Commonwealth Edison Company
Dresden Generating Station
6500 North Dresden Road
Morris, IL 60450
Tel 815-942-2920

ComEd

February 21, 2000

10 CFR 50.90

PSLTR #00-0056

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Request for an Amendment to Technical Specifications:
Emergency Core Cooling System Actuation Instrumentation

In accordance with 10 CFR 50.90, Commonwealth Edison (ComEd) Company requests a change to Appendix A Technical Specifications (TS) of Facility Operating License Nos. DPR-19 and DPR-25, for the Dresden Nuclear Power Station (DNPS), Units 2 and 3, respectively. We are proposing changes to TS Table 3.2.B-1 and Table 4.2.B-1 for Emergency Core Cooling System (ECCS) "Actuation Instrumentation" for the Condensate Storage Tank Level – Low function that supports operability of the High Pressure Coolant Injection (HPCI) system. Specifically, we propose the following changes.

1) The unit of measure for TS Table 3.2.B-1, "ECCS ACTUATION INSTRUMENTATION," Trip Setpoint for Condensate Storage Tank Level –Low is being changed from gallons to feet above the bottom of the condensate storage tank for the Condensate Storage Tank Level –Low trip setpoint,

2) TS Table 4.2.B-1, "ECCS ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS", Item 3.c CHANNEL FUNCTIONAL TEST frequency is being changed from "M" (i.e., Monthly) to "Q" (i.e., Quarterly) and the CHANNEL CALIBRATION frequency is being changed from "NA" to "E" (i.e., At Least Once per 18 Months) for the Condensate Storage Tank Level –Low trip setpoint and,

A001

3) Minimum Channels per Trip Function requirement is being changed to add clarifying information relative to the number of level switches required for the two Condensate Storage Tanks (CSTs).

We are proposing these changes to address the adequacy of the current Trip Setpoint of 10,000 gallons in the CST to ensure no air entrainment due to vortexing in the HPCI system pump prior to the automatic transfer of the HPCI pump suction source from the CST to the Suppression Chamber (i.e., Torus). Air entrainment can seriously reduce or completely eliminate the HPCI pump's capability to provide an adequate supply of cooling water to the core. We have also chosen to upgrade the current CST level switches that provide the automatic transfer to a more reliable design, which necessitates the changes in surveillance test frequencies.

Currently, the HPCI system is operable based on an engineering operability evaluation that has instituted administrative controls that ensure water level in the 2/3A and 2/3B CSTs is maintained at or above the low level alarm setpoint. These administrative controls have been instituted in accordance with the guidelines outlined in the Nuclear Regulatory Commission's (NRC's) Administrative Letter (AL) 98-10 "Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety."

This proposed changes are subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed changes,

2. Attachment B includes the marked-up TS pages with the requested changes indicated,

3. Attachment C describes our evaluation performed using the criteria in 10 CFR 50.92(c), which provides information supporting a finding of no significant hazards consideration , and

4. Attachment D provides information supporting an Environmental Assessment.

The proposed changes have been reviewed and approved by the Plant Operations Review Committee and the Nuclear Safety Review Board in accordance with the Quality Assurance Program.

ComEd is notifying the State of Illinois of this request for changes to the TS by transmitting a copy of this letter and its attachments to the designated State Official.

Should you have any questions concerning this letter, please contact Mr. D.F. Ambler at (815) 942-2920 Extension 3800.

