



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

October 25, 2011

Mr. Paul A. Harden
Site Vice President
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
Mail Stop A-BV-SEB1
P.O. Box 4, Route 168
Shippingport, PA 15077

SUBJECT: BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2 - ISSUANCE OF AMENDMENTS REGARDING THE ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE CHANGE TRAVELER-513, "REVISE PWR [PRESSURIZED-WATER REACTOR] OPERABILITY REQUIREMENTS AND ACTIONS FOR REACTOR COOLANT SYSTEM LEAKAGE INSTRUMENTATION" (TAC NOS. ME6120 AND ME6121)

Dear Mr. Harden:

The Commission has issued the enclosed Amendment No. 288 to Renewed Facility Operating License No. DPR-66 for the Beaver Valley Power Station, Unit No. 1 (BVPS-1) and Amendment No. 175 to Renewed Facility Operating License No. NPF-73 for the Beaver Valley Power Station, Unit No. 2 (BVPS-2). These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated April 29, 2011.

These amendments revise the BVPS-1 and 2 TSs to define a new time limit for restoring inoperable reactor coolant system (RCS) leakage detection instrumentation to operable status and establish alternate methods of monitoring RCS leakage when one or more required monitors are inoperable.

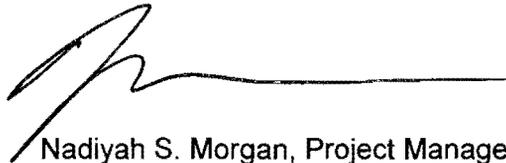
The proposed TS changes are consistent with the Commission-approved Technical Specifications Task Force, Change Traveler-513 (TSTF-513), "Revise PWR [Pressurized-Water Reactor] Operability Requirements and Actions for RCS Leakage Instrumentation," Revision 3. The TSTF-513, Revision 3 was issued in the *Federal Register* on January 3, 2011 (76 FR 189), as part of the consolidated line item improvement process.

P. Harden

- 2 -

A copy of the related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to be 'Nadiyah S. Morgan', with a long horizontal line extending to the right.

Nadiyah S. Morgan, Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

Enclosures:

1. Amendment No. 288 to DPR-66
2. Amendment No. 175 to NPF-73
3. Safety Evaluation

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

FIRSTENERGY NUCLEAR OPERATING COMPANY

FIRSTENERGY NUCLEAR GENERATION CORP.

DOCKET NO. 50-334

BEAVER VALLEY POWER STATION, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 288
Renewed License No. DPR-66

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by FirstEnergy Nuclear Operating Company, et al. (the licensee), dated April 29, 2011, 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 Renewed Facility Operating License No. DPR-66 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 288, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Nancy L. Salgado, Chief
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the License and
Technical Specifications

Date of Issuance: October 25, 2011

ATTACHMENT TO LICENSE AMENDMENT NO. 288

RENEWED FACILITY OPERATING LICENSE NO. DPR-66

DOCKET NO. 50-334

Replace the following page of the Renewed Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove
3

Insert
3

Replace the following page of Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove
3.4.15-2

Insert
3.4.15-2

- (3) FENOC, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (4) FENOC, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components;
- (5) FENOC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter 1: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

FENOC is authorized to operate the facility at a steady state reactor core power level of 2900 megawatts thermal.

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 288, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

(3) Auxiliary River Water System

(Deleted by Amendment No. 8)



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

FIRSTENERGY NUCLEAR OPERATING COMPANY

FIRSTENERGY NUCLEAR GENERATION CORP.

OHIO EDISON COMPANY

THE TOLEDO EDISON COMPANY

DOCKET NO. 50-412

BEAVER VALLEY POWER STATION, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 175
Renewed License No. NPF-73

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by FirstEnergy Nuclear Operating Company, et al. (the licensee), dated April 29, 2011, 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. NPF-73 is hereby amended to read as follows:

- (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 175, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto are hereby incorporated in the license. FENOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Nancy L. Salgado, Chief
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the License and
Technical Specifications

Date of Issuance: October 25, 2011

ATTACHMENT TO LICENSE AMENDMENT NO. 175

RENEWED FACILITY OPERATING LICENSE NO. NPF-73

DOCKET NO. 50-412

Replace the following page of the Renewed Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove

4

Insert

4

Replace the following page of Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove

