****	APRIL	1		
ockets Nos. 50-269, 50-270 and 50-287	DISTRIBUTION Docket File NRC PDR	PWagner RIngram		
Mr. William O. Parker, Jr. Vice President - Steam Production Duke Power Company P. O. Box 33189 422 South Church Street Charlotte, North Carolina 28242	L PDR TERA NSIC ORB#4 Rdg DEisenhut OELD AEOD	Gray File EBlackwood HOrnstein WHazelton GJohnson DChaney		
Dear Mr. Parker:	IE ACRS-10			

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We have completed our review of your requests for relief from certain ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," requirements dated June 1, 1981, July 13, 1981 and March 11, 1982. The findings of our review are contained in the enclosed Evaluation of Relief Requests. The section numbering sequence used in the enclosed Evaluation is the same sequence as used in our approval of your program issued on November 7, 1980.

As shown in the enclosed Evaluation, we have reviewed each of your relief requests and have determined that all but one (Item I.B.2) may be granted. Item I.B.2 - Volumetric Examination of Core Flood Welds - has not been granted. Additionally, alternative requirements have been imposed for Items I.A.3 and I.B.4.

For those items for which relief has been granted, we have determined that the Code requirements are impractical and that the relief requests are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

We request that those items, for which relief has not been granted or augmented requirements imposed, be reviewed and included in your next refueling interval inspection program. If you are unable to perform these inspections, we request that you inform us of your position 90 days prior to the start of the next applicable refueling outage.

If you have any questions on this subject, please contact me.

A copy of Notice of Granting Relief is also enclosed.

Sincerel				Sincerely,	ely,			
-			Philip C. Wagner, Project Manager Operating Reactors Branch #4 Division of Licensing RECEIVED APR 1.5 1982 BUILDER REGULATORY COMMISSION ADDUMENT MANAGEMENT BA					
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Dockets Nes 50-269, 50 0 and 50-267	DISTRIBUTION	
	Docket File NRC PDR	RIngram Gray File FBlackwood
Mr. William O. Parker, Jr.		HOrnstein
Duke Power Company	ORB#4 Rdg	GJohnson
P. O. Box 33189 422 South Church Street	OELD	Dunaney
Charlotte, North Carolina 2824	12 AEOD IE	
Dear Mr. Parker:	ACRS-10 PWagner	

We have completed our review of your requests for relief from certain ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," requirements dated June 1, 1981, July 13, 1981 and March 11, 1982. The findings of our review are contained in the enclosed Evaluation of Relief Requests.

As noted in the enclosed evaluation, we have reviewed your requests in accordance with the provisions of 10 CFR Part 50.55a(g)(6) and have determined that all but two of the requests are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Two of the requests, contained in your June 1, 1981 submittal, related to reactor vessel supports and core flood nozzles have not been granted. The request for relief from inspection requirements for the reactor vessel supports would be acceptable provided the augmented inspections, as authorized by 10 CFR 50.55a(g)(6)(ii) and presented in Section I.A.3 of the enclosed evaluation, are implemented. We request that these two items be reviewed and included in your next refueling interval inspection program. If you are unable to perform these inspections, we request that you inform us of your position 90 days prior to the start of the next applicable refueling outage.

The section numbering sequence used in the enclosed Evaluation is the same sequence as used in our approval of your program issued on November 7, 1980.

If you have any questions on this subject, please contact me.

A copy of Notice of Granting Relief is also enclosed.

Sincerely,

Philip C. Wagner, Project Manager Operating Reactors Branch #4 Division of Licensing

	Enclosure 1. Evalu 2. Notic	es: Mation ce osures: See	next	page		<u> </u>	<i>.</i>	· · · · · · · · · · · · · · · · · · ·
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Duke Power Company

cc w/enclosure(s):

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ENCLOSURE

OCONEE UNITS 1, 2 & 3 EVALUATION OF RELIEF REQUESTS INSERVICE INSPECTION PROGRAM

I. CLASS 1 COMPONENTS

A. Reactor Vessel

2a. Relief Request

Relief is requested from examining the clad patch areas of the reactor vessel, pressurizer, and steam generator as required by the 1974 Edition of Section XI (Items B1.13, B1.14, B2.9, and B3.8, Examination Categories B-I-1 and B-I-2).

Code Requirements

For the reactor vessel, visual examination shall be performed on at least six patches (each 36 sq. in.) evenly distributed in the closure head and six patches (each 36 sq. in.) evenly distributed in accessible sections of the vessel shell. For the pressurizer and steam generator, visual examination shall be performed on at least one patch (36 sq. in.) near each manway in the primary side of the vessel. The examinations performed during each inspection interval shall cover 100% of the patch areas. The examination of the patches in the steam generator and pressurizer may be performed at or near the end of the inspection interval.