Respectfully,

Preston Swafford
Site Vice President
Dresden Station

Attachments

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Dresden Nuclear Power Station
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

bcc: Project Manager – NRR – Dresden Nuclear Power Station
NGG Senior Vice President – ComEd
NGG Senior Vice President – Nuclear Operations – ComEd
Vice President, Regulatory Services – ComEd
Station Manager – Dresden Nuclear Power Station
Regulatory Assurance Manager – Dresden Nuclear Power Station
Operations Manager – Dresden Nuclear Power Station
Training Manager – Dresden Nuclear Power Station
Director, Licensing and Compliance – Dresden Nuclear Power Station
Dresden Regulatory Assurance – Subject File (Technical Specifications)
Office of Nuclear Facility Safety – IDNS
Senior Reactor Analysis – IDNS
Manager of Energy Practice – Winston and Strawn
ComEd Document Control Desk Licensing (Hard Copy)
ComEd Document Control Desk Licensing (Electronic Copy)
SVP Numerical File – PSLTR: #00-0056

STATE OF ILLINOIS

COUNTY OF GRUNDY

IN THE MATTER OF

COMMONWEALTH EDISON (COMED) COMPANY	**Docket Nos.**
DRESDEN NUCLEAR POWER STATION - UNITS 2 AND 3	**50-237 and 50-249**

SUBJECT: **Request for an Amendment to Technical Specifications: Emergency Core Cooling System Actuation Instrumentation**

AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

Preston Swafford
Site Vice President
Dresden Station

Subscribed and sworn to before me, a Notary Public in and for the State above named, this 21st day of February, 2000.

Linda Sanders
Notary Public

OFFICIAL SEAL
LINDA S. SANDERS
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 12-29-2002

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

A. SUMMARY OF PROPOSED CHANGES

In accordance with 10 CFR 50.90, Commonwealth Edison (ComEd) Company proposes to amend Appendix A, Technical Specifications (TS), of Facility Operating License Nos. DPR-19 and DPR-25, Dresden Nuclear Power Station (DNPS), Units 2 and 3, respectively. The proposed changes are needed to address the adequacy of the current 10,000 gallon Emergency Core Cooling System (ECCS) Trip Setpoint for the High Pressure Coolant Injection (HPCI) suction source transfer on Condensate Storage Tank (CST) Level – Low (i.e., TS Table 3.2.B-1, Item 3c). This proposed change will ensure adequate CST level is maintained to preclude the potential for vortexing in the CSTs if HPCI were required to safely shut down the reactor. The elimination of vortexing ensures that there will be no air entrainment at the inlet of the HPCI pump. Air entrainment can seriously reduce or completely eliminate the HPCI pump's capability to provide an adequate supply of cooling water to the core. We have also chosen to replace the current CST level switches from a float type switch design to a pressure switch type design. This facility change has not resulted in an Unreviewed Safety Question, but requires a change to the TS due to the required setpoint change and differences in calibration requirements from the float-type switch design to the pressure-type switch design.

Currently, the HPCI system is operable based on an engineering operability evaluation that has instituted administrative controls that ensure water level in the 2/3A and 2/3B CSTs are at or above the low level alarm setpoint. The administrative controls that have been placed on the station are as follows. Maintain water level in the CSTs greater than 15.5 feet when both HPCI systems are required to be operable. When only one HPCI system is required to be operable, maintain water level in the CSTs greater than or equal to 12.5 feet. If either condition falls below the required level, then within one hour, transfer the HPCI suction to the torus or declare HPCI inoperable. These administrative controls have been instituted in accordance with the guidelines outlined in the Nuclear Regulatory Commission's (NRC's) Administrative Letter (AL) 98-10 "Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety."

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

TS Table 3.2.B-1 item 3c, "ECCS Actuation Instrumentation," provides the Applicable OPERATIONAL MODES, the minimum OPERATIONAL CHANNELS per TRIP FUNCTION, and the required ACTIONS for each instrument that provides actuation, interlocks, and permissives to ECCS systems identified in TS Section 3.5.A. For TS Table 3.2.B-1 item 3c, these requirements apply to a set of float-type level switches. There are two level switches currently mounted on standpipes for each respective CST, 2/3 A and 2/3 B. When low level is reached in a CST, any one of these switches will cause the HPCI pump suction valves from the Suppression Chamber (i.e., Torus) for both Unit 2 and Unit 3 to open. When these valves reach full open, the HPCI pump suction valves from the CSTs will close. This operation transfers the HPCI pump suction from the CSTs to the Suppression Chamber . The current TS Surveillance Requirements (SRs) require performance of a CHANNEL FUNCTIONAL TEST on a MONTHLY basis. No CHANNEL CHECK or CHANNEL CALIBRATION is required since the level switches are of a float type design and provide no indication and no transmission of level to local or remote indication.

