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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Request for Amendment to Technical Specifications Associated With Refueling Equipment Interlocks

Reference: (1) Technical Specifications Task Force (TSTF) Traveler TSTF-225, Revision 1, Fuel movement with inoperable refueling equipment interlocks

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," AmerGen Energy Company, LLC (i.e., AmerGen), proposes changes to Appendix A, Technical Specifications (TS), of Facility Operating License No. NPF-62 for the Clinton Power Station (CPS). The proposed changes are to TS Section 3.9.1, "Refueling Equipment Interlocks." Specifically, AmerGen proposes a change to the Required Action for Limiting Condition for Operation (LCO) 3.9.1 to provide an alternative Required Action A.2 if the refueling interlocks become inoperable. In addition, AmerGen proposes to change the surveillance frequency for Surveillance Requirement (SR) 3.9.1.1 from 7 days to 31 days.

The change to the Required Action "A" of LCO 3.9.1 will allow the plant to continue to safely perform fuel movements in the reactor vessel should the refueling equipment interlocks become inoperable for any reason. The extension of the surveillance test interval will ensure that the interlocks are tested commensurate with the function resulting in reduction of unnecessary testing during a refueling outage.

This proposed changes to TS Section 3.9.1 is consistent with TSTF-225, Revision 1 (Reference 1), submitted to the NRC by the Technical Specifications Task Force (TSTF). AmerGen respectfully requests approval of this change prior to December 31, 2001, in order to support preparation for the next refueling outage.

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This request is 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. A marked-up copy of the affected TS Bases pages is provided for information only.

3. Attachment C describes our evaluation performed using the criteria in 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (a)(1) which provides information supporting a finding of no significant hazards consideration in accordance with 10 CFR 50.92, "Issuance of amendment," paragraph (c).

4. Attachment D provides information supporting an Environmental Assessment.

This proposed change has been reviewed by the CPS Plant Operations Review Committee and approved by the Nuclear Safety Review Board.

AmerGen is notifying the State of Illinois of this application 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. J. L. Peterson at (217) 937-3418.

Respectfully,

J. M. Heffley
Vice President
Clinton Power Station

JLP/krk

Attachments:
Affidavit
Attachment A: Description and Safety Analysis for Proposed Change
Attachment B: Marked-up Pages for Proposed Change
Attachment C: Information Supporting a Finding of No Significant Hazards Consideration
Attachment D: Information Supporting An Environmental Assessment

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

STATE OF ILLINOIS	)	
COUNTY OF DEWITT	)	
IN THE MATTER OF	)	
AMERGEN ENERGY COMPANY, LLC	)	**Docket Number**
CLINTON POWER STATION, UNIT 1	)	**50-461**

SUBJECT: Request for Amendment to Technical Specifications Associated With Refueling Equipment Interlocks

AFFIDAVIT

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

J. M. Heffley
Vice President
Clinton Power Station

Subscribed and sworn to before me, a Notary Public in and for the State above named, this 21st day of May, 2001.

* OFFICIAL SEAL *
Jacqueline S. Matthias
Notary Public, State of Illinois
My Commission Expires 11/24/2001

Jacqueline S. Matthias
Notary Public

DESCRIPTION AND SAFETY ANALYSIS FOR THE PROPOSED CHANGES

A. SUMMARY OF THE PROPOSED CHANGES

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," AmerGen Energy Company, LLC (i.e., AmerGen), proposes changes to Appendix A, Technical Specifications (TS), of Facility Operating License No. NPF-62 for the Clinton Power Station (CPS). The proposed changes are to TS Section 3.9.1, "Refueling Equipment Interlocks." Specifically, AmerGen proposes a change to the Required Action for Limiting Condition for Operation (LCO) 3.9.1 to provide an alternative Required Action A.2 if the refueling interlocks become inoperable. In addition, AmerGen proposes to change the surveillance frequency for Surveillance Requirement (SR) 3.9.1.1 from 7 days to 31 days.

The change to the Required Action "A" of LCO 3.9.1 will allow the plant to continue to safely perform fuel movements in the reactor vessel should the refueling equipment interlocks become inoperable for any reason. The extension of the surveillance test interval will ensure that the interlocks are tested commensurate with the function resulting in reduction of unnecessary testing during a refueling outage.

