

10CFR50.59
10CFR50.90

December 19, 2001
NG-01-1412

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Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Technical Specification Change Request (TSCR-048)
"One-Time On-Line Safety-Related Battery Replacement"

File: A-117

Dear Sir(s):

In accordance with the Code of Federal Regulations, Title 10 Sections 50.59 and 50.90, Nuclear Management Company (NMC) hereby requests revision to the Technical Specifications for the Duane Arnold Energy Center (DAEC).

This application for amendment to the DAEC Technical Specifications (TS) proposes to amend TS section 3.8.4.A to allow replacement of 125 VDC Batteries 1D1 and 1D2 while at power. This TS change would be applicable one-time only for each battery division.

Since the battery replacement cannot be accomplished within the 8-hour Limiting Condition for Operation (LCO) completion time currently allowed by the TS while at power, due to the high number of work activities involved including inspection and testing, the proposed change will provide one-time allowances for DAEC to permit the on-line installation of new batteries.

Separate completion times for up to 10 days will be allowed for each safety-related battery while at power. The associated DC bus will remain energized by the associated existing battery charger and a temporary, non-seismic station battery. This arrangement will maintain the associated DC distribution system "available", though not "operable". This temporary battery will be assembled from safety-related Class 1E cells purchased

for later use in another safety-related battery. The temporary battery will not be seismically mounted and supported due to its location in the turbine building.

The change also imposes a condition similar to TS section 3.8.1.B.2 for an inoperable diesel generator. This one-time only change will require that required features be declared inoperable when the associated 125 VDC source is inoperable and the redundant required feature(s) are inoperable for at least four hours.

The on-line battery replacement activities are expected to result in a more focused, timely, and higher quality work product as compared to a refueling outage project. The on-line activity is also intended to provide operational flexibility and reduce refueling outage duration, while still providing an acceptable level of plant safety. These on-line maintenance activities will not only reduce refueling outage scope, but also result in a safer and better-controlled refueling outage which can be performed free from the encumbrance of battery replacement outage windows.

Probabilistic safety assessment (PSA) reviews were completed for the proposed on-line battery replacements. These reviews ensured that the specified lineup of the temporary battery supplying the associated DC bus for up to a maximum of 10 days resulted in a very low increase in risk and as such, the activity is acceptable. These reviews have also demonstrated that replacement of the batteries online will not result in significantly more risk as compared to replacement during a refueling outage when the plant is shut down.

Amendments similar to this one have been granted to Indian Point Unit No. 3 on September 19, 2001 and Braidwood Units No. 1 and 2 on March 26, 1999.

This application has been reviewed by the DAEC Operations Committee and the Offsite Review Committee. A copy of this submittal, along with the 10CFR 50.92 evaluation of "No Significant Hazards Consideration," is being forwarded to our appointed state official pursuant to 10 CFR Section 50.91.

There are no new commitments made in this letter.

To support our planned replacement schedule, NMC requests the NRC review and approve the request by October 1, 2002.

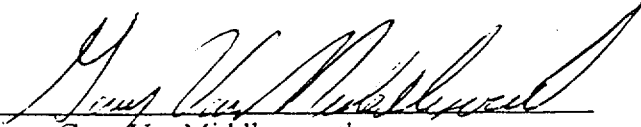
This letter is true and accurate to the best of my knowledge and belief.

Nuclear Management Company, LLC

December 19, 2001

NG-01-1412

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By 
Gary VanMiddlesworth
DAEC Site Vice-President

State of Iowa
(County) of Linn

Signed and sworn to me before on this 19th day of December, 2001

By Gary Van Middlesworth



Notary Public in and for the State of Iowa

Nancy S. Franck
9-28-04
Commission Expires

Attachments:

1. Evaluation of Change Pursuant to 10CFR Section 50.92
2. PROPOSED CHANGE TSCR-048 TO THE DUANE ARNOLD ENERGY CENTER TECHNICAL SPECIFICATIONS
3. SAFETY ASSESSMENT
4. ENVIRONMENTAL CONSIDERATION

CC: C. Bleau (w/a)
R. Anderson (NMC) (w/o)
B. Mozafari (NRC-NRR) (w/a)
J. Dyer (NRC-Region III) (w/a)
D. McGhee (State of Iowa) (w/a)
NRC Resident Office (w/a)
Documaster

Evaluation of Change Pursuant to 10 CFR Section 50.92Background:

This proposed amendment extends the completion time for TS section 3.8.4.A to allow replacement of 125VDC Batteries 1D1 and 1D2 while at power (Mode 1). This TS change would be applicable one-time only, for each battery.

