

June 6, 2019

Mr. G. T. Powell President and CEO/CNO STP Nuclear Operating Company South Texas Project P.O. Box 289 Wadsworth, TX 77483

## SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - ISSUANCE OF AMENDMENT NOS. 215 AND 201 RE: ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER TSTF-522 (EPID L-2018-LLA-0271)

Dear Mr. Powell:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 215 to Renewed Facility Operating License No. NPF-76 and Amendment No. 201 to Renewed Facility Operating License No. NPF-80 for the South Texas Project, Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 27, 2018.

The amendments revise Surveillance Requirement 4.7.7.b of TS Section 3/4.7.7, "Control Room Makeup and Cleanup Filtration System," to allow operation for at least 15 minutes at a frequency controlled in accordance with the Surveillance Frequency Control Program by adoption of Technical Specifications Task Force (TSTF) Traveler TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 Hours per Month."

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely DOWS

G. Edward Miller, Project Manager Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures:

- 1. Amendment No. 215 to NPF-76
- 2. Amendment No. 201 to NPF-80
- 3. Safety Evaluation

cc: Listserv



# STP NUCLEAR OPERATING COMPANY

# DOCKET NO. 50-498

## SOUTH TEXAS PROJECT, UNIT 1

## AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 215 Renewed License No. NPF-76

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by STP Nuclear Operating Company (STPNOC)\*, acting on behalf of itself and for NRG South Texas LP, the City Public Service Board of San Antonio (CPS), and the City of Austin, Texas (COA) (the licensees), dated September 27, 2018, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

<sup>\*</sup>STPNOC is authorized to act for NRG South Texas LP, the City Public Service Board of San Antonio, and the City of Austin, Texas, and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-76 is hereby amended to read as follows:
  - (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 215, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Thomas Mery

Robert J. Pascarelli, Chief Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Attachment: Changes to the Renewed Facility Operating License No. NPF-76 and Technical Specifications

Date of Issuance: June 6, 2019



# STP NUCLEAR OPERATING COMPANY

# DOCKET NO. 50-499

## SOUTH TEXAS PROJECT, UNIT 2

## AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 201 Renewed License No. NPF-80

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by STP Nuclear Operating Company (STPNOC)\*, acting on behalf of itself and for NRG South Texas LP, the City Public Service Board of San Antonio (CPS), and the City of Austin, Texas (COA) (the licensees), dated September 27, 2018, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

<sup>\*</sup>STPNOC is authorized to act for NRG South Texas LP, the City Public Service Board of San Antonio, and the City of Austin, Texas, and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-80 is hereby amended to read as follows:
  - (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 201 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Thomas Newgert for

Robert J. Pascarelli, Chief Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Attachment:

Changes to the Renewed Facility Operating License No. NPF-80 and Technical Specifications

Date of Issuance: June 6, 2019

# ATTACHMENT TO LICENSE AMENDMENT NOS. 215 AND 201 TO RENEWED FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80

#### SOUTH TEXAS PROJECT, UNITS 1 AND 2

#### DOCKET NOS. 50-498 AND 50-499

Replace the following pages of the Renewed Facility Operating License Nos. NPF-76 and NPF-80, and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License No. NPF-76

<u>REMOVE</u> - 4 - <u>INSERT</u> - 4 -

#### Renewed Facility Operating License No. NPF-80

<u>REMOVE</u> - 4 - <u>INSERT</u> - 4 -

**Technical Specifications** 

 REMOVE
 INSERT

 3/4 7-17
 3/4 7-17

## (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 215, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

## (3) Not Used

(4) Initial Startup Test Program (Section 14, SER)\*

Any changes to the Initial Test Program described in Section 14 of the Final Safety Analysis Report made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

#### (5) Safety Parameter Display System (Section 18, SSER No. 4)\*

Before startup after the first refueling outage, HL&P[\*\*] shall perform the necessary activities, provide acceptable responses, and implement all proposed corrective actions related to issues as described in Section 18.2 of SER Supplement 4.

#### (6) <u>Supplementary Containment Purge Isolation (Section 11.5, SSER No. 4)\*</u>

HL&P shall provide, prior to startup from the first refueling outage, control room indication of the normal and supplemental containment purge sample line isolation valve position.

