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10 CFR 50.90
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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3
Docket Numbers 52-027 and 52-028
Combined License Numbers NPF-93 and NPF-94

Subject: Revision to Request for License Amendment and Exemption: Addition of New Turbine Building Sump Pumps to ITAAC (LAR 15-17R1)

Reference: 1. NND-15-0559, Request for License Amendment and Exemption: Addition of New Turbine Building Sump Pumps to ITAAC (LAR 15-17), dated September 30, 2015 (Accession Number ML15273A115)

In accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G), acting on behalf of itself and the South Carolina Public Service Authority (Santee Cooper), requested an amendment to combined operating license (COL) numbers NPF-93 and NPF-94 for VCSNS Units 2 & 3, respectively, in Reference 1.

The requested amendment proposed changes to plant-specific Tier 1 information, with corresponding changes to the associated COL Appendix C information, regarding the addition of two turbine building sump pumps to accommodate the increased flow that will be experienced during condensate polishing system rinsing operations. Enclosure 1, included with Reference 1, provides the description, technical evaluation, and regulatory evaluation (including the Significant Hazards Consideration determination) for the proposed changes. Enclosure 2, included with Reference 1, provides the background and supporting basis for the requested exemption. Enclosure 3, included with Reference 1, provides markups depicting the requested changes to plant-specific DCD Tier 1 information, the corresponding changes to COL Appendix C, and UFSAR text and tables.

Enclosure 4 of this letter is provided as a revision to the LAR in Reference 1. This revision provides multiple revised pages of the corresponding Enclosure 1 in Reference 1. Therefore, it is requested that Enclosure 4 replace Enclosure 1 in Reference 1.

The information provided in Enclosures 4 does not change the scope of the amendment request in Reference 1 submitted on September 30, 2015. The LAR text was revised to more accurately describe the proposed changes. The extent of the changes does not affect the scope of the Significant Hazards Consideration and Environmental Consideration determination. The licensing basis markups previously provided as Enclosure 3 in Reference 1 are not changed and remain valid.

This letter contains no regulatory commitments.

SCE&G requests staff approval of the license amendment provided in Enclosure 4 of this letter and exemption previously provided in Reference 1 by December 15, 2016. SCE&G expects to implement the proposed amendment within 30 days of approval of the requested changes.

In accordance with 10 CFR 50.91, SCE&G is notifying the State of South Carolina of this LAR by transmitting a copy of this letter and enclosures to the designated State Official.

Should you have any questions, please contact April Rice by telephone at (803) 941-9858, or by email at arice@scana.com.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 15th day of June, 2016.

Sincerely,



Ronald A. Jones
Vice President
New Nuclear Operations

BB/RAJ/bb

Enclosures:

Enclosure 4: Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 – Revision to Request for License Amendment Regarding Addition of New Turbine Building Sump Pumps to ITAAC - (LAR 15-17R1)

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South Carolina Electric & Gas Company

NND-16-0206

Enclosure 4

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3

**Revision to Request for License Amendment
Regarding Addition of New Turbine Building Sump Pumps to ITAAC
(LAR 15-17R1)**

(Enclosure 4 consists of 11 pages, including this cover page)

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Pursuant to 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G), acting on behalf of itself and the South Carolina Public Service Authority (Santee Cooper), hereby requests an amendment to Combined License (COL) Nos. NPF-93 and NPF-94 for Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3, respectively.

1. Summary Description

The proposed changes clarify that there is more than one turbine building main sump and incorporates the second sump pump for each of the two turbine building main sumps into COL Appendix C (and associated Plant-specific Tier 1). Incorporation of the second sump pumps into COL Appendix C (and associated Plant-specific Tier 1) is made to be consistent with a previously evaluated change to Tier 2 information and does not involve the addition of a new component.

The proposed changes will require a change to plant-specific Tier 1, and corresponding change to COL Appendix C information. (See Section 2 for details.) This enclosure requests approval of the license amendment necessary to implement this change.