Licensee Basis for Requesting Relief

Liquid penetrant testing has been performed on 12 head clad patches at Oconee with no degradation found. Visual examination of 2 steam generator clad patches has been performed at Oconee with no degradation found. The internal pressure boundary surfaces of the reactor vessel will be visually inspected. As such, it is not considered necessary to inspect the clad patches. This is consistent with the Summer 1978 Code.

Licensee Proposed Alternate Examination

Visually inspect internal pressure boundary surfaces of the reactor vessel.

Compliance with the requirements for examination of the clad patches in the pressurizers and steam generators examined has been met. Examination of the reactor vessel nozzles will cover sufficient cladding in critical areas to provide assurance that the general condition of the cladding has not deteriorated. Visual examination of the vessel internal surface will provide additional assurance of the cladding integrity. We therefore conclude that the proposed alternate examination is acceptable and that relief from the requirements of the 1974 Edition of Section XI may be granted.

3. Relief Request

Relief from volumetric examination of the reactor vessel support skirt weld and heat-affected zone is requested for Oconee Units 1, 2 & 3 (Item B1.12, Examination Category B-H).

Code Requirement

In the case of vessel support skirts, volumetric examination shall be performed during each inspection interval and shall cover, at least, 10% of the circumference of the weld to the vessel. The areas examined shall include the welds to the vessel and the base metal beneath the weld zone and along the support attachment for a distance of two support thicknesses.

Licensee Basis for Requesting Relief

By letter dated November 27, 1979, Duke originally requested relief from the volumetric examination because of dose rate considerations and proposed that remote visual examination of the weld be performed at or near the end of the inspection interval.

Subsequently, it has been determined that remote visual examination of the weld surfaces area would result in abnormally high doses to the inspection personnel. Radiation levels are expected to be 1-2 R/Hr in the area. Insulation, present on the outer surface, would have to be removed in order to inspect that surface. No insulation is present on the inner weld surface.

The following radiation doses would be expected in each case:

Direct visual inspection of the OD surface - 25-50 MAN-REM Remote visual inspection of the OD surface - 40-80 MAN-REM Direct visual inspection of the ID surface - 0.5-1 MAN-REM Remote visual inspection of the ID surface - 10-20 MAN-REM

Licensee Proposed Alternate Examination

Direct visual inspection of the inner weld surface.

The reactor vessel support skirt-to-vessel weld is impractical to examine volumetrically considering access for examination equipment, the necessity of insulation removal, personnel exposure to a relatively high radiation field and the amount of time required to obtain acceptable results. However, because of the importance of the structural integrity of this weld, the alternate examination proposed by the licensee will not provide the assurance that the weld remains structurally sound after ten years of plant operation. Pursuant to 10 CFR 50.55a(g)(6)(ii), the staff requires that surface examination be performed on the inner surface of the weld shall be examined, approximately sixty (60) inches, and (b) the areas examined shall consist of three twenty-inch lengths approximately 120° apart.

Because failure of this weld will most likely occur as a result of mechanical loads, surface examination will provide acceptable results and assurance of the structural integrity of this weld.

4. Relief Request

Request to use Article 4 of Section V of the 1977 Edition through Summer 1978 Addenda of Section XI for ultrasonic examination of the reactor vessel, pressurizer, and steam generator in lieu of Appendix I of the 1974 Edition of Section XI and Article 5 of Section V.

Code Requirement

Ultrasonic examination shall be conducted in accordance with the provisions of Appendix I. Where Appendix I (I-1200) is not applicable, the provisions of Article 5 of Section V shall apply.

Licensee Basis for Requesting Relief

An improved reactor vessel inspection program is being prepared for Oconee which is based on guidance contained in a proposed NRC Regulatory Guide. This guide refers to Article 4 of Section V, 1977 Edition through Summer 1978 Addenda for ultrasonic examination methods. It is desired to have a consistent inspection program throughout the reactor coolant system. Article 4 of Section V is equivalent to Appendix I of Section XI.

Licensee Proposed Alternate Examination

Article 4 of Section V, 1977 Edition, including Addenda through Summer 1978 will be used to establish inspection methods for the referenced components.

The use of the requirements contained in Article 4 of Section V in conjunction with the Regulatory Position of Regulatory Guide 1.150 will improve the ultrasonic examination methods required by the 1974 Edition of Section XI and therefore provide a greater level of assurance of the structural integrity of the pressure vessels. We conclude, therefore, that the proposed alternative ultrasonic examination of the vessels may be used and relief from the requirements of the 1974 Edition may be granted.

