ATTACHMENT 2A TO AEP:NRC:1322

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 1

3/4 8-9
B 3/4 8-1

ELECTRICAL POWER SYSTEMS

SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. One circuit between the offsite transmission network and the onsite Class 1E distribution system, and

b. One diesel generator with:

1. A day fuel tank containing a minimum of 70 gallons of fuel,

2. A fuel storage system containing a minimum indicated volume of 46,000 gallons of fuel, and

3. A fuel transfer pump.

APPLICABILITY: MODES 5 and 6.

ACTION:

With less than the above minimum required A.C. electrical power sources OPERABLE, suspend all operations involving CORE ALTERATIONS, positive reactivity changes* until the minimum required A.C. electrical power sources are restored to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.8.1.2 The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for requirement 4.8.1.1.2.a.5.

*For purposes of this specification, addition of water from the RWST does not constitute a positive reactivity addition provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2.

Commencing in 1999 during the extended shutdown initiated in 1997, the 18-month surveillance requirements 4.8.1.1.2.e.4.a) and b); 4.8.1.1.2.e.6.a), b) and c); 4.8.1.1.2.e.8; 4.8.1.1.2.e.9.a), b) and c); 4.8.1.1.2.e.10.a) and b); and 4.8.1.1.2.e.11, may be delayed one time until just prior to the first entry into MODE 4 following the shutdown.

The OPERABILITY of the A.C. and D.C power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least one of each of the onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the facility status.

The AB and CD station battery systems provide a reliable source of continuous power for supply and control of plant loads such as switchgear and annunciator control circuits, static inverters, valve control centers, emergency lighting and motor control centers. The design duty cycles of these batteries are composite load profiles resulting from the combination of the three hour Loss Of Coolant Accident/Loss Of Offsite Power battery load profiles and the four hour Station Blackout battery load profiles.

The train N station battery system provides an independent 250 volt DC power supply for power and control of the turbine driven auxiliary feedwater pump train. The limiting conditions of operation for the train N battery are consistent with the requirements of the auxiliary feedwater system. The surveillance requirements for the train N battery system are consistent with the requirements of the AB and CD station batteries. The train N battery loads are derived from equipment in the turbine driven auxiliary feedwater pump train and battery sizing is consistent with the functional requirements of these components. Simulated loads for battery tests are loads equivalent to measured actual loads.

Specific surveillance requirements (SRs) of SR 4.8.1.2 may be delayed one time until just prior to the first entry into MODE 4 following the extended outage that commenced in 1997. The delay is permitted to recognize the significant ongoing maintenance to safety systems and components that would be required to be OPERABLE solely to support the referenced surveillances. The delay recognizes the reduced decay heat load and fission product activities resulting from the extended shutdown and consequently the small benefit from performing the surveillances prior to the next entry into MODE 4. It is the intent that these SRs must still be capable of being met, but actual performance is not required until the required safety systems are ready to support entry into MODE 4.

ATTACHMENT 2B TO AEP:NRC:1322

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 2

3/4 8-9
B 3/4 8-1

ELECTRICAL POWER SYSTEMS

SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. One circuit between the offsite transmission network and the onsite Class 1E distribution system, and

b. One diesel generator with:

1. A day fuel tank containing a minimum of 70 gallons of fuel,

2. A fuel storage system containing a minimum indicated volume of 46,000 gallons of fuel, and

3. A fuel transfer pump.

APPLICABILITY: MODES 5 and 6.

ACTION:

With less than the above minimum required A.C. electrical power sources OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes* until the minimum required A.C. electrical power sources are restored to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.8.1.2 The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for requirement 4.8.1.1.2.a.5.†‡

* For purposes of this specification, addition of water from the RWST does not constitute a positive reactivity addition provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2.

Commencing in 1999 during the extended shutdown initiated in 1997, the 18-month surveillance requirements 4.8.1.1.2.e.4.a) and b); 4.8.1.1.2.e.6.a), b) and c); 4.8.1.1.2.e.8; 4.8.1.1.2.e.9.a), b) and c); 4.8.1.1.2.e.10.a) and b); and 4.8.1.1.2.e.11, may be delayed one time until just prior to the first entry into MODE 4 following the shutdown.

~~† The provisions of Technical Specification 4.0.8 are applicable.~~

The OPERABILITY of the A.C. and D.C power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least one of each of the onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the facility status.

The AB and CD station battery systems provide a reliable source of continuous power for supply and control of plant loads such as switchgear and annunciator control circuits, static inverters, valve control centers, emergency lighting and motor control centers. The design duty cycles of these batteries are composite load profiles resulting from the combination of the three hour Loss Of Coolant Accident/Loss Of Offsite Power battery load profiles and the four hour Station Blackout battery load profiles.

