

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

March 1, 2012

Mr. Michael J. Pacilio President and Chief Nuclear Officer Exelon Nuclear 4300 Winfield Road Warrenville, IL 60555

SUBJECT: LASALLE COUNTY STATION, UNIT 1 - ISSUANCE OF AMENDMENT REGARDING TECHNICAL SPECIFICATION CHANGE FOR SAFETY LIMIT MINIMUM CRITICAL POWER RATIO (TAC NO. ME7331)

Dear Mr. Pacilio:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 205 to Facility Operating License No. NPF-11 for the LaSalle County Station, Unit 1 (LSCS). The amendment is in response to your application dated October 12, 2011, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML112860068) as supplemented by letters dated January 30, 2012, and February 13, 2012 (ADAMS Accession Nos. ML12031A073, and ML12055A200, respectively).

The amendment modifies the LSCS, Unit 1, Appendix A, Technical Specifications (TS), Section 2.1.1, "Reactor Core SLs [Safety Limits]" minimum critical power ratio from \geq 1.11 to \geq 1.13 for two-loop recirculation operation and from \geq 1.12 to \geq 1.15 for single-loop recirculation operation.

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

Sincerely,

Herno

Nicholas DiFrancesco, Project Manager Plant Licensing Branch III-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-373

Enclosures:

- 1. Amendment No. 205 to NPF-11
- 2. Safety Evaluation

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

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-373

LASALLE COUNTY STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 205 License No. NPF-11

- 1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by the Exelon Generation Company, LLC (the licensee), dated October 12, 2011, as supplemented by letters dated January 30, 2012, and February 13, 2012, complies with the standards and requirements 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 facility will operate in conformity with the application, the provisions of the Act, and the 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 set forth in 10 CFR Chapter I;
 - 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 the Facility Operating License No. NPF-11 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 205, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented after Cycle 14 is completed and prior to the operation of Cycle 15.

FOR THE NUCLEAR REGULATORY COMMISSION

Jacob I. Zimmerman, Chief Plant Licensing Branch III-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications and Facility Operating License

Date of Issuance: March 1, 2012

ATTACHMENT TO LICENSE AMENDMENT NO. 205

FACILITY OPERATING LICENSE NO. NPF-11

DOCKET NO. 50-373

Replace the following pages of the Facility Operating Licenses and Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove</u>

<u>Insert</u>

License NPF-11 Page 3 License NPF-11 Page 3

<u>TSs</u> Page 2.0-1 <u>TSs</u> Page 2.0-1

- (4) Exelon Generation Company, LLC, 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; and
- (5) Exelon Generation Company, LLC, 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 LaSalle County Station, Units 1 and 2 and such Class B and Class C low-level radioactive waste as may be produced by the operation of Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, and Clinton Power Station, Unit 1.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I 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:
- Am. 198 09/16/10

08/28/09

08/28/09

(1) Maximum Power Level

The licensee is authorized to operate the facility at reactor core power levels not in excess of full power (3546 megawatts thermal).

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 205, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

- Am. 194 (3) DELETED 08/28/09
- Am. 194 (4) DELETED
- Am. 194 (5) DELETED 08/28/09
- Am. 194 (6) DELETED
- Am. 194 (7) DELETED 08/28/09

Amendment No. 205

2.1 SLs

- 2.1.1 <u>Reactor Core SLs</u>
 - 2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be $\leq 25\%$ RTP.

2.1.1.2 With the reactor steam dome pressure \geq 785 psig and core flow \geq 10% rated core flow:

For Unit 1, MCPR shall be ≥ 1.13 for two recirculation loop operation or ≥ 1.15 for single recirculation loop operation.

For Unit 2, MCPR shall be \geq 1.11 for two recirculation loop operation or \geq 1.12 for single recirculation loop operation.

- 2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.
- 2.1.2 Reactor Coolant System Pressure SL

Reactor steam dome pressure shall be \leq 1325 psig.

2.2 SL Violations

With any SL violation, the following actions shall be completed within 2 hours:

2.2.1 Restore compliance with all SLs; and

2.2.2 Insert all insertable control rods.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

AMENDMENT NO. 205 TO FACILITY OPERATING LICENSE NO. NPF-11

EXELON GENERATION COMPANY, LLC

LASALLE COUNTY STATION, UNIT 1

DOCKET NO. 50-373

1.0 INTRODUCTION

By letter to the U.S. Nuclear Regulatory Commission (NRC, the Commission) dated October 12, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML112860068) as supplemented by letters dated January 30, 2012, and February 13, 2012 (ADAMS Accession Nos. ML12031A073, and ML12055A200, respectively), Exelon Generation Company, LLC (the licensee), requested changes to the technical specifications (TSs), for LaSalle County Station (LSCS), Unit 1. The January 30, 2012, and February 13, 2012, supplements contained clarifying information and did not expand the scope of the application as originally noticed and did not change the NRC staff's initial proposed finding of no significant hazards consideration published in the *Federal Register* (77 FR 139, January 3, 2012).