2. Detailed Description

As described in Updated Final Safety Analysis Report (UFSAR) subsection 9.2.9.2.1, liquid wastes from the turbine building floor and equipment drains (which include laboratory and sampling sink drains, oil storage room drains, the main steam isolation valve compartment, auxiliary building penetration area and the auxiliary building heating, ventilation and air conditioning (HVAC) room) are collected in the two turbine building main sumps. Drainage from the auxiliary building sump – north (a nonradioactive sump) and the annex building sump, and rinse effluent from the condensate polishing system (CPS) are also collected in the turbine building main sumps.

There are three waste water system (WWS) sumps in the turbine building. The two turbine building main sumps (WWS-MT-09A/B) collect non-radioactive drainage from the auxiliary building sump – north, the annex building sump, and CPS rinse effluent via the turbine building collection basin. The turbine building collection basin provides approximately equal distribution of flow into the two turbine building main sumps. Turbine building floor and equipment drain waste water is collected in turbine building sump C (WWS-MT-09C). Water from turbine building sump C is pumped to the turbine building collection basin and ultimately collected in the turbine building main sumps. The WWS does not provide a safety-related design function.

Each of the two turbine building main sumps and turbine building sump C are equipped with two air-operated, double diaphragm sump pumps. Sump pumps WWS-MP-01A and WWS-MP-07A are associated with turbine building main sump WWS-MT-09A, and sump pumps WWS-MP-01B and WWS-MP-07B are associated with turbine building main sump WWS-MT-09B. Sump pumps WWS-MP-08A and WWS-MP-08B are associated with turbine building sump WWS-MT-09C. Interconnecting piping between the suction of the turbine building main sump pumps allows the pumps associated with either of the main sumps to transfer waste water from either or both of the main sumps.

Each turbine building main sump and turbine building sump C is equipped with a level transmitter. Alarms are generated when the level in a sump exceeds specified setpoints. Signals are also generated based on sump level to open or close the air supply valve to the sump

pumps in the associated sump, which are air-powered, thereby initiating or terminating effluent flow from the associated sump.

The sump pumps for each turbine building main sump and turbine building sump C operate in a lead/lag control scheme where the air valve for the lead pump will open on high sump level (H1), and the air valve for both sump pumps will open on high-high sump level (H2). The air valves for sump pumps associated with the affected sump will close on low sump level, thereby securing the pumps and terminating effluent flow from the sump. Manual controls are also provided for each WWS sump pump in addition to the automatic level-actuated control signals.

A single radiation monitor is provided on the common discharge piping from the turbine building main sumps to detect and terminate the release of waste water from the sumps and prevent it from being released to the waste water retention basin in the event that radioactive contamination is detected in the sump discharge effluent. This is accomplished by the radiation monitor generating a signal to close the air supply valves to the sump pumps when radioactive contamination in excess of the designated setpoint is sensed in the turbine building main sump effluent discharge line, thereby securing the pumps and terminating effluent flow from the sumps.

Should it be determined that the turbine building main sump contents contain radioactive contamination effluent discharges from the sumps may be manually diverted to the liquid radwaste system (WLS) via a temporary hose connection and three-way valve connection to a steam generator blowdown system (BDS) line in the turbine building. The waste water transfer path from turbine building sump C to the turbine building main sumps does not have the ability to release effluent outside the WWS boundary, and is therefore not equipped with a radiation monitor.

As described in UFSAR Section 10.4.6, the CPS can be used to remove corrosion products and ionic impurities from the condensate system (CDS) during plant startup, hot standby, power operation with abnormal secondary cycle chemistry, safe shutdown, and cold shutdown operations. The CPS cleans up the condensate using deep bed mixed resin polishers during startup to meet condensate and feedwater system water chemistry specifications. During power operation, the condensate polishers are used only when abnormal secondary cycle conditions exist. Resin replacement requires the polisher vessel to be out of service. Upon removal of exhausted resin from the polisher vessel, the vessel is rinsed with water, which is directed to the turbine building main sumps, and new resin is placed in the vessel. Prior to plant startup, a new resin bed is rinsed and resin performance is verified, with flow through the vessel discharged to the turbine building main sumps. The CPS does not provide a safety-related design function.