The train N station battery system provides an independent 250 volt DC power supply for power and control of the turbine driven auxiliary feedwater pump train. The limiting conditions of operation for the train N battery are consistent with the requirements of the auxiliary feedwater system. The surveillance requirements for the train N battery system are consistent with the requirements of the AB and CD station batteries. The train N battery loads are derived from equipment in the turbine driven auxiliary feedwater pump train and battery sizing is consistent with the functional requirements of these components. Simulated loads for battery tests are loads equivalent to measured actual loads.

Specific surveillance requirements (SRs) of SR 4.8.1.2 may be delayed one time until just prior to the first entry into MODE 4 following the extended outage that commenced in 1997. The delay is permitted to recognize the significant ongoing maintenance to safety systems and components that would be required to be OPERABLE solely to support the referenced surveillances. The delay recognizes the reduced decay heat load and reduced fission product activities resulting from the extended shutdown and consequently the small benefit from performing the surveillances prior to the next entry into MODE 4. It is the intent that these SRs must still be capable of being met, but actual performance is not required until the required safety systems are ready to support entry into MODE 4.

ATTACHMENT 3A TO AEP:NRC:1322

PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES
UNIT 1

3/4 8-9
B 3/4 8-1

SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. One circuit between the offsite transmission network and the onsite Class 1E distribution system, and

b. One diesel generator with:

1. A day fuel tank containing a minimum of 70 gallons of fuel,

2. A fuel storage system containing a minimum indicated volume of 46,000 gallons of fuel, and

3. A fuel transfer pump.

APPLICABILITY: MODES 5 and 6.

ACTION:

With less than the above minimum required A.C. electrical power sources OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes* until the minimum required A.C. electrical power sources are restored to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.8.1.2 The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for requirement 4.8.1.1.2.a.5.

Commencing in 1999 during the extended shutdown initiated in 1997, the 18-month surveillance requirements 4.8.1.1.2.e.4.a) and b); 4.8.1.1.2.e.6.a), b) and c); 4.8.1.1.2.e.8; 4.8.1.1.2.e.9.a), b) and c); 4.8.1.1.2.e.10.a) and b); and 4.8.1.1.2.e.11, may be delayed one time until just prior to the first entry into MODE 4 following the shutdown.

*For purposes of this specification, addition of water from the RWST does not constitute a positive reactivity addition provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2.

The OPERABILITY of the A.C. and D.C power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least one of each of the onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the facility status.

Specific surveillance requirements (SRs) of SR 4.8.1.2 may be delayed one time until just prior to the first entry into MODE 4 following the extended outage that commenced in 1997. The delay is permitted to recognize the significant ongoing maintenance to safety systems and components that would be required to be OPERABLE solely to support the referenced surveillances. The delay recognizes the reduced decay heat load and fission product activities resulting from the extended shutdown and consequently the small benefit from performing the surveillances prior to the next entry into MODE 4. It is the intent that these SRs must still be capable of being met, but actual performance is not required until the required safety systems are ready to support entry into MODE 4.

The AB and CD station battery systems provide a reliable source of continuous power for supply and control of plant loads such as switchgear and annunciator control circuits, static inverters, valve control centers, emergency lighting and motor control centers. The design duty cycles of these batteries are composite load profiles resulting from the combination of the three hour Loss Of Coolant Accident/Loss Of Offsite Power battery load profiles and the four hour Station Blackout battery load profiles.

The train N station battery system provides an independent 250 volt DC power supply for power and control of the turbine driven auxiliary feedwater pump train. The limiting conditions of operation for the train N battery are consistent with the requirements of the auxiliary feedwater system. The surveillance requirements for the train N battery system are consistent with the requirements of the AB and CD station batteries. The train N battery loads are derived from equipment in the turbine driven auxiliary feedwater pump train and battery sizing is consistent with the functional requirements of these components. Simulated loads for battery tests are loads equivalent to measured actual loads.

ATTACHMENT 3B TO AEP:NRC:1322

PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES
UNIT 2

3/4 8-9
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SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. One circuit between the offsite transmission network and the onsite Class 1E distribution system, and

b. One diesel generator with:

1. A day fuel tank containing a minimum of 70 gallons of fuel,

2. A fuel storage system containing a minimum indicated volume of 46,000 gallons of fuel, and

3. A fuel transfer pump.

APPLICABILITY: MODES 5 and 6.

ACTION:

With less than the above minimum required A.C. electrical power sources OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes* until the minimum required A.C. electrical power sources are restored to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.8.1.2 The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for requirement 4.8.1.1.2.a.5.

Commencing in 1999 during the extended shutdown initiated in 1997, the 18-month surveillance requirements 4.8.1.1.2.e.4.a) and b); 4.8.1.1.2.e.6.a), b) and c); 4.8.1.1.2.e.8; 4.8.1.1.2.e.9.a), b) and c); 4.8.1.1.2.e.10.a) and b); and 4.8.1.1.2.e.11, may be delayed one time until just prior to the first entry into MODE 4 following the shutdown.

