSAR).

Amendment 12, Proposed Revision: Deleted this reference from the Technical Specification and the figure from the CSAR.

GE-MO Justification for Change: The figure was deleted from the CSAR. The description alone is sufficient.

Reviewer Comment: Acceptable — Figure 1-5 was deleted from the CSAR during an earlier revision. This proposed amendment brings the Technical Specification and CSAR into agreement. This change has no adverse effect on the safety of the facility.

Section 2.1.1(a) & (b) Specification

Approved Version: Provides specific limits for the type of light-water reactor nuclear fuel that can be stored at GE-MO. Figures 2-1 (a and b) and 2-2 (a and b) define the fuel parameters for the receipt of spent nuclear fuel.

Amendment 12, Proposed Revision: Deletes all of Section 2.1.1.b, which includes fuel parameters for spent fuel to be received by GE-MO, the authorization to store stainless-steel-clad LaCrosse 10x10 BWR fuel, and Figures 2-1 (a and b) and 2-2 (a and b) which contain the k4 limits for spent fuel received by or stored at GE-MO. The replacement section contains detailed historic information (type, cladding, bundle array, dates received, and total bundles) for the fuel onsite and limits GE-MO to storage of the fuel currently onsite.

GE-MO Justification for Change: The proposed amendment limits the facility to its current inventory. GE-MO has deleted fuel receipt parameters because: "The current inventory has been on hand since 1989. No new receipts, no shuffling of fuel in storage, and no transfers are planned or expected."

NRC Finding: Acceptable — by including the statement, "No new fuel will be received and storage is limited to the current inventory," in the Technical Specification, GE-MO cannot receive any new fuel without a revision to the Technical Specification that would require NRC approval.

Section 2.3.1(a) Ventilation Exhaust Vacuum

Approved Version: Requires an air tunnel vacuum of at least 1.9 centimeters of water (0.75 inches of water) whenever the Low Activity Waste (LAW) evaporator is operating.

Amendment 12, Proposed Revision: Deletes this requirement.

GE-MO Justification for Change: The LAW evaporator was used to evaporate liquid waste from the LAW vault. The LAW vault has been closed, decontaminated, and is no longer in use. The original evaporator has been replaced with a smaller electric powered unit to evaporate the minimal quantity of water produced by laundry and other activities associated with the current operation. The smaller unit is operated only 1 to 2 weeks per year and is administratively controlled to operate only if the ventilation system is operating.

NRC Finding: Acceptable — the LAW vault and LAW evaporator was originally part of the fuel reprocessing operation. It is not required for spent fuel storage. Loss of vacuum exhaust will not adversely impact the safety of the current fuel storage operation.

Section 4.0 Surveillance Requirements

Approved Version: Table 4-1 summarizes the surveillance requirements and frequencies for effluent air, evaporative ponds, sealed sources, instruments, *basin water coolers*, *process steam*, *cask coolant*, and spent fuel storage basin water.

Amendment 12, Proposed Revision: Table 4-1 summarizes the surveillance requirements for effluent air, wastewater basins, sealed sources, instruments, and spent

fuel storage basin water. Surveillance requirements for basin water coolers, process steam and cask coolant have been eliminated.

GE-MO Justification for Change: Deleted the surveillance requirements for basin water coolers because the outside equipment has been replaced with inside chillers which are not classified as “important-to-safety.” Deleted the surveillance requirements for process steam because the process steam system has been replaced with a package boiler that does not perform a safety-related function. Deleted the surveillance requirements for cask coolant because liquid cooled shipping casks are no longer used.

NRC Finding: Acceptable — Removing surveillance requirements for non-safety related equipment and unnecessary components from the Technical Specifications is acceptable and in compliance with 10 CFR §72.44(c)(1).

Section 4.5 Coolers

Approved Version: Requires monthly inspections and smear samples of the basin water coolers.

Amendment 12, Proposed Revision: Deleted this section.

GE-MO Justification for Change: The exterior water coolers were removed in 2000. The new heat exchanger is inside and contained in a sump and piped to drain leakage back to the fuel storage basins.