B. Piping Pressure Boundary

2. <u>Relief Request</u>

Relief from volumetric examination of core flood nozzle-to-safe end and safe end-to-pipe welds is requested for Oconee Units 1, 2, & 3 (Items B1.6 and B4.1, Examination Category B-5).

Code Requirement

Volumetric and surface examination shall be performed during each inspection interval and shall cover the circumference of 100% of the welds. The areas examined shall include the base material for at least one wall thickness beyond the edge of the weld.

Licensee Basis for Requesting Relief

The subject welds will be inspected by VT from the inside surface. Outside surface examination would require about 80 man-hours in radiation fields of from 0.5 to 2 R/Hr. The preparation includes removal of the refueling canal seal plate, shielding bricks and supports in the nozzle area, and insulation. Due to the elevation and proximity to the reactor vessel cavity temporary shielding is not considered practical.

Licensee Proposed Alternate Examination

Welds will be inspected by VT from the inside surface.

Evaluation

The basis for this request is not adequate to justify granting relief from the requirements for nozzle-to-safe ends and safe end-to-pipe welds. These types of welds are of concern because of past experience of inservice flaw initiation and growth in a number of plants. Assurance that the structural integrity of the core flood nozzles is maintained must be provided by performing the required examinations or an alternative examination which will provide equivalent or superior results. Therefore, relief from the requirements may not be granted.

3. Relief Request

Request to use the requirements of the 1977 Edition through Summer 1978 Addenda for examination of branch connection welds (Items B4.6 and B4.7, Examination Category B-J).

Code Requirements

1974 Edition:

Branch pipe connection welds exceeding six-inch diameter shall be volumetrically examined (B4.6). Branch pipe connection welds six-inch diameter and smaller shall be surface examined. The examinations performed during each inspection interval shall cover all of the area of 25% of the circumferential joints including the adjoining one-foot sections of longitudinal joints and 25% of the pipe branch connection joints. The areas shall include the weld metal, the base metal for one pipe wall thickness beyond the edge of the weld on the main pipe run, and at least two inches of the base metal along the branch run.

1977 Edition, Summer 1978 Addenda:

Branch pipe connection welds greater than two-inch nominal pipe size shall be surface and volumetrically examined. Branch pipe connection welds two-inch nominal pipe size and less shall be surface examined.

Licensee Basis for Requesting Relief

Because of weld and nozzle configurations for branch connections, complete volumetric examination required by the code cannot be accomplished.

The Summer 1978 Addenda to ASME Section XI, Table 1WB 2500-1, Examination Category B-J, requires volumetric examination of branch connection welds only when the branch pipe exceeds 2-inch nominal pipe size. For these branch connections, volumetric examination is required for the material within 1/3 wall thickness of the inside surface of the weld. A surface examination is required for all branch connections.

A meaningful volumetric examination can be performed on the lower 1/3t, as required by the Summer 1978 Code. The inspection program for these welds under the Summer 1978 Code should provide equal or superior assurance of the pressure boundary integrity.

Licensee Proposed Alternate Examination

The examination methods and examination areas for all Class 1 piping branch connection welds will be chosen from Table IWB-2500-1 of the 1977 Edition of ASME XI, including Addenda through Summer 1978.

The impracticality of examining branch pipe connection welds to the requirements of the 1974 Edition of Section XI was recognized and revisions to the examination requirements were incorporated in the 1977 Edition Summer 1978 Addenda. The examination requirements of the Summer 1978 Addenda provide adequate assurance that branch pipe connection welds and base metal remain structurally sound. Therefore, relief from the requirements of the 1974 Edition through Summer 1975 Addenda may be granted.

4. Relief Requested

ASME Boiler and Pressure Vessel Code Section XI, 1974 edition, including 1975 Summer Addenda, paragraph IWC-2430, which states:

Examinations that reveal unacceptable structural defects ... shall be extended to include an additional number of components in the same category approximately equal to that number initially examined. In the event further unacceptable structural defects are revealed, all of the same components in the other streams of the system shall be examined.

Licensee Basis for Requesting Relief

The Main Stream, Main Feedwater, and Auxiliary Feedwater piping at Oconee was originally constructed to meet the requirements of ANSI B31.1 Code. This did not require volumetric inspection of pipe welds of smaller than 0.750" wall thickness, which includes approximately 40% of the welds on these systems. Oconee began commercial operation before ASME Section XI required a preservice inspection of Quality Group B piping. Because of these combined circumstances, volumetric inspection is now being conducted for the first time on many of these welds as a part of the inservice inspection requirements.