<sup>\*</sup> The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

<sup>\*\*</sup>The original licensee authorized to possess, use and operate the facility was HL&P. Consequently, historical references to certain obligations of HL&P remain in the license conditions.

## (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 201 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

## (3) Not Used

(4) Initial Startup Test Program (Section 14. SR)\*

Any changes to the Initial Test Program described in Section 14 of the Final Safety Analysis Report made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

## (5) License Transfer

Texas Genco, LP shall provide decommissioning funding assurance, to be held in decommissioning trusts for South Texas Project, Unit 2 (Unit 2) upon the direct transfer of the Unit 2 license to Texas Genco, LP, in an amount equal to or greater than the balance in the Unit 2 decommissioning trust immediately prior to the transfer. In addition, Texas Genco, LP shall ensure that all contractual arrangements referred to in the application for approval of the transfer of the Unit 2 license to Texas Genco, LP shall ensure that all contractual arrangements referred to in the application for approval of the transfer of the Unit 2 license to Texas Genco, LP to obtain necessary decommissioning funds for Unit 2 through a non-bypassable charge are executed and will be maintained until the decommissioning trusts are fully funded, or shall ensure that other mechanisms that provide equivalent assurance of decommissioning funding in accordance with the Commission's regulations are maintained.

(6) License Transfer

The master decommissioning trust agreement for Unit 2, at the time the direct transfer of Unit 2 to Texas Genco, LP is effected and thereafter, is subject to the following:

<sup>\*</sup> The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

#### PLANT SYSTEMS

#### SURVEILLANCE REQUIREMENTS

4.7.7 Each Control Room Makeup and Cleanup Filtration System shall be demonstrated OPERABLE:

- a. At a frequency in accordance with the Surveillance Frequency Control Program by verifying that the control room air temperature is less than or equal to 78°F;
- b. At a frequency in accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers of the makeup and cleanup air filter units and verifying that the system operates for at least 15 continuous minutes with the makeup filter unit heaters operating;
- At a frequency in accordance with the Surveillance Frequency Control Program or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:
  - Verifying that the makeup and cleanup systems satisfy the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% for HEPA filter banks and 0.10% for charcoal adsorber banks and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 6000 cfm ± 10% for the cleanup units and 1000 cfm ± 10% for the makeup units;
  - 2) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," for a methyl iodide penetration of less than 1.0% when tested at a temperature of 30°C and a relative humidity of 70%; and
  - Verifying a system flow rate of 6000 cfm ± 10% for the cleanup units and 1000 cfm ± 10% for the makeup units during system operation when tested in accordance with ANSI N510-1980.
- d. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 for a methyl iodide penetration of less than 1.0% when tested at a temperature of 30°C and a relative humidity of 70%.
- e. At a frequency in accordance with the Surveillance Frequency Control Program by:

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 Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6.1 inches Water Gauge for the makeup units and 6.0 inches Water Gauge for the cleanup units while operating the system at a flow rate of 6000 cfm ± 10% for the cleanup units and 1000 cfm ± 10% for the makeup units;

SOUTH TEXAS - UNITS 1 & 2

Unit 1 - Amendment No. <del>127 188</del>, <del>195</del>, 215 Unit 2 - Amendment No. <del>116 175</del>, <del>183</del>, 201



## SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

## RELATED TO AMENDMENT NOS. 215 AND 201 TO

## RENEWED FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80

## STP NUCLEAR OPERATING COMPANY, ET AL.

## SOUTH TEXAS PROJECT, UNITS 1 AND 2

DOCKET NOS. 50-498 AND 50-499

## 1.0 INTRODUCTION

By application dated September 27, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18270A319), STP Nuclear Operating Company (STPNOC, the licensee) requested changes to the technical specifications (TSs) for South Texas Project Units 1 and 2. The changes would adopt U.S. Nuclear Regulatory Commission (NRC)-approved Technical Specifications Task Force (TSTF) Standard Technical Specifications (STS) Change Traveler TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month," dated March 30, 2010 (ADAMS Accession No. ML100890316).

The proposed change would revise Surveillance Requirement (SR) 4.7.7.b of TS Section 3/4.7.7, "Control Room Makeup and Cleanup Filtration System," which currently requires each control room makeup and cleanup filtration system to operate with flow through the high efficiency particulate air (HEPA) filters and charcoal adsorbers for at least 10 continuous hours with the makeup filter unit heaters operating at a frequency controlled in accordance with the Surveillance Frequency Control Program (SFCP). The licensee proposed to change SR 4.7.7.b to require at least 15 continuous minutes of system operation at a frequency controlled in accordance with the SFCP.