The submittal seeks to revise TS 2.1, "Safety Limits," to reflect revised Safety Limit Minimum Critical Power Ratio (SLMCPR) values (limits) listed in TS 2.1.2 and calculated for operating Cycle 15. The SLMCPR analysis establishes SLMCPR values that will ensure that during normal operation and during abnormal operational transients, at least 99.9 percent of all fuel rods in the core do not experience transition boiling if the limit is not violated. The SLMCPRs are calculated to include cycle-specific parameters.

The NRC staff has completed its review and finds that the requested TS modifications are acceptable.

2.0 REGULATORY EVALUATION

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 36, "Technical specifications," paragraph (c)(1), requires that power reactor facility TS include safety limits for process variables that protect the integrity of certain physical barriers that guard against the uncontrolled release of radioactivity. The fuel cladding integrity SLMCPR is established to assure that at least 99.9 percent of the fuel rods in the core do not experience boiling transition during normal operation and abnormal operating transients. Thus, the TSs must contain the SLMCPR.

The NRC staff used 10 CFR Part 50, Appendix A, Criterion 10 (GDC-10), "Reactor Design," and NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," as evaluation criteria for the proposed license amendment request (LAR).

Enclosure 2

GDC-10 states, in part, that the reactor core and associated coolant, control, and protection systems shall be designed with appropriate margin to assure that specified acceptable fuel design limits (SAFDLs) are not exceeded. As described in the LSCS Updated Final Safety Analysis Report, Section 3.1, LSCS meets the requirements of GDC-10. NUREG-0800, provides guidance on the acceptability of the reactivity control systems, the reactor core and fuel system design. Specifically, Section 4.2, "Fuel System Design," specifies all fuel damage criteria for evaluation of whether fuel designs meet the SAFDLs. Section 4.4, "Thermal Hydraulic Design," provides guidance on the review of thermal-hydraulic design in conforming to GDC-10 and the fuel design criteria established in Section 4.2.

The purpose of the SLMCPR is to ensure that SAFDLs, as specified in GDC-10, are not exceeded during steady state operation and analyzed transients. The fuel cladding is one of the physical barriers that separate the radioactive materials from the environment. The integrity of this cladding barrier is related to its relative freedom from perforations or cracking. Thermal stresses, which can occur from reactor operation significantly above design conditions, can cause fuel cladding perforations. Since the parameters that result in fuel damage are not directly observable during reactor operation, the thermal and hydraulic conditions that result in the onset of transition boiling are used to mark the beginning of the region in which fuel cladding damage could occur. Margin to these thermal and hydraulic conditions is protected by the SLMCPR values in the TS.

3.0 TECHNICAL EVALUATION

3.1 Proposed TS Changes

The proposed changes would revise LSCS, Unit 1, Appendix A, Technical specification, Section 2.1.1, "Reactor Core SLs" minimum critical power ratio safety limit (MCPR) from \ge 1.11 to \ge 1.13 for two-loop recirculation operation (TLO) and from \ge 1.12 to \ge 1.15 for a single-loop recirculation operation (SLO) for LSCS, Unit 1, Cycle 15, operation only and no change of the SLMCPR values for LSCS, Unit 2. These SLMCPR values apply when the reactor steam dome pressure is greater than 785 psig [pounds per square inch gauge] and core flow is greater than 10 percent of rated core flow.

3.2 NRC Staff Evaluation

The NRC staff has reviewed the licensee's regulatory and technical analyses in support of its proposed license amendment which are described in Sections 3 and 4 of the licensee's submittal. The licensee described the methodology to calculate the new SLMCPR values for the TS in its submittal and supplement. The Cycle 15 SLMCPR analysis was performed by Global Nuclear Fuel (GNF) using plant- and cycle-specific fuel and core parameters, and NRC approved methodologies, including the following:

- NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel (GESTAR II)," Revision 18, April, 2011
- NEDC-32505P-A, "R-Factor Calculation Method for GE11, GE12 and GE13 Fuel," Revision 1, July 1999

 NEDC-32601P-A, "Methodology and Uncertainties for Safety Limit MCPR Evaluations," August 1999