Radiography was chosen as the method of volumetric inspection on these systems. To date, no service-related flaws have been detected on any weld inspected on these systems. However, several welds have been found to contain fabrication flaws which do not meet the current acceptance standards. Specifically the current inservice inspection plan for the 1982 refueling outage at Oconee 2 requires the volumetric inspection of thirteen (13) welds on the Main Steam system. Seven (7) of these welds were not volumetrically inspected during construction. Three (3) welds inspected during this outage have been found to contain fabrication flaws that are not acceptable by the current inspection standards. Two (2) of these three (3) have never before been volumetrically inspected. The third was inspected by radiography during construction. The construction radiograph of this weld revealed a fabrication flaw that appeared to be acceptable, but the improved quality of the inservice radiograph showed that the original flaw was rejectable. Paragraph IWC-2430 would now require another thirteen (13) welds be inspected. If another

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weld is found to contain a rejectable flaw, either serviceinduced or originally present from fabrication, the entire main steam system (approximately 190 welds) would have to be inspected imposing a great hardship in terms of cost and manpower available to accomplish. Section XI makes no distinction in Paragraph IWC-2430 between service-related flaws and fabrication flaws in requiring additional inspection samples. Duke feels that the intent of Section XI is to assure that operation of the plant has not caused any degradation of the pressure boundary material. Therefore, flaws which can be characterized as fabrication flaws should not be considered in deciding whether additional inspection samples are needed.

Licensee Proposed Alternate Examinations

The volumetric examination required by Table IWC-2600 will be performed. When any unacceptable indication is found, the examination will be evaluated by the Duke Power Company Level III to determine if the flaw is service-related or original fabrication. If the flaw is determined to have been produced during original fabrication, the weld will not be considered unacceptable for the purpose of choosing additional inspection samples. If the flaw is determined to be service-related, or if no determination can be made, the weld will be considered unacceptable, and all provisions of Paragraph IWC-2430 will apply.

These requirements will be implemented for all inservice inspection conducted during the remainder of the first ten-year interval at Oconee Nuclear Station.

Evaluation

Imposition of the acceptance standards in the 1974 Edition through Summer 1975 Addenda of Section XI for welds made to the requirements of ANSI B31.1 would cause an undue burden on the licensee and is an impractical requirement to meet from a design aspect. Fabrication flaws which were unacceptable to criteria during construction would have to be repaired or evaluated in accordance with the rules of Section XI. The intent of Section XI is to detect flaws and to determine if they are unacceptable or if they are propagating through the piping pressure boundary over a period of plant operation. Construction standards provide rules for design, examination, and testing of piping welds which, after meeting the acceptance criteria, the welds are deemed acceptable for the service that they are intended.

The staff has determined that: (1) the acceptance criteria used in the original construction Code, ANSI B31.1, should be applied to the welds in the main steam, main and auxiliary feedwater systems, (2) the conditions for additional sampling of welds found to be unacceptable to the criteria in the original construction code should comply with the 1974 Edition through Summer 1975 Addenda and (3) welds which are examined and determined to have service induced flaw and inservice growth of the fabrication flaw should be repaired. The staff has discussed the above with the licensee and the licensee has agreed to modify the inservice examination program to reflect these criteria. We conclude that these modifications of the examination procedure will provide assurance of the structural integrity of the welds, in the main steam and main and auxiliary feedwater systems and that relief from the requirements in the 1974 Edition of Section XI may be granted.

C. Pump Pressure Boundary

1. Relief Request

Relief is requested from performing 100% volumetric examination on the reactor coolant pump casing welds and 100% visual examination of the pump internal pressure boundary surfaces (Items B5.6 and B5.7, Examination Categories B-L-1 and B-L-2).

Code Requirements

Volumetric examinations performed during each inspection interval shall include 100% of the pressure-retaining welds in at least one pump in each group of pumps performing similar functions in the system. The internal pressure boundary surfaces shall be visually examined on one pump in each group of pumps performing similar functions in the system.

Licensee Basis for Requesting Relief

The Reactor Coolant Pumps on Oconee Units 2 and 3 were designed and manufactured by Bingham-Willamette Company before the ASME, Boiler and Pressure Vessel, Section XI Code was developed. The pump casing was designed in such a way that a large portion of the internal pressure boundary is inaccessible for visual inspection, and small areas at the outer edges of the volute are inaccessible for volumetric inspection using radiography. Therefore, the code as it presently stands does not give adequate consideration to pumps that were designed in this manner. A visual inspection of these areas would require cutting the pump casing open which would be impractical and not in keeping with the concept of Non-Destructive Examinations (NDE).