These proposed changes to TS Section 3.9.1 are consistent with TSTF-225, Revision 1 (Reference 1), submitted to the NRC by the Technical Specifications Task Force (TSTF). It should be noted that the changes to the Required Action "A" are consistent with changes approved by the NRC for the River Bend Station, Grand Gulf Nuclear Station, and the Perry Nuclear Power Plant. The proposed changes are described in detail in Section E of this Attachment. The marked-up TS pages are provided in Attachment B of this submittal.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

TS Section 3.9.1 requires that the refueling equipment interlocks be operable during in-vessel fuel movement with equipment associated with the interlocks. In the event that one or more of the required refueling equipment interlocks are declared inoperable the required action is to immediately suspend in-vessel fuel movement with equipment associated with the inoperable interlock(s). This places the unit in a condition where the LCO no longer applies. The action ensures operations are not performed with equipment that would potentially not be blocked from unacceptable operations such as loading fuel in a cell with a withdrawn control rod.

SR 3.9.1.1 requires that a channel functional test be performed prior to performing in-vessel fuel movements with equipment associated with the interlocks and every 7 days thereafter for the following refueling equipment interlock inputs.

- All-rods-in
- Refueling platform position
- Refuel platform main hoist, fuel loaded

C. BASES FOR THE CURRENT REQUIREMENTS

The purpose of the refueling equipment interlocks is to prevent criticality during refueling. Refueling equipment interlocks restrict the operation of the refueling equipment or the withdrawal of control rods to reinforce unit procedures in preventing the reactor from achieving criticality during refueling. The refueling interlock circuitry senses the conditions of the refueling equipment and the control rods. Depending on the sensed conditions, interlocks are actuated to prevent the operation of the refueling equipment or the withdrawal of control rods.

The control rods, when fully inserted, serve as the system capable of maintaining the reactor subcritical in cold conditions during all fuel movement activities and accidents, as required by General Design Criterion (GDC) 26, "Reactivity Control System Reliability and Capability "of 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," Appendix A, "General Design Criteria for Nuclear Power Plants."

The refueling interlocks are explicitly assumed in the control rod removal error during refueling analysis presented in Section 15.4.1.1 of the CPS Updated Safety Analysis Report (USAR) . This analysis evaluates the consequences of control rod withdrawal during refueling. A prompt reactivity excursion during refueling could potentially result in fuel failure with subsequent release of radioactive material to the environment. Criticality and, therefore, subsequent prompt reactivity excursions are prevented during the insertion of fuel, provided all control rods are fully inserted during the fuel insertion. The refueling interlocks accomplish this by preventing loading fuel into the core with any control rod withdrawn, or by preventing withdrawal of a rod from the core during fuel loading.

Two channels of instrumentation are provided. The following inputs are used in the logic circuit; the position of the refueling platform; the loading of the refueling platform main hoist; and the full insertion of all control rods. With the reactor mode switch in the shutdown or refueling position, the indicated conditions are combined in logic circuits to determine if all restrictions on refueling equipment operations and control rod insertion are satisfied.

A control rod not at its full-in position interrupts power to the refueling equipment and prevents operating the equipment over the reactor core when loaded with a fuel assembly. Conversely, the refueling equipment located over the core and loaded with fuel inserts a control rod withdrawal block to prevent withdrawing a control rod.

The refueling platform has two mechanical switches that open before the platform and the fuel grapple are physically located over the reactor vessel. The main hoist has a load cell sensor that feeds the programmable logic controller (PLC) that has two output switches that open when the hoist is loaded with fuel. The PLC setpoint for "hoist loaded" is set to a load lighter than the weight of a single fuel assembly in water to ensure that the interlock is activated when the hoist is loaded with fuel. The refueling interlocks use these indications to prevent operation of the refueling equipment with fuel loaded over the core whenever any control rod is withdrawn, or to prevent control rod withdrawal whenever fuel loaded refueling equipment is moved over the core.

Refueling equipment interlocks satisfy Criterion 3 of the NRC Policy Statement.

D. NEED FOR REVISION OF THE REQUIREMENTS

The change to the Required Action LCO 3.9.1 will allow the plant to continue to safely perform fuel movements in the reactor vessel should the refueling equipment interlocks become inoperable for any reason. Since typical refueling operations usually take more than 7 days, refueling operations would need to be interrupted to perform the surveillance. The change to the SR frequency will reduce the risk associated with halting and recommencing fuel movements.

E. DESCRIPTION OF THE PROPOSED CHANGES

The proposed TS changes are as follows.