The LSCS, Unit 1, Cycle 15 core, has 764 GE fuel assemblies, of which there are 296 fresh GNF2 bundles, 320 once burned ATRIUM-10 bundles, and 148 twice burned ATRIUM-10 bundles. The licensee addressed the applicability of the above approved methodologies to the associated SLMCPR calculation since the data bases for the GNF2 fuel were not included in those approved methodologies. The NRC staff reviewed the licensee's justification for the applicability of the above approved methodologies to LSCS, Unit 1, Cycle 15 including a review of the NRC staff's report dated September 25, 2008, "Audit Report for Global Nuclear Fuels GNF2 Advanced Fuel Assembly Design GESTAR II Compliance Audit," (ADAMS Accession No. ML081630579). This report was based on the GESTAR II compliance report for GNF2 fuel¹ and concluded that the justification is acceptable because GNF2 fuel meets the requirements as specified in the limitations and conditions of the approved methodologies.

Additionally, the licensee addressed the mixed core design and identified those related analyses in several of GNF's design record files. The staff reviewed mixed core design with respect to fuel rod power calculational uncertainty, R-factor uncertainty, the MCPR Importance Parameter (MIP) criterion, and effective bundle power uncertainty, and found that the justification is acceptable for the LSCS, Unit 1, Cycle 15, application.

By letter dated October 12, 2011, and clarified by letters dated January 30, 2012, and February 13, 2012, the licensee qualitatively addressed the final core loading pattern selection for LSCS, Unit 1, Cycle 15 operation with respect to the combination of the input parameters such as cycle energy requirements, thermal limit margins, reactivity margins, discharge exposure limitations and other limits, desired control rod patterns, and channel distortion minimization. The licensee addressed the SLMCPR calculation process with respect to the uncertainties associated with R-Factor, core flow rate and the Local Power Range Monitor update/calibration interval. The licensee also addressed the bundle groupings for both two-loop operation and single-loop operation SLMCPR calculations, along with the number of bundles in the group, their contribution to percent number of rods subject to boiling transition (NRSBT) and group average fuel assembly exposure for Cycle 15. The licensee confirmed the applicability of the two-loop power/flow map for Cycle 15 operation including stability Option III features of the scram region and controlled entry region for backup stability protection, using decay ratio criterion specified in GESTAR II.

The NRC staff reviewed the information presented in the submittal and supplemental information and concluded that the licensee provided satisfactory data and methodology descriptions. The NRC staff determined that the proposed revisions to the TS SLMCPR values for LSCS, Unit 1, Cycle 15, operation from \geq 1.11 to \geq 1.13 for TLO and from \geq 1.12 to \geq 1.15 for SLO are acceptable because:

- (1) Approved methodologies are used with acceptable justification for the method deviation and adjusted uncertainties relating to R-Factor and traversing incore probe reading;
- (2) The GNF2 data contained in Figure 5, of Attachment 4, of the submittal, supplemented

^{1. &}quot;GNF2 Advantage Generic Compliance with NEDE-24011-P-A (GESTAR II), NEDC-33270P, March 2007, and GEXL17 Correlation for GNF2 Fuel, NEDC-33292P, March 2007," FLN-2007-011, dated March 14, 2007 (ADAMS Accession No. ML070780335).

by letters dated January 30, 2012, and February 13, 2012, provides sufficient evidence of an acceptable relationship between MCPR Importance Factor and Critical Power Ration margin

- (3) Qualitative descriptions of the final core loading pattern and critical power analysis are provided;
- (4) A core map was provided and dominant fuel bundle locations were identified based on LSCS, Unit 1, Cycle 15, SLMCPR calculation in terms of percentage contribution to NRSBT; and
- (5) Mechanisms to push the SLMCPR increase into the higher range of expectations are identified along with results that the GNF2 fuel would dominate the SLMCPR calculation.

The NRC staff has also reviewed the justification for the SLMCPR value of ≥ 1.13 for TLO and ≥ 1.15 for SLO using the approach stated in GESTAR-II, Revision 18. Based on our review of the submittal, and the responses to the request for additional information, the staff has concluded that the SLMCPR analysis for LSCS, Unit 1, Cycle 15, operation using the plant and cycle-specific calculation in conjunction with the approved method is acceptable. The Cycle 15 SLMCPR will ensure that 99.9 percent of the fuel rods in the core will not experience boiling transition which satisfies the requirements of GDC 10 of Appendix A to 10 CFR Part 50 regarding acceptable fuel design limits. The NRC staff has concluded that the justification for analyzing and determining the SLMCPR value of ≥ 1.13 for TLO and ≥ 1.15 for SLO for LSCS, Unit 1, Cycle 15, is acceptable since approved methodologies were used in conjunction with assumption of a higher R-Factor uncertainty, performance of a bounding calculation at rated core power and minimum core flow, and an analysis on power shape for Cycle 15 operation.