New condensate polisher resin beds are rinsed prior to being placed in service. The resin beds may also be rinsed following plant transients that involve sudden hydraulic unloading to remove entrained suspended solids and resin fragments that may have been loosened by the transient. Additionally, the ion exchange vessel and resin transfer lines are rinsed with demineralized water after completion of a spent resin transfer to ensure that no resin beads remain to cause localized corrosion damage to components. This rinse water is directed to the spent resin holdup tank and is not routed to the turbine building sump. However, since the bottom of the polisher vessel may contain resin fragments after a spent resin transfer, the vessel may be rinsed a second time. The drain path for this rinse cycle is to the turbine building main sumps.

Background on Previous Changes Already Made to the Turbine Building Sump Design

Under the original CPS design, CPS rinse effluent was discharged to the circulating water system (CWS). However, in order to preclude resin fines and potentially radioactive resin fines from the CPS rinse effluent from directly entering the CWS, the CPS rinse effluent path was modified to discharge to the WWS. By discharging to the WWS, the CPS rinse effluent is directed through the turbine building main sumps where it is subject to radiation monitoring before it is ultimately discharged to the waste water retention basin and mixed with the cooling tower blowdown in the blowdown sump.

Because the original turbine building sump design had insufficient volume and pumping capacity to account for the increased inflows resulting from addition of the CPS rinse effluent stream it was necessary to add one air operated pump for each of the two turbine building main sumps and increase the size of the turbine building main sumps. Each of the added pumps is identical in design and size as the original sump pumps and is operated in the same manner. It was also necessary to expand the Southwest corner of turbine building El. 82'-9" to accommodate the increase in size for the sump.

With the addition of a second pump for each main sump, the turbine building main sumps are able to accommodate the maximum CPS rinse effluent flow into the sumps. During CPS rinse operations, the lag pair of turbine building main sump pumps will be started to aid the lead pair of turbine building main sump pumps in draining the sump contents and avoiding sump overflow. Operational restrictions will also prevent initiation of CPS rinsing operations if the turbine building main sumps are filled to greater than 20 percent of capacity, and significant flows into the turbine building sumps from other sources will also be avoided during CPS rinse operations.

As previously described, discharge from the turbine building main sumps is automatically terminated in the event radioactive contamination in excess of the radiation monitor setpoint is detected in turbine building main sump effluent discharge line. The radiation monitor design does not include provisions to secure CPS rinse inflow to the turbine building main sumps when effluent discharges from the sumps have been terminated due to the detection of radioactive contamination in excess of the monitor setpoint in the effluent discharge line. However, high level alarms are provided for the turbine building main sumps to notify the operator of abnormal conditions that could result in overfilling of the sumps during CPS rinse operations. There are no provisions to automatically terminate CPS rinse water inflows to the turbine building main sumps in order to prevent overflow.

The addition of the second sump pump in each of the two turbine building main sumps, the increase in capacity for the turbine building main sumps, and expansion of the turbine building at El. 82'-9" to accommodate the larger sumps have been separately evaluated in accordance with the requirements of 10 CFR 52, Appendix D, Section VIII and determined to not require prior NRC approval. Therefore, these changes are not within the scope of this license amendment request. Changes were previously made to UFSAR Tier 2 Sections 9.2.9.2.1 and 9.2.9.2.2 to address addition of the CPS rinse discharge effluent stream to the turbine building main sumps and to acknowledge that additional pumps were provided for each of the turbine building main sumps. Changes were also made to UFSAR Tier 2 Figures 1.2-23, 1.2-30, 9A-2 (Sheet 1), 12.3-1 (Sheet

15), 12.3-2 (Sheet 15), and 12.3-3 (Sheet 15) to reflect the increased size of the turbine building main sumps.