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

C. BASES FOR THE CURRENT REQUIREMENTS

DNPS is equipped with two CSTs. One function of a CST is to provide a source of water to the Unit 2 and Unit 3 HPCI systems during an accident. The system is designed to ensure a minimum of 90,000 gallons of water is available from each CST for use by the HPCI system. However, the CSTs and their standpipes are not safety related and are not designed to withstand a seismic event. The Torus is the safety-related source of water for the HPCI suction as described in the safety analysis and the CST low low level switches ensure that the HPCI system can access the safety-related water source, when required. The suction of the Unit 2 and Unit 3 HPCI pumps are normally aligned to both CSTs. During a HPCI initiation, water volume in the CST will drop to 10,000 gallons, at which time, the HPCI system suction valves from the Torus will open and the HPCI system suction valve from the CST will close. The 10,000-gallon trip setpoint was originally set to assure that the HPCI suction line would not be uncovered during the transfer to the Torus. Once this transfer is made, suction is supplied to the HPCI pump from the Torus.

The current TS SRs specify performance of a CHANNEL FUNCTIONAL TEST on a MONTHLY basis. No CHANNEL CHECK or CHANNEL CALIBRATION is required since the level switches are of a float type design and provide no indication and no transmission of level to local or remote indication.

D. NEED FOR REVISION OF THE REQUIREMENT

We are submitting this amendment request to change the Condensate Storage Tank Level – Low trip setpoint to ensure prevention of air entrainment in the HPCI pump suction line during a suction transfer and revise the SRs. We identified the need to revise the trip setpoint for this function as a result of a similar problem identified during an NRC inspection at the Quad Cities Nuclear Power Station. Upon further review by station personnel and the performance of an operability determination, it was determined that the HPCI system is operable because the transfer of the HPCI pump suction from the CSTs to the Torus would occur prior to the potential for significant air entrainment due to the high water level maintained in the Torus. Currently, the HPCI system is operable based on an engineering operability evaluation that has placed administrate controls enforcing water level in the 2/3A and 2/3B CSTs at or above the low level alarm setpoint. The administrative controls that have been placed on the station are when both HPCI systems are required to be operable, maintain water level in the CSTs greater than or equal to 15.5 feet. When only one HPCI system is required to be operable, maintain water level in the CSTs greater than 12.5 feet. If either condition falls below the required level, then within one hour, transfer the HPCI suction to the torus or declare HPCI inoperable. These administrative controls are in accordance with the guidelines outlined in NRC AL 98-10, "Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety."

10 CFR50.36, "Technical specifications," requires that appropriate SRs exist to ensure that systems and components are properly maintained. Accordingly, new SRs are provided to reflect the calibration and test requirements of the new level switches. Specifically, the new

pressure-type switches will require a quarterly channel calibration frequency to assure the setpoint values are maintained.

E. DESCRIPTION OF THE PROPOSED CHANGES

As described previously, DNPS is equipped with two CSTs that, among many functions, provide a source of water to the HPCI systems for Unit 2 and Unit 3. The Unit 2 and Unit 3 HPCI systems are normally aligned to take suction from the CSTs but are equipped with a feature that allows automatic transfer of the suction to the Torus upon low level in the CST. This transfer occurs when there is greater than or equal to 10,000 gallons (i.e., 3.5 feet relative to the bottom of the CST) remaining in either CST. To ensure no air entrainment will occur in the HPCI suction line, the revised trip setpoints for the 2/3A and 2/3B CST are raised to 10.8 feet and 7.3 feet respectively, both relative to the bottom of the CST. The engineering units have been revised from gallons to feet to reflect the engineering units of indication available in the main control room. The conclusion of the setpoint requirements is based on engineering calculations performed using the Froude Number criteria method.

