USEC
A Global Energy Company

January 17, 2014
GDP 14-0001

ATTN: Document Control Desk
Ms. Catherine Haney
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Paducah Gaseous Diffusion Plant (PGDP)
Docket No. 70-7001, Certificate No. GDP-1
Certificate Amendment Request – SAR Table 1-4, Authorized Uses of NRC-Regulated Materials, and Application to Downgrade

Dear Ms. Haney:

In accordance with 10 CFR 76.45, the United States Enrichment Corporation (USEC) hereby submits a request for amendment to the Certificate of Compliance for PGDP. This Certificate Amendment Request (CAR) proposes to revise PGDP's authorized activities described in Safety Analysis Report (SAR) Table 1-4.

Enclosure 1 contains the Oath and Affirmation Statement. Enclosure 2 provides a detailed description and justification for the proposed change. Enclosure 3 is a copy of the revised SAR pages associated with this request. Enclosure 4 contains the basis for USEC's determination that the proposed changes associated with this CAR are not significant.

The proposed changes will revise SAR Table 1-4 to remove enrichment from the authorized uses of NRC-regulated materials at PGDP. By letter dated June 3, 2013, USEC notified the U.S. Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 76.66(b) that USEC was ceasing enrichment at PGDP. By letter dated September 9, 2013, NRC acknowledged USEC's official notification of termination of enrichment and provided USEC with an adjusted inspection program as a result of limited operations. Based on NRC's acknowledgement of limited operations at PGDP, USEC requested on September 24, 2013, that for purposes of an appropriate 10 CFR Part 171 annual fee determination for the remaining PGDP NRC certified activities, that PGDP be removed from the enrichment category and placed into a category that appropriately reflects its remaining limited operations. On January 3, 2014, USEC received NRC's letter dated December 13, 2013, stating that in order for NRC to downgrade PGDP, USEC would be required to submit a CAR reflecting activity changes and an application to downgrade. Accordingly by this CAR, USEC is requesting that enrichment be removed as an authorized activity at PGDP. This request serves as the application to downgrade.

USEC requests NRC review of this CAR as soon as practical. The amendment should become effective immediately after issuance. Upon removal of enrichment as an authorized activity at PGDP, USEC requests that NRC place PGDP into a 10 CFR Part 171 annual fee category that appropriately reflects its remaining limited operations.

NMSS20

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Should you have any questions related to this submittal, please contact me at (301) 564-3250. There are no new commitments contained in this submittal.

Sincerely,

S. A. Toelle

Steven A. Toelle
Director, Regulatory Affairs

Enclosures:

1. Oath and Affirmation
2. Detailed Description and Justification of the Changes
3. Removal/Insertion Instructions
4. Significance Determination

cc: M. Crespo, NRC Region II
O. Siurano-Perez, NRC HQ
B. Smith, NRC HQ
M. Sykes, NRC Region II

Enclosure 1
GDP 14-0001

Oath and Affirmation

OATH AND AFFIRMATION

I, Steven A. Toelle, swear and affirm that I am the Director, Regulatory Affairs of the United States Enrichment Corporation (USEC), that I am authorized by USEC to sign and file with the Nuclear Regulatory Commission this Certificate Amendment Request for the Paducah Gaseous Diffusion Plant addressing revisions to the Safety Analysis Report contained in USEC letter GDP 14-0001, that I am familiar with the contents thereof, and that the statements made and matters set forth therein are true and correct to the best of my knowledge, information, and belief.

S. A. Toelle

Steven A. Toelle

On this 17th day of January 2014, the individual signing above personally appeared before me, is known by me to be the person whose name is subscribed to within the instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof I hereunto set my hand and official seal.

Rita Peak

Rita Peak, Notary Public
State of Maryland, Montgomery County
My commission expires 12/10/2017

Rita L. Peak
Notary Public
State of Maryland
County of Montgomery

Enclosure 2
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USEC-01
Certificate Amendment Request
SAR Table 1-4, Authorized Uses of NRC-Regulated Materials

Detailed Description and Justification of the Changes

Enclosure 2
GDP 14-0001
United States Enrichment Corporation (USEC)
Certificate Amendment Request
SAR Table 1-4, Authorized Uses of NRC-Regulated Materials

Detailed Description and Justification of the Changes

1) Description of Change

SAR Table 1-4, Authorized Uses of NRC-Regulated Materials, currently includes several material uses for "enrichment". USEC ceased uranium enrichment operations and shut down the enrichment cascade on July 25, 2013. Therefore, SAR Table 1-4, Authorized Uses of NRC-Regulated Materials, is being revised to remove "enrichment" as an authorized use of NRC-regulated materials.