The scope of the proposed changes associated with this activity involves addition of the second sump pump for each of the two turbine building main sumps to COL Appendix C (and associated Plant-specific Tier 1) Table 2.3.29-1. This change is made to revise Tier 1 information to be consistent with Tier 2 information. Additionally, changes are proposed to COL Appendix C (and associated Plant-specific Tier 1) Section 2.3.29 and Table 2.3.29-1 to change the description of the turbine building sump from being reflected as a singular entity and reflect that the turbine building sump is actually comprised of more than one sump. This change is a non-technical change and is made for clarification only. The proposed changes do not involve an increase in the number of turbine building sumps, the turbine building sump design or capacity, or turbine building basemat design.

Licensing Basis Change Descriptions

Plant-Specific Change	Description of Proposed Change
Tier 1 and COL Appendix C Section 2.3.29	Revise the Design Description to indicate there is more than one turbine building sump; i.e. change “sump” to “sumps”.
Tier 1 and COL Appendix C Table 2.3.29-1	Revise to indicate there is more than one turbine building sump and to include turbine building sump pumps WWS-MP-07A and B as pumps that will be confirmed to stop operating on a simulated high radiation signal from the radiation discharge monitor.

3. Technical Evaluation

UFSAR subsection 9.2.9.2.1 describes the WWS and its function. Upon detection of radioactivity, the radiation monitor on the common discharge of the turbine building main sump pumps will alarm and stop the turbine building main sump pumps to ensure radioactivity is not released.

Because the CPS rinse water will be collected in the turbine building main sumps before being routed to the oil separator and the waste water retention basin, the volume of the turbine building main sumps was increased. Also, in order to prevent overflow of the sumps, additional pumping capability from the sumps was required, and turbine building air operated sump pumps WWS-MP-07A/B were added, one to each of the two turbine building main sumps, to accommodate the increased flow from the CPS. These pumps will operate in the same manner as the existing sump pumps (WWS-MP-01A/B). Either existing WWS-MP-01A/B or new WWS-MP-07A/B can be aligned as the lead pump. Each of the running pumps will stop if a high-radiation signal is received indicating radioactivity in the turbine building main sumps.

The additional turbine building main sump pumps do not provide any safety related function; therefore the proposed changes do not affect any function or feature used for the prevention and mitigation of accidents or their safety analyses. The turbine building main sumps are nonsafety-related structures. The oil separator and the waste water retention basin are not

safety-related and perform no safety-related function. The function of the waste water discharge radiation monitor (WWS-JE-RE021) to maintain discharge releases within regulatory limits is not affected. Thus, no safety-related structure, system, component (SSC) or function is involved. The proposed changes do not involve nor interface with any SSC accident initiator or initiating sequence of events related to the accidents evaluated in the plant-specific DCD or UFSAR. Under normal operating conditions, there are no significant amounts of radioactive contamination within the CPS. However, radioactive contamination of the CPS can occur as a result of a primary to secondary leakage in the steam generator should a steam generator tube leak develop while the CPS is in operation and radioactive condensate is processed by the CPS. Radiation monitors associated with the steam generator blowdown, steam generator, and turbine island vents, drains and relief systems provide the means to determine if the secondary side is radioactively contaminated.

In the event of radioactive contamination of the ion exchange resins in the vessel the resin is transferred to a mobile radwaste processing unit located outside of the turbine building. The CPS does not include ion exchange resin regeneration capability. As such, it is not expected that the CPS rinse water effluent to the turbine building sump will contain significant contamination. Additionally, any release from the turbine building main sumps following a primary system to secondary system leak that may contaminate the condensate polishers is a monitored release. The proposed changes do not affect the radiological source terms (i.e., amounts and types of radioactive materials released, their release rates and release durations) used in the accident analyses.