NRC Finding: Acceptable — The original Technical Specification requirement verified that the exterior water cooler units did not leak potentially contaminated basin water onto the ground outside the building. Replacing the exterior coolers with interior chillers has eliminated the need for this requirement.

Section 4.6 Process Steam Bypass

Approved Version: Requires radiological sampling of process steam condensate when utility steam is used to operate the low-activity waste evaporators.

Amendment 12, Proposed Revision: Deleted this section.

GE-MO Justification for Change: The low-activity waste (LAW) evaporator no longer uses steam. The steam evaporator was replaced with an electric evaporator.

NRC Finding: Acceptable — The steam powered LAW evaporator was replaced with an electrical evaporator and this requirement is no longer applicable to the facility.

Section 4.7 Cask Coolants

Approved Version: Specifies that only water can be used as a cask coolant in all casks received by GE-MO.

Amendment 12, Proposed Revision: Deleted this section.

GE-MO Justification for Change: No new fuel will be received by GE during the license renewal period.

NRC Finding: Acceptable — GE-Morris has eliminated its ability to receive new spent fuel for storage. This section is no longer required in the Technical Specifications.

Section 4.8 Basin Water Chemical Characteristics

Approved Version: Specifies the basin water shall be maintained as follows.

Item	Acceptable Analysis
pH	4.5 to 9.0
NaNO ₃	<200 ppm
Cl-	<10 ppm

Section 4.5 of Amendment 12, Proposed Revision: Proposes to revise this specification to read as follows.

Item	Acceptable Analysis
Conductivity	Less than 2.5 μ moh/cm (equivalent to pH of 4.5 to 9.0)

GE-MO Justification for Change: A report from L. L. Denio to the GE-MO Safety Committee dated February 16, 1996, provides the justification for assuming an equivalency between conductivity and pH.

NRC Finding: Acceptable — The NRC staff performed an independent evaluation of the relationship between conductivity and water purity and found the evaluation submitted by GE-Morris to be acceptable.

Water quality limits are implemented to assure a suitable water environment for the safe storage of the spent nuclear fuel and submerged equipment. The original water treatment facility produced high-quality water with a dissolved solids concentration of approximately 100 parts per million (ppm), mostly sodium nitrate. This level, while low, was sufficient to permit normal laboratory equipment to accurately measure the concentration of hydrogen ions (H⁺) in solution (referred to as pH). The installation of a computer controlled demineralization system produced ultra-pure water with dissolved solid levels of less than 0.1 ppm which was too low to permit normal laboratory equipment to accurately measure the pH. Minor changes in water quality caused large swings in the apparent pH of the basin water. This led the licensee to seek an alternative method to verify the quality of the water in the fuels storage basins.

After analysis, GE proposed using conductivity to demonstrate the purity of the basin water. A review by the NRC staff determined that conductivity was an acceptable method of verifying the purity and non-aggressive nature of the water in the spent fuel storage basins. The results of the staff's analysis demonstrated that the ultra-pure water in the storage basins was in equilibrium with the carbon dioxide (CO₂) in the atmosphere which caused it to be mildly acidic. This helped offset the slightly alkaline nature of the makeup water from the demineralizers. Additional independent evaluations by the Pacific Northwest Laboratories in 1977 and the International Atomic Energy Agency (IAEA) in 1998 have shown the durability of spent nuclear fuels in wet storage.

Section 4.9 Basin Water Radioactive Contaminants

Approved Version: Requires halting all fuel receipt operations, NRC notification, and implementation of immediate cleanup measures if radioactive material concentrations in the basin water exceed 0.1 $\mu\text{Ci/ml}$.

Section 4.6 of Amendment 12, Proposed Revision: Eliminates NRC notification and fuel receipt language. The revised section states that additional water-cleanup measures shall be initiated if the concentration of radioactive material in the water exceeds 0.02 $\mu\text{Ci/ml}$ beta (β).

GE-MO Justification for Change: Elimination of fuel receipt language is acceptable because no new fuel will be received by GE-MO during this license renewal period. Additionally, any increase in fuel pool radioactivity levels will be reported to the NRC under normal reporting guidelines.