The changes shown below are for SAR Table 1-4, Authorized Uses of NRC-Regulated Materials. New wording is shown as underlined and deleted wording is shown as a strikeout. The final revised SAR pages are shown in Enclosure 3. The changes on Enclosure 3 pages are noted with revision bars in the right hand margin.

Table 1-4. Authorized uses of NRC-regulated materials

Material Type	Authorized Use
A. Source Material, Element 92[b]	1. Heating cylinders and feeding contents ~~into the diffusion process.~~ 2. ~~Enrichment of uranium up to 5.5 percent enrichment by weight~~ ~~^{235}U~~. 3. Receipt, storage, inspection, and acceptance sampling of cylinders containing natural or recycled uranium, and uranium depleted in ^{235}U generated from domestic gaseous diffusion plant operations. 4. Filling, assay, storage, and shipment of cylinders with natural uranium and uranium depleted in ^{235}U. 5. Cleaning and inspection of cylinders used for the storage and transport of process feed, product, and tails containing source or special nuclear material 6. Storage of process wastes containing uranium, transuranic elements, and other contaminants and decay products 7. Process, characterize, package, ship, or store low-level radioactive and mixed wastes 8. Radiation protection, process control and environmental sample collection, analysis, instrument calibration and operation checks 9. Maintenance, repair, and replacement of process equipment 10. Process Control Laboratory analysis and testing 11. Cold feeding[a] 12. Transfer between cylinders 13. Receipt, storage, inspection, and acceptance sampling of two cylinders containing depleted uranium hexafluoride (UF_6) from the former Starmet CMI site. 14. Receipt, storage, inspection, acceptance sampling and enrichment of one cylinder containing depleted uranium derived from four off-specification cylinders transferred from DOE to USEC.
B. Source Material, Element 90	1. Calibration and use of portable health physics and fixed laboratory equipment 2. Process Control Laboratory analysis and testing 3. Process, characterize, package, ship, or store low level radioactive and mixed wastes

Material Type	Authorized Use
C. Special Nuclear Material[b]	1. Heating cylinders and feeding contents ~~into the diffusion process.~~ 2. Filling, assay, storage, and shipment of cylinders containing uranium enriched up to 5.5 percent by weight ^{235}U 3. Nondestructive testing and analyses of product and process streams 4. Receipt, storage, inspection, and acceptance sampling of cylinders containing uranium enriched up to 5.5 percent by weight ^{235}U 5. Cleaning and inspection of cylinders used for the storage and transport of process feed, product, and tails containing source or special nuclear material 6. Storage of process wastes containing uranium, transuranic elements, and other contaminants and decay products 7. Process, characterize, package, ship or store low level radioactive and mixed wastes 8. Radiation protection, process control and environmental sample collection, analysis, instrument calibration and operation checks 9. Maintenance, repair, and replacement of process equipment 10. Process Control Laboratory analysis and testing 11. Cold feeding cylinders[a] 12. Transfer between cylinders 13. That remaining in equipment and facilities from previous operations. 14. ~~Enrichment up to 5.5% ^{235}U by weight.~~ 15. Swipe samples for assays in excess of 5.5 wt% enrichment.
D. By-Product Material, Elements 1, 3-84, 88	1. Radiation protection, process control, and environmental sample collection, analysis, instrument calibration, and operation checks 2. Process Control Laboratory analysis and testing 3. Nondestructive testing of product and product streams
93, 95 to 100	1. Calibration and use of portable health physics and fixed laboratory equipment 2. Process Control Laboratory analysis and testing 3. Nondestructive testing of product and product streams 4. Storage of process wastes containing uranium, transuranics, process contaminants and decay products 5. That remaining in equipment and facilities from previous operations 6. Process, characterize, package, ship, or store low-level radioactive and mixed waste 7. Americium - used in smoke detectors
$^{99}_{43}Tc$	1. That remaining in equipment and facilities as a result of previous operations 2. Storage of process wastes as a result of feeding recycled uranium 3. Process Control Laboratory analysis and testing
E. Neutron Sources, 241 Am-Be, Cf-252	1. Calibration of neutron measuring instrumentation 2. Internal sources in density meters 3. UF_6 assay and flow instrumentation

