DUKE POWER COMPANY

OCONEE NUCLEAR STATION

ATTACHMENT 1

TECHNICAL SPECIFICATIONS

Remove Page	Insert Page
4.1-10	4.1-10
4.1-12	4.1-12
3.1-12	3.1-12
3.1-13	3.1-13
3.1-21	3.1-21
3.1-22	3.1-22

Table 4.1-3

Minimum Sampling Frequency And Analysis Program

	Item	Check	Frequency
1.	Reactor Coolant	a. Gamma Isotopic Analysis b. Boron Concentration c. E Determination (2)	a. 3 times/week* b. 2 times/week** c. Semi-annually
2.	Borated Water Storage Tank Water Sample	Boron Concentration	Weekly* and after each makeup
3.	Core Flooding Tank	Boron Concentration	Monthly* and after each makeup
4.	Spent Fuel Pool Water Sample	Boron Concentration	Monthly and after each makeup
5.	OTSG or Final Feedwater	Gamma Isotopic Analysis	Weekly*
6.	Concentrated Boric Acid Tank	Boron Concentration	Weekly*

* Not applicable if reactor is in a cold shutdown condition for a period exceeding the sampling frequency.

** Applicable only when fuel is in the reactor.

TABLE 4.1-3 NOTES

(1) (Not Used)

(2) $\bar{E}$ determination will be started when gross gamma activity analysis indicates greater than 10μCi/ml and will be determined for each 10μCi/ml increase in gross gamma activity analysis thereafter. A radiochemical analysis for this purpose shall consist of a quantitative measurement of 95 percent of the radionuclides in the reactor coolant with half lives greater than 30 minutes.

(3) (Not Used)

(4) (Not Used)

(5) (Not Used)

(6) (Not Used)

(7) (Not Used)

(8) (Not Used)

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(10) (Not Used)

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DUKE POWER COMPANY

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ATTACHMENT 2

TECHNICAL SPECIFICATIONS
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Table 4.1-3

Minimum Sampling Frequency And Analysis Program

	Item	Check	Frequency
1.	Reactor Coolant	a. Gamma Isotopic Analysis ~~b. Radiochemical Analysis for Sr 89, 90~~ ~~c. Tritium~~ ~~d. Gross Beta Activity (1)~~ ~~e. Chemistry (Cl, F and O_2)~~ b~~f~~. Boron Concentration ~~g. Gross Alpha Activity~~ c~~h~~. E Determination (2)	a. 3 times/week* ~~b. Monthly*~~ ~~c. Monthly*~~ ~~d. 3 times/week*~~ ~~e. 5 times/week*~~ b~~f~~. 2 times/week** ~~g. Monthly*~~ c~~h~~. Semi-annually
2.	Borated Water Storage Tank Water Sample	Boron Concentration	Weekly* and after each makeup
3.	Core Flooding Tank	Boron Concentration	Monthly* and after each makeup
4.	Spent Fuel Pool Water Sample	Boron Concentration	Monthly~~***~~ and after each makeup
5.	OTSG or Final Feedwater	~~a. Gross Beta Activity~~ ~~b.~~ Gamma Isotopic Analysis ~~(3)~~	~~a.~~ Weekly*
6.	Concentrated Boric Acid Tank	Boron Concentration	~~Twice w~~Weekly*

* Not applicable if reactor is in a cold shutdown condition for a period exceeding the sampling frequency.

** Applicable only when fuel is in the reactor.

~~*** Applicable only when fuel is in the wet storage in the spent fuel pool.~~

TABLE 4.1-3 NOTES

(1) (Not Used) ~~When radioactivity level is greater than 10 percent of the limits of Specification 3.1.4, the sampling frequency shall be increased to a minimum once each day.~~

(2) E determination will be started when gross gamma activity analysis indicates greater than 10μCi/ml and will be determined for each 10μCi/ml increase in gross gamma activity analysis thereafter. A radiochemical analysis for this purpose shall consist of a quantitative measurement of 95 percent of the radionuclides in the reactor coolant with half lives greater than 30 minutes. ~~This is expected to consist of gamma isotopic analysis of the primary coolant, including dissolved gaseous activities, radiochemical analysis for Sr-89 and Sr-90, and tritium analysis.~~