3.4.15-2

Insert

3.4.15-2

- (b) Further, the licensees are also required to notify the NRC in writing prior to any change in: (i) the term or conditions of any lease agreements executed as part of these transactions; (ii) the BVPS Operating Agreement, (iii) the existing property insurance coverage for BVPS Unit 2, and (iv) any action by a lessor or others that may have adverse effect on the safe operation of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations set forth in 10 CFR Chapter 1 and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
 - (1) Maximum Power Level

FENOC is authorized to operate the facility at a steady state reactor core power level of 2900 megawatts thermal.
 - (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 175, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto are hereby incorporated in the license. FENOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 288 AND 175 TO RENEWED FACILITY OPERATING
LICENSE NOS. DPR-66 AND NPF-73
FIRSTENERGY NUCLEAR OPERATING COMPANY
FIRSTENERGY NUCLEAR GENERATION CORP.
OHIO EDISON COMPANY
THE TOLEDO EDISON COMPANY
BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-334 AND 50-412

1.0 INTRODUCTION

By application dated April 29, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11126A014), FirstEnergy Nuclear Operating Company (the licensee), requested changes to the Technical Specifications (TSs) for Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS-1 and 2). The proposed changes would revise the BVPS-1 and 2 TSs to define a new time limit for restoring inoperable reactor coolant system (RCS) leakage detection instrumentation to operable status and establish alternate methods of monitoring RCS leakage when one or more required monitors are inoperable.

The proposed TS changes are consistent with the Commission-approved Technical Specifications Task Force, Change Traveler-513 (TSTF-513), "Revise PWR [Pressured-Water Reactor] Operability Requirements and Actions for RCS Leakage Instrumentation," Revision 3. TSTF-513, Revision 3 was issued in the *Federal Register* (FR) on January 3, 2011 (76 FR 189), as part of the consolidated line item improvement process.

2.0 REGULATORY EVALUATION

The Nuclear Regulatory Commission (NRC) regulatory requirements related to the content of the TS are contained in Section 50.36 of Title 10 of the *Code of Federal Regulations* (10 CFR). Paragraph (c)(2)(i) of 10 CFR 50.36 states that limiting conditions for operation (LCOs) are the lowest functional capability or performance levels of equipment required for safe operation of the facility. Paragraph (c)(2)(ii) of 10 CFR 50.36 lists four criteria for determining whether

particular items are required to be included in the TS LCOs. The first criterion applies to installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary (RCPB). As described in the FR Notice associated with this regulation (60 FR 36953, July 16, 1995), the scope of TS includes two general classes of technical matters: (1) those related to prevention of accidents, and (2) those related to mitigation of the consequences of accidents. Criterion 1 addresses systems and process variables that alert the operator to a situation when accident initiation is more likely, and supports the first of these two general classes of technical matters which are included in TS. As specified in Paragraph (c)(2)(i) of 10 CFR 50.36, when an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by TS until the condition can be met.

The NRC's guidance for the format and content of PWR TS can be found in NUREG-1431, Revision 3.0, "Standard Technical Specifications [STS] Westinghouse Plants." STS 3.4.15 "RCS Leakage Detection Instrumentation" contains the guidance specific to the RCS leakage detection instrumentation for PWRs. The STS Bases provide a summary statement of the reasons for the STS.

The Bases for STS 3.4.15 contained in NUREG-1431, Revision 3.0, provide background information, the applicable safety analyses, a description of the LCO, the applicability for the RCS leakage detection instrumentation TS, and describe the Actions and Surveillance Requirements. The TS Bases provide the purpose or reason for the TS which are derived from the analyses and evaluation included in the safety analysis report, and for these TSs, the RCS leakage detection instrumentation design assumptions and licensing basis for the plant.

As stated in NRC Information Notice (IN) 2005-24, "Nonconservatism in Leakage Detection Sensitivity" (ADAMS Accession No. ML051780073), the reactor coolant activity assumptions for containment atmosphere gaseous radioactivity monitors may be nonconservative. This means the monitors may not be able to detect a 1 gallon per minute (gpm) leak within 1 hour under all likely operating conditions.