a. Cold feeding or controlled feeding shall be in accordance with an approved TSR and operating procedure

b. Uranium to be fed to the cascade will meet the requirements of ASTM Standard C996, "Standard Specification for Uranium Hexafluoride Enriched to Less Than 5% ^{235}U," or ASTM Standard C787, "Standard Specification for Uranium Hexafluoride for Enrichment," for reprocessed UF_6. All other uranium that does not meet the requirements of ASTM C996 or C787 for reprocessed UF_6 may be accepted by USEC for storage and subsequent dispositioning but will not be introduced to the cascade, with the exception of small amounts (e.g., 50 pounds of UF_6) associated with sampling, subsampling, and analyses required to establish receiver's values.

2) Reason for the Changes

With the shutdown of the enrichment cascade, USEC requested via correspondence (letter dated September 23, 2013) that the NRC reclassify the current PGDP license fee category to reflect the limited operational activities remaining at the PGDP. The NRC recently responded (letter dated December 13, 2013) that though PGDP has shut down the enrichment cascade, the licensing authority currently granted by the NRC to the PGDP has not changed. As a result the NRC stated that they could not downgrade the PGDP license fee category until USEC submits a certificate amendment request (CAR) regarding the activity changes for PGDP and an application for downgrade. Therefore, changes to SAR Table 1-4 have been prepared to reflect the shutdown of the PGDP enrichment cascade and the changes submitted to the NRC in this CAR.

3) Justification of the Changes

The enrichment cascade has been shut down as of July 25, 2013, in preparation for de-lease and return to DOE authority and regulation. The UF_6 cylinder transfer/consolidation operations in the feed, withdrawal and toll transfer and sampling facilities will continue for a short time after the enrichment cascade facilities are shut down.

The proposed changes to SAR Table 1-4, Authorized Uses of NRC-Regulated Materials, will remove/revise Authorized Use items A.1, A.2, C.1, and C.14, which will remove uranium enrichment as an authorized activity at PGDP. These specific items are being removed/revised because the enrichment cascade (except the C-310 purge cascade) has been shut down and will not be restarted. These proposed changes bring SAR Table 1-4 into alignment with the previous SAR changes made to the SAR due to the shutdown of the enrichment cascade. The C-310 purge cascade contains some cells that can be utilized for enrichment of ^{235}U. As discussed above the enrichment cascade has been shut down. The C-310 purge cascade continues to run to support UF_6 cylinder repackaging and other post shut down operations. The operation of the C-310 purge cascade is not for enrichment of ^{235}U but the separation of lighter molecular weight gases from UF_6 being processed for repackaging, etc. In addition, the C-310 purge cascade has been modified to recycle UF_6 so that there are no net "enrichment" operations. UF_6 cylinder repackaging operations, post-repackaging operations (e.g., cylinder movement, shipping, etc.) and other operations involving NRC-regulated materials will continue to be allowed by the revised authorized use activities listed in SAR Table 1-4. The C-310 purge cascade will be shut down following completion of UF_6 cylinder repackaging and other post shut down operations.

Enclosure 3
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USEC-01
Certificate Amendment Request
SAR Table 1-4, Authorized Uses of NRC-Regulated Materials

Removal/Insertion Instructions

Certificate Amendment Request Paducah Gaseous Diffusion Plant Letter GDP 14-0001 Removal/Insertion Instructions	
Remove Pages	**Insert Pages**
APPLICATION FOR UNITED STATES NUCLEAR REGULATORY COMMISSION CERTIFICATION VOLUME 1	
SAR Section 1.0 1-10; 1-11	**SAR Section 1.0** 1-10; 1-11

Table 1-4. Authorized uses of NRC-regulated materials.

