

## I. OVERVIEW / SIGNATURES

Facility: Waterford 3

Document Reviewed: ER-W3-2002-0595-000

Change/Rev.: 00

System Designator(s)/Description: Main Generator, Main Transformer

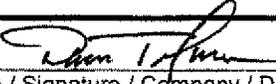
## Description of Proposed Change:

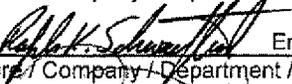
ER-W3-2002-0595-000 replaces the oil filled generator output breakers (OCB) with SF6 generator output breakers (GOB) having continuous and interrupt current ratings upgraded for generator output at the full main generator name plate rating. The replacement breakers perform the same function and interface with plant control in a similar manner, but employ different technology for electrical insulation and arc suppression. The replacement breakers also employ internal failure monitoring and trip actuation logic to mitigate failure mechanisms associated with the breaker design. Contrary to the existing breaker design, the replacement breaker local control cabinet does not include a test push button for breaker testing. Periodic testing will require installation of a temporary test switch or jumper, an activity only conducted with the breaker removed from service.

While the 50.59 Exemption for ER-W3-2002-0595-000 (including ERCN-1) addresses upgrade of bus work, disconnects and interconnecting lines in the switching station in addition to breaker replacement, this 50.59 Evaluation is limited to the replacement of the generator output breakers to address Corrective Action #2 of CR-WF3-2004-3152. This evaluation only addresses the change in breaker design, along with internal failure monitoring and trip protection changes, and the impact this change has on breaker function, since the previous 50.59 review for ER-W3-2002-0595-000 was determined adequate for the other switching station changes.

Check the applicable review(s): (Only the sections indicated must be included in the Review.)

<input type="checkbox"/>	EDITORIAL CHANGE of a Licensing Basis Document	Section I
<input type="checkbox"/>	SCREENING	Sections I and II required
<input type="checkbox"/>	50.59 EVALUATION EXEMPTION	Sections I, II, and III required
<input checked="" type="checkbox"/>	50.59 EVALUATION (#: <u>05-014</u> )	Sections I, II, and IV required

Preparer: David Tolman  Enercon 4/14/05  
Name (print) / Signature / Company / Department / Date

Reviewer: Ralph K. Schwartzbeck  Enercon 4/14/05  
Name (print) / Signature / Company / Department / Date

OSRC: R. A. Dadds  18 April 2005  
Chairman's Name (print) / Signature / Date

[Required only for Programmatic Exclusion Screenings and 50.59 Evaluations.]

## II. SCREENINGS

A. Licensing Basis Document Review

1. Does the proposed activity impact the facility or a procedure as described in any of the following Licensing Basis Documents?

Operating License	YES	NO	CHANGE # and/or SECTIONS IMPACTED
Operating License	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Orders	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If "YES", obtain NRC approval prior to implementing the change by initiating an LBD change in accordance with NMM ENS-LI-113. (See Section 5.2[13] for exceptions.)

LBDs controlled under 50.59	YES	NO	CHANGE # (if applicable) and/or SECTIONS IMPACTED
FSAR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS Bases	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Technical Requirements Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Core Operating Limits Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Safety Evaluation Report and supplements for the initial FSAR <sup>1</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Safety Evaluations for amendments to the Operating License <sup>1</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If "YES", perform an Exemption Review per Section III OR perform a 50.59 Evaluation per Section IV OR obtain NRC approval prior to implementing the change. If obtaining NRC approval, document the LBD change in Section II.A.5; no further 50.59 review is required. However, the change cannot be implemented until approved by the NRC. AND initiate an LBD change in accordance with NMM ENS-LI-113.

LBDs controlled under other regulations	YES	NO	CHANGE # (if applicable) and/or SECTIONS IMPACTED
Quality Assurance Program Manual <sup>2</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Emergency Plan <sup>2,3</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Fire Protection Program <sup>3,4</sup> (includes the Fire Hazards Analysis)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Offsite Dose Calculations Manual <sup>3,4</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If "YES", evaluate any changes in accordance with the appropriate regulation AND initiate an LBD change in accordance with NMM ENS-LI-113. No further 50.59 review is required.

<sup>1</sup> If "YES," see Section 5.2[5]. No LBD change is required.