The issue described in IN 2005-24 has raised questions regarding the operability requirements for containment atmosphere gaseous radioactivity monitors. TSTF-513, Revision 3, revises the TS Bases to reflect the proposed TS changes and more accurately describe the contents of the facility design basis related to operability of the RCS leakage detection instrumentation. Part of the TS Bases changes revise the specified safety function of the RCS leakage detection monitors to specify the required instrument sensitivity level. In addition, TSTF-513, Revision 3, includes revisions to TS Actions for RCS leakage detection instrumentation to establish limits for operation during conditions of reduced monitoring sensitivity because of inoperable RCS leakage detection instrumentation.

The General Design Criteria (GDC) included in Appendix A to 10 CFR Part 50, became effective on May 21, 1971. The Construction Permit for BVPS-1 was issued on June 26, 1970; consequently, this unit was not subject to GDC requirements (Reference SECY-92-223, dated September 18, 1992). The updated final safety analysis report (UFSAR) states that BVPS-1 has been designed and constructed to comply with the "General Design Criteria for Nuclear Power Plant Construction," published in July 1967 by the Atomic Energy Commission (AEC). However, UFSAR Appendix 1A provides a discussion of the degree of conformance to the AEC GDC published as Appendix A to 10 CFR Part 50 in July 1971, which indicates that it meets the

intent of the GDC. BVPS-1 UFSAR Section 1A.30, "Quality of Reactor Coolant Pressure Boundary (Criterion 30)" states that, "The BVPS-1 design conforms with the intent of Criterion 30." The specific methods are described in UFSAR Section 4.2.7.1, "Leakage Detection," which include, but are limited to, the containment sump water level, and containment gas and particulate radiation monitors. The BVPS-1 UFSAR does not state any commitment to RG 1.45.

The Construction Permit for BVPS-2 was issued on May 3, 1974. The UFSAR for BVPS-2 states that the unit conforms with the NRC GDC, Appendix A of 10 CFR Part 50, as amended through October 27, 1978. The design of BVPS-2 complies with GDC 30, as described in BVPS-2 UFSAR Section 3.1.2.30, "Quality of Reactor Coolant Pressure Boundary." Table 1.8-1, "USNRC Regulatory Guides," describes the basis for general compliance with RG 1.45, Revision 0. UFSAR Section 5.2.5, "Detection of Leakage Through Reactor Coolant Pressure Boundary," describes methods including monitors for containment sump level and flow, containment airborne (particulate and gaseous) radioactivity, and containment atmospheric pressure, temperature, and humidity.

10 CFR Part 50, Appendix A, GDC 30, "Quality of Reactor Coolant Pressure Boundary," requires means for detecting and, to the extent practical, identifying the location of the source of RCS leakage. Regulatory Guide (RG) 1.45, Revision 0, "Reactor Coolant Pressure Boundary Leakage Detection Systems," May 1973, describes acceptable methods of implementing the GDC 30 requirements with regard to the selection of leakage detection systems for the RCPB.

RG 1.45, Revision 0, Regulatory Position C.2, states that "Leakage to the primary reactor containment from unidentified sources should be collected and the flow rate monitored with an accuracy of one gpm or better."

RG 1.45, Revision 0, Regulatory Position C.3 states:

At least three separate detection methods should be employed and two of these methods should be (1) sump level and flow monitoring and (2) airborne particulate radioactivity monitoring. The third method may be selected from the following: a. monitoring of condensate flow rate from air coolers [or] b. monitoring of airborne gaseous radioactivity. Humidity, temperature, or pressure monitoring of the containment atmosphere should be considered as alarms or indirect indication of leakage to the containment.

RG 1.45, Revision 0, Regulatory Position C.5 states, "The sensitivity and response time of each leakage detection system in regulatory position 3. above employed for unidentified leakage should be adequate to detect a leakage rate, or its equivalent, of one gpm in less than one hour." RG 1.45, Revision 0, states, "In analyzing the sensitivity of leak detection systems using airborne particulate or gaseous radioactivity, a realistic primary coolant radioactivity concentration assumption should be used. The expected values used in the plant environmental report would be acceptable." The appropriate sensitivity of a plant's containment atmosphere gaseous radioactivity monitors is dependent on the design assumptions and the plant-specific licensing basis as described in the plant's UFSAR. The NRC staff's approval of the use of expected primary coolant radioactivity concentration values used in the environmental report creates a potential licensing conflict when a licensee is able to achieve and maintain primary coolant radioactivity concentration values lower than the value assumed in the environmental report.