*For purposes of this specification, addition of water from the RWST does not constitute a positive reactivity addition provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2.

The OPERABILITY of the A.C. and D.C power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least one of each of the onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the facility status.

Specific surveillance requirements (SRs) of SR 4.8.1.2 may be delayed one time until just prior to the first entry into MODE 4 following the extended outage that commenced in 1997. The delay is permitted to recognize the significant ongoing maintenance to safety systems and components that would be required to be OPERABLE solely to support the referenced surveillances. The delay recognizes the reduced decay heat load and reduced fission product activities resulting from the extended shutdown and consequently the small benefit from performing the surveillances prior to the next entry into MODE 4. It is the intent that these SRs must still be capable of being met, but actual performance is not required until the required safety systems are ready to support entry into MODE 4.

The AB and CD station battery systems provide a reliable source of continuous power for supply and control of plant loads such as switchgear and annunciator control circuits, static inverters, valve control centers, emergency lighting and motor control centers. The design duty cycles of these batteries are composite load profiles resulting from the combination of the three hour Loss Of Coolant Accident/Loss Of Offsite Power battery load profiles and the four hour Station Blackout battery load profiles.

The train N station battery system provides an independent 250 volt DC power supply for power and control of the turbine driven auxiliary feedwater pump train. The limiting conditions of operation for the train N battery are consistent with the requirements of the auxiliary feedwater system. The surveillance requirements for the train N battery system are consistent with the requirements of the AB and CD station batteries. The train N battery loads are derived from equipment in the turbine driven auxiliary feedwater pump train and battery sizing is consistent with the functional requirements of these components. Simulated loads for battery tests are loads equivalent to measured actual loads.

ATTACHMENT 4 TO AEP:NRC:1322

NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

No Significant Hazards Consideration Evaluation

I&M has evaluated this proposed amendment and determined that it involves no significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

1. involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;

2. create the possibility of a new or different kind of accident from any previously analyzed; or

3. involve a significant reduction in a margin of safety.

I&M proposes to revise T/S 3/4.8.1.2, "Electrical Power Systems, Shutdown," and its associated bases to provide a one-time extension of the 18-month surveillance interval for specific surveillance requirements (SRs). In addition, for unit 2 only, a minor administrative change is included to delete a reference to T/S 4.0.8 that is no longer applicable. For unit 1 only, an editorial correction is made.

The determination that the criteria set forth in 10 CFR 50.92 are met for this amendment request is indicated below.

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

   A discussion of each of the applicable accidents follows.

   Fuel handling accident
   The only time a fuel handling accident could occur is during the handling of a fuel assembly. The design of fuel handling equipment is such that an interruption of A.C. power would not cause a fuel element to be inadvertently dropped. Therefore, an interruption or loss of A.C. power does not significantly increase the probability of a fuel handling accident.

   At present, fission product activities in the fuel assembly pellet-to-cladding gaps are greatly reduced. The fuel handling accident analysis considers the thyroid dose at the site boundary and in the low population zone. This dose is dominated by the isotope iodine 131, which also decays more slowly than the other iodine contributors to the dose. The activity of iodine 131 decreases by one-half every 8.05 days. The current shutdown period of approximately 18 months represents over 70 half-lives. Activity of a radioactive material is generally considered to be negligible after 7 half-lives (a reduction in activity of 1/128). By contrast, the accident analysis assumes an iodine reduction of less than 1/10 (from activated charcoal filtration) in the fuel handling building, and no reduction in the containment, prior to release. Therefore, the consequences of a fuel handling

accident are clearly bounded by the existing safety analysis without taking credit for any iodine removal by charcoal filtration. The greatly reduced fission product activity at the current time provides assurance that the consequences of this event are bounded by the existing analysis. Therefore, the consequences are not significantly increased.

Accidental release of radioactive liquids

The inadvertent release of radioactive liquid wastes to the environment was evaluated for the waste evaporator condensate and monitor tanks, condensate storage tank, primary water storage tank, refueling water storage tank (RWST), the auxiliary building storage tanks and the chemical and volume control system (CVCS) holdup tanks. It was concluded, in the UFSAR Chapter 14 evaluation, that loss of liquid from these tanks to the environment is not a credible accident. This conclusion does not depend on operating mode , hence, further evaluation of this event is not required.