1. Change the Required Action for LCO 3.9.1 to provide an alternative Required Action A.2 if the refueling equipment interlocks become inoperable. The proposed change will require the actions (Required Action A.2.1) to immediately insert a control rod withdrawal block and (Required Action A.2.2) to immediately verify all control rods are fully inserted.

2. Change the surveillance frequency of the Channel Functional Testing specified in TS SR 3.9.1.1 for the refueling equipment interlocks from 7 days to 31 days.

3. Change the TS Bases to be consistent with the above changes to TS Section 3.9.1.

The proposed TS changes are reflected on a marked-up copy of the affected pages from the CPS TS contained in Attachment B. A marked-up copy of the affected pages from the current TS Bases is also provided in Attachment B. Following NRC approval of this request, we will revise the CPS TS Bases, in accordance with the TS Bases Control Program of TS Section 5.5.11, to incorporate the changes identified in Attachment B.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

The design basis for the refueling interlocks is to restrict the withdrawal of control rods or the operation of the refueling equipment to reinforce unit procedures in preventing the reactor from achieving criticality during refueling operations. Criticality is prevented during the insertion of fuel, provided controls rods in the vicinity of the vacant fuel space are fully inserted during the fuel insertion. In the event that a fuel assembly is loaded on the hoist and moving over the core region, the refueling interlocks will insert a control rod block to ensure that a rod can not be withdrawn. This rod block is removed when the loaded hoist has moved beyond the core region, or if the fuel assembly has been ungrappled (i.e., fuel assembly loaded into core location). If a rod is withdrawn, operation of the refueling equipment over the core region is prevented by interrupting power supply to the equipment.

The first proposed change adds alternative actions to Required Action "A" of TS Section 3.9.1, in the event that refueling interlocks are declared inoperable. These alternative actions ensure that the design basis provided by the refueling equipment interlocks are immediately satisfied. Required Action A.2.1 will require that a control rod block first be placed in effect, thereby ensuring that control rods are not subsequently withdrawn. Following placement of the continuous control rod withdrawal block in effect, Required Action A.2.2 will require verification of all control rods to be fully inserted. A continuous rod block will be inserted vice the conditional rod block generated, based on sensed inputs, by the refueling equipment interlocks. In addition, a verification that all of the control rods are fully inserted will be conducted to verify compliance with TS Section 3.9.3, "Control Rod Position." The proposed additional Required Actions provide an equivalent level of assurance that fuel will not be inadvertently loaded into a core cell that has a control rod withdrawn.

The proposed Required Actions increase consistency within the TS, since they are similar to the Required Actions for an existing, related LCO 3.9.4. LCO 3.9.4, "Control Rod Position Indication," controls the operability of the control rod position indicators, which serve a support system role for the refueling interlocks controlled by LCO 3.9.1 (i.e., the position indicators provide information to the "all-rods-in" interlock). The key point is that LCO 3.9.4 Required Action A.2 (with subactions A.2.1 and A.2.2) does not require that all fuel movement be suspended but proposes alternate means to ensure the safety function is satisfied. The proposed LCO 3.9.1 Required Actions are consistent with the current Required Actions of LCO 3.9.4 since they require either fuel movement be suspended (i.e., similar to the TS Section 3.9.4, A.1 series of Actions), or all control rods be verified to be inserted and control rod withdrawal be blocked (i.e., similar to the TS Section 3.9.4, A.2 series of Actions).

The second proposed change involves extending the surveillance frequency of the Channel Functional Testing (i.e., TS SR 3.9.1.1) for the refueling equipment interlocks from 7 days to 31 days. The proposed change to the SR 3.9.1 will permit a complete fuel off-load, shuffle, or on-load of new fuel, without the need to halt critical path refueling activities solely for the purpose of performing of these surveillance tests. This is provided that the refueling activities are completed within 31 days from the last performance of the SR.

USAR Section 7.6.1.1.3.7, "Testability" related to refueling equipment interlocks states that functional testing of all refueling interlocks before any refueling outage will positively indicate that the interlocks operate in the situations for which they were designed. There is no statement requiring routine testing to continue verification. The current basis for the SR 3.9.1.1 notes that the SR frequency was simply based on engineering judgment, and was considered adequate in view of other indications of refueling equipment interlocks and the associated input status that are available to operations personnel. Although the formal interlock surveillance would not be performed at the same frequency as before, the associated instruments have indications on the refueling bridge console. Therefore, if a problem develops with one of the instrument channels between surveillance tests, fuel handling operators would be provided with an indication that the channel is not performing its intended function. This is consistent with the Bases for TS SR 3.9.1.1.