The licensee stated that the license amendment request is consistent with NRC-approved Traveler TSTF-522, Revision 0. The availability of this TS improvement was announced in the *Federal Register* on September 20, 2012 (77 FR 58421), as part of the consolidated line item improvement process.

## 2.0 REGULATORY EVALUATION

One of the reasons air filtration and adsorption systems are required at nuclear power plants is to lower the concentration of airborne radioactive material that may be released from the site to the environment due to a design-basis event. Lowering the concentration of airborne radioactive materials can mitigate doses to plant operators and members of the public in the event of a design-basis event. A typical system consists of ventilation ductwork, fans, dampers, valves, instrumentation, prefilters or demisters, HEPA filters, heaters, and activated charcoal adsorbers. These systems are tested by operating the systems and monitoring the response of the overall system as well as individual components. Laboratory tests of charcoal adsorbers are also performed to ensure the charcoal adsorbs an acceptable amount of radioactive gases.

Current testing requirements for the air filtration and adsorption systems state that the systems should be operated for at least 10 continuous hours with heaters operating at a frequency controlled by the SFCP. These requirements are based on NRC staff guidance for testing air filtration and adsorption systems that has been superseded. New NRC staff guidance states at least 15 continuous minutes of ventilation system operation with heaters operating every 31 days is acceptable for those plants that test ventilation system adsorption at a relative humidity of less than 95 percent. Plants that test ventilation system to perform its specified safety function and the bracketed phrase "with heaters operating" is not included in the SRs.

The licensee has proposed revising SR 4.7.7.b, which currently requires operating the system for at least 10 continuous hours with the heaters operating at a frequency controlled in accordance with the SFCP. The SR would be changed to require at least 15 continuous minutes of system operation with heaters operating at a frequency controlled in accordance with the SFCP.

Design and testing of these systems is intended to demonstrate compliance with the regulatory requirements contained in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.67, "Accident source term," and 10 CFR Part 100, "Reactor Site Criteria."

Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, General Design Criteria (GDC) 19, "Control room"; GDC 41, "Containment atmosphere cleanup"; GDC 42, "Inspection of containment atmosphere cleanup systems"; GDC 43, "Testing of containment atmosphere cleanup systems"; and GDC 61, "Fuel storage and handling and radioactivity control," establish the minimum requirements for the design of air filtration and adsorption systems at nuclear power plants.

Section 3.1, "Conformance with NRC General Design Criteria," of the South Texas Project Updated Final Safety Analysis Report, contains a statement that South Texas Project fully satisfies and is in compliance with the GDC.

The licensee has adopted Regulatory Guide (RG) 1.52, Revision 2, "Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants," dated March 1978 (ADAMS Accession No. ML003740139), to provide guidance and criteria acceptable to the NRC staff for licensees to implement the regulations in 10 CFR related to air filtration and adsorption systems.

Regulatory Position 4.d of RG 1.52, Revision 2, states, "Each ESF [engineered safety feature] atmosphere cleanup train should be operated at least 10 hours per month, with the heaters on (if so equipped), in order to reduce the buildup of moisture on the adsorbers and HEPA filters." The purpose of this position is to minimize the moisture content in the system and thereby, enhance efficiency in the event the system is called upon to perform its design-basis function. The STS SRs 3.6.11.1, 3.6.13.1, 3.7.10.1, 3.7.12.1, 3.7.13.1, and 3.7.14.1 currently require operating the heaters in the respective ventilation and filtering systems for at least 10 continuous hours every 31 days. The current STS Bases explain that operation of heaters for 10 hours would eliminate moisture on the charcoal adsorbers and HEPA filters.

Subsequently, the NRC staff was informed that 10 continuous hours of system operation would dry out the charcoal adsorber for a brief period of time, however, following heater de-energization, the level of moisture accumulation in adsorbers would rapidly return to the pre-test level. The NRC staff found this information persuasive and, subsequently, issued NRC Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999 (ADAMS Accession No. ML082350935), and Errata, dated August 23, 1999 (ADAMS Accession No. ML031110094). GL 99-02 requested licensees to confirm their charcoal testing protocols accurately reflect the adsorber gaseous activity capture capability. GL 99-02 also requested the licensees to account for the effects of moisture accumulation in adsorbers.