NRC Finding: Acceptable — GE-Morris has deleted its ability to receive any new fuel during this license period. The proposed amendment has significantly reduced the level (from 0.1 $\mu\text{Ci/ml}$ to 0.02 $\mu\text{Ci/ml}$ β) for taking corrective action and current plans call for the fuel in storage to remain undisturbed until it is shipped to a long term repository. This revision to the technical specification will not have an adverse impact on safety at the GE-MO site.

Section 5.1 Fuel-Storage Basin

Approved Version: States that the energy-absorbing pad on the cask set-off shelf shall not be altered without appropriate safety review.

Amendment 12, Proposed Revision: Adds a reference to the documentation requirements of 10 CFR §72.48.

GE-MO Justification for Change: For all practical purposes, the basins are full and no new fuel is planned or anticipated.

NRC Finding: Acceptable — no fuel shipping is currently planned. Undertaking a safety evaluation prior to shipping the fuel will assure that the energy absorbing pad is suitable for the casks to be used.

The energy-absorbing pad is installed on the bottom of the cask set-off shelf in the deepest part of the cask unloading basin. It is intended to absorb and distribute the impact of a fully loaded spent fuel shipping cask to minimize the possibility of rupturing the stainless steel basin liner or damaging the concrete floor of the spent fuel storage basin. The existing pad was designed for the General Electric type IF-300 shipping cask. New shipping cask designs are heavier and the pad may not adequately protect the stainless steel liner and concrete basin floor. A new safety analysis will be required to verify that the energy absorbing pad will perform its design function.

Section 5.2 (5.2.1 to 5.2.5) Fuel-Storage System

Approved Version: Contains detailed descriptions of the components of the fuel-storage system.

Amendment 12, Proposed Revision: Added the words “important to safety” and names the components of the fuel-storage system, but does not provide detailed descriptions of each component.

GE-MO Justification for Change: Detailed descriptions of the components of the fuel-storage system are contained in Section 11 of the CSAR, it is not necessary to repeat the descriptions in the Technical Specifications.

NRC Finding: Acceptable — identification of the components in the Technical Specification is sufficient. The detailed description in the CSAR is sufficient. This revision does not adversely impact the safety of the facility.

Section 6.2.2 Staff Qualifications

Approved Version: Provides minimum education, experience, and competence requirements for key members of the GE-MO staff.

Amendment 12, Proposed Revision: Deleted this section.

GE-MO Justification for Change: Section 9.2 of the CSAR has an organization chart and description of duties and responsibilities for each management position.

NRC Finding: Acceptable — Section 9.2 of the CSAR provides a description of the operating organization, delegations of responsibility and authority, and minimum skills and experience levels for various key staff positions. This is in compliance with 10 CFR §72.190.

Section 6.3.2(b) Plans and Procedures - Minimum Requirements

Approved Version: States that plans and procedures are required for analysis of cask-drop accident consequences prior to receipt of types of casks that have not been previously received or unloaded.

Amendment 12, Proposed Revision: States that plans and procedures are required prior to handling spent fuel shipping casks not previously handled by GE-MO per 10 CFR §72.48.

GE-MO Justification for Change: Loaded shipping casks will no longer be received by GE-MO. Fuel will be shipped at some future point, and the shipping casks need to be evaluated.

Reviewer Comment: Acceptable — the spent fuel storage basin is near full capacity and there will be no new receipts of spent fuel. Future plans to ship fuel from GE-MO will require new analyses and procedures which may require NRC review and approval.

Section 6.4.1 Safety Committee

Approved Version: States that the Safety Committee consists of seven members and that a minimum of four members must be present to conduct business. The Safety Committee members are identified as:

- Manager - Morris Operation.

- Manager - Plant Operations and Maintenance.
- Manager - Plant Services.
- Plant Operations Engineer.
- Maintenance Engineer.
- Safety and Security Engineer.

Amendment 12, Proposed Revision: States that the Safety Committee shall consist of five members and a minimum of three members must be present to conduct business. The proposed revision also references Figure 9-2 in the CSAR which identifies the Safety Committee members.