(3) (Not Used) ~~When gross beta activity increase by a factor of two above background iodine concentrations will be determined by gamma isotopic analysis and performed thereafter when the gross beta activity increase by 10 percent.~~

(4) (Not Used)

(5) (Not Used)

(6) (Not Used)

(7) (Not Used)

(8) (Not Used)

(9) (Not Used)

(10) (Not Used)

(11) (Not Used)

Move to SLC

3.1.5 Chemistry

Specification

3.1.5.1 If the concentration of oxygen in the primary coolant exceeds 0.1 ppm during power operation, corrective action shall be initiated within eight hours to return oxygen levels to $\leq$ 0.1 ppm.

3.1.5.2 If the concentration of chloride in the primary coolant exceeds 0.15 ppm during power operation, corrective action shall be initiated within eight hours to return chloride levels to $\leq$ 0.15 ppm.

3.1.5.3 If the concentration of fluorides in the primary coolant exceeds 0.15 ppm following modifications or repair to the primary system involving welding, corrective action shall be initiated within eight hours to return fluoride levels to $\leq$ 0.15 ppm.

3.1.5.4 If the concentration limits of oxygen, chloride or fluoride in 3.1.5.1, 3.1.5.2 and 3.1.5.3 above are not restored within 24 hours the reactor shall be placed in a hot shutdown condition within 12 hours thereafter. If the normal operational limits are not restored within an additional 24-hour period, the reactor shall be placed in a cold shutdown condition within 24-hours thereafter.

3.1.5.5 If the oxygen ocncentration and the chloride or fluoride concentration of the primary coolant system individually exceed 1.0 ppm. the reactor shall be immediately brought to the hot shutdown condition using normal shutdown procedure and action is to be taken immediately to return the system to within normal operation specifications. If normal operating specifications have not been reached in 12 hours, the reactor shall be brought to a cold shutdown condition using normal procedure.

Bases

By maintaining the chloride, fluoride and oxygen concentration in the reactor coolant within the specifications, the integrity of the reactor coolant system is protected against potential stress corrosion attack. (1,2)

The oxygen concentration in the reactor coolant system is normally expected to be below detectable limits since dissolved hydrogen is used when the reactor is critical and a residual of hydrazine is used when the reactor is subcritical to control the oxygen. The requirement that the oxygen concentration not exceed 0.1 ppm during power operation is added assurance that stress corrosion cracks will not occur. (4)

If the oxygen, chloride, or fluoride limits are exceeded, measures can be taken to correct the condition (e.g., switch to the spare demineralizer, replace the ion exchange resin, increase the hydrogen concentration in the makeup tank, etc.) and further because of the time dependent nature of any adverse effects arising from chlorides or oxygen concentrations in excess of the limits, it is unnecessary to shutdown immediately, since the condition can be corrected.

Move to SLC

The oxygen and halogen limits specified are at least an order of magnitude below concentrations which could result in damage to materials found in the reactor coolant system even if maintained for an extended period of time. (4) Thus, the period of eight hours to initiate corrective action and the period of 24 hours to perform corrective action to restore the concentration within the limits have been established. The eight hour period to initiate corrective action allows time to ascertain that the chemical analyses are correct and to locate the source of contamination. If corrective action has not been effective at the end of 24 hours, then the reactor coolant system will be brought to the hot shutdown condition within 12 hours and corrective action will continue. If the operational limits are not restored within an additional 24 hour period, the reactor shall be placed in a cold shutdown condition within 24 hours thereafter.

The maximum limit of 1 ppm for the oxygen and halogen concentration that will not be exceeded was selected as the hot shutdown limit because these values have been shown to be safe at 500°F. (3)

REFERENCES

(1) FSAR, Section 5.2.1.7

(2) FSAR, Section 9.3.1-2

(3) Stress Corrosion of Metals, Logan

(4) Corrosion and Wear Handbook, O. J. DePaul, Editor

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3.1.10 Control Rod Operation

Specification

3.1.10.1 Allowable combinations of pressure and temperature for control rod operation shall be to the left of and above the limiting pressure versus temperature curve as shown in Figure 3.1.10-1.