Nuclear Management Company, LLC Docket No-50-331.

Duane Arnold Energy Center, Linn County, Iowa

Date of Amendment Request : December 19, 2001

Description of Amendment Request:

The proposed amendment request adds required actions 3.8.4.A.2.1 and 3.8.4.A.2.2 as one-time only alternates and a conditional note following 3.8.4.A.1 to allow replacement of the 125 VDC batteries during a 10 day period for each battery.

Basis for proposed No Significant Hazards Consideration:

The Commission has provided standards 10CFR Section 50.92 (C) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration in accordance with the proposed amendment if the change would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

After reviewing this proposed amendment, NMC has concluded that no significant hazards exist for the following reasons:

- 1) The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

During the replacement of the existing station batteries, a temporary battery will provide the same function as the battery being removed. Even though this temporary battery will not meet seismic requirements, it will be assembled from safety-related Class 1E cells. The temporary battery will be subjected to surveillance testing prior to being utilized to confirm serviceability. The respective DC bus will be continuously energized by the existing battery charger. A backup swing charger will also be available which is a normal part of system configuration.

This one-time change also requires that required features be declared inoperable when the associated 125 VDC source is inoperable and the redundant required feature(s) are also inoperable for at least four hours. This action is intended to provide assurance that a loss of onsite power, during the period that a 125 VDC

source is inoperable, does not result in a complete loss of safety function of critical systems. The completion time is intended to allow the operator time to evaluate and repair any discovered inoperabilities.

Due to the limited duration of the activity, the very low probability of a seismic event over this limited extended completion time, and the planned implementing contingency actions, a significant increase in the probability of an accident previously evaluated does not occur. The proposed change does not affect accident initiators or precursors, or design assumptions for the systems or components used to mitigate the consequences of an accident as analyzed in Chapter 15 of the DAEC UFSAR. The other division of DC power will remain operable to support design mitigation capability. Therefore, the proposed one-time completion time TS amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

During the replacement of the existing station batteries, a temporary battery will provide the same function as the batteries being removed. Even though this temporary battery does not meet the seismic requirements, it possesses adequate capacity to fulfill the safety-related requirements of supplying necessary power to the associated 125VDC bus. Because the temporary battery will perform like the station battery that is currently installed, no new electrical or functional failure modes are created. The temporary battery will be located in the turbine building which is non-seismic. The temporary battery will not be placed into seismically mounted racks. Thus, a seismic failure of this temporary battery is possible. The failure, if it does occur, would not create a new or different kind of accident from accidents previously evaluated.

This one-time change also requires that required features be declared inoperable when the associated 125 VDC source is inoperable and the redundant required feature(s) are also inoperable for at least four hours. This action is intended to provide assurance that a loss of onsite power, during the period that a 125 VDC source is inoperable, does not result in a complete loss of safety function of critical systems. The completion time is intended to allow the operator time to evaluate and repair any discovered inoperabilities.

The proposed one-time change does not introduce any new accident initiators or precursors or any new design assumptions for those systems or components used to mitigate the consequences of an accident. Therefore, the possibility of a new or different kind of accident from any previously evaluated has not been created. Thus, the proposed one-time completion time extension TS amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

3) The proposed amendment will not involve a significant reduction in a margin of safety.