Material Type	Authorized Use
A. Source Material, Element 92[b]	1. Heating cylinders and feeding contents.
	2. Text deleted.
	3. Receipt, storage, inspection, and acceptance sampling of cylinders containing natural or recycled uranium, and uranium depleted in ^{235}U generated from domestic gaseous diffusion plant operations.
	4. Filling, assay, and storage, and shipment of cylinders with natural uranium and uranium depleted in ^{235}U.
	5. Cleaning and inspection of cylinders used for the storage and transport of process feed, product, and tails containing source or special nuclear material
	6. Storage of process wastes containing uranium, transuranic elements, and other contaminants and decay products
	7. Process, characterize, package, ship, or store low-level radioactive and mixed wastes
	8. Radiation protection, process control and environmental sample collection, analysis, instrument calibration and operation checks
	9. Maintenance, repair, and replacement of process equipment
	10. Process Control Laboratory analysis and testing
	11. Cold feeding[a]
	12. Transfer between cylinders
	13. Receipt, storage, inspection, and acceptance sampling of two cylinders containing depleted uranium hexafluoride (UF_6) from the former Starmet CMI site.
	14. Receipt, storage, inspection, acceptance sampling and enrichment of one cylinder containing depleted uranium derived from four off-specification cylinders transferred from DOE to USEC.
B. Source Material, Element 90	1. Calibration and use of portable health physics and fixed laboratory equipment
	2. Process Control Laboratory analysis and testing
	3. Process, characterize, package, ship, or store low level radioactive and mixed wastes

Table 1-4. Authorized uses of NRC-regulated materials.

Material Type	Authorized Use
C. Special Nuclear Material[b]	1. Heating cylinders and feeding contents.
	2. Filling, assay, storage, and shipment of cylinders containing uranium enriched up to 5.5 percent by weight ^{235}U
	3. Nondestructive testing and analyses of product and process streams
	4. Receipt, storage, inspection, and acceptance sampling of cylinders containing uranium enriched up to 5.5 percent by weight ^{235}U
	5. Cleaning and inspection of cylinders used for the storage and transport of process feed, product, and tails containing source or special nuclear material
	6. Storage of process wastes containing uranium, transuranic elements, and other contaminants and decay products
	7. Process, characterize, package, ship or store low level radioactive and mixed wastes
	8. Radiation protection, process control and environmental sample collection, analysis, instrument calibration and operation checks
	9. Maintenance, repair, and replacement of process equipment
	10. Process Control Laboratory analysis and testing
	11. Cold feeding cylinders[a]
	12. Transfer between cylinders
	13. That remaining in equipment and facilities from previous operations.
	14. Text deleted.
	15. Swipe samples for assays in excess of 5.5 wt% enrichment.

Enclosure 4
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USEC-01
Certificate Amendment Request
SAR Table 1-4, Authorized Uses of NRC-Regulated Materials

Significance Determination

Enclosure 4
GDP 14-0001

USEC-01
United States Enrichment Corporation (USEC)
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SAR Table 1-4, Authorized Uses of NRC-Regulated Materials

Significance Determination

The United States Enrichment Corporation (USEC) has reviewed the proposed change associated with this certificate amendment request and provides the following Significance Determination for consideration.

1. No Significant Change to Any Conditions to the Certificate of Compliance

   None of the Conditions to the Certificate of Compliance specifically address the subject SAR Table that is being revised. Thus, the proposed change will have no impact on any of the Conditions to the Certificate of Compliance.

2. No Significant Increase in the Probability of Occurrence or Consequences of Previously Evaluated Accidents

   The accidents of concern associated with the proposed SAR Table 1-4 changes include all the scenarios in SAR Chapter 4, Hazard and Accident Analysis. As delineated in the discussion section of this evaluation the PGDP enrichment cascade has been shut down in preparation for de-lease and return to DOE operations and regulatory control. Limited liquid UF_6 cylinder consolidation/transfer operations will continue in the UF_6 handling facilities. Following completion of these operations, UF_6 cylinder operations will be limited to solid UF_6 cylinder movement and shipping. The C-310 purge cascade may continue to operate with limited UF_6 and no withdrawal operations (no liquid UF_6) to support post-enrichment cascade operations.

   The scenarios in Chapter 4, Hazard and Accident Analysis are presented in several sections including: 4.3.2.1 Cascade Facilities; 4.3.2.2, UF_6 Handling and Storage Facilities; 4.3.2.3, Miscellaneous Waste Storage and Handling Facilities; 4.3.2.4 Miscellaneous Support Facilities; 4.3.2.5, Natural Phenomena; and 4.3.2.6, Criticality Events. Each will be discussed with respect to the shutdown of enrichment cascade operations and support facilities.

