

PDR

70-1308

GENERAL ELECTRIC

NUCLEAR FUEL
AND SERVICES

DIVISION
SPENT FUEL SERVICES OPERATION

GENERAL ELECTRIC COMPANY, 175 CURTNER AVE., SAN JOSE, CALIFORNIA 95125
Mail Code 861

DMD-452
Docket No. 70-1308
License No. SNM-1265

June 12, 1980

Office of Nuclear Material Safety & Safeguards
Attn: R.E. Cunningham, Director
Division of Fuel Cycle & Material Safety
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: REVISED AMENDMENT REQUEST REGARDING CHANGES, TESTS
AND EXPERIMENTS

Gentlemen:

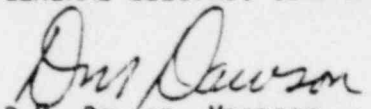
Please refer to item (b) of our amendment request dated January 18, 1980. The proposed provisions for changes, tests and experiments were discussed during a meeting on June 10, 1980, between Messrs. Rouse, Clark and others of the NRC Staff, and Messrs. Dawson, Herrington and Voiland from General Electric. As a result of this meeting, the proposed amendment of Operation Specifications, Chapter 10 of NEDO-21326C, Section 10.2.3 through 10.2.3.2, is hereby withdrawn and replaced by new Sections 10.1.5 through 10.1.5.2 and Section 10.6.6.3, as contained in Attachment A to this letter.

This change does not affect other aspects of our amendment request of January 18, 1980. Upon approval of the revised material submitted with this letter, a new Revision C2 of NEDO-21326 will be printed and distributed. No additional amendment fee should be required; please refer to Control Number 15326.

Please contact H.A. Rogers (408*925-6496) or C.C. Herrington (408*925-6385) of this office if there are questions regarding this revised amendment request or related matters.

Respectfully submitted,

GENERAL ELECTRIC COMPANY



D.M. Dawson, Manager
Licensing & Transportation

DMD:HAR:bn
Attachment

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ATTACHMENT A

10.1.5 Changes, Tests, and Experiments

Changes in the plant and procedures described in this report, as well as tests and experiments related to the receipt, storage and transfer of spent fuel, which are not described in this report, may be performed without prior approval by the U.S. Nuclear Regulatory Commission, provided that a proposed change, test or experiment does not require a change in the Operation Specifications of this Chapter, does not involve unreviewed safety or environmental issues, and does not decrease the effectiveness of the physical security plan.

A change in the plant and procedures described in this report, and tests or experiments that require a change in the Operation Specifications or involve unreviewed safety or environmental issues, or that would decrease the effectiveness of the physical security plan, require prior approval by the U.S. Nuclear Regulatory Commission.

The above provisions permit the flexibility to make changes in the plant and procedures and to conduct tests and experiments related to the receipt, storage and transfer of spent fuel that utilize the unique features of Morris Operation while maintaining these actions within safety limits and environmental impacts previously reviewed and approved by the U.S. Nuclear Regulatory Commission.

10.1.5.1 Unreviewed Safety and Environmental Issues Criteria

Changes in the plant or procedures described in this report and tests and experiments (hereafter referred to as "actions") shall be reviewed for safety and environmental issues previously unreviewed by the U.S. Nuclear Regulatory Commission under the following criteria:

- a. The proposed action shall be deemed to involve an unreviewed safety issue if the probability or consequences of an accident or malfunction of equipment important to safety would exceed limitations established in this report or established by regulations.
- b. The proposed action shall be deemed to involve an unresolved safety issue if the margin of safety where defined in any specification in this chapter is significantly reduced.

- c. The proposed action shall be deemed to involve an unreviewed safety issue if occupational radiation exposure, either individually or collectively, is significantly increased over that experienced in routine operations involving receipt, storage, and transfer of spent fuel.
- d. The proposed action shall be deemed to involve an unreviewed environmental issue if the impact of that action would have a significant environmental effect not considered previously.

10.1.5.2 Physical Security Issues

Matters involving physical security issues shall be considered and processed as specified in the approved physical security plan for the plant.

10.6.6.3 Records and Reports for Changes, Tests and Experiments

The following special records and reports are required regarding changes, tests and experiments (see Section 10.1.5):

- a. Records of plant changes shall be made and maintained until termination of license, including the bases for determining that the changes did not involve unreviewed safety and environmental issues. Plant changes of a long-term or permanent nature will be recorded by issuing revisions to appropriate chapters of this report.
- b. Records of temporary plant changes and tests and experiments shall be prepared and maintained for five years. These records shall include safety evaluations to document the bases for determining that the subject changes, tests and experiments did not involve unreviewed safety and environmental issues.
- c. An annual report of actions under Section 10.1.5 shall be furnished to the Nuclear Regulatory Commission Regional Office and other addressees as required by applicable regulations. The annual report shall contain a brief description of changes, tests and experiments and shall include a summary of the safety and environmental evaluation of each action.

NOTICE OF DISTRIBUTION
to
SERVICE LIST - DOCKET NO. 70-1308

In the matter of General Electric's application for renewal of Materials License No. SNM-1265, copies of the documents discussed in the attached letter have been forwarded to the law firm of Mayer, Brown and Platt, 231 South LaSalle, Chicago, IL. 60604, counsel for General Electric Company, for transmittal to the service list as shown below:

Andrew C. Goodhope, Esq., Chairman
Atomic Safety and Licensing Board
3320 Estelle Terrace
Wheaton, Maryland 20906

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Linda W. Little
Atomic Safety and Licensing Board
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Raleigh, North Carolina 27612

Docketing and Service Section
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