During the replacement of the existing station batteries, a temporary safety-related battery will perform the same function as the battery being removed. Even though this battery will not be seismically mounted, it will be assembled from safety-related Class 1E cells. The battery is functionally similar to the safety-related battery that is already installed. It will possess adequate capacity to fulfill the requirements of the associated 125VDC bus. The proposed replacement activity will not prevent the plant from mitigating a Design Basis Accident (DBA) during events that result in the loss of power from the temporary battery. In these cases, the remaining DC power supporting the design mitigation capability will be maintained. Due to the limited duration of the activity, the very low probability of a seismic event over this limited extended completion time, and the planned implementing contingency actions, a significant reduction in the margin of safety will not result. The associated DC bus will always be supplied by either the temporary battery and/or the battery charger at all times. In addition a spare swing battery charger is available. As a result, there is no significant reduction in the margin of safety.

This one-time change also requires that required features be declared inoperable when the associated 125 VDC source is inoperable and the redundant required feature(s) are inoperable for at least four hours. This action is intended to provide assurance that a loss of onsite power, during the period that a 125 VDC source is inoperable, does not result in a complete loss of safety function of critical systems. The completion time is intended to allow the operator time to evaluate and repair any discovered inoperabilities.

Therefore, this proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, we have determined that the proposed amendment will not involve a significant hazards consideration.

Local Public Document Room Location: Cedar Rapids Public Library, 500 First Street SE, Cedar Rapids, Iowa 52401.

Attorney for Licensee: Al Gutterman, Morgan, Lewis & Bockius, 1800 M Street NW Washington, D.C. 20036-5869.

PROPOSED CHANGE TSCR-048 TO THE DUANE ARNOLD ENERGY CENTER
TECHNICAL SPECIFICATIONS

The holders of license DPR-49 for the Duane Arnold Energy Center propose to amend the Technical Specifications by deleting the referenced page and replacing it with the enclosed new page. Following this page is the marked-up page for this change.

SUMMARY OF CHANGES:

<u>Page</u>	<u>Description of Changes</u>
3.8-17	A conditional note is added after 3.8.4.A.1 and additional Required Actions A.2.1 and A.2.2 are added.

The revised Technical Specification Bases pages are attached for information only.

3.8 ELECTRICAL POWER SYSTEMS

3.8.4 DC Sources - Operating

LCO 3.8.4 Both Division 1 and Division 2 125 VDC electrical power subsystems and the 250 VDC electrical power subsystem shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One 125 VDC electrical power subsystem inoperable.	A.1 Restore 125 VDC electrical power subsystem to OPERABLE status.	8 hours
B. Required Action and Associated Completion Time of Condition A not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours
C. 250 VDC electrical power subsystem inoperable.	C.1 Declare associated supported features inoperable.	Immediately
D. Two or more DC electrical power subsystems inoperable.	D.1 Enter LCO 3.0.3.	Immediately

OR Note: May be used on a one-time-only basis for each battery division.

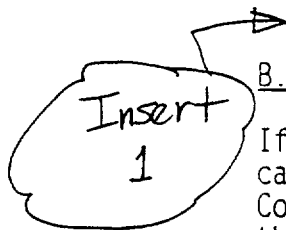
REQUIRED ACTION	COMPLETION TIME
A.2.1 Declare required feature(s), supported by the inoperable 125 VDC source, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of condition A concurrent with inoperability of redundant required feature
<u>AND</u> A.2.2 Restore 125 VDC electrical power subsystem to OPERABLE status.	10 days

BASES (continued)

ACTIONS

A.1 (continued)

result in the loss of minimum necessary DC electrical subsystems to mitigate a worst case accident. continued power operation should not exceed 8 hours. The 8 hour Completion Time reflects a reasonable time to assess unit status as a function of the inoperable 125 VDC electrical power subsystem and, if the 125 VDC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.



B.1 and B.2

If the station service 125 VDC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 4 is consistent with the time suggested in Regulatory Guide 1.93 (Ref. 6).

C.1

With the 250 VDC electrical power subsystem inoperable, the HPCI System and associated PCIVs may be incapable of performing their intended function and must be immediately declared inoperable. The associated PCIVs referred to are: the RHR-SDC Isolation Valve (MO-1909), the RWCU Inlet Outboard Isolation Valve (MO-2701), the HPCI Steam Supply Isolation Valve (MO-2239), the HPCI Feedwater Injection Isolation Valve (MO-2312), and Main Steam Drain Line Isolation Valve (MO-4424).