In addition, the refueling equipment interlocks have been determined to be reliable and problems with the interlock circuitry during the time between performance of surveillances is easily identified. A review of surveillance history was performed for the past two refueling outages. In the last seven performances of the refueling equipment interlocks operability test, the interlocks have operated successfully with no corrective maintenance or corrective action necessary. Based on the above, it has been concluded that extending the frequency of the Channel Functional Tests would not allow an inoperability to go undetected until the next performance of the surveillance.

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 license amendment requests.

H. SCHEDULE REQUIREMENTS

We request approval of these proposed changes prior to December 31, 2001, to support preparation for the next refueling outage.

I. REFERENCES

(1) Technical Specifications Task Force (TSTF) Traveler TSTF-225, Revision 1, Fuel movement with inoperable refueling equipment interlocks

Attachment B
Proposed Technical Specification Changes
Clinton Power Station, Unit 1

MARKED-UP TS PAGES FOR PROPOSED CHANGES

REVISED TS PAGES

3.9-1

REVISED BASES PAGES
(PROVIDED FOR INFORMATION ONLY)

B 3.9-3

3.9 REFUELING OPERATIONS

3.9.1 Refueling Equipment Interlocks

LCO 3.9.1 The refueling equipment interlocks shall be OPERABLE.

APPLICABILITY: During in-vessel fuel movement with equipment associated with the interlocks.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more required refueling equipment interlocks inoperable.	A.1	Suspend in-vessel fuel movement with equipment associated with the inoperable interlock(s).	Immediately
	OR		
	A.2.1	**Insert a control rod withdrawal block**	**Immediately**
		AND	
	A.2.2	**Verify all control rods are fully inserted.**	**Immediately**

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.1.1	Perform CHANNEL FUNCTIONAL TEST on each of the following required refueling equipment interlock inputs: a. All-rods-in, b. Refuel platform position, and c. Refuel platform main hoist, fuel loaded.	~~7~~ **31** days

INSERT for B 3.9.1 (Required Action A.1) (page B 3.9-3)

A.1, **A.2.1 and A.2.2**

With one or more of the required refueling equipment interlocks inoperable, the unit must be placed in a condition in which the LCO does not apply **(Required Action A.1) or the interlocks are not needed (Required Action A.2). Therefore, Required Action A.1 requires that in-**vessel fuel movement with the affected refueling equipment must be immediately suspended. This action ensures that operations are not performed with equipment that would potentially not be blocked from unacceptable operations (e.g., loading fuel into a cell with a control rod withdrawn). Suspension of in-vessel fuel movement shall not preclude completion of movement of a component to a safe position.

Alternatively, Required Actions A.2.1 and A.2.2 require a control rod withdrawal block to be inserted, and require verification that all control rods be fully inserted. Required Action A.2.1 ensures no control rods can be withdrawn, because a block to control rod withdrawal is in place. The withdrawal block utilized must ensure that if rod withdrawal is requested, the rod will not respond (i.e., it will remain inserted). Required Action A.2.2 is performed after placing the rod withdrawal block in effect, and provides verification that all control rods are fully inserted. This verification that all control rods are fully inserted is in addition to the periodic verifications required by SR 3.9.3.1.

Like Required Action A.1, Required Actions A.2.1 and A.2.2 ensure unacceptable operations are blocked (e.g., loading fuel into a cell with the control rod withdrawn).

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

According to 10 CFR 50.92, "Issuance of Amendment," paragraph (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; or,

(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.

AmerGen Energy Company, LLC (i.e., AmerGen), proposes changes to Appendix A, Technical Specifications (TS), of Facility Operating License No. NPF-62 for the Clinton Power Station (CPS). The proposed changes are to TS Section 3.9.1, "Refueling Equipment Interlocks." Specifically, AmerGen proposes a change to the Required Action for Limiting Condition for Operation (LCO) 3.9.1 to provide an alternative Required Action A.2 if the refueling interlocks become inoperable. The purpose of the refueling equipment interlocks is to prevent criticality during refueling. Refueling equipment interlocks restrict the operation of the refueling equipment or the withdrawal of control rods to reinforce unit procedures in preventing the reactor from achieving criticality during refueling. The refueling interlock circuitry senses the conditions of the refueling equipment and the control rods. Depending on the sensed conditions, interlocks are actuated to prevent the operation of the refueling equipment or the withdrawal of control rods. The proposed addition of required actions provide an alternative means to satisfy the safety function provided by the refueling equipment interlocks. This is accomplished by inserting a continuous control rod withdrawal block and verifying all control rods are fully inserted, thereby ensuring fuel loading will not occur with a control rod inappropriately withdrawn.