<sup>2</sup> If "YES," notify the responsible department and ensure a 50.54 Evaluation is performed. Attach the 50.54 Review.

<sup>3</sup> Changes to the Emergency Plan, Fire Protection Program, and Offsite Dose Calculation Manual must be approved by the OSRC in accordance with NMM OM-119.

<sup>4</sup> If "YES," evaluate the change in accordance with the requirements of the facility's Operating License Condition or under 50.59, as appropriate.

2. Does the proposed activity involve a test or experiment not described in the FSAR?  Yes

No

If "yes," perform a 50.59 Evaluation per Section IV OR obtain NRC approval prior to implementing the change AND initiate an LBD change in accordance with NMM LI-113. If obtaining NRC approval, document the change in Section II.A.5; no further 50.59 review is required. However, the change cannot be implemented until approved by the NRC.

3. Basis

Explain why the proposed activity does or does not impact the Operating License/Technical Specifications and/or the FSAR and why the proposed activity does or does not involve a new test or experiment not previously described in the FSAR. Discuss other LBDs if impacted. Adequate basis must be provided within the Screening such that a third-party reviewer can reach the same conclusions. Simply stating that the change does not affect TS or the FSAR is not an acceptable basis.

Technical Specifications and Bases

Technical Specifications 3/4.8.1 specifies the requirement for two independent offsite sources of power to be operable but does not describe the role of the generator output breakers or provide any controls that have to be met for their operability. Therefore, the technical specifications are not affected by replacing these breakers.

Operating License and NRC Orders

The generator output breakers are not described by the Operating License and contain no restrictions for its function. No NRC Orders are issued with respect to the generator output breakers. Therefore, replacement of the generator output breakers does not affect the Operating License and does not involve any NRC Orders.

FSAR

FSAR Section 8.2 discusses the function of the generator output breakers and describes them as oil circuit breakers; however, the functional significance of oil insulation is not explicitly discussed. FSAR Section 8.2.2.2 describes the applicability of GDC 17 and GDC 18 criteria for two offsite independent sources of power to support safety-related equipment operation. SER Section 8.2 provides detailed consideration of the functional performance of the oil circuit breakers to ensure the availability of offsite power to supply power to safety-related loads and includes details of the coordination of the breakers. FSAR Section 8.2.2.1 discusses grid stability, a characteristic considered for viability of offsite power sources. The breakers' function to clear faults following transients were evaluated in the grid stability study. The evaluation in Section IV of this 50.59 Review is necessary since the replacement breaker technology (SF6 gas insulated) is different from the previously evaluated technology (oil insulated) and the failure mechanisms and means of monitoring, responding to failures, and testing, is changed commensurate with this different technology.

Technical Requirements Manual

The Switching Station equipment, including the generator output breakers are not discussed in the TRM.

4. **References**

Discuss the methodology for performing LBD searches. State the location of relevant licensing document information and explain the scope of the review such as electronic search criteria used (e.g., key words) or the general extent of manual searches per Section 5.5.1[5](d) of LI-101. **NOTE: Ensure that manual searches are performed using controlled copies of the documents. If you have any questions, contact your site Licensing department.**

LBDs/Documents reviewed via keyword search:      Keywords:

Autonomy 50.59 search

oil circuit breaker; OCB; generator breaker; offsite power, grid stability

LBDs/Documents reviewed manually:

Technical Specifications and Bases  
Section 3/4.8.1

FSAR  
Section 8.2

SER  
SER Section 8.2

5. Is the validity of this Review dependent on any other change?

Yes

No

If "YES", list the required changes/submittals. The changes covered by this 50.59 Review cannot be implemented without approval of the other identified changes (e.g., license amendment request). Establish an appropriate notification mechanism to ensure this action is completed.

(List the required changes / submittals.)

**B. ENVIRONMENTAL SCREENING**

If any of the following questions is answered "yes," an Environmental Review must be performed in accordance with NMM Procedure ENS-EV-115, "Environmental Evaluations," and attached to this 50.59 Review. Consider both routine and non-routine (emergency) discharges when answering these questions.

