



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 29, 1994

Docket No. 50-238

Dr. Zelvin Levine
Senior Technical Advisor
U.S. Department of Transportation
U.S. Maritime Administration
Room 7328
400 Seventh Street, S.W.
Washington, DC 20590

James H. Flatley III
Chief Executive Officer
The Naval and Maritime Museum
Patriots Point
40 Patriots Point Road
Mt. Pleasant, South Carolina 29464

Gentlemen:

SUBJECT: ISSUANCE OF AMENDMENT NO. 12 TO AMENDED FACILITY LICENSE NO. NS-1 -
N.S. SAVANNAH (TAC NO. M89505)

The Commission has issued the enclosed Amendment No. 12 to Amended Facility License No. NS-1 for the N.S. Savannah. The amendment consists of changes to the amended facility license and Technical Specifications (TSs) in response to your submittal dated May 19, 1994, as supplemented on May 24 and 27, 1994, and June 3, 1994.

The amendment (1) deletes the State of South Carolina Patriots Point Development Authority (PPDA) as a co-licensee, (2) allows relocation of the N.S. Savannah to the James River Reserve Fleet, a U.S. Maritime Administration (MARAD) facility, (3) changes the performance of radiological health physics coverage, surveillance, and response to the U.S. Army Center for Public Works, Humphries Engineering Center, (4) changes the composition of the review and audit committee to be consistent with the deletion of PPDA as a co-licensee, (5) discontinues public access to the facility, and (6) makes other minor changes to the TSs.

The deletion of PPDA as a co-licensee under the possession-only license is subject to NRC approval pursuant to 10 CFR 50.80(a). Such approval is given in the enclosed Order Approving Transfer and Notice of Issuance of License Amendment, which is being forwarded to the Office of the Federal Register for publication.

DISTRIBUTION

cc w attachments:

D. Herrera
V. Weissberg
M. McMorrow
J. Swank
M. Delpercio
J. Seelinger
E. Koehler
M. Bagley
Z. Levine/File.

Addressees

- 2 -

We have also reviewed your revised Port Operating Plan for the James River Reserve Fleet, Virginia (MASTS-106), May 1994. On the basis of the contents of the plan and because the N.S. *Savannah* is defueled, we have concluded that the N.S. *Savannah* can be towed and moored as proposed in the James River Reserve Fleet Port Operating Plan. If modifications to the Port Operating Plan are contemplated, a new port operating plan should be submitted for review.

In connection with this license amendment, we are enclosing three copies of Agreement of Indemnification, Amendment No. 2. Please sign one copy and return it to this office.

A copy of the related safety evaluation supporting Amendment No. 12 is enclosed. Notice of issuance will be included in the Commission's biweekly Federal Register Notice.

Sincerely,



Alexander Adams, Jr., Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 12
2. Safety Evaluation
3. Order
4. Agreement of Indemnification,
Amendment No. 2

cc w/enclosures:
See next page

N.S. Savannah

cc:

Mr. John J. Davis III, Deputy Director
Office of Ship Operations
U.S. Maritime Administration,
MAR-700.2
400 Seventh Street, S.W., Room 7330
Washington, DC 20230



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

STATE OF SOUTH CAROLINA PATRIOTS POINT DEVELOPMENT AUTHORITY

U.S. MARITIME ADMINISTRATION

DOCKET NO. 50-238

N.S. SAVANNAH

AMENDED FACILITY LICENSE

Amendment No. 12
License No. NS-1

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to Amended Facility License No. NS-1 filed by the State of South Carolina Patriots Point Development Authority and the U.S. Maritime Administration, dated May 19, 1994, as supplemented on May 24 and 27, 1994, and June 3, 1994, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the regulations of the Commission as stated in 10 CFR Chapter I;
 - B. The facility will be maintained in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public and (ii) that such activities will be conducted in compliance with the regulations of the Commission;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the regulations of the Commission and all applicable requirements have been satisfied;

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the enclosure to this license amendment, and the license is amended to read as follows:

- (a) The title on page 1 of the license shall read:

U.S. MARITIME ADMINISTRATION
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N.S. SAVANNAH
AMENDED FACILITY LICENSE

- (b) Paragraph 1.D. of the license shall read:

The licensee is technically and financially qualified to engage in the activities authorized by this amended license in accordance with the rules and regulations of the Commission;

- (c) Paragraph 1.E. of the license shall read:

The licensee has complied with the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;

- (d) Paragraph 2.B. of the license shall read:

Subject to the conditions and requirements incorporated herein, the Commission hereby licenses the U.S. Maritime Administration:

(1) Pursuant to Section 104b of the Act and 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," to possess, but not operate, the reactor as a utilization facility in accordance with the procedures and limitations in this license; and

(2) Pursuant to the Act and 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material," to possess, but not separate, such byproduct material as may have been produced by operation of the facility.

- (e) Paragraph 2.C.(1) of the license shall read:

The licensee shall not reactivate the reactor without prior approval of the Commission;

- (f) Paragraph 2.C.(2) of the license shall read:

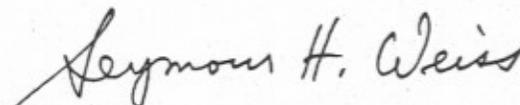
The licensee shall not dismantle or dispose of the facility without prior approval of the Commission.

(g) Paragraph 2.C.(3) of the license is amended to read as follows:

The Technical Specifications contained in Appendix A, as revised through Amendment No. 12, are hereby incorporated in the license. The licensee shall possess the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Seymour H. Weiss, Director
Non-Power Reactors and Decommissioning
Project Directorate
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

Enclosure:
Appendix A Technical
Specifications Changes

Date of Issuance: June 29, 1994

ENCLOSURE TO LICENSE AMENDMENT NO. 12

AMENDED FACILITY LICENSE NO. NS-1

DOCKET NO. 50-238

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The Technical Specifications have been revised in their entirety. The revised pages are identified by amendment number.

Remove

All pages

Insert

1-12

N.S. SAVANNAH
Technical Specifications
Docket No. 50-238

Appendix A to
Facility License No. NS-1

Revised MAY 26, 1994

U.S. Department of Transportation
Maritime Administration

Amendment No. 12
May 1994

Technical Specifications

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1.0 General

The nuclear ship N.S. SAVANNAH is in a state of protective storage. All fuel assemblies, radioactive fluids, demineralizer resins and contaminated trash have been removed from the ship. Adequate radiation monitoring, environmental surveillance, access control and security procedures will be established under the possession-only license to ensure that the health and safety of the employees, visitors and the public are not endangered.

2.0 Radioactive Releases

2.1 Radioactive Liquid Waste Release

Applicability

Applies only to radioactive liquid waste disposal. No radioactive liquids will be produced as a result of any foreseen operations aboard the ship or from the ship's operation. Incidental amounts of liquid may be generated in the unlikely event decontamination is found necessary in controlled areas. All radioactive liquids have been removed from the primary and auxiliary systems.

Objective

To assure that liquid radioactive waste releases do not present an undue hazard to the general public or the environment.

Specification

Radioactive liquid waste releases shall be as low as reasonably achievable and shall not exceed ten-percent (10%) of limits specified in NRC (10 CFR 20) or other applicable Federal regulations. Radioactive liquid waste shall be solidified in approved media and may be transferred to a properly licensed burial facility. All solidified liquid waste shall be transferred in accordance with applicable NRC (10 CFR 71) and U.S. Department of Transportation, Hazardous Materials Branch regulations and the burial facility's license and acceptance criteria.

2.2 Radioactive Airborne Particulate Releases

Applicability

Applies only to radioactive airborne particulate releases that may occur due to maintenance requirements such as cutting and welding of contaminated components.

Objective

To assure that radioactive airborne particulate releases do not present an undue hazard to the general public or the environment.

Specification

No activities shall be conducted that would result in a release of radioactive airborne particulates in excess of 10% of limits specified in 10 CFR 20, Appendix B, or other applicable Federal regulations.

2.3 Radioactive Liquid Waste Release Surveillance

Applicability

Applies to the surveillance requirements for controlling radioactive liquid waste released to the hydrosphere.

Objective

To verify that liquid radioactive waste discharged to the hydrosphere will not exceed 10% of limits specified in 10 CFR 20 or other applicable Federal regulations.

Specification

Liquid wastes resulting from radiological decontamination shall be analyzed prior to discharge. Concentrations of radioactive liquid waste shall not exceed 10% of the applicable limits of 10 CFR 20 or prescribed by other applicable Federal regulations. Records of analyses and amounts of wastes discharged shall be maintained.

2.4 Solid Radioactive Waste Release

Applicability

Applies only to those solid radioactive wastes generated as the result of general decontamination of controlled areas, ship surveillance, and entry into controlled areas.

Objective

To assure that solid radioactive waste presents no undue hazard to the general public or environment.

Specification

All solid radioactive waste shall be maintained in appropriate containers in accordance with 10 CFR 20 and other applicable Federal regulations and secured in locked storage areas. Transfers of solid radioactive waste may be made to a licensed burial facility in accordance with applicable regulations of the NRC (10 CFR 71), the U.S. Department of Transportation,

Hazardous Materials Branch, and the burial facility's license and acceptance criteria.

3.0 Administrative Controls

3.1 Administrative Responsibility

The N.S. Savannah NS-1 License is held by the Senior Technical Advisor, as the responsible official for the U.S. Maritime Administration, Washington, D.C.

At all times, including the duration of layup at the Maritime Administration's James River Reserve Fleet (JRRF) and any periods when the vessel may be relocated to an off-site ship repair facility, the custody and responsibility for access control, security, environmental surveillance, radiological monitoring, reporting to the U.S. Nuclear Regulatory Commission and maintenance will be with the Senior Technical Advisor, U.S. Maritime Administration (MARAD), Washington, D.C.

The annual radiation surveys, semi-annual environmental sampling and surveillance, and laboratory analyses will be the responsibility of MARAD and performed for MARAD by the U.S. Army Center for Public Works, Humphries Engineering Center (formerly the U.S. Army Engineering and Housing Support Center, Safety and Occupational Health Office). Staff members or contractor personnel performing these functions for MARAD will be health physicists with at least two years specialized training in health physics or equivalent and three years of work experience related to radiological health and safety.

MARAD shall have a health physicist on duty or on call within two (2) hours to provide health physics support for radiological emergencies or entry into radiation control areas. In addition to the services of a health physicist, MARAD shall provide an Emergency Radiological Assistance Team in the event of radiological emergencies.

3.2 Records

In addition to the records required by applicable regulations, the Senior Technical Advisor, U.S. Maritime Administration, Washington, D.C., and other assigned personnel shall maintain the following records:

1. Health Physics Records

- a. Personnel Exposure
- b. Ship's