GE-MO Justification for Change: Due to staff reductions, the number of members in the Safety Committee has been changed from seven to five by Safety Committee approval so a minimum of three are required to conduct business. Specific members by title and position are described in the Safety Committee operating procedure. Figure 9-2 in the CSAR identifies the staff positions that are members of the Safety Committee.

NRC Finding: Acceptable — The operating staff at the GE-MO ISFSI has been reduced to reflect the facility's current operating mode and decision to not accept any additional spent fuel for storage. With no fuel movement planned in the near future, the facility can be safely operated with fewer individuals. The reduction in the number of workers will not adversely impact the quality of the change review process. Figure 9.2 in the CSAR identifies the following five individuals as members of the Safety Committee:

- Manager - Morris Operation.
- Manager - Plant Operations and Maintenance
- Manager - Regulatory Compliance
- Radiation and Operations Safety Officer
- Specialist - EHS, Procurement, and Facilities.

Additionally, Section 9 of the CSAR includes a description of the operating organization, delegations of responsibility and authority, and minimum skill and experience levels for these and other positions at the ISFSI. This position description complies with 10 CFR §72.28(c).

The primary responsibility of the Safety Committee is to review changes, tests and experiments to verify that the results will not adversely impact the safety and operation of the facility. The review must be done by individuals that are knowledgeable in the operation and safety requirements of the facility.

By identifying the Safety Committee members in the same section used to describe the organization and minimum knowledge, skills, and abilities needed to serve in the key positions, the NRC staff is able to review both the position and minimum qualifications for the members of the safety committee.

Section 6.4.2 Audits

Approved Version: States that audits shall be conducted as designated by the Manager of Nuclear Training Services and Manager of Nuclear Plant Services Department.

Amendment 12, Proposed Revision: States that audits shall be conducted as designated by GE Nuclear Energy Management.

GE-MO Justification for Change: None given.

NRC Finding: Acceptable — Audits shall be performed in accordance with the requirements of 10 CFR Part 72, Subpart G. This proposed modification is acceptable.

Section 6.5.1 Functions and Operating Limits

Approved Version: Requires the following actions when a functional or operating limit is exceeded:

- When feasible, prompt action taken to assure timely return of operations to compliance.
- Prompt notification of the Safety Committee.
- Notification of the NRC Regional Office within 24 hours.
- A root-cause evaluation of the failure to prevent reoccurrence.

Amendment 12, Proposed Revision: Requires the following actions when a functional or operating limit is exceeded:

- Prompt corrective actions to restore normal operation.
- Notification of the Safety Committee within 24 hours.
- Notification of the NRC Operations Center within 30 days.
- A root-cause evaluation of the failure to prevent reoccurrence.

GE-MO Justification for Change: Generic changes to improve document clarity and incorporate organizational name changes.

NRC Finding: Acceptable — Elimination of the phrase “When Feasible” makes the first requirement clearer. Changing notification of the Safety Committee from “prompt” to “within 24 hours” will not adversely impact safe operation of the facility. Additionally, notifying the NRC Operations Center within 30 days in lieu of the NRC Regional Office within 24 hours is in accordance with current NRC guidelines.

Section 6.5.2(c) Limiting Conditions

Approved Version: States that notification of the NRC shall be made at the time of the next inspection to advise them of events resulting in limiting conditions being exceeded.

Amendment 12, Proposed Revision: States that a report shall be sent to the NRC Operations Center within 30 days to advise them of events resulting in limiting conditions being exceeded.

GE-MO Justification for Change: No rationale given.

NRC Finding: Acceptable — 10 CFR 72.75, “Reporting Requirements for Specific Events and Conditions,” requires notification of the NRC within a specified time period after emergency and certain non-emergency events. This revision is in compliance with the NRC regulation.

Section 6.5.2(d) Limiting Conditions

Approved Version: States that a review of a noncompliance shall be made by the Plant Safety Committee whenever a given limiting condition has been exceeded more than once in a period of 3 months or more than twice in any 12-month period. In these situations, the Committee shall establish the cause and define means to eliminate or reduce the frequency of occurrence.

Amendment 12, Proposed Revision: States that the Safety Committee will establish cause and define means to prevent reoccurrence of events that result in a functional or operating limit being exceeded.