   The probability and consequences of accidents described in the accident analysis of enrichment cascade operations in SAR Section 4.3.2.1 are lower for the shutdown condition. The accident scenarios postulating the release of toxic materials have lower probability than stated since the remaining inventory of UF_6 is much less than the analyzed condition due to obtaining a UF_6 negative on most cascade equipment. The purge cascade will continue running to support ongoing repackaging and other operations. Continuing C-310 purge cascade operation has limited applicability to any of the accident scenarios for the cascade facilities group since the total UF_6 inventory in the purge cascade piping and equipment remains below the threshold for evaluation. The C-310 purge cascade will be shut down following completion of the UF_6 cylinder repackaging and other operations. There are two scenarios identified in the SAR accident analysis that are applicable to the purge cascade as limiting events and were included in the accident analysis; criticality and evacuation of cascade process building. The purge cascade in C-310 does not have sufficient hazards (UF_6 inventory) during normal or future operating conditions to cause significant on-site consequences beyond the immediate area, even if the primary system fails. If the purge

cascade primary system were to fail, with the evacuation already performed, any local consequences would be negligible. The potential risk of a criticality accident in the purge cascade will remain unchanged if operations are continued to support potential DOE needs. The risk of a fire is also lower due to removal of the lube oil from the shutdown process equipment, the shutdown of the compressors and the reduction in energized electrical equipment. While the use of additional space heaters or running process motors uncoupled may introduce some potential fire risk, there is little combustible loading associated with the heaters themselves or the running process motors and the overall risk of fire is much lower than is the case for an operating enrichment cascade. The probability and consequences of an exothermic reaction or explosion are also greatly reduced due to the reduction in the amount of operating equipment, UF_6, coolant and oxidant that could be present.

The probability of accidents described in the accident analysis of UF_6 handling and storage operations in SAR Section 4.3.2.2 is lower for the shutdown condition. The C-333-A and C-337-A autoclave facilities, the C-310 (as discussed above, the C-310 purge cascade will continue to run to support ongoing UF_6 cylinder repackaging and other operations) and C-315 withdrawal facilities, and the C-360 toll transfer and sampling facility will be shut down following limited UF_6 cylinder consolidation/repackaging. The C-315 withdrawal facilities, and the C-360 toll transfer and sampling facility will be shut down following limited UF_6 cylinder consolidation/repackaging. USEC will utilize the cylinder storage yards associated with these facilities to store solid UF_6 cylinders and the C-360-A facility to ship them. Once the consolidation/repackaging is complete, only residual quantities of UF_6 will remain in the equipment and piping of the UF_6 handling and storage facilities. Following completion of the UF_6 cylinder consolidation/repackaging, only solid cylinder UF_6 movement and shipping will occur in these facilities, including C-360-A. Without liquid UF_6 processing operations in these facilities, the probability and consequences of UF_6 releases are greatly reduced.

The large fire scenario included in SAR Sections 4.3.2.3 and 4.3.2.4 is the only scenario applicable to the miscellaneous waste storage and handling facilities and the miscellaneous support facilities. The shutdown of the enrichment cascade and support facilities will not impact the probability of a large fire in these miscellaneous facilities as discussed in the existing scenarios. The amount of hazardous material contained in the facilities may be reduced after shutdown but this will not impact the probability or consequences of a large fire in these facilities.

The natural phenomena scenarios delineated in SAR Section 4.3.2.5 include flood and local intense storm, high wind, earthquake. The shutdown of the enrichment cascade and support facilities will not impact the probability of natural phenomena events as discussed in the existing scenarios. The amount of hazardous material contained in the enrichment cascade and support facilities will be significantly reduced after shutdown but this will not impact the probability or consequences of natural phenomena events in these facilities.

The inadvertent nuclear criticality scenario included in SAR Section 4.3.2.6, Criticality Events, is applicable to entire plant site. The probability of a nuclear criticality at PGDP is addressed in the first paragraph of Section 4.3.2.6.a of the SAR, as it relates to Evaluation Basis Event (EBE) frequencies. That section explains that adherence to the double contingency principle as described in ANSI/ANS-8.1 ensures the "actual frequency of accidental criticality is well below the 10^{-2}/yr threshold for EBEs." The PGDP NCS program does not require explicit quantification of failure probabilities; however, adherence to the preferred design approach, as described in SAR Section 5.2.2.4, ensures that new controls/barriers are at least as reliable as previous controls/barriers. Applicable NCSEs/NCSAs have been revised to reflect the current and planned shutdown operations at PGDP. Since all post-shutdown activities involving fissile material will continue to be conducted

under NCSEs and NCSAs created and approved according to TSR 3.11 and SAR 5.2, the probability of occurrence or consequences of an inadvertent criticality is not increased.