We will upgrade the current float switch type design to pressure switch design. The upgrade is necessary to implement the proposed trip settings since float switches have limited range capabilities. Currently, transfer of both the Unit 2 and Unit 3 HPCI pumps suction will occur when any one of the installed four switches sense low water level. The new switches will not provide local or remote indication, therefore, the requirement of "NA" for a CHANNEL CHECK will remain. The proposed CHANNEL FUNCTIONAL TEST change is to perform the test on a quarterly , (i.e., "Q") frequency instead of monthly, (i.e., "M") as denoted in Table 4.2.B-1. The pressure switches will also require a CHANNEL CALIBRATION at an 18-month frequency, denoted in TS Table 4.2.B-1 Item 3.c as "E." The 18-month frequency is consistent with the manufacturer's recommendation. The CST water level is determined from each tank's instrumentation standpipe, currently consisting of two float switches for each standpipe, for a total of four. Each float switch has a set of contacts to both Units 2 and 3 HPCI Torus suction valve logic. Given this dual contact design, performance of functional testing for one unit requires the installation of jumpers to the other unit's circuit to prevent its HPCI Torus suction valves from opening. The TS allows only one hour for the jumper to be in place or the channel must be placed in the tripped condition. The planned modification replaces the existing four float switches with eight new pressure switches, four per instrumentation standpipe, consisting of two for Unit 2 and two for Unit 3. Each new CST level instrument then will only sense level from one CST and provide input to only one unit's HPCI transfer logic circuitry. The new design will allow for testing and replacement of CST Level switches without affecting the operability of both HPCI systems concurrently and still maintain proper redundancy.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

The HPCI system is provided to ensure adequate core cooling for all primary coolant system break sizes smaller than those sizes for which the low pressure core cooling systems can adequately protect the core without assistance from other ECCS. Suction for the HPCI pump is taken from the CSTs or from the Torus. The HPCI system is normally aligned to the CSTs.

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

After HPCI system initiation, water level in the CST will eventually drop to the Condensate Storage Tank Level- Low trip setpoint causing the HPCI pump suction to align to the Torus. Actuation of the suction transfer below the proposed trip settings could result in the introduction of air in the suction of the HPCI pump, which can lead to reduced pump performance. The proposed trip settings will ensure no air entrainment in the HPCI pump suction lines. This is accomplished by ensuring that the water level in the CSTs does not reach the vortex limit before the transfer of the HPCI pump suction from the CSTs to the Torus is complete. Currently, the HPCI system is operable based on an engineering operability evaluation that has instituted administrative controls that ensure water level in the 2/3A and 2/3B CSTs at or above the low level alarm setpoint.

The proposed change to the CHANNEL FUNCTIONAL TEST to perform the test on a quarterly, (i.e., "Q") frequency instead of monthly, (i.e., "M") as denoted in TS Table 4.2.B-1 and a CHANNEL CALIBRATION at an 18-month frequency denoted in TS Table 4.2.B-1 Item 3.c as "E," are based on the installation of the new pressure-type level switches instead of captive float based switches. The pressure switch model that is planned to be installed has been qualified for use in the nuclear industry. The new pressure-type switches provide the ability to adjust the setpoint of the CST low level as required thus increasing the range capabilities as compared to the existing float type switches. This type of switch is environmentally qualified for this specific application. In addition, this type of switch has exhibited history of satisfactory performance. Therefore the proposed use of this switch in a mild environment is considered to be acceptable with the SRs as proposed in TS Table 4.2.B-1.