RG 1.45, Revision 1, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage," was issued in May 2008. RG 1.45, Revision 1, describes methods for implementing GDC 30 requirements that are different from those in RG 1.45, Revision 0, and was developed and issued to support new reactor licensing. Revision 1 allows that having two TS leakage detection methods capable of detecting 1 gpm leak within 1 hour provides adequate leakage detection capability from a safety perspective. It recommends that other potential indicators (including the gaseous radiation monitors) be maintained even though they may not have the same detection capability. These indicators, in effect, provide additional defense-in-depth.

GDC 4 of Appendix A to 10 CFR Part 50, "Environmental and dynamic effects design bases," requires structures, systems, and components important to safety to be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents. GDC 4 allows the use of leak before break (LBB) technology to exclude dynamic effects of pipe ruptures in the design bases when analyses reviewed and approved by the Commission demonstrate that the probability of fluid system piping rupture is extremely low under conditions consistent with the design basis for the piping.

3.0 TECHNICAL EVALUATION

In adopting the changes to TS included in TSTF-513, Revision 3, the licensee proposed to revise TS 3.4.15, "RCS Leakage Detection Instrumentation" Conditions and Required Actions. The licensee proposed adding new Condition C to TS 3.4.15. New Condition C would be applicable when the containment atmosphere gaseous radioactivity monitor is the only operable RCS leakage detection monitor. This new Condition is necessary because improved fuel integrity and the resulting lower primary coolant radioactivity concentration affects a plant's containment atmosphere gaseous radioactivity monitor to a greater extent than other monitors. The proposed Required Actions for new Condition C require the licensee to analyze grab samples of the containment atmosphere once per 12 hours and restore the required containment sump monitor to operable status within 7 days. These actions are in addition to the Required Actions of Conditions A and B which require performing an RCS mass balance once per 24 hours.

The NRC staff determined that the proposed Condition C is more restrictive than the current requirement, because the current Condition that would apply to the situation when the containment atmosphere gaseous radioactivity monitor is the only operable RCS leakage detection monitor would allow the licensee 30 days to restore the inoperable monitors to operable status. The proposed Actions and Completion Times are adequate because the grab samples combined with the more frequent RCS mass balances will provide an alternate method of monitoring RCS leakage when the containment atmosphere gaseous radioactivity monitor is the only operable RCS leakage detection monitor and the 12-hour interval is sufficient to detect increasing RCS leakage long before a piping flaw could progress to a catastrophic failure of the primary RCPB. Allowing 7 days to restore another RCS leakage monitor to operable status is reasonable given the diverse methods employed in the Required Actions to detect an RCS leak and the low probability of a large RCS leak during this period. Proposed Condition C is conservative relative to the STS, sufficiently alerts the operating staff, provides a comparable ability to detect RCS leakage, and provides time intervals that are reasonable. Therefore, the NRC staff determined that proposed Condition C provides an adequate assurance of safety when judged against current regulatory standards.

The NRC staff evaluated the licensee's proposed changes against the applicable regulatory requirements listed in Section 2.0 of this safety evaluation. The NRC staff also compared the proposed changes to the changes made to STS by TSTF-513, Revision 3. The NRC staff determined that all the proposed changes afford adequate assurance of safety when judged against current regulatory standards. Therefore, the NRC staff finds the proposed changes acceptable.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (76 FR 40940). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that 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.

7.0 REFERENCES

1. Beaver Valley Power Station, Unit Nos. 1 and 2, License Amendment Request for Adoption of Technical Specification Task Force (TSTF)-513, Revision 3, "Revise PWR Operability Requirements and Actions for RCS Leakage Instrumentation." (Agencywide Documents Access and Management System (ADAMS) Accession No. ML1126A014).
2. TSTF-513, Revision 3 (ADAMS Accession No. ML102360355).

3. *Federal Register*, Notice of Availability published on January 3, 2011 (ADAMS Accession No. ML101340267).

Principal Contributors: K. Hemphill
M. Hamm

Date: October 25, 2011

P. Harden

- 2 -

A copy of the related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/ra/

Nadiyah S. Morgan, Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

Enclosures:

1. Amendment No. 288 to DPR-66
2. Amendment No. 175 to NPF-73
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ADAMS Accession No.: ML11284A187 *Input received. No substantive changes made.

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