Based on the review above, and because the changes were analyzed based on NRC-approved methods using LSCS, Unit 1, Cycle 15, cycle-specific inputs for the Cycle 15 fuel bundles, the NRC staff finds that the TS changes proposed in the LAR involving the SLMCPR values for both two-loop and single-loop operation, are acceptable for LSCS Unit 1, Cycle 15 operation.

4.0 STATE CONSULTATION

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

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION (NSHCD)

On January 3, 2012, the Commission has issued a proposed finding that the amendment involves no significant hazards consideration, along with an opportunity to comment upon that finding by February 2, 2012, and an opportunity to request a hearing by March 5, 2012. (77 FR 139; January 3, 2012). No comments were received on the proposed no significant hazards consideration. The Commission has determined to issue this amendment prior to the March 5 due date for hearing requests. Accordingly, the Commission has made a final determination that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendment does 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. As required by 10 CFR 50.91(a), an evaluation of the issue of no significant hazards consideration is presented below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The Minimum Critical Power Ratio Safety Limit (MCPR SL) is defined in the TS Bases Section B 2.1.1 as that limit "that, in the event of an AOO [Anticipated Operational Occurrence] from the limiting condition of operation, at least 99.9 percent of the fuel rods in the core would be expected to avoid boiling transition." The MCPR SL satisfies the requirements of General Design Criterion 10 of Appendix A to 10 CFR 50 regarding acceptable fuel design limits. The MCPR SL is reevaluated for each reload using NRC approved methodologies. The analyses for LSCS, Unit 1, Cycle 15 have concluded that a two-loop MCPR SL of \geq 1.13, based on the application of Global Nuclear Fuel's (GNF's) NRC-approved MCPR SL methodology, will ensure that this acceptance criterion is met. For single-loop operation, a MCPR SL of \geq 1.15 also ensures that this acceptance criterion is met. The MCPR operating limits are presented and controlled in accordance with the LSCS, Unit 1, Core Operating Limits Report (COLR).

The requested Technical Specification changes do not involve any plant modifications or operational changes that could affect system reliability or performance or that could affect the probability of operator error. The requested changes do not affect any postulated accident precursors, do not affect any accident mitigating systems, and do not introduce any new accident initiation mechanisms.

Therefore, the changes to the Minimum Critical Power Ratio safety limit do not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The GNF2 fuel to be used in Cycle 15 is of a design compatible with the co-resident Areva ATRIUM-10 fuel. Therefore, the introduction of GNF2 fuel into the Cycle 15 core will not create the possibility of a new or different kind of accident. The proposed change does not involve any new modes of operation, any changes to setpoints, or any plant modifications. The proposed revised MCPR SLs have accounted for the mixed fuel core and have been shown to be acceptable for Cycle 15 operation. Compliance with the criterion for incipient boiling transition continues to be ensured. The core operating limits will continue to be developed using NRC approved methods which also account for the mixed fuel core design. The proposed MCPR SLs or methods for establishing the core operating limits do not result in the creation of any new precursors to an accident. ·

Therefore, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The MCPR SLs have been evaluated in accordance with GNF's NRC-approved cycle specific limit methodology to ensure that during normal operation and during AOO's at least 99.9 percent of the fuel rods in the core are not expected to experience transition boiling. The proposed revised MCPR SLs have accounted for the mixed fuel core and have been shown to be acceptable for Cycle 15 operation. Compliance with the criterion for incipient boiling transition continues to be ensured. On this basis, the implementation of the change to the MCPR SLs does not involve a significant reduction in a margin of safety.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above evaluation, the NRC staff concludes that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff has made a final determination that no significant hazards consideration is involved for the proposed amendment and that the amendment should be issued as allowed by the criteria contained in 10 CFR 50.91.

6.0 ENVIRONMENTAL CONSIDERATION

The amendment changes requirements with respect to the installation or use of the facilities components located within the restricted area as defined in 10 CFR Part 20. 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 determination that no significant hazards consideration is involved for the proposed amendment as discussed above in Section 5.0. 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.

7.0 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: Tai Huang, SRXB/DSS

Date of issuance: March 1, 2012

Mr. Michael J. Pacilio President and Chief Nuclear Officer Exelon Nuclear 4300 Winfield Road Warrenville, IL 60555

SUBJECT: LASALLE COUNTY STATION, UNIT 1 - ISSUANCE OF AMENDMENT REGARDING TECHNICAL SPECIFICATION CHANGE FOR SAFETY LIMIT MINIMUM CRITICAL POWER RATIO (TAC NO. ME7331)

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Sincerely, /RA/ Nicholas DiFrancesco, Project Manager Plant Licensing Branch III-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-373

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