3.1.10.2 The dissolved gas concentration shall not exceed 100 standard cc/liter.

3.1.10.3 If either the limits of 3.1.10.1 or 3.1.10.2 are exceeded, the center control rod drive mechanism shall be checked for accumulation of undissolved gases.

Bases

The limiting pressure versus temperature curve for dissolved gases is determined by the equilibrium pressure versus temperature curve for the dissolved gas concentration of 100 std. cc/liter of water. This equilibrium total pressure is the sum of the partial pressure of the dissolved gases plus the partial pressure of water at a given temperature.

By maintaining the reactor coolant temperature and pressure as specified above, any dissolved gases in the reactor coolant system are maintained in solution.

Although the dissolved gas concentration is expected to be approximately 20-40 std. cc/liter of water, the dissolved gas concentration is conservatively assumed to be 100 std. cc/liter of water at the reactor vessel outlet temperature.

If either the maximum dissolved gas concentration (100 std. cc/liter of water) is exceeded or the operating pressure falls below or to the right of the limiting pressure versus temperature curve, the center CRDM should be checked for accumulation of undissolved gases.

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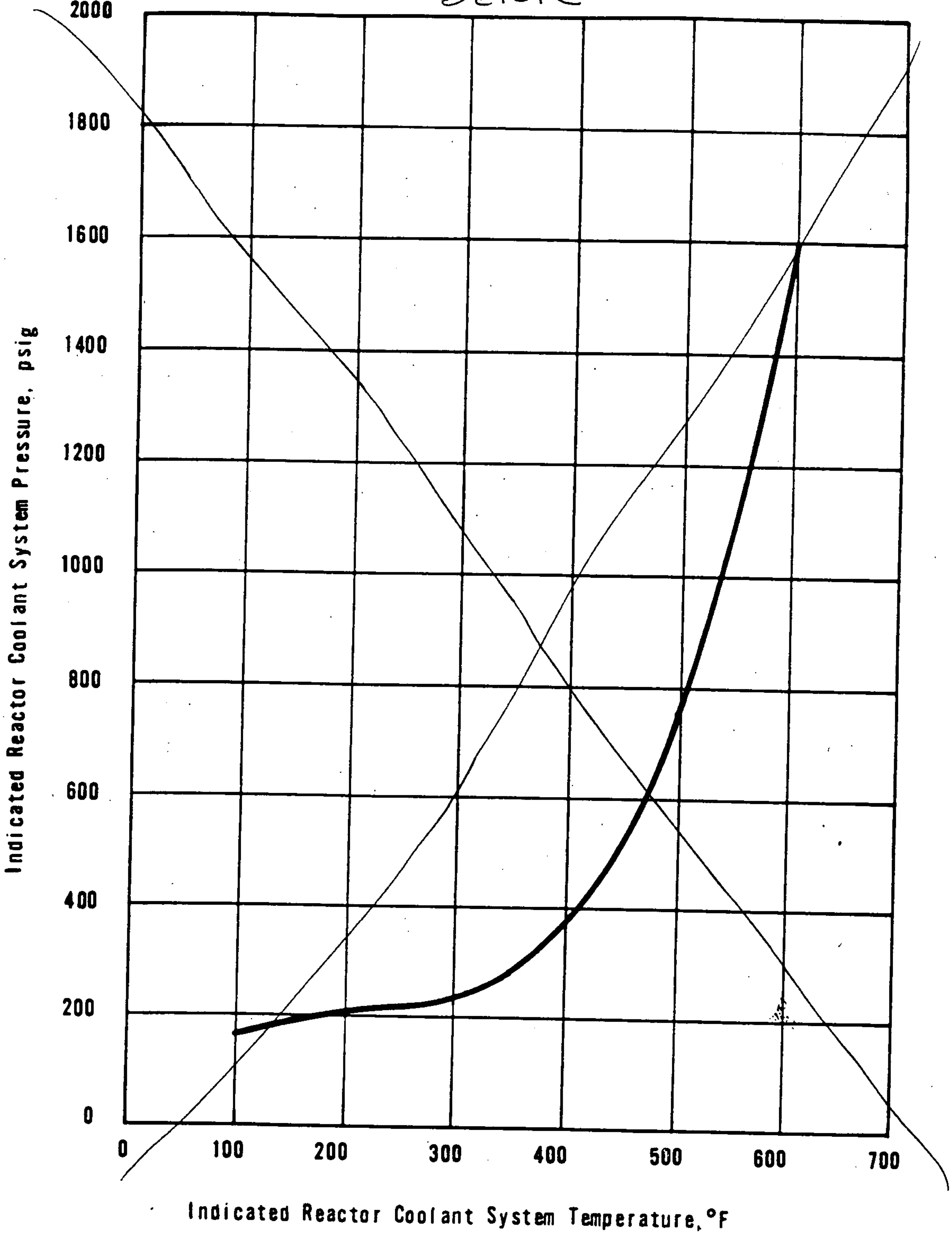