D.1

Condition D corresponds to a level of degradation in the DC Electrical Power System that either causes a required safety function to be lost (e.g. when Division I and Division II of the 125 VDC electrical power subsystem are inoperable) or

(continued)

Insert 1-Bases Change-Information Only

An amendment was approved to revise the completion time for required action 3.8.4.A.1 from 8 hours to 10 days on a one-time basis to allow replacement of station batteries 1D1 and 1D2 while at power.

This one-time change also requires that required features be declared inoperable when the associated 125 VDC source is inoperable and the redundant required feature(s) are also inoperable for at least four hours. This action is intended to provide assurance that a loss of onsite power, during the period that a 125 VDC source is inoperable, does not result in a complete loss of safety function of critical systems. The completion time is intended to allow the operator time to evaluate and repair any discovered inoperabilities.

A temporary battery will be connected to the associated bus during the replacement activity. This temporary battery will be assembled from safety-related, Class 1E cells but will not be seismically mounted due to its location in the turbine building. There will be a 10-day replacement period for battery 1D1 and a separate 10-day replacement period for battery 1D2.

SAFETY ASSESSMENT

Background:

By letter dated December 19, 2001, Nuclear Management Company, LLC (NMC) submitted a request for revision of the technical specifications (TS) for the Duane Arnold Energy Center (DAEC). The proposed amendment requests an extension of the completion time for required action 3.8.4.A.1 which addresses restoration of the 125 VDC electrical power subsystem to an operable status. The amendment is a one-time only request and would extend the completion time from the normal 8 hours to 10 days for safety-related battery 1D1 and 1D2 separately so that they can be replaced on line versus during a refueling outage. This one-time change also requires that required features be declared inoperable when the associated 125 VDC source is inoperable and the redundant required feature(s) are also inoperable for at least four hours. This action is intended to provide assurance that a loss of onsite power, during the period that a 125 VDC source is inoperable, does not result in a complete loss of safety function of critical systems. The completion time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. Once the batteries are replaced, the extension would no longer be applicable.

This change is preferred over the option of replacing the batteries during a refueling outage. The on-line activities will not only reduce refueling outage scope, but also result in a safer and better controlled refueling outage which can be performed free from the encumbrance of battery replacement outage windows which can severely restrict and complicate other refueling outage work activities.

A temporary battery charger will be procured. It will be used to charge the backup battery before connection to the bus and charge the new 1D1 and 1D2 battery cells prior to reconnection to the bus. Post charge acceptance tests on the backup battery must be successfully completed before the backup battery connection is made to the respective bus. The backup battery will be disconnected from the temporary battery charger then connected to the respective bus in the Battery Rooms (butt-spliced at the bus cable ends next to the Battery) or connected to the Bus in the respective Division I and Division II Switchgear rooms. The backup battery cable ends will connect to the battery-side of the respective circuit breakers if the connection is made in the switchgear rooms.

1. 1D1 125 Volt Division I Battery

This battery is located in the 1D1 East Battery Room of the Control Building, near the Battery Room Corridor Sliding Door-121, (Level 757') and contains 58 battery cells. Battery 1D1 required three battery cell replacements due to age-related degradation. All battery cells (C&D Technologies LC-17 lead calcium cells) will be replaced with C & D Technologies LCR-17 lead calcium cells.

Battery 1D1 will be removed from the 1D10 bus followed by immediate connection of the backup battery. While the backup battery is being connected to the 1D10 bus, the 1D12 or 1D120 Battery Charger will continue to energize the 1D10 bus.

The intercell and terminal connectors on the battery cells in Battery 1D1 will be disconnected, removed, and discarded. The existing battery cells will be removed from the 1D1 (East) Battery Room.

58 new C & D Technologies LCR-17 lead calcium cells will be transported into the 1D1 (East) Battery Room via Turbine Building clean area. The new battery cells will be connected in the existing battery rack with new intercell and terminal connector hardware. The structural condition of the battery rack, battery cell pre-charge conditions, and battery cell connections will be verified prior to battery cell initial charge. Post acceptance testing will occur post battery cell charge. The backup battery will be removed from the 1D10 bus, followed by immediate reconnection of Battery 1D1.