In addition, AmerGen proposes to change the surveillance frequency for Surveillance Requirement (SR) 3.9.1.1 from 7 days to 31 days. SR 3.9.1.1 currently requires that a channel functional test be performed prior to performing in-vessel fuel movements with equipment associated with the interlocks and every 7 days thereafter for the for the refueling equipment interlock inputs.

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

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

The proposed addition of alternate actions in the event that the refueling equipment interlocks are determined to be in operable ensures that the safety function provided by the interlocks are enforced. This is accomplished through

manually inserting a rod block to prevent the inadvertent withdrawal of a control rod when fuel is being moved over the core region.

The refueling equipment interlocks are credited in the Control Rod Removal Error During Refueling – Fuel Insertion with Control Rod Withdrawn as described in Updated Safety Analysis (USAR Section 15.4.1.1.2.2. The manual insertion of a control rod withdrawal block provides equivalent protection for the conditional rod block provided by the refueling equipment interlocks.

The proposed change to the surveillance frequency does not change the means in which the refueling equipment operates. A review of surveillance history was performed for the past two refueling outages. In the last seven performances of the refueling equipment interlocks operability test, the interlocks have operated successfully with no corrective maintenance or corrective action necessary. Therefore, since the proposed changes do not result in any physical changes to the facility, or involve any modifications to plant systems or design parameters or conditions that contribute to the initiation of any accidents previously evaluated, the proposed changes do not increase the probability of any accident previously evaluated.

Since the proposed changes maintain the same level of protection provided by the refueling equipment interlocks, the conclusion of the accident scenario remain valid. The probability of a criticality event during refueling remains such that no radioactive material would be released. Therefore, the proposed changes do not increase the consequences of an accident previously evaluated.

In summary, the proposed changes do not involve 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?

The proposed changes do not involve a change to the plant design or operation. Inserting a manual rod block is not considered an abnormal operation. The change to the SR frequency does not increase the probability of a malfunction of the refueling equipment interlocks, since the interlocks are considered reliable and their function can be verified with each fuel move. As a result, the proposed changes do not affect any of the parameters or conditions that could contribute to the initiation of any accidents. No new accident modes or equipment failure modes are created by these changes. Therefore, these proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The major challenge to the margin of safety would be a criticality event that would cause a potential failure of the fuel cladding. The proposed addition of alternative actions in the event that the refueling equipment interlocks are

determined to be inoperable ensure that equivalent protection is in place during fuel loading movements. Given this equivalent protection, a criticality event is not credible. In addition, the increase in the SR frequency for performing the channel functional test of the refueling equipment interlocks does not impact the ability of the interlocks to perform their function, thereby maintaining the refueling interlocks function.

Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Therefore, based on the above evaluation, we have concluded that the proposed changes do not involve a significant hazards consideration.

Attachment D
Proposed Technical Specification Changes
Clinton Power Station, Unit 1

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

AmerGen Energy Company, LLC (i.e., AmerGen) has evaluated this proposed change against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." AmerGen has determined that this proposed change meets the criteria for a categorical exclusion set forth in 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," paragraph (c)(9), and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92, "Issuance of amendment," paragraph (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, "Domestic Licensing of Production and Utilization Facilities," which changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation," or that changes an inspection or surveillance requirement, and the amendment meets the following specific criteria.

(i) The proposed changes involve 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.

The proposed changes to Technical Specification Section 3.9.1, "Refueling Equipment Interlocks," are consistent with the design basis of the plant. As documented in Attachment A, there will be no significant increase in the amounts of any effluents released offsite. These changes do not result in an increase in power level, do not increase the production, nor alter the flow path or method of disposal of radioactive waste or byproducts. Therefore, the proposed changes will not affect the types or increase 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 configuration of the facility. The proposed changes only affect the Required Action for Limiting Condition for Operation (LCO) 3.9.1 to provide an alternative Required Action A.2 if the refueling interlocks become inoperable, and also extend the surveillance frequency for Surveillance Requirement (SR) 3.9.1.1 from 7 days to 31 days. 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 in the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from these changes.