LIMITING PRESSURE VS TEMPERATURE CURVE FOR 100 STD CC/LITER H_2O

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Figure 3.1.10 - 1

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ATTACHMENT 3

TECHNICAL JUSTIFICATION

Technical Specification Change

The proposed Technical Specification revision which is provided in Attachment 1 removes several Chemistry surveillance requirements for the Reactor Coolant System (RCS). The surveillances which will be removed from the Technical Specifications include the radiochemical analysis for Sr^{89} and Sr^{90}, tritium, gross beta activity, chloride, fluoride, oxygen, gross alpha activity, and dissolved gas concentration. The surveillance requirements for tritium, chloride, fluoride, and oxygen will be relocated to the Selected Licensee Commitment (SLC) Manual. In addition, the once through steam generator (OTSG) or final feedwater gross beta activity analysis is removed. A reduction in the surveillance frequency for the concentrated boric acid storage tank (CBAST) is included to reduce the current twice a week requirement to a weekly requirement. Finally, a miscellaneous note on the applicability of the Spent Fuel Pool sample is removed.

Background/Technical Justification

This section provides the background and technical justification for each proposed Technical Specification revision separately.

Radiochemical Analysis for Sr^{89} and Sr^{90}

The first proposed Technical Specification change involves the deletion of the monthly requirement to perform a radiochemical analysis of the RCS for Sr^{89} and Sr^{90} per Technical Specification Table 4.1-3 Item 1b. Sr^{89} and Sr^{90} are isotopes that have been analyzed and trended since the beginning of operation at Oconee Nuclear Station (ONS). These isotopes are of interest due to their biological hazard and long half-life, 52 days and 28.1 years respectively. In addition, strontium (Sr^{89} and Sr^{90}) is factored into the semi-annual calculations for 224/Ebar due to a Technical Specification requirement to account for 95% of the RCS activity in the event of a postulated steam generator tube rupture (SGTR) accident.

With Oconee's operational history and two decades of strontium data trending, an accurate baseline has been established for normal operating conditions. Strontium activity is within a range of 1.0E-5 and 1.0E-7 during normal operations. This amount would not impact the total related activities when performing the semi-annual Ebar calculations. Also, the strontium activity constitutes less than 2.0E-3% of the total RCS activity.

If any potential biological threats and/or abnormal activity increased in the RCS, the daily gamma spectral analysis would identify the anomalies. In addition, the current methodology for evaluating the SGTR accident doses is tied to a technical specification requirement, along with Ebar determination, which puts a specific limit on the dose equivalent iodine (DEI) in the RCS. This requirement is a more conservative approach to determining the SGTR accident doses as opposed to the Ebar technical specifications.

An additional Technical Specification requirement in Table 4.1-3, page 4.1-12, Note: (2) will be maintained. This will require an Ebar determination to be initiated when the gross gamma analysis indicates greater than 10μCi/ml and will be redetermined for each additional 10μCi/ml increase.

The proposed elimination of the radiochemical analysis of strontium is justified due to the low strontium activity levels, the ability to detect RCS anomalies with the daily gamma spectral analysis, the conservative approach in evaluating the SGTR accident doses, and the additional requirement to perform an Ebar determination when the gross gamma analysis increases above the acceptable limits. The absence of the strontium analysis will in no way impair the qualitative or quantitative assessment of the RCS isotopic inventory under normal operations. However, the elimination of the strontium analysis will present a cost savings and a substantial dose reduction.