2. 1D2 125 Volt Division II Battery

This battery is located in the 1D2 West Battery Room of the Control Building, near the Battery Room Corridor Door-421, (Level 757') and contains 58 battery cells. Battery 1D2 required one battery cell replacement due to age-related degradation. All 1D2 Battery cells (C&D Technologies LC-17 lead calcium cells) will be replaced with C & D Technologies LCR-17 lead calcium cells.

Battery 1D2 will be removed from the 1D20 bus followed by immediate connection of the backup battery. While the backup battery is being connected to the 1D20 bus, the 1D22 or 1D120 Battery Charger will continue energizing the 1D20 bus.

The intercell and terminal connectors on the battery cells in Battery 1D2 will be disconnected, removed, and discarded. The existing battery cells will be removed from the 1D2 (West) Battery Room.

58 new C & D Technologies LCR-17 lead calcium cells will be transported into the 1D2 (West) Battery Room via the same route (through the Turbine Building clean area) as the removed battery cells. The new battery cells will be connected in the existing battery rack with new intercell and terminal connector hardware. The structural condition of the battery rack, battery cell pre-charge conditions, and battery cell connections will be verified prior to battery cell initial charge. Post acceptance testing occur post battery cell charge. The backup battery will be removed from the 1D20 bus, followed by immediate reconnection of Battery 1D2.

Basis for change:

This application proposes an amendment to the DAEC TS to revise the completion time for required action 3.8.4.A.1 from 8 hours to 10 days on a one-time basis to allow replacement of station batteries 1D1 and 1D2 while at power.

This one-time change also requires that required features be declared inoperable when the associated 125 VDC source is inoperable and the redundant required feature(s) are also inoperable for at least four hours. This action is intended to provide assurance that a loss of onsite power, during the period that a 125 VDC source is inoperable, does not result in a complete loss of safety function of critical systems. The completion time is intended to allow the operator time to evaluate and repair any discovered inoperabilities.

A temporary battery will be connected to the associated bus during the replacement activity. This temporary battery will be assembled from safety-related, Class 1E cells but will not be seismically mounted due to its location in the turbine building. There will be a 10-day replacement period for battery 1D1 and a separate 10-day replacement period for battery 1D2.

Several implementing actions and conditions are planned to support this 10 day extended completion period. These take into account the Probabilistic Risk Assessment (PRA) analysis and minimize risk associated with occurrence of a seismic event. These include:

- (1) The existing safety-related battery charger associated with the replaced station battery is operable and connected to the DC bus in parallel with the temporary battery;
- (2) An existing swing backup safety-related battery charger will be available to be connected to the DC bus if needed;
- (3) The temporary and replacement batteries will be subjected to the applicable station battery surveillance tests before placing them into service;
- (4) The plant is in a stable condition with no Required Actions in effect at the start of the battery replacement activity necessitating plant shutdown and no risk significant, planned maintenance or testing activities which may impact AC or DC normal or emergency electrical distribution sources;
- (5) Preparation of thorough planning to minimize the duration of the battery replacement project through good coordination of work activities;
- (6) Conduct pre-job briefings to prevent worker error;
- (7) Procedure refreshment for Operations personnel on AOP 302.1, "Loss of 125 VDC Power".

During the actual conduct of the project, the work will be closely controlled and supervised in accordance with plant administrative procedures.

DAEC UFSAR ANALYSIS

As stated in the DAEC UFSAR Section 8.3.2.1.1, the safety objective of the DC power supply (including 125 VDC) and distribution system is to provide a source of reliable, continuous power for the control and instrumentation of safeguard systems and for other loads required for normal operation and orderly shutdown.

The 125 VDC system consists of two batteries each with its own charger. The batteries are sized to supply, without recharging, the control and essential instrumentation power for a minimum of 4 hours and the emergency motor loads for their required length of time. Each battery charger is sized to restore its battery to full charge after a 4-hour emergency discharge while carrying normal steady state DC loads. Each charger receives AC power from a separate AC bus. One spare battery charger is supplied for either of the two 125 VDC batteries.

All of the normal loads connected to the plant battery system can be supplied by the battery chargers. The chargers can be powered from multiple sources of plant auxiliary power including the plant standby diesel generator system. The aggregate system is so arranged and powered that the probability of system failure resulting in a loss of DC power is very low. Only the emergency motor loads require the capacity of the storage battery for their operation.

DAEC UFSAR Section 8.3.2.2.3 notes that the 125 VDC buses are separate and redundant. Because of this redundancy, it is concluded that a loss of a battery or its bus would not be of serious consequence although it might cause an operating inconvenience.

Precedents

Previous license amendments similar to this request have been approved for Braidwood Units 1 and 2 in March 1999 and Indian Point 3 in September 2001. In both cases they were 10-day one-time only changes and utilized a temporary non-seismic battery similar to this request.

PRA Analysis

The calculated base core damage frequency (CDF) from seismically initiated events alone for DAEC is $6.99\text{E-}07$ per year. Over a ten-day period, the change in core damage probability (CDP) is $6.22\text{E-}08$ for 125 VDC Division 1. The corresponding change in CDP for 125 VDC Division 2 is $3.24\text{E-}08$. The increase in CDP for replacing both divisions is the sum of these two values: $9.46\text{E-}08$. This increase in CDP is based on the assumption that the plant is operating at full power while the battery replacement activity is taking place. This value would likely be somewhat smaller if the activity were to be performed during a refueling outage. Decay heat levels are substantially reduced several days after reactor shutdown. When the reactor cavity is flooded with water, the time required for it to reach the boiling point in the absence of active cooling is on the order of 24 to 48 hours. This affords plant personnel a long period of time in which to establish cooling by alternate means, thus reducing risk of core damage. However, since the

probability of core damage is so low for the on-line case, the risk benefit of replacing the batteries during a refueling outage is judged to be very minimal. Since only a negligible reduction in risk can be achieved by performing this activity while shutdown, performing it while operating is appropriate.

EPRI Technical Report TR-105396, "PSA Applications Guide" contains quantitative screening criteria for temporary risk increases. A temporary increase can be considered non-risk significant if it results in an increase in CDP of less than $1E-06$. Since the increase in CDP for replacing both divisions of 125 VDC while operating is less than $1E-06$, the activity is considered to be non-risk significant.

The PRA assessment has demonstrated that the increase in risk during the temporary time period in which the batteries are replaced is very low and as such, the activity is acceptable.

Fire Protection

The cables connecting the temporary battery to the existing buses will be sized adequately so that it is protected from short circuit and overload conditions. The cables will be routed in accordance with station fire protection requirements. Final routing details have not yet been determined but either existing fire penetrations will be utilized as required or doors will be blocked opened with fire watches posted as required. Control Building boundary requirements will be met.

Summary

As indicated above, no significant safety consequences have been identified associated with performing the proposed activities in the manner proposed while the unit is at power. Several implementing actions and conditions are being utilized to ensure proper risk management during the proposed battery replacement periods.

ENVIRONMENTAL CONSIDERATION

10 CFR Section 51.22(c)(9) identifies certain licensing and regulatory actions which are eligible for categorical exclusion from the requirement to perform an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazardous consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that be released offsite; and (3) result in a significant increase in individual or cumulative occupational radiation in individual exposure. Nuclear Management Company (NMC) has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22 (c) (9). Pursuant to 10 CFR Section 51.22 (b), no environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9) for the following reasons:

1. As documented in attachment 1 to this letter, the proposed amendment does not involve a significant hazards consideration.
2. There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The operation of the plant is not being changed by the one-time extension of the completion time to restore one 125 VDC electrical power subsystem to operable status.
3. There is no significant increase in individual or cumulative occupational radiation exposure. The activities of plant personnel are not being changed by the one-time extension of the completion time to restore one 125 VDC electrical power subsystem to operable status.