Licensee Proposed Alternate Examination

The remaining portion of the casing can be visually and volumetrically inspected and the results of this portion of the visual inspection should be indicative of what conditions exist in the inaccessible areas.

Because of the reactor coolant pump design, it is impractical to volumetrically examine 100% of the casing welds and visually examine 100% of the internal pressure boundary surface. The welds and surface area which can be examined are sufficient to determine the general condition of the pump and provide assurance of continued structural integrity. We conclude that relief from examining 100% of the welds and internal pressure boundary surfaces may be granted.

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II. CLASS 2 COMPONENTS

3. Relief Request

Request relief from volumetric examination of Class 2 piping welds in pipes with nominal wall thickness less than 0.25 inch (Items C2.1, C2.2 and C2.3, Examination Categories C-F and C-G).

Code Requirement

Volumetric examination shall cover 100% of the weld.

Licensee Basis for Requesting Relief

Reliability for detection and characterization of flaws in thin-wall piping using the 1975 Summer Addenda of the procedures is poor. This is mainly due to resolution problems inherent with the UT technique, weld joint configurations, and material properties in the case of austenitic welds. Further, the code required calibration fracture, a 3/32" diameter hole, is over 50% of the wall thickness in some cases.

Additionally, the 1977 and later Editions of Section XI (including Addenda) require a surface examination of Class 1 piping weldments with less than 4 inch nominal pipe diameter and of Class 2 piping weldments 0.5 inch and less in thickness. No volumetric examination is required for these welds.

A surface examination (MT or PT) provides better sensitivity for detecting and sizing surface initiating flaws.

Licensee Proposed Alternate Examination

A liquid penetrant examination will be performed on those welds with thicknesses less than 0.25 inch that had been identified for volumetric inspection.

Because of the questionable results which would arise from the volumetric examination of thin wall pipes, the requirements for examination of welds in these pipes will not produce the level of quality and assurance of structural integrity desired. Surface examination of welds in thin wall pipe is acceptable. We find the proposed examination acceptable and conclude that relief from volumetric examination of welds in pipe with wall thickness less than 0.25 inch may be granted.

IV. GENERAL

3. Relief Request

Relief is requested from the material fabrication requirement for 9" and 13" thick basic T calibration blocks (I-3121).

Code Requirement

Material from which the block is fabricated shall be from the component, from either a nozzle dropout or a prolongation.

Licensee Basis for Requesting Relief

ASME Code acceptance material for fabrication of the identified calibration blocks is not available.

Alternate baseline calibration blocks, as described in Attachments GI, G2 will be used. Calibration block #40305 will be used for the 9-inch THK basic T calibration block; and calibration block #40308 for the 13 inch THK basic T calibration block.

Licensee Proposed Alternate Examination

Alternate calibration blocks will be used.

Evaluation

The material from which the calibration blocks is made was reported by the licensee to be SA-515 GR 60. The components which will be examined ultrasonicaTly are fabricated from SA-302 GR B and SA-508 CL 1 material. The Code requires the calibration block material to be made of the same or similar material as that of the component being examined. Material content, heat treatment, cold working, etc. affect the acoustic properties of the material. However, the staff has determined that the calibration block material is similar to that of the components being examined and that any deviations in the acoustic properties can be compensated for in the calibration technique. Assurance that Code unacceptable flaws will be detected can be provided by using the calibration block material and ultrasonic calibration method. We therefore conclude that the request to use the alternate calibration block material may be granted.

V. CONCLUSIONS

1. Summary

We have reviewed each of the above relief requests and have determined that all but one (Item I.B.2) may be granted. Item I.B.2 - Volumetric Examination of Core Flood Welds - has not been granted. Additionally, alternative requirements have been imposed for Items I.A.3 and I.B.4.

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For those items for which relief has been granted, we have determined that the Code requirements are impractical and that the relief requests are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

2. Environmental Consideration

We have determined that the granting of relief does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that granting relief involves an action which is insignificant from the standpoint of environmental impact and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the granting of these reliefs.

3. Conclusion

We have concluded, based on the considerations discussed above, that: (1) granting this relief does not involve a significant increase in the probability or consequences of accidents previously considered, does not involve a significant decrease in a safety margin, and, therefore, does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) the activities authorized by the grants of relief will not be inimical to the common defense and security or to the health and safety of the public.

Dated: April 8, 1982

The following NRC staff personnel contributed to this Evaluation: P. C. Wagner, G. Johnson.