Will the proposed Change being evaluated:

- |     | <u>Yes</u>                          | <u>No</u>                           |  |
|-----|-------------------------------------|-------------------------------------|--|
| 1.  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Involve a land disturbance of previously disturbed land areas in excess of one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds)? |
| 2.  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)?  |
| 3.  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Involve dredging activities in a lake, river, pond, or stream?   |
| 4.  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Increase the amount of thermal heat being discharged to the river or lake?   |
| 5.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Increase the concentration or quantity of chemicals being discharged to the river, lake, or air?   |
| 6.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Discharge any chemicals new or different from that previously discharged?  |
| 7.  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Change the design or operation of the intake or discharge structures?  |
| 8.  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Modify the design or operation of the cooling tower that will change water or air flow characteristics?  |
| 9.  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Modify the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge?   |
| 10. | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)? <sup>1</sup>   |
| 11. | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Involve the installation of stationary fuel burning equipment or use of portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)? <sup>1</sup>               |
| 12. | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Involve the installation or use of equipment that will result in a new or additional air emission discharge?   |
| 13. | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Involve the installation or modification of a stationary or mobile tank?   |
| 14. | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Involve the use or storage of oils or chemicals that could be directly released into the environment?  |
| 15. | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Involve burial or placement of any solid wastes in the site area that may affect runoff, surface water, or groundwater?  |

See Page 10 for Environmental Review.

<sup>1</sup> See NMM Procedure ENS-EV-117, "Air Emissions Management Program," for guidance in answering this question.  
LI-101-01, Rev. 7

**C. SECURITY PLAN SCREENING**

If any of the following questions is answered "yes," a Security Plan Review must be performed by the Security Department to determine actual impact to the Plan and the need for a change to the Plan.

Could the proposed activity being evaluated:

- |     | <u>Yes</u>               | <u>No</u>                           |  |
|-----|--------------------------|-------------------------------------|--|
| 1.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Add, delete, modify, or otherwise affect Security department responsibilities (e.g., including fire brigade, fire watch, and confined space rescue operations)?  |
| 2.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Result in a breach to any security barrier(s) (e.g., HVAC ductwork, fences, doors, walls, ceilings, floors, penetrations, and ballistic barriers)?   |
| 3.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Cause materials or equipment to be placed or installed within the Security Isolation Zone?   |
| 4.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Affect (block, move, or alter) security lighting by adding or deleting lights, structures, buildings, or temporary facilities?   |
| 5.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect the intrusion detection systems (e.g., E-fields, microwave, fiber optics)?  |
| 6.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect the operation or field of view of the security cameras?   |
| 7.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect (block, move, or alter) installed access control equipment, intrusion detection equipment, or other security equipment?   |
| 8.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect primary or secondary power supplies to access control equipment, intrusion detection equipment, other security equipment, or to the Central Alarm Station or the Secondary Alarm Station? |
| 9.  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect the facility's security-related signage or land vehicle barriers, including access roadways?  |
| 10. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect the facility's telephone or security radio systems?   |

Documentation for accepting any "yes" statement for these reviews will be attached to this 50.59 Review or referenced below.

## IV. 50.59 EVALUATION

License Amendment Determination

Does the proposed Change being evaluated represent a change to a method of evaluation  Yes  
**ONLY?** If "Yes," Questions 1 – 7 are not applicable; answer only Question 8. If "No," answer  No  
 all questions below.

Does the proposed Change:

1. Result in more than a minimal increase in the frequency of occurrence of an accident  Yes  
 previously evaluated in the FSAR?  No

BASIS:

The reliability of offsite power sources required to supply safety-related electrical loads during transients and accidents evaluated in the FSAR is dependent on the operation of the generator output breakers to isolate the main generator and main transformers from offsite sources of energy. This isolation function is required to satisfy 10CFR50 GDC 17, which specifies the need for two independent offsite electrical power sources, since the Main Generator output flows through the same transmission lines dedicated for offsite power. Each replacement breaker has higher continuous and short-circuit current interrupt ratings, sufficient for full power output with the generator operated at 1333.2 MVA. The interrupt capacity of the replacement breakers bounds the fault analysis results at the rated generator output of 1333.2 MVA. The primary difference in the technology between the replacement breakers is the use of gas insulating medium (SF6), instead of the insulating oil employed in existing breakers. The grid stability evaluation (Report PID-185) demonstrated that the replacement breakers have sufficient fault clearing time response to support operation of Waterford 3 generator at the nameplate rating of 1333.2 MVA. Industry experience shows the SF6 breaker technology to be highly reliable and the likelihood of spurious trip operation due to loss of insulating gas is consistent with the likelihood of spurious trip of the existing oil insulated breakers. The potential for loss of isolation function as a result of leakage of SF6 insulating gas is mitigated by gas pressure and spring force monitoring devices which provide alarms and would trip the breakers prior to loss of function, placing it in the required state to ensure availability of the offsite power source. The provision for failure mitigation is consistent with the considerations made in the SER for failure protection. Although the built-in breaker test switch is omitted on the replacement breaker (requiring use of a temporary test switch or jumper), this has no effect on breaker function since the testing and maintenance are conducted with the breaker removed from service. Based on these considerations, the likelihood of a loss of offsite power event as a result of both generator output breakers failing to operate on demand or by their spurious operation is not increased more than a minimal amount.

2. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a  Yes  
 structure, system, or component important to safety previously evaluated in the FSAR?  No

## BASIS:

Each replacement breaker has higher continuous and short-circuit current interrupt ratings, sufficient for full power output with the generator operated at 1333.2 MVA. The interrupt ratings of the replacement breakers bound the fault analysis results at the rated generator output of 1333.2 MVA. Operation of the main generator at 1333.2 MVA with the replacement breakers ensures that the likelihood of breaker malfunction does not increase as a result of the higher power operation. The use of gas insulation technology in the breakers introduces a new failure mechanism, that being the loss of SF6 insulating gas. However, the failure mode of failing to isolate or break the circuit following faults or transients remains the same. The new breaker failure mechanism does not result in more than a minimal increase in the likelihood of breakers to isolate the offsite sources from faults or transients, since the new design has been demonstrated by industry experience to be highly reliable and because gas pressure and spring force monitoring provides an early alarm (in the main control room) and subsequent breaker trip prior to loss of function. The reliability of the replacement breakers limits the likelihood of spurious trip operation due to loss of insulating gas consistent with the likelihood of spurious trip of the existing oil insulated breakers. The provision for failure mitigation is consistent with the considerations made in the SER for failure protection. With the exception of the SF6 gas pressure trip discussed above, the power system protection inputs to the breakers remains the same and are evaluated and adjusted for operation of the generator at 1333.2 MVA as documented by ER-W3-2001-1149-008 and ER-W3-2002-0595-000. The breaker trip coordination with other breakers required to function to maintain offsite power availability and the sources of control power for the breakers remains unchanged. Breaker testability, including monitoring of SF6 gas pressure, is provided to facilitate periodic verification of breaker function and meets the requirements of GDC 18 as previously considered.

Although the local breaker test switch provided with the existing breaker is omitted on the replacement breaker control panels, the ability to install a temporary test switch or jumper is provided for by the breaker vendor. Routine methods for installing and controlling temporary test configurations such as wire lift logging and restoration verification provide reasonable assurance that maintenance related errors will not result in malfunction of the breakers commensurate with importance of the breaker functions. Based on these considerations, the likelihood of a malfunction of the SF6 replacement breakers is not increased more than a minimal amount.

3. Result in more than a minimal increase in the consequences of an accident previously evaluated in the FSAR?  Yes  
 No

## BASIS:

The generator output breakers provide a means to supply power from the main generator to the power transmission system and can only fail to isolate the transmission lines from faults or generator trips with the potential for loss of offsite power. The breakers cannot affect the consequence of loss of offsite power events. The consequence of a loss of offsite power is minimized by safety-related onsite power sources, whose integrity is maintained by other safety-related circuit protection. Therefore, the generator output breakers have no impact on the consequence of accidents regardless of the specific breaker design and technology.

4. Result in more than a minimal increase in the consequences of a malfunction of a structure, system, or component important to safety previously evaluated in the FSAR?  Yes  
 No

## BASIS:

Like the existing oil insulated breakers, the replacement SF6 breakers can fail to open, fail to close or spuriously trip due to malfunction. The potential for fire associated with the oil insulated breaker is greatly diminished by the inert SF6 breaker technology. The bounding result of failure of both breakers is the loss of offsite power sources, but the consequences of the loss of offsite power are not changed by installing the SF6 replacement breakers.