Therefore, the NRC staff updated RG 1.52 in June 2001 to include this new information (ADAMS Accession No. ML011710176). RG 1.52, Revision 3, Regulatory Position 6.1 states, "Each ESF atmosphere cleanup train should be operated continuously for at least 15 minutes each month, with the heaters on (if so equipped), to justify the operability of the system and all its components."

One of the reasons for the previous 10-hour requirement for ventilation system operation with heaters operating was to minimize the effects of moisture on the adsorber's ability to capture gaseous activity. However, these effects are already accounted for in SR 4.7.7.c.2 by verifying that a laboratory analysis of a representative carbon sample meets the laboratory testing criteria for a methyl iodide penetration of less than 1.0 percent when tested at a temperature of 30 degrees Celsius and a relative humidity of 70 percent.

The NRC's regulatory requirements related to the content of the TSs are contained in 10 CFR 50.36. The regulations in 10 CFR 50.36 require that the TSs include items in the following categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls. 10 CFR 50.36(c)(3) states that SRs are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met.

The NRC's current guidance for the format and content of TSs can be found in NUREG-1431, "Standard Technical Specifications Westinghouse Plants," Revision 4 (ADAMS Accession No. ML12100A222). The format of South Texas Project TSs differs from that in NUREG-1431 because South Texas Project TSs follow previous NRC guidance. For the purposes of this evaluation the difference in format is administrative.

#### 3.0 TECHNICAL EVALUATION

The NRC staff evaluated the licensee's proposed change against the applicable regulatory guidance in RG 1.52, Revision 3, guidance in the STS, as modified by TSTF-522, and the regulatory requirements of 10 CFR 50.36(c)(3).

The proposed change would require at least 15 minutes of system operation with heaters operating, as described in RG 1.52, Revision 3. Therefore, the NRC staff finds that the proposed change is consistent with guidance in RG 1.52, Revision 3.

The NRC staff evaluated the licensee's proposed change against the applicable regulatory guidance in the STS, as modified by TSTF-522. The proposed change adopted the TS content, to the extent practicable, contained in the changes made to NUREG-1431 by TSTF-522. The NRC staff found that the proposed change is consistent with guidance in the STS, as modified by TSTF-522, and therefore is acceptable.

The NRC staff compared the proposed change to the existing SR, as well as the regulatory requirements of 10 CFR 50.36(c)(3). The existing SR provides assurance that the necessary quality of ventilation systems and components will be maintained and that the LCOs will be met. The proposed change reduces the amount of required system operational time from 10 hours to 15 minutes with heaters operating. The 10-hour operational requirement for heaters was based on using the SR to eliminate moisture in the adsorbers and thus ensure the adsorbers would capture gaseous activity. Since SR 4.7.7 b is no longer relied upon to ensure the effects of moisture on the adsorber's ability to capture gaseous activity are accounted for, the 10-hour heater operational requirement is unnecessary. As discussed in RG 1.52, Revision 3, reducing the required minimum system operation time with heaters operating to 15 minutes is sufficient to justify operability of the system and all its components. Therefore, the NRC staff finds that the proposed SR meets the regulatory requirements of 10 CFR 50.36(c)(3) because it provides assurance that the necessary quality of ventilation systems and components will be maintained and that the LCOs will be met. Therefore, the NRC staff finds the proposed change is acceptable.

## 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendment on May 28, 2019. The State official had no comments.

## 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration published in the *Federal Register* on January 2, 2019 (84 FR 25), and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Matthew Hamm

Date: June 6, 2019

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - ISSUANCE OF AMENDMENT NOS. 215 AND 201 RE: ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER TSTF-522 (EPID L-2018-LLA-0271) DATED JUNE 6, 2019

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\*by memorandum \*\*via email

#### ADAMS Accession No. ML19067A222

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DATE	6/6/19	5/20/19	2/15/2019
OFFICE	OGC-NLO	NRR/DORL/LPL4/BC	NRR/DORL/LPL4/PM
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DATE	6/5/19	6/6/19	6/6/19

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