GE-MO Justification for Change: No rationale given.

NRC Finding: Acceptable — 10 CFR §72.172 states: “In cases of a significant condition identified as adverse to quality, the measures must ensure that the cause of the condition is determined and corrective action is taken to preclude repetition.” This word change is in agreement with the regulations.

Section 6.5.3(d) Surveillance Requirements

Approved Version: States that notification of NRC Inspection and Enforcement Regional Office, Region III, shall be made at the time of the next inspection to advise them of events that resulted in a surveillance requirement being violated.

Amendment 12, Proposed Revision: Deleted this section.

GE-MO Justification for Change: No rationale given.

NRC Finding: Acceptable — 10 CFR §72.75, “Reporting Requirements for Specific Events and Conditions,” requires notification of the NRC within a specified time period after emergency and certain non-emergency events.

Section 7.0 References and Notes

Approved Version: Bullet 3 defines “coolant” as the heat-transfer medium used in the cask.

Amendment 12, Proposed Revision: Deleted this section.

GE-MO Justification for Change: The current inventory has been on hand since 1989. No new receipts, no shuffling of fuel in storage, and no shipments are planned or expected.

NRC Finding: Acceptable — since the NRC has no approved casks using any liquid coolant, this definition may be deleted without impacting the safety of the facility.

Section 8.1 Environmental Monitoring Program

Approved Version: Refers to Table 8-1 that identifies specific environmental monitoring activities the licensee must perform.

Amendment 12, Proposed Revision: States the licensee will maintain an environmental monitoring program as detailed in specific Compliance and Operability Test Procedures. Changes in frequency or collection sites by the licensee shall be evaluated against the experience of acquired data and reported with the annual environmental report required by 10 CFR §72.44(d)(3).

GE-MO Justification for Change: The environmental monitoring program has provided results from over 20 years of Morris Operation environmental experience. These years of operational experience with the monitoring program provide a sound basis for evaluating the programs effectiveness.

NRC Finding: Acceptable — The effluent and environmental monitoring program is defined in Section 7.7.1 and Table 7-3 of the current CSAR. Changes or revisions to the environmental monitoring program will be noted in the yearly update of the CSAR.

Specification 8.2 Annual Environmental Report

Approved Version: Bases the requirement on 10 CFR §72.33(d)(3).

Amendment 12, Proposed Revision: Uses 10 CFR §72.44(d)(3) as the basis for the requirement.

GE-MO Justification for Change: No rationale given.

NRC Finding: Acceptable — 10 CFR §72.33(d)(3) does not exist. The correction is editorial in nature and does not adversely impact the safety of the facility.

4.0 Requirements for Noticing Proposed Action

The staff considered the amendment's potential impact on the health and safety of the public. The staff finds that this license amendment does not involve any changes in the scope or type of operations presently authorized by the license. The staff has determined that the amendment does not present a genuine issue as to whether public health and safety will be significantly affected.

Accordingly, pursuant to 10 CFR 72.46(b)(2), immediate action on this amendment may be taken without notice of the proposed action or notice of opportunity for hearing.

5.0 Environmental Review

In connection with the issuance of the amended license, an Environmental Impact Considerations Determination was conducted. The staff has determined that this amendment request, due to the nature of the changes being proposed, satisfies the criteria specified in 10 CFR 51.22©)(11) for a categorical exclusion from the requirements to perform an environmental assessment or to prepare an environmental impact statement.

6.0 Conclusions and Findings

The proposed revision to the Technical Specifications and commensurate changes to the ISFSI license do not affect other prior staff conclusions and findings made in granting approval of

Amendment 9. The staff agrees that the proposed changes to the ISFSI License and TS will have no adverse affect on the continued safe operation of the GEMO ISFSI.

The staff concludes that proposed changes to the License and Technical Specifications provide reasonable assurance that the ISFSI will allow continued safe storage of spent fuel. This finding is based on the regulation itself, appropriate regulatory guides, applicable codes and standards, and accepted practices.

Issued with Materials License No. SNM-2500, Amendment No. 12, on _____