Waste gas release

Radioactive gases are introduced into the reactor coolant by the escape of fission products if defects exist in the fuel cladding. The processing of the reactor coolant by auxiliary systems results in the accumulation of radioactive gases in various tanks. The two main sources of any significant gaseous radioactivity that could occur would be the volume control tank (VCT) and the gas decay tanks. It is assumed that a tank ruptures by an unspecified mechanism after the reactor has been operating for one core cycle with 1% defects in the fuel cladding. There is no identified mechanism by which an interruption or loss of power could result in a tank rupture. Therefore, it is concluded that the probability of occurrence of a tank rupture would not be significantly increased by an interruption or loss of A.C. power. The greatly reduced fission product activities at the current time provides assurance that the consequences of this event are bounded by the current analysis and would, therefore, not be significantly increased.

Uncontrolled rod cluster control assembly (RCCA) withdrawal from a subcritical condition

This event can only occur with the reactor trip breakers closed and the control rod drive mechanisms (CRDMs) energized. With the exception of testing or special maintenance, the rod drive motor generator set remains tagged out until Mode 3 and this alone would preclude rod movement. If the conditions for rod withdrawal are met, two operable source range instruments and two reactor trip channels and trip breakers must be operable. An interruption or loss of power would preclude CRDM movement and release the control rods. The source range instruments would remain available. Therefore, it is concluded that the probability of occurrence of an uncontrolled RCCA withdrawal would not be significantly increased by an interruption or loss of A.C. power in Modes 5 or 6. Acceptable consequences for this event rely on precluding its occurrence.

Uncontrolled boron dilution

This event requires a malfunction of the CVCS. The CVCS is designed to limit, even under various postulated failure modes, the potential rate of dilution to a value which provides the operator sufficient time to correct the situation in a safe and orderly manner. The rate of addition of unborated water makeup to the reactor coolant system is limited by the capacity of the primary water pumps. The maximum addition rate in this case is 225 gpm with both primary water pumps running. An interruption or loss of A.C. power would preclude pump operation and accidental dilution. The RWST is not a credible dilution source as recognized by a footnote to T/S 3/4.8.1.2. Therefore, the possibility of an uncontrolled boron dilution is not significantly increased. Acceptable consequences for this event rely on precluding its occurrence and by detection with the source range nuclear instrumentation required by the T/S in Modes 5 and 6.

The proposed revision involves deferral of certain surveillance requirements when shut down but does not reduce the required operable power sources of the Limiting Condition for Operation (LCO), does not increase the allowed outage time of any required operable power supplies and does not reduce the requirement to know that the deferred SRs could be met at all times. Deferral of the testing does not by itself increase the potential that the testing would not be met and the previously evaluated accidents described above do not rely on automatic starting or loading of the single operable EDG permitted in Modes 5 and 6. The monthly EDG starts, fuel level checks, and fuel transfer pump checks will continue to be performed to provide adequate confidence that the required EDG will be available if needed. Therefore, it is concluded that the required A.C. sources will remain available and the previously evaluated consequences will not be increased.

The proposed administrative change for unit 2 deletes a reference to T/S 4.0.8 that is no longer applicable and, thus, does not increase the probability or consequences of an accident. The editorial change to unit 1 corrects a typographical error. The correction is not intended to change the meaning.

Therefore, based on the above discussion, it is concluded that the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed changes do not involve operation of the required electrical power sources in a manner or configuration different than those previously recognized or evaluated. No new failure mechanisms of the A.C. power supplies are introduced by extension of the subject surveillance intervals.

The proposed administrative change for unit 2 deletes a reference to T/S 4.0.8 that is no longer applicable and, thus, does not create the possibility of a new or different kind of accident. The editorial change to unit 1 corrects a typographical error. The correction is not intended to change the meaning.

Therefore, it is concluded that the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

The required operable power supplies have not been reduced. Deferral of the specified SRs does not by itself introduce a failure mechanism, and past performance of the SRs has demonstrated reliability in passing the deferred surveillances. Therefore, the availability of power supplies assumed for accident mitigation is not significantly reduced and previous margins of safety are maintained.

The proposed administrative change for unit 2 deletes a reference to T/S 4.0.8 that is no longer applicable and thus, does not increase the probability or consequences of an accident. The editorial change to unit 1 corrects a typographical error. The correction is not intended to change the meaning. Therefore, these changes do not involve a significant reduction in the margin of safety.

In summary, based upon the above evaluation, I&M has concluded that these changes involve no significant hazards consideration.

ATTACHMENT 5 TO AEP:NRC:1322

ENVIRONMENTAL ASSESSMENT

Environmental Assessment

I&M has evaluated this license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. I&M has determined that this license amendment request meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or that changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria.

(i) The amendment involves no significant hazards consideration.

As demonstrated in attachment 4, this proposed amendment does not involve significant hazards consideration.

(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

As documented in attachment 1, there will be no significant change in the types or significant increase in the amounts of any effluents released offsite.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not result in significant changes in the operation or configuration of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels within the plant. Therefore, there will be no significant increase in individual or cumulative occupational radiation exposure resulting from this change.