ATTACHMENT I

ST. LUCIE UNIT 1

TECHNICAL SPECIFICATIONS

MARKED UP PAGES

FOR F_{xy}^{T} DELETION

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INDEX

DEFINITIONS

DELETE

INDEX

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

STAGGERED TEST BASIS

1.32 A STAGGERED TEST BASIS shall consist of:

a. A test schedule for n systems, subsystems, trains or other designated components obtained by dividing the specified test interval into n equal subintervals, and

b. The testing of one system, subsystem, train or other designated component at the beginning of each subinterval.

THERMAL POWER

1.33 THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

UNIDENTIFIED LEAKAGE

1.34 UNIDENTIFIED LEAKAGE shall be all leakage which is not IDENTIFIED LEAKAGE or CONTROLLED LEAKAGE.

UNRESTRICTED AREA

1.35 An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

UNRODDED INTEGRATED RADIAL PEAKING FACTOR - F_r

1.36 The UNRODDED INTEGRATED RADIAL PEAKING FACTOR is the ratio of the peak pin power to the average pin power in an unrodded core, excluding tilt.

UNRODDED PLANAR RADIAL PEAKING FACTOR - F_{xy}

1.37 The UNRODDED PLANAR RADIAL PEAKING FACTOR is the maximum ratio of the peak to average power density of the individual fuel rods in any of the unrodded horizontal planes, excluding tilt.

DELETE

SURVEILLANCE REQUIREMENTS (Continued)

c. Verifying that the AXIAL SHAPE INDEX is maintained within the allowable limits of Figure 3.2-2, where 100 percent of maximum allowable power represents the maximum THERMAL POWER allowed by the following expression:

M x N

where:

1. M is the maximum allowable THERMAL POWER level for the existing Reactor Coolant Pump combination.

2. N is the maximum allowable fraction of RATED THERMAL POWER as determined by the F_r^T curve of Figure 3.2-3.

ADD: F_r^T → DELETE

4.2.1.4 Incore Detector Monitoring System# - The incore detector monitoring system may be used for monitoring the core power distribution by verifying that the incore detector Local Power Density alarms:

a. Are adjusted to satisfy the requirements of the core power distribution map which shall be updated at least once per 31 days of accumulated operation in MODE 1.

b. Have their alarm setpoint adjusted to less than or equal to the limits shown on Figure 3.2-1 when the following factors are appropriately included in the setting of these alarms:

1. A measurement-calculational uncertainty factor of 1.07,

2. An engineering uncertainty factor of 1.03,

3. A THERMAL POWER measurement uncertainty factor of 1.02.

#If the core system becomes inoperable, reduce power to M x N within 4 hours and monitor linear heat rate in accordance with Specification 4.2.1.

POWER DISTRIBUTION LIMITS

TOTAL PLANAR RADIAL PEAKING FACTOR - F_{xy}^T

LIMITING CONDITION FOR OPERATION

3.2.2 The calculated value of F_{xy}^T shall be limited to $\leq$ 1.70.

APPLICABILITY: MODE 1*.

ACTION:

With F_{xy}^T > 1.70, within 6 hours either:

a. Reduce THERMAL POWER to bring the combination of THERMAL POWER and F_{xy}^T to within the limits of Figure 3.2-3 and withdraw the full length CEAs to or beyond the Long Term Steady State Insertion Limits of Specification 3.1.3.6; or

b. Be in HOT STANDBY.

SURVEILLANCE REQUIREMENTS

4.2.2.1 The provisions of Specification 4.0.4 are not applicable.

4.2.2.2 F_{xy}^T shall be calculated by the expression $F_{xy}^T = F_{xy}(1+T_q)$ when F_{xy} is calculated with a non-full core power distribution analysis code and shall be calculated as $F_{xy}^T = F_{xy}$ when calculations are performed with a full core power distribution analysis code. F_{xy}^T shall be determined to be within its limit at the following intervals:

a. Prior to operation above 70 percent of RATED THERMAL POWER after each fuel loading,

b. At least once per 31 days of accumulated operation in MODE 1, and

c. Within four hours if the AZIMUTHAL POWER TILT (T_q) is > 0.03.