G. IMPACT ON PREVIOUS SUBMITTALS

We have reviewed the proposed changes regarding impact on any previous submittals, and have determined that there is no impact on any outstanding previous submittals.

H. SCHEDULE REQUIREMENTS

ComEd requests approval of these proposed changes prior to August 1, 2000.

I. REFERENCES

Updated Final Safety Analysis Report (UFSAR) Section 7.3.1.3.1, "Initiations and Interlocks"

ATTACHMENT B

Proposed Changes to Technical Specifications for Dresden Nuclear Power Station, Unit 2 and Unit 3

MARKED-UP PAGES FOR PROPOSED CHANGES

REVISED PAGES

3/4.2-14

3/4.2-18

TABLE 3.2.B-1 (Continued)

ECCS ACTUATION INSTRUMENTATION

Functional Unit	Trip Setpoint[h]	Minimum CHANNEL(s) per Trip Function[a]	Applicable OPERATIONAL MODE(s)	ACTION
2/3 A CONDENSATE STORAGE TANK	≥ 10.8'	2	1, 2, 3	35
2/3 B CONDENSATE STORAGE TANK	≥ 7.3'	2	1, 2, 3	35
3. HIGH PRESSURE COOLANT INJECTION (HPCI) SYSTEM[d]				
a. Reactor Vessel Water Level - Low Low	≥84 inches	4	1, 2, 3	35
b. Drywell Pressure - High[f]	≤2 psig	4	1, 2, 3	35
c. Condensate Storage Tank Level - Low[f]	~~≥10,000 gal~~	~~2~~	~~1, 2, 3~~	~~35~~
d. Suppression Chamber Water Level - High[i]	≤15' 5" above bottom of chamber	2	1, 2, 3	35
e. Reactor Vessel Water Level - High (Trip)	≤194 inches	1	1, 2, 3	31
f. HPCI Pump Discharge Flow - Low (Bypass)	≥600 gpm	1	1, 2, 3	33
g. Manual Initiation	NA	1/system	1, 2, 3	34
4. AUTOMATIC DEPRESSURIZATION SYSTEM - TRIP SYSTEM 'A'[d]				
a. Reactor Vessel Water Level - Low Low	≥84 inches	2	1, 2, 3	30
b. Drywell Pressure - High[f]	≤2 psig	2	1, 2, 3	30
c. Initiation Timer	≤120 sec	1	1, 2, 3	31
d. Low Low Level Timer	≤10 min	1	1, 2, 3	31
e. CS Pump Discharge Pressure - High (Permissive)	≥100 psig & ≤150 psig	1/pump	1, 2, 3	31
f. LPCI Pump Discharge Pressure - High (Permissive)	≥100 psig & ≤150 psig	1/pump	1, 2, 3	31

TABLE 4.2.B-1

ECCS ACTUATION INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

Functional Unit	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	Applicable OPERATIONAL MODE(s)
1. CORE SPRAY (CS) SYSTEM				
a. Reactor Vessel Water Level - Low Low	S	M	E[f]	1, 2, 3, 4[b], 5[b]
b. Drywell Pressure - High[d]	NA	M	Q	1, 2, 3
c. Reactor Vessel Pressure - Low (Permissive)	NA	M	Q	1, 2, 3, 4[b], 5[b]
d. CS Pump Discharge Flow - Low (Bypass)	NA	Q	E[e]	1, 2, 3, 4[b], 5[b]
2. LOW PRESSURE COOLANT INJECTION (LPCI) SUBSYSTEM				
a. Reactor Vessel Water Level - Low Low	S	M	E[f]	1, 2, 3, 4[b], 5[b]
b. Drywell Pressure - High[d]	NA	M	Q	1, 2, 3
c. Reactor Vessel Pressure - Low (Permissive)	NA	M	Q	1, 2, 3, 4[b], 5[b]
d. LPCI Pump Discharge Flow - Low (Bypass)	NA	Q	E[e]	1, 2, 3, 4[b], 5[b]
3. HIGH PRESSURE COOLANT INJECTION (HPCI) SYSTEM[e]				
a. Reactor Vessel Water Level - Low Low	S	M	E[f]	1, 2, 3
b. Drywell Pressure - High[d]	NA	M	Q	1, 2, 3
c. Condensate Storage Tank Level - Low	NA	~~M~~ Q	~~NA~~ E	1, 2, 3
d. Suppression Chamber Water Level - High	NA	M	NA	1, 2, 3
e. Reactor Vessel Water Level - High (Trip)	NA	M	E[f]	1, 2, 3
f. HPCI Pump Discharge Flow - Low (Bypass)	NA	Q	Q	1, 2, 3
g. Manual Initiation	NA	E	NA	1, 2, 3