CPS piping and components are located within the turbine building in non-radiological zones that do not normally restrict worker occupancy. Introduction of the CPS rinse effluent stream to the turbine building sump does not result in a change to the radiation zones for normal operations, shutdown, and post-accident depicted in UFSAR Figures 12.3-1 and 12.3-2. In the event of an abnormal condition that results in radioactively contaminated resins being discharged the turbine building sump, handling of contaminated resins will be handled in accordance with procedures for handling solid waste, and personnel access and radiation zone posting will be performed in accordance with the radiation protection program.

The proposed additional turbine building sump pumps are identical in design and operation to the existing turbine building main sump pumps and will permit the discharge of waste water from the turbine building main sumps to the oil separator. In the event of radioactivity in the turbine building main sumps waste water, the proposed turbine building main sump pumps will be stopped and the discharge of the waste water will be terminated, consistent with the operation of the existing turbine building main sump pumps. The turbine building main sumps, the turbine building main sump pumps and the waste water discharge radiation monitors are nonsafety-related. The turbine building main sumps or turbine building main sump pumps do not interface with/affect safety-related equipment or a fission product barrier. No system or design function or equipment qualification is be affected by the proposed changes. The changes do not result in a new failure mode, malfunction or sequence of events that could affect a radioactive material barrier or safety-related equipment. The proposed changes do not affect equipment associated with the reactor or spent fuel systems and do not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures.

Summary

Indicating that there are more than one turbine building sump and the proposed addition of an additional sump pump for each of the turbine building main sumps (to make a total of four) to Tier 1 Section 2.3.29 and Tier 1 Table 2.3.29-1 will cause Tier 1 to be consistent with the Tier 2 information. Although there are Tier 1 changes, the resulting reduction in standardization caused by the Tier 1 changes does not result in a decrease in safety.

The above proposed changes will not affect any safety-related equipment or function, design function, radioactive material barrier or safety analysis.

4. Regulatory Evaluation

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 52.98(f) requires NRC approval for any modification to, addition to, or deletion from the terms and conditions of a COL. This activity involves a departure from plant-specific Tier 1 information, and a corresponding change to COL Appendix C, Inspections, Tests, Analyses and Acceptance Criteria information; therefore, this activity requires a proposed amendment to the COL. Accordingly, NRC approval is required prior to making the plant-specific changes in this license amendment request.

10 CFR 52, Appendix D, Section VIII.B.5.a allows an applicant or licensee who references this appendix to depart from Tier 2 information, without prior NRC approval, unless the proposed departure involves a change to or departure from Tier 1 information, Tier 2* information, or the Technical Specifications, or requires a license amendment under paragraphs B.5.b or B.5.c of the section. This change involves a revision to plant-specific Tier 1 information (and corresponding COL Appendix C information), and thus requires NRC approval for the Tier 1 departures.

10 CFR 50, Appendix A, Criterion 60—*Control of releases of radioactive materials to the environment*, requires that each nuclear power unit design include means to control suitably the release of radioactive materials in gaseous and liquid effluents and to handle radioactive solid wastes produced during normal reactor operation, including anticipated operational occurrences. Sufficient holdup capacity shall be provided for retention of gaseous and liquid effluents containing radioactive materials, particularly where unfavorable site environmental conditions can be expected to impose unusual operational limitations upon the release of such effluents to the environment. These proposed changes to indicate there is more than one turbine building sump and to add two turbine building sump pumps meets this criterion by ensuring potentially radioactive material is collected and the sump pumps are stopped if any the discharge radiation monitor detects any radioactivity, thus ensuring any radioactive material that may be in the sumps will be retained

4.2 Precedent

No precedent is identified.

4.3 Significant Hazards Consideration Determination

The proposed changes would revise the Combined Licenses (COLs) to identify that there are more than one turbine building sumps and to add two additional turbine building sump pumps to Tier 1 Section 2.3.29 and Tier 1 Table 2.3.29-1, Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) 2.3.29.04.

The requested amendment proposes a change to the plant-specific Tier 1 and corresponding changes to COL Appendix C information.

An evaluation to determine whether or not a significant hazards consideration is involved with the proposed amendment was completed by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

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

Response: No

The proposed changes to identify that there is more than one turbine building sump and to add two turbine building sump pumps (WWS-MP-07A and B) to COL Appendix C Section 2.3.29 and corresponding Table 2.3.29-1 will provide consistency within the current licensing basis. The main turbine building sumps and sump pumps are not safety-related components and do not interface with any systems, structures, or components (SSC) accident initiator or initiating sequence of events; thus, the probability of accidents evaluated within the plant-specific UFSAR are not affected. The proposed changes do not involve a change to the predicted radiological releases due to accident conditions, thus the consequences of accidents evaluated in the UFSAR are not affected.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No

The proposed changes to identify that there is more than one turbine building sump and to add two turbine sump pumps to the non-safety waste water system (WWS) do not affect any safety-related equipment, nor does it add any new interface to safety-related SSCs. No system or design function or equipment qualification is affected by this change. The changes do not introduce a new failure mode, malfunction, or sequence of events that could affect safety or safety-related equipment.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident.

4.3.3 Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The WWS is a non safety-related system that does not interface with any safety-related equipment. The proposed changes to identify that there is more than one turbine building sump and to add two turbine building sump pumps do not affect any design code, function, design analysis, safety analysis input or result, or design/safety margin. No safety analysis or design basis acceptance limit/criterion is challenged or exceeded by the proposed change.

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

Based on the above, it is concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. Pursuant to 10 CFR 50.92, the requested change does not involve a Significant Hazards Consideration.

5. Environmental Considerations

This review supports a request to amend the Combined Licenses (COLs) to allow a departure from various elements of the certification information in the plant-specific Tier 1 information and the corresponding elements in Appendix C of the COL.

The proposed changes clarify that there is more than one turbine building sump and add two additional turbine building sump pumps to Tier 1 Section 2.3.29 and Tier 1 Table 2.3.29-1.

A review of the anticipated construction and operational effects of the requested amendment has determined the requested amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), in that:

- (i) *There is no significant hazards consideration.*

As documented in Section 4.3, Significant Hazards Consideration Determination, of this license amendment request, an evaluation was completed to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment." The Significant Hazards Consideration determined that (1) the proposed amendment does not involve a

significant increase in the probability or consequences of an accident previously evaluated; (2) the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated; and (3) the proposed amendment does not involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of “no significant hazards consideration” is justified.

- (ii) *There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.*

The proposed changes in the requested amendment clarify that there is more than one turbine building sump and adds two additional turbine building sump pumps to the Tier 1 Section 2.3.29 and Tier 1 Table 2.3.29-1. The proposed changes are unrelated to any aspect of plant construction or operation that would introduce any change to effluent types (e.g., effluents containing chemicals or biocides, sanitary system effluents, and other effluents), or affect any plant radiological or non-radiological effluent release quantities. Furthermore, the proposed changes do not affect any effluent release path or diminish the functionality of any design or operational features that are credited with controlling the release of effluents during plant operation. Therefore, it is concluded that the proposed amendment does not involve a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite.

- (iii) *There is no significant increase in individual or cumulative occupational radiation exposure.*

The proposed changes indicate that there is more than one turbine building sump and adds two additional turbine building sump pumps to the Tier 1 Section 2.3.29 and Tier 1 Table 2.3.29-1. Plant radiation zones (addressed in UFSAR Section 12.3) are not affected, and controls under 10 CFR 20 preclude a significant increase in occupational radiation exposure. Therefore, the proposed amendment does not involve a significant increase in individual or cumulative occupational radiation exposure.

Based on the above review of the requested amendment, it has been determined that anticipated construction and operational effects of the proposed amendment do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the requested amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment of the proposed exemption is not required.

6. References

None