<u>Tritium Analysis</u>

Tritium is a known biological hazard with a half-life of 12.3 years. The production mechanism of the tritium in the RCS is well known and projections can be made in regards to the RCS inventory. Ternary fission and fast neutron reactions with the RCS constituents are the major production mechanisms. The fast neutron reaction production mechanism is the only area where ONS can exercise any significant control. In order to control the fast neutron reactions, 99.9% pure Li^7 is utilized to control the RCS pH level as opposed to Li^6. In addition, the use of 99.9% pure Li^7 is a commitment to the American Nuclear Insurers.

ONS has formalized programs in place to monitor all effluents which leave the site for tritium content. This includes composite samples from the chemical treatment pond discharge. In addition, ONS includes the tritium analysis in the onsite groundwater monitoring program. Finally, an air monitoring analysis is performed within containment whenever the Reactor Building is entered.

Removal of this surveillance from Technical Specification Table 4.1-3 Item 1c, will not eliminate the commitment to perform the tritium analysis. The tritium analysis will be placed in the SLC manual with a quarterly surveillance frequency. The proposed Technical Specification change can be justified due to the effluent monitoring programs in place at ONS, the use of Li^7 to reduce the amount of tritium in the RCS, and the placement of the surveillance in the SLC manual with a quarterly frequency. The removal of the tritium analysis from Technical Specifications will in no way impair the protection of the public health and safety. However, the Technical Specification change will present a cost savings and a dose reduction.

Gross Beta and Alpha Activity Analysis

The gross beta and alpha analyses were instituted in the early 1970s when ONS began commercial operation. Since the advanced multichannel gamma isotopic analyzer (MCA) technology was not available at the time, the RCS fission products and fuel cladding integrity were trended using the gross beta and alpha analyses. In the past two decades, the radiochemistry program at ONS has advanced to the state of the art in MCA technology. The MCA equipment allows for precise identification of the individual isotopes in the RCS. This includes the identification of the beta and alpha emitting fission products from their gamma emissions.

In addition, ONS has a formalized tracking program to scrutinize the RCS on a daily basis for inconsistencies in selected isotopes. Deviations in excess of two sigma in the levels of the selected isotopes will result in an investigation to determine the cause of the increase. On a monthly basis, long term plots of each isotope are reviewed by Staff personnel. Any adverse trends are identified for joint investigation in regards to system anomalies, sample preparation errors, and/or counting interferences. An additional review of the analysis data is conducted 3 times per year to evaluate the behavior characteristics of individual isotopes.

The elimination of the gross beta and alpha activity analysis from Technical Specification Table 4.1-3 Item 1d and 1g will not impair the assessment of the RCS isotopic inventory. ONS has programs and monitoring equipment in place to provide a superior means of monitoring and trending the RCS isotope activity. Finally, the elimination of this surveillance requirement will result in a cost savings and dose reduction for ONS.

Chemistry (oxygen, chloride, and fluoride) Analysis

The limits on the oxygen, chloride and fluoride levels for the RCS in Technical Specification Section 3.1.5 and Table 4.1-3 Item 1e are intended to protect the integrity of the RCS against stress corrosion cracking. This concern is based on laboratory data which demonstrates stress corrosion cracking in high temperature water in the presence of oxygen and ionic chloride.

While these concerns are valid over a period of time and high concentration levels, the chemistry specifications for these parameters are not based on the operability of any of the associated systems. Therefore, the chemistry specifications should be relocated to the SLC manual with a reduced surveillance frequency of three times per week. This change will not alter the current operating practices and limits for the RCS which are derived from the Electric Power Research Institute's (EPRI) "Pressurized Water Reactor Primary Water Chemistry Guidelines" Revision 2. FSAR Chapter 5.2.1.7 contains Oconee's commitment to utilize the EPRI guidelines for the RCS chemistry specifications. These EPRI guidelines contain various action levels which require plant shutdown dependent on the oxygen, chloride, and fluoride levels in the RCS. EPRI action level 2 allows 24 hours to shutdown the plant if oxygen, chloride and fluoride levels exceed 100, 150, and 150 ppb respectively. EPRI action level 1 requires immediate shutdown if the limits of 1000, 1500 and 1500 ppb respectively are exceeded.

The removal of the chemistry specifications from Technical Specifications will not impair the protection of the public safety and health. ONS has programs in place to monitor the oxygen, chloride and fluoride levels in the RCS. In addition, the requirements of this program will be contained in the SLC manual with a surveillance frequency of 3 times per week and shutdown requirements consistent with the EPRI guidelines. The reduced frequency is justified due to the fact that these RCS parameters develop over several days or even weeks during normal operation. The reduced frequency ensures that changes in the oxygen, chloride, and fluoride levels will be determined in advance and corrected prior to exceeding the shutdown requirements. Finally, the sampling frequency reduction will result in a cost savings and a dose reduction for ONS.

<u>OTSG or Final Feedwater Gross Beta Activity</u>

The current Technical Specification, Item 5 of Table 4.1-3, for gross beta activity requires that the gamma isotopic analysis be performed if the gross beta activity increases by a factor of two above the background iodine concentrations. In addition, a gamma isotopic analysis is required when the gross beta activity increases by 10 percent. Currently, ONS has programs in place to monitor the gamma isotopic analysis regardless of the gross beta results. These programs provide an adequate means of monitoring the isotopic analysis. Removal of this analysis from the Technical Specifications will not impair the assessment of the gamma isotopic activity.

Finally, the elimination of this requirement will result in a cost savings and dose reduction for ONS.

Boron Concentration Analysis of the CBAST

Boron precipitation is prevented by the normal operational restrictions that are associated with the CBAST. The CBAST is utilized for the addition of borated water to the RCS and is maintained in a normally isolated condition. The level of the CBAST is monitored in the ONS Control Room on instrumentation monitors. The operator aided computer (OAC) provides alarms for the operator if the temperature of the CBAST exceeds preset values. In addition, operational procedures require evaluation of the CBAST boron concentration within four hours after completing any volume transfers.

Reduction of the CBAST boron concentration surveillance requirements in Technical Specification Table 4.1-3 Item 6 to a weekly frequency will not impair the protection of the public health and safety. Remote monitoring instrumentation, OAC alarms and operational procedure requirements ensure that daily plant activities do not result in the CBAST boron concentration exceeding the Technical Specifications. This proposed change will result in a cost savings for ONS due to a reduced sampling frequency.

Dissolved Gas Concentration Analysis

The B&W total dissolved gas specifications of 100 standard cc/liter of water evolved from an incident that occurred during the initial testing of ONS Unit 1 in 1971. During the testing, a nitrogen overpressure of 400 psig was established on the pressurizer to operate the reactor coolant pumps. This resulted in a concentration of 300 standard cc N^2/liter of water in the pressurizer. Following pressurization of the system, a pressurizer valve failed which resulted in a sudden depressurization to about 60 psig. A gas pocket formed in the reactor vessel and some of the control rod drive mechanisms (CRDM). In conjunction with this event, the control rod drop tests were being conducted. When the control rods dropped, several of the control rods were damaged because the CRDMs did not have the necessary inventory of six inches of water above the snubbing springs for proper dampening action.

During the operational history of ONS, the dissolved gas concentration has not exceeded the Technical Specification limits. The average total gas is normally less than 50 standard cc/liter of water. The potential problems with the dissolved gases are likely to occur during periods other than normal operations (i.e., heatup, power movement operation, and cooldown). Dissolved gases can come out of solution if there is a pressure reduction to the point where the total system pressure is less than the sum of the partial pressures of the dissolved gases and the partial pressure of the reactor coolant. The primary method for control of gases during heatup, power operation, and cooldown is through operation practices such as venting. At Oconee, instrumentation and procedures are in place to ensure that the appropriate actions are taken for conditions that would result in a "gas-out" problem. The CRDMs and the RCS loops are vented by Operations following the RCS refill. Limits on the RCS level and pressure when the RCS is pressurized prevent a gas-out problem.

The elimination of Technical Specification Section 3.1.10 on the dissolved gas concentration in the RCS will not impair the protection of the public health and safety. Monitoring instrumentation, OAC parameters, and operational procedures are in place to ensure that a potential gas-out problem does not occur. In addition, the elimination of this requirement will result in a cost savings to ONS.

Spent Fuel Pool Sampling Note Deletion

The note on Page 4.1-10 for the Spent Fuel Pool (SFP) Water sampling will be deleted by this amendment. This note indicates that the SFP sampling is applicable only when fuel is in wet storage in the pool. This note was in the original Technical Specification to prevent excessive monitoring prior to storing fuel in the pool. Since fuel will be in the SFP for wet storage, this note is no longer necessary.

Justification

Each specification being removed from the Technical Specifications was reviewed against the four criteria from 10 CFR 50.36. If none of the criteria are met, then a Technical Specification is unnecessary. The following information addresses each criterion and indicates that no Technical Specifications are required.

Criterion 1 - Installed instrumentation that is used to detect and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

Response - The deletion of the surveillances from Technical Specifications will not impact the ability of the control room to detect a significant abnormal degradation of the reactor coolant pressure boundary. The required instrumentation in the control room to detect significant degradation of the reactor coolant pressure boundary is not affected by the associated surveillances or surveillance frequencies.

Criterion 2 - A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Response - The removal of the surveillances by this amendment does not involve a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis.

Criterion 3 - A structure, system, or component (SSC) that is part of the primary success path and which functions to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Response - The removal of the chemistry surveillances by this amendment does not involve an SSC which is required to mitigate a design basis accident or transient.

Criterion 4 - A SSC which operating experience or probabilistic risk assessment (PRA) has shown to be significant to public health and safety.

Response - Operating experience and the PRA has not shown the surveillances removed by this amendment to be safety significant.

Based on the information provided in this attachment, Duke Power concludes that the proposed amendment is acceptable.

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

ATTACHMENT 4

NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

Pursuant to 10 CFR 50.91, Duke Power Company (Duke) has made the determination that this amendment request involves a No Significant Hazards Consideration by applying the standards established by the NRC regulations in 10 CFR 50.92. This ensures that operation of the facility in accordance with the proposed amendment would not:

(1) Involve a significant increase in the probability or consequences of an accident previously evaluated:

Each accident analysis addressed within the Oconee Final Safety Analysis Report (FSAR) has been examined with respect to the proposed amendment request. The probability of any Design Basis Accident (DBA) is not significantly increased by the proposed amendment due to the fact that the identified cause in the FSAR accidents is not impacted. In addition, the consequences of the accidents are within the bounds of the FSAR analyses since the proposed amendment does not change the accident analysis methods or assumptions described in the FSAR.

(2) Create the possibility of a new or different kind of accident from any kind of accident previously evaluated:

The proposed amendment revises and eliminates several of the RCS chemistry Technical Specification surveillance requirements. The changes in the surveillance requirements do not alter the plant safety features or the method of operation at ONS. Therefore, operation of ONS in accordance with the proposed Technical Specification will not create any failure modes not bounded by previously evaluated accidents.

(3) Involve a significant reduction in a margin of safety.

The proposed amendment does not impact the mitigation of any of the accidents analyzed in the FSAR. Therefore, there is not a significant reduction in the margin of safety associated with the proposed amendment.

Duke has concluded, based on the above, that there are no significant hazards considerations involved in this amendment request.

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OCONEE NUCLEAR STATION

ATTACHMENT 5

ENVIRONMENTAL IMPACT ANALYSIS

Pursuant to 10 CFR 51.22 (b), an evaluation of the proposed amendment has been performed to determine whether or not it meets the criteria for categorical exclusion set forth in 10 CFR 51.22 (c) 9 of the regulations. The proposed amendment does not involve:

1) A significant hazards consideration.

This conclusion is supported by the No Significant Hazards Consideration evaluation which is contained in Attachment 4.

2) A significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed amendment will not change the types or amounts of any effluents that may be released offsite.

3) A significant increase in the individual or cumulative occupational radiation exposure.

The proposed will not increase the individual or cumulative occupational radiation exposure.

In summary, the proposed amendment request meets the criteria set forth in 10 CFR 51.22 (c) 9 of the regulations for categorical exclusion from an environmental impact statement.