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison (ComEd) Company has evaluated these proposed changes and determined that they involve 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:

Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;

Create the possibility of a new or different kind of accident from any previously analyzed; or

Involve a significant reduction in a margin of safety.

ComEd proposes to raise the Condensate Storage Tank (CST) Level – Low suction transfer trip setpoint for the High Pressure Coolant Injection (HPCI) system to ensure no air entrainment due to vortexing (i.e., vortex limit) during an automatic transfer of the HPCI pump suction source from the CST to the Suppression Chamber (i.e., Torus). Concurrent with the Trip Septoint change will be an upgrade of the existing CST level switches to a more reliable design. The upgrade is necessary to implement the proposed trip settings since the existing float switches have limited range capabilities. The proposed changes will provide clarity with respect to the CST level requirements and to ensure the operability of the HPCI system.

The determination that the criteria set forth in 10 CFR 50.92 are met for these proposed changes is indicated below.

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

The Condensate Storage Tank (CST) water level and the installation of new pressure type switches are not precursors to accidents or transients described in the Updated Final Safety Analysis Report (UFSAR). The proposed changes will maintain the operability of the High Pressure Coolant Injection (HPCI) system, thus the HPCI system will continue to function as designed. Any failure of the new switches will still cause realignment of the HPCI suction from the CST to the Torus as currently designed. Therefore, the proposed changes in water level and the installation of a new type switch will not result in a significant increase in the probability or consequences of an accident previously evaluated.

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

For a system to create the possibility of a new and different accident, the proposed changes would have to require the system to operate in a mode or configuration that is different from the original design. The installation of the new switches does not alter the current logic configuration. The new switches will continue to function and initiate a transfer from the CSTs to the Torus as the suction source as originally designed. The proposed changes to

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

the Technical Specifications (TS) will ensure that the HPCI suction transfer will occur before any air is entrained into the pump suction line. This is accomplished by ensuring that the water level in the CSTs does not reach the vortex limit before the transfer of the HPCI pump suction from the CSTs to the Torus is complete. No new functional failure modes will be introduced upon implementation of the proposed changes. Therefore, the possibility of a new or different kind of accident has not been created.

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

The proposed changes to the CST Level-Low trip setpoint and installation of the new pressure switches provide assurance that air entrainment and vortexing will be prevented during HPCI operation. By maintaining an increased volume in the CSTs, the probability of a HPCI system malfunction due to air entrainment or vortexing is decreased. The installation of the new pressure type switches does not change the current logic configuration. The new switches will be calibrated at a frequency to ensure that the probability of unacceptable instrument drift is maintained at an acceptable level. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

ATTACHMENT D, Proposed Change to Technical Specifications for Dresden Nuclear Power Station, Unit 2 and Unit 3

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

ComEd has evaluated this proposed operating license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. We have determined that this proposed license amendment request meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9) and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b). 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 C, this proposed amendment does not involve any 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 C, there will be no 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 changes in the operation or configuration of the facility. There will be no changes in the level of controls or methodology used for processing of radioactive effluents or handling of solid waste, nor will the proposal result in any change in the normal radiation levels within the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from this change.