5. Create a possibility for an accident of a different type than any previously evaluated in the FSAR?  Yes  
 No

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50.59 REVIEW FORM

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BASIS:

The only accident or event influenced by the generator output breakers is the loss of offsite power event and other events evaluated coincident with loss of offsite power, all of which are currently described in the FSAR. The use of the gas insulated breakers, as opposed to the oil insulated breakers, does not create the possibility of new or different accidents since the SF6 gas is nonflammable and is not significantly toxic when released to the open environment.

6. Create a possibility for a malfunction of a structure, system, or component important to safety with a different result than any previously evaluated in the FSAR?  Yes  No

BASIS:

With the exception of the potential for fire that the existing oil insulated breakers have, the failure modes of the replacement breakers remain the same and the results of the failure of the breakers, i.e., loss of offsite power, is the same. The possibility of fire resulting from breaker failure is greatly diminished by use of inert SF6 gas as the insulating medium and the SF6 gas is not significantly toxic when released to the open environment. Based on these considerations, the replacement of the existing breakers with new SF6 gas insulated breakers does not create the possibility of a malfunction with a different result from the loss of offsite power evaluated in the FSAR.

7. Result in a design basis limit for a fission product barrier as described in the FSAR being exceeded or altered?  Yes  No

BASIS:

The generator output breakers do not interface with or function to maintain fission product barriers or the processes associated with the barriers and they do not affect the capacity of the offsite power sources to supply safety-related loads; therefore, the replacement of the breakers cannot result in a design basis limit for fission product barriers being exceeded.

8. Result in a departure from a method of evaluation described in the FSAR used in establishing the design bases or in the safety analyses?  Yes  No

BASIS:

The replacement of the generator output breakers does not involve any method of analysis described in the FSAR; therefore, the breaker replacement does not result in a departure in the methods used to establish design basis or safety analysis results.

**If any of the above questions is checked "YES", obtain NRC approval prior to implementing the change by initiating a change to the Operating License in accordance with NMM Procedure ENS-LI-113.**

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	<b>NUCLEAR MANAGEMENT MANUAL</b>	QUALITY RELATED	EN-EV-115	REV. 0		
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ATTACHMENT 9.2  
SHEET 1 of 1

ENVIRONMENTAL REVIEW FORM (TYPICAL)

1. Facility: Waterford 3
2. Document Number: 50:59 Environmental Screening Review
3. ER Number: ER-W3-2002-0595-000
4. Activity Reviewed: Replacement of oil filled generator output breakers (OCB's) with gas filled SF6 (GOB) breakers
5. Complete Screening Below (as applicable to each site):

Reference	Within Scope	Modification/Revision/ Approval Needed
Section 2.0[1] References	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Section 2.0[2] References	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Section 2.0[4] References (ANO)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[5] References (GGNS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[6] References (IP2)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[7] References (IP3)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[8] References (JAF)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[9] References (PNPS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[10] References (RBS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[11] References (VYNPS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[12] References (W3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

6. If within scope, attach cited reference(s) and appropriate section(s) along with a brief discussion:  
**Sulfur Hexafluoride, (SF6) is not listed as a Toxic Air Pollutant under LAC 33:III .51 or a hazardous substance under LAC 33:III 39. SF6 is not a reportable hazardous material under CERCLA 40 CFR 302 nor is it listed as an extremely hazardous material under 40 CFR 355. Since SF6 is not listed as an air pollutant or toxic chemical in the above reference codes then Sulfur hexafluoride is not an environmental emission concern IAW the Clean Air Act, Clean Water Act, Waterford 3 air permit # 2520-00091-00, or LPDES permit # LA0007374. Since the modification to the breakers removes the oil content, the breakers are not required to be listed in the Spill Prevention Control and Countermeasure Plan in UNT-007-064. The use of SF6 filled OCB's does not pose any unreviewed environmental question and is within the scope of Section 2.0 [1], 2.0 [2], 2.0 [3] and 2.0 [12] references of this procedure.**
7. If a modification, revision or approval is needed, attach a brief discussion:
8. Prepared By: Mark Lague Date: 4-13-05