Therefore, the proposed change to SAR Table 1-4 will not result in a significant increase in the probability of occurrence or consequences of previously evaluated accidents.

3. No New or Different Type of Accident

The shutdown of the enrichment cascade has been completed. The UF_6 handling and storage facilities will continue operations for a short time while limited liquid UF_6 cylinder consolidation/transfers are completed. Following completion of the UF_6 cylinder consolidation/transfers, solid UF_6 cylinder movement and shipping operations will be the only UF_6 operation. The C-310 purge cascade will continue to operate with limited UF_6 and no withdrawal operations (no liquid UF_6) to support post-enrichment cascade operations. Following shutdown of the enrichment cascade facilities and UF_6 handling and storage facilities, the UF_6 will be removed from the UF_6 piping, equipment and systems. Only residual quantities of UF_6 will remain in the process piping, equipment and systems. Most of the equipment important to safety previously evaluated in the SAR will not be operating. The shutdown and removal of UF_6 from the enrichment cascade and eventual cessation of all liquid UF_6 operations in the UF_6 handling and storage facilities will not result in a different type of accident than any currently in the SAR.

Therefore, the proposed changes to SAR Table 1-4 will not create a new or different type of accident.

4. No Significant Reduction in Margins of Safety

The shutdown of the enrichment cascade has been completed. The UF_6 handling and storage facilities will continue operations for a short time while limited liquid UF_6 cylinder consolidation/transfers are completed. Following completion of the UF_6 cylinder consolidation/transfers, solid UF_6 cylinder movement and shipping operations will be the only UF_6 operation. The purge cascade will continue running to support limited UF_6 repackaging and other post shut down operations. The purge cascade will be shut down following these limited operations. The shutdown of the enrichment cascade and associated support facilities does not require any TSR or TSR bases changes. The shutdown of the equipment/systems does not impact any of the margins of safety associated with any of the equipment. Some systems/equipment (criticality accident alarm system, high pressure fire water system, etc.) will continue to operate as required by the SAR accident analysis and TSR operability applicability requirements. The margins of safety will be unaffected by the enrichment cascade shutdown. The shutdown of the enrichment cascade and support facilities will not impact any margin of safety associated with the systems/equipment that will continue to operate post shutdown.

Therefore, incorporating this change into SAR Table 1-4 does not adversely affect the safety limit defined in any TSR or supporting basis document.

5. No Significant Decrease in the Effectiveness of Any Programs or Plans Contained in the Certificate Application

The proposed changes to SAR Table 1-4 do not impact or change any programs or plans in the certificate application.

Therefore, the proposed changes will not decrease the effectiveness of any programs or plans contained in the Certificate Application.

6. The Proposed Changes do not Result in Undue Risk to 1) Public Health and Safety, 2) Common Defense and Security, and 3) the Environment

   Due to the fact that there is no significant increase in the probability or consequences of any accident previously analyzed and no new or different type of accident, as discussed in items 2 and 3 above, there will be no undue risk to the public health and safety due to the proposed changes. In addition, the proposed changes will have no impact on plant effluents or on the programs and plans in place to implement physical security, protection of classified matter, transportation security, or special nuclear material accountability.

   Therefore, the proposed changes to SAR Table 1-4 will not pose any undue risk to the public health and safety, common defense and security, or the environment.

7. No Change in the Types or Significant Increase in the Amounts of Any Effluents that May be Released Off-Site

   The proposed changes to SAR Table 1-4 do not involve any physical change to the plant or changes to plant operations that could change the types or increase the amounts of any effluents that may be released offsite.

   Therefore, the proposed changes to SAR Table 1-4 do not change the type or significantly increase the amount of effluents that may be released offsite.

8. No Significant Increase in Individual or Cumulative Occupational Radiation Exposure

   The proposed changes to SAR Table 1-4 will not affect the radiological protection program description or the actions in place to minimize occupational exposures.

   Therefore, there is no significant increase in individual or cumulative occupational radiation exposure as a result of the proposed changes to SAR Table 1-4.

9. No Significant Construction Impact

   These proposed changes will not require any construction. The proposed changes to SAR Table 1-4 have no construction impact.

   Therefore, since there is no construction, there are no significant construction impacts associated with the proposed changes to SAR Table 1-4.