*See Special Test Exception 3.10.2.

DELETE

SURVEILLANCE REQUIREMENTS (Continued)

4.2.2.3 F_{xy} shall be determined each time a calculation of F_{xy}^T is required by using the incore detectors to obtain a power distribution map with all full length CEAs at or above the Long Term Steady State Insertion Limit for the existing Reactor Coolant Pump combination. This determination shall be limited to core planes between 15% and 85% of full core height and shall exclude regions influenced by grid effects.

4.2.2.4 T_q shall be determined each time a calculation of F_{xy}^T is made using a non full core power distribution analysis code. The value of T_q used in this case to determine F_{xy}^T shall be the measured value of T_q.

DELETE

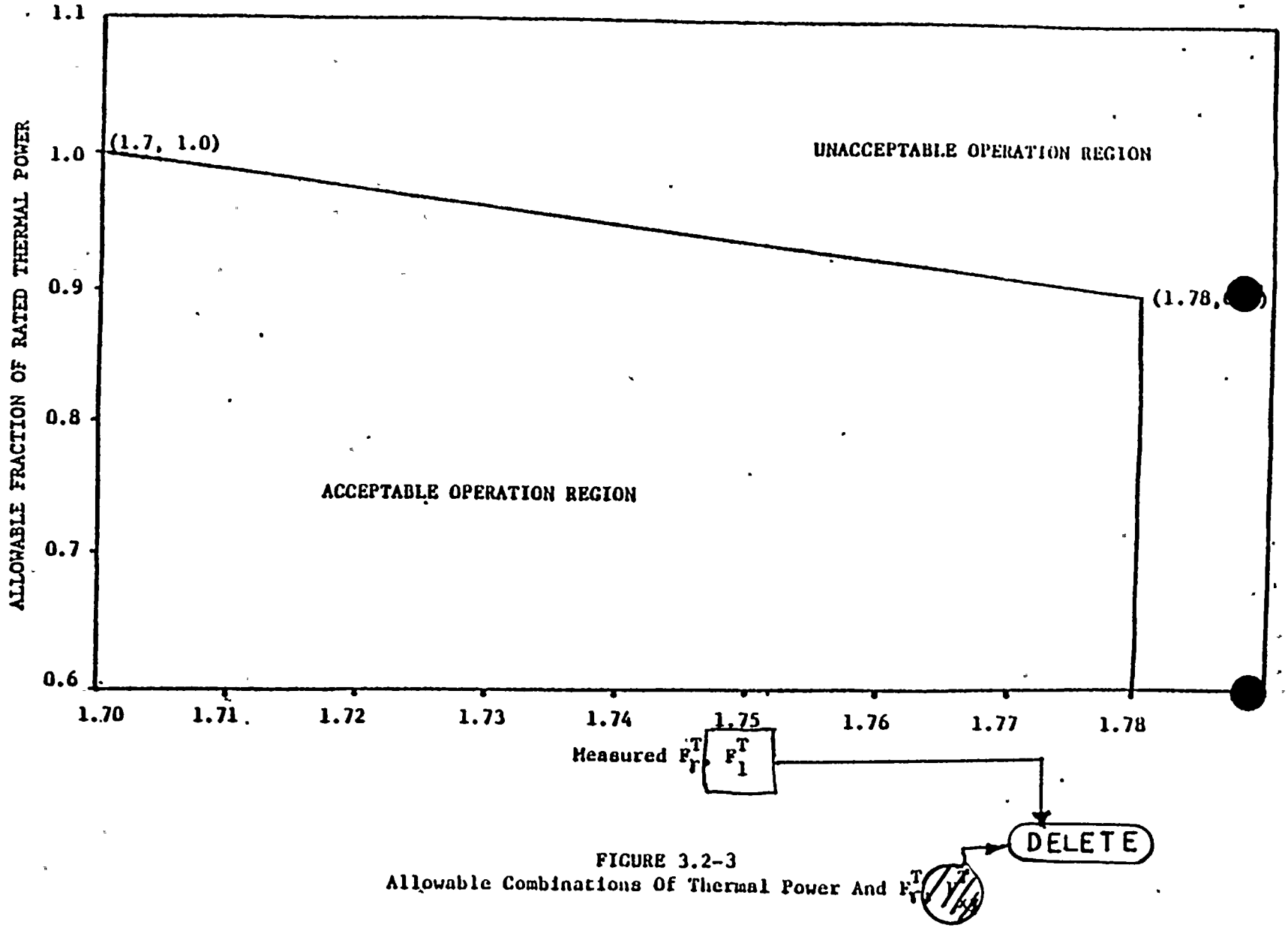

FIGURE 3.2-3
Allowable Combinations Of Thermal Power And F_r^T

POWER DISTRIBUTION LIMITS

AZIMUTHAL POWER TILT - T_q

LIMITING CONDITION FOR OPERATION

3.2.4 The AZIMUTHAL POWER TILT (T_q) shall not exceed 0.03.

APPLICABILITY: MODE 1*

ACTION:

a. With the indicated AZIMUTHAL POWER TILT determined to be > .030 but ≤ 0.10, either correct the power tilt within two hours or determine within the next 2 hours and at least once per subsequent 8 hours, that ~~the TOTAL PLANAR RADIAL PEAKING FACTOR (F^I_{xy}) and~~ the TOTAL INTEGRATED RADIAL PEAKING FACTOR (F^I_r) ~~are~~ is within the limits of Specification ~~3.2.2 and~~ 3.2.3. DELETE

b. With the indicated AZIMUTHAL POWER TILT determined to be > 0.10 operation may proceed for up to 2 hours provided that the TOTAL INTEGRATED RADIAL PEAKING FACTOR (F^T_r) ~~and TOTAL PLANAR RADIAL PEAKING FACTOR (F^T_{xy})~~ are within the limits of Specification ~~3.2.2 and~~ 3.2.3. Subsequent operation for the purpose of measurement and to identify the cause of the tilt is allowable provided the THERMAL POWER level is restricted to ≤ 20% of the maximum allowable THERMAL POWER level for the existing Reactor Coolant Pump combination. DELETE

SURVEILLANCE REQUIREMENT

4.2.4.1 The provisions of Specification 4.0.4 are not applicable.

4.2.4.2 The AZIMUTHAL POWER TILT shall be determined to be within the limit by:

a. Calculating the tilt at least once per 7 days when the Subchannel Deviation Alarm is OPERABLE,

*See Special Test Exception 3.10.2.

SPECIAL TEST EXCEPTIONS

GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS

LIMITING CONDITION FOR OPERATION

3.10.2 The group height, insertion and power distribution limits of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.2, 3.1.3.5, 3.1.3.6, 3.2.1, 3.2.3 and 3.2.4 may be suspended during the performance of PHYSICS TESTS provided:

DELETE

a. The THERMAL POWER is restricted to the test power plateau which shall not exceed 85% of RATED THERMAL POWER, and

b. The limits of Specification 3.2.1 are maintained and determined as specified in Specification 4.10.2.2 below.

APPLICABILITY: MODES 1 and 2.

ACTION:

With any of the limits of Specification 3.2.1 being exceeded while the requirements of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.2, 3.1.3.5, 3.1.3.6, 3.2.1, 3.2.3 and 3.2.4 are suspended, either:

DELETE

a. Reduce THERMAL POWER sufficiently to satisfy the requirements of Specification 3.2.1, or

b. Be in HOT STANDBY within 6 hours.

SURVEILLANCE REQUIREMENTS

DELETE

4.10.2.1 The THERMAL POWER shall be determined at least once per hour during PHYSICS TESTS in which the requirements of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.2, 3.1.3.5, 3.1.3.6, 3.2.1, 3.2.3 or 3.2.4 are suspended and shall be verified to be within the test power plateau.

4.10.2.2 The linear heat rate shall be determined to be within the limits of Specification 3.2.1 by monitoring it continuously with the Incore Detector Monitoring System pursuant to the requirements of Specifications 4.2.1.3 and 3.3.3.2 during PHYSICS TESTS above 5% of RATED THERMAL POWER in which the requirements of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.2, 3.1.3.5, 3.1.3.6, 3.2.1, 3.2.3 or 3.2.4 are suspended.

DELETE

3/4.2 POWER DISTRIBUTION LIMITS

BASES

3/4.2.1 LINEAR HEAT RATE

The limitation on linear heat rate ensures that in the event of a LOCA, the peak temperature of the fuel cladding will not exceed 2200°F.

Either of the two core power distribution monitoring systems, the Excore Detector Monitoring System and the Incore Detector Monitoring System, provides adequate monitoring of the core power distribution and is capable of verifying that the linear heat rate does not exceed its limits. The Excore Detector Monitoring System performs this function by continuously monitoring the AXIAL SHAPE INDEX with the OPERABLE quadrant symmetric excore neutron flux detectors and verifying that the AXIAL SHAPE INDEX is maintained within the allowable limits of Figure 3.2-2. In conjunction with the use of the excore monitoring system and in establishing the AXIAL SHAPE INDEX limits, the following assumptions are made: 1) the CEA insertion limits of Specifications 3.1.3.5 and 3.1.3.6 are satisfied, 2) the AZIMUTHAL POWER TILT restrictions of Specification 3.2.4 are satisfied, and 3) the TOTAL PLANAR RADIAL PEAKING FACTOR does not exceed the limits of Specification 3/4.2.2, ADD: 3.2.3. ADD: INTEGRATED

The Incore Detector Monitoring System continuously provides a direct measure of the peaking factors and the alarms which have been established for the individual incore detector segments ensure that the peak linear heat rates will be maintained within the allowable limits of Figure 3.2-1. The setpoints for these alarms include allowances, set in the conservative directions, for 1) a measurement-calculational uncertainty factor of 1.07, 2) an engineering uncertainty factor of 1.03, 3) a THERMAL POWER measurement uncertainty factor of 1.02.

DELETE 3/4.2.2, 3/4.2.3 and 3/4.2.4 TOTAL DELETE PLANAR AND INTEGRATED RADIAL PEAKING FACTORS - F^T_{xy} AND F^T_r AND AZIMUTHAL POWER TILT - T_q

DELETE

The limitations on F^T_{xy} and F^T_r and T_q are provided to ensure that the assumptions used in the analysis for establishing the Linear Heat Rate and Local Power Density-High LCOs and LSSS setpoints remain valid during and operation at the various allowable CEA group insertion limits. The limitations on F^T_r and T_q are provided to ensure that the assumptions

ADD:

DELETE

BASES

used in the analysis establishing the DNB Margin LCO, and Thermal Margin/Low Pressure LSSS setpoints remain valid during operation at the various allowable CEA group insertion limits. If F_r^T or T_q exceed their basic limitations, operation may continue under the additional restrictions imposed by the ACTION statements since these additional restrictions provide adequate provisions to assure that the assumptions used in establishing the Linear Heat Rate, Thermal Margin/Low Pressure and Local Power Density - High LCOs and LSSS setpoints remain valid. An AZIMUTHAL POWER TILT > 0.10 is not expected and if it should occur, subsequent operation would be restricted to only those operations required to identify the cause of this unexpected tilt.

The requirement that the measured value of $(1+T_q)$ be multiplied by the calculated values of F_r and F_{xy} to determine F_r^T is applicable only when F_r and F_{xy} are calculated with a non-full core power distribution analysis. With a full core power distribution analysis code the azimuthal tilt is explicitly accounted for as part of the radial power distribution used to calculate F_{xy} and F_r.

The surveillance requirements for verifying that F_{xy}, F_r^T and T_q are within their limits provide assurance that the actual values of F_{xy}, F_r^T and T_q do not exceed the assumed values. Verifying F_{xy} and F_r^T after each fuel loading prior to exceeding 75% of RATED THERMAL POWER provides additional assurance that the core was properly loaded.

3/4.2.5 DNB PARAMETERS

The limits on the DNB related parameters assure that each of the parameters are maintained within the normal steady state envelope of operation assumed in the transient and accident analyses. The limits are consistent with the safety analyses assumptions and have been analytically demonstrated adequate to maintain a minimum DNBR of $\geq$ 1.22 throughout each analyzed transient.

The 12 hour periodic surveillance of these parameters through instrument readout is sufficient to ensure that the parameters are restored within their limits following load changes and other expected transient operation. The 18 month periodic measurement of the RCS total flow rate is adequate to detect flow degradation and ensure correlation of the flow indication channels with measured flow such that the indicated percent flow will provide sufficient verification of flow rate on a 12 hour basis.

ATTACHMENT II
SAFETY ANALYSIS

INTRODUCTION - BACKGROUND

This is a request to delete the St. Lucie Unit 1 Technical Specification 3/4.2.2 "Total Planar Radial Peaking Factor - $^{T}F_{xy}$" and all of its associated references.

Advanced Nuclear Fuels Corporation (ANF) previously performed the setpoint analysis for St. Lucie Unit 1 reloads ANF-1 through 4 using Axial Power Distributions (APDs) generated by using a one-dimensional core simulator model which required the presence of an F^{T}_{xy} limit (Reference 1). For the ANF-5 reload (current reload), and future reloads, the APDs were and will be generated by using a three-dimensional (3-D) core model (Reference 2). The use of the APDs from the 3-D core model obviates the need for the F^{T}_{xy} parameter because a synthesis of the 1-D axial power shapes and the 2-D radial power distribution is no longer performed. The NRC has determined that the use of the 3-D core model does not constitute a methodology change (Reference 3). Thus, the deletion of the F^{T}_{xy} Technical Specification limit is possible because ANF's 3-D power distribution methodology does not require it.

II. SAFETY ANALYSIS (continued)

DESCRIPTION OF TECHNICAL SPECIFICATION CHANGES

The detailed description of the proposed changes related to the deletion of the F_{xy}^{T} limit are presented below:

1. Item: Page Ia

   Action: Reference to the "Unrodded Planar Radial Peaking Factor - F_{xy}" is deleted from the Index of Definitions.

   Discussion: This change is needed due to the deletion of the Definition 1.37 (which defines the "Unrodded Planar Radial Peaking Factor - F_{xy}").

2. Item: Page IV

   Action: Reference to the Technical Specification 3/4.2.2 is deleted from the Index of Limiting Conditions for Operation and Surveillance Requirements.

   Discussion: This change is needed due to the deletion of Technical Specification 3/4.2.2.

3. Item: Page 1-7

   Action: The definition 1.37 "Unrodded Planar Radial Peaking Factor - F_{xy}" is deleted.

   Discussion: The deletion of Technical Specification 3/4.2.2 obviates the need to have a definition for F_{xy}.

4. Item: Page 3/4 2-2

Action: The term "F_{xy}^{T}" in Surveillance Requirements 4.2.1.3 Item c. is replaced with the term "F_{r}^{T}".

Discussion: When the LHR is monitored by excore detectors the allowable core power distribution was based on the Total Planar Radial Peaking Factor - F_{xy}^{T}. Due to the revision in the setpoint methodology, assurance that LHR limits are not exceeded is provided by adherence to Technical Specification 3/4.2.3 limit on "Total Integrated Radial Peaking Factor - F_{r}^{T}".

5. Item: Pages 3/4 2-6, 3/4 2-7

Action: The "TOTAL PLANAR RADIAL PEAKING FACTOR - F_{xy}^{T} "Limiting Condition for Operation 3.2.2 and Surveillance Requirements 4.2.2.1, 4.2.2.2, 4.2.2.3 and 4.2.2.4 are deleted.

Discussion: This change is needed because ANF's setpoint methodology does not require the Planar Radial Peaking Factor - F_{xy} to determine the maximum total core peaking factor.

6. Item: Page 3/4 2-8

Action: Reference to "F^T_{xy}" is deleted from Figure 3.2-3. Additionally the term "F^T_l" is deleted.

Discussion: The deletion of the "F^T_{xy}" term from Figure 3.2-3 is needed due to the deletion of Technical Specification 3/4.2.2 (which defines the limits of the peaking factor - F^T_{xy}). The term "F^T_l" in the title "Measured F^T_r, F^T_l" is a typographical error. The term should have been "F^T_{xy}" which is being deleted.

7. Item: Page 3/4 2-11

Action: References to the "Total Planar Radial Peaking Factor, F^T_{xy}" and to the limits of Specification 3.2.2 are deleted from the Technical Specification 3/4.2.4. Revised text accounts for the deletions.

Discussion: These changes are based on the deletion of Technical Specification 3/4.2.2.

8. Item: Page 3/4 10-2

Action: References to the Technical Specification 3.2.2 are deleted from the Technical Specification 3/4.10.2.

Discussion: These changes resulted due to the deletion of Technical Specification 3/4.2.2.

9. Item: Page B 3/4 2-1

Action: In the Technical Specification Bases for 3/4.2.1 for Linear Heat Rate, the word "PLANAR" is replaced with the word "INTEGRATED" and the reference to Technical Specification "3.2.2" is replaced with "3.2.3".

Discussion: When the LHR is monitored by excore detectors the allowable core power distribution was based on the Total Planar Radial Peaking Factor - F_{xy}^{T}. Due to the revision in the setpoint methodology, assurance that LHR limits are not exceeded is provided by adherence to Technical Specification 3/4.2.3 limit on "Total Integrated Radial Peaking Factor - F_{r}^{T}".

10. Item: Pages B 3/4 2-1, B 3/4 2-2

Action: Technical Specification Bases for 3/4.2.2 is deleted. The text is corrected to account for the deletion of the F_{xy}^{T} limit.

Additionally, the term "F_{r}^{T}" is being added to the text after the word "determine" in the second line of the second paragraph of Page B 3/4 2-2.

Discussion: With the deletion of Technical Specification 3/4.2.2 the need to have a basis for F_{xy}^{T} is obviated. The term "F_{r}^{T}" was omitted from the original text and is being added to technically correct the text.

SAFETY ANALYSIS (continued)

TECHNICAL DISCUSSION

The Technical Specification limit on Planar Radial Peaking Factor - F^T_{xy}, enters into the setpoint analyses for the Local Power Density (LPD) Limiting Safety System Settings (LSSS), and LPD Limiting Conditions for Operation (LCO).

The LPD LSSS setpoint is established to produce a reactor trip during any plant Condition II transient to prevent exceeding the 21 kw/ft LPD or Linear Heat Rate (LHR) limit which coincides with fuel centerline melt. The LPD LCO is an operational limit on reactor power (currently 15 kw/ft for Unit 1) to assure that the calculated peak cladding temperature will not exceed the regulatory limit of 2200°F during a Large Break Loss of Coolant Accident (LOCA). The LPD LCO also provides monitoring requirements in the event in-core detectors are inoperable and it protects against penetration of the 15 kw/ft LPD limit. The LPD limit shown in Technical Specifications is essentially the locus of the limiting values of core power level versus Axial Shape Index (ASI). ASI is defined as the difference between the core power in the bottom half of the core and the top half divided by the sum of the top and bottom halves. These limiting values are correlated to provide allowable power level as a function of axial shape index.

In the analyses for the LPD LSSS and LCO a large number of Axial Power Distributions (APDs) are examined to establish bounding values of the Total Power Peaking Factor (F_Q), versus ASI. The peak linear heat rate occurs at the position of the maximum total peaking factor (F_Q). The axial power distributions used in the

setpoint analyses for St. Lucie Unit 1 reloads ANF-1 through 4 (Cycle 6 through 9) were generated using an axial one-dimensional (1-D) core simulator model together with a two-dimensional power distribution. In this synthesis technique, the total peaking factor, F_Q, is determined by:

$$F_Q = F_{xy} \times F_z$$

where F_Q = core maximum surface heat flux factor

F_{xy} = ratio of maximum surface heat flux in an axial core plane to the average surface heat flux in that plane

F_z = Core average axial power (heat flux) distribution.

When synthesizing a core maximum F_Q from a one-dimensional F_z distribution and a separate 2-D peaking factor, assurance that the resultant F_Q is not exceeded is obtained by limiting the maximum value of F_{xy} at which the core can operate.

The Axial Power Distributions (APDs) used in the setpoint analyses for St. Lucie Unit 1 ANF-5 (current cycle) and future ANF reloads were and will be generated using a three-dimensional core simulator model. ANF has demonstrated that the use of the 3-D APD generation without an F_{xy} limit provides an F_Q value that is not significantly different from the value obtained from the 1-D methodology with an F_{xy} limit. Therefore, the results for the setpoints will not be significantly different. In the 3-D APD generation, the core maximum surface heat flux factor F_Q is calculated directly from the XTGPWR 3-D core model. The need for an F_{xy} Technical Specification limit is eliminated since F_Q is calculated directly and is limited by adherence to the F_r Technical Specification limit.

SAFETY ANALYSIS (continued)

REFERENCES

1. Exxon Report, XN-NF-507, "ENC Setpoint Methodology for CE Reactors", dated July 1980.

2. Advanced Nuclear Fuels Report, ANF-507 (P) Addendum 1 "Advanced Nuclear Fuels Corporation Setpoint Methodology for CE Reactors: Three Dimensional Axial Power Distribution Generation", dated June 1988.

3. NRC Letter, M.W. Hodges (NRC) to R.A. Copeland (ANF), "ANF 3-dimensional Setpoint Methodology for Combustion Engineering Reactors", dated July 8, 1988.

ATTACHMENT III

DETERMINATION OF NO SIGNIFICANT HAZARDS

The standards used to arrive at a determination that a request for amendment involves no significant hazards consideration are included in the Commission's regulation 10 CFR 50.92, which states that no significant hazards considerations are involved if the 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; 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. Each standard is discussed as follows:

(1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The LPD LSSS and LPD LCO setpoints ensure that the core thermal limits are not exceeded. The setpoint analysis utilizes the total core peaking factor, F_Q, and radial peaking factor, F_r, to establish the operational limitations. The planar power peaking factor, F_{xy}, limitation was utilized in the synthesis of the total core peaking factor F_Q. Improved physics methodology for core modeling to generate three-dimensional axial power distributions (APDs) obviates the need for the F_{xy} factor since it permits the direct calculation of F_Q using the peak assembly Axial Power Distribution (APD).

The dependence of the LPD setpoint methodology on the Technical Specification F_{xy} limit is replaced with an equivalent dependence on the F_r Technical Specification limit.

Therefore, adherence to the F_r^T Technical Specification effectively limits core F_Q, and assures that the LPD setpoint methodology results will bound reactor operation.

With the exception of the replacement of F_r^T for F_{xy}^T there has been no change to the input or acceptance criteria used in the safety analysis. No FSAR safety limits have been exceeded based on the proposed Technical Specification change. The FSAR conclusion that the design basis acceptance criteria are met for the Condition II events remain valid. Therefore, it can be concluded that the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

(2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not affect any active hardware involving plant operation nor does it alter the mode of operation of the plant. The limitation of the Planar Radial Peaking Factor - F_{xy}^T, is replaced with the equivalent limitation of the Total Integrated Radial Peaking Factor - F_r^T as a result of the improved core modeling in the setpoint methodology. The proposed change creates no new accident initiators. Therefore, it can be concluded that the proposed changes will not create the possibility of a new or different kind of accident from any previously evaluated.

(3) Operation of the facility in accordance with the proposed amendment would not involve significant reduction in a margin of safety.

The deletion of the F^T_{XY} limit has been reviewed for the impact upon the current licensed safety analyses. Assumptions in the accident consequences remain valid. The changes caused by the proposed Technical Specification change are bounded by the assumptions in the accident analyses. Therefore, it can be concluded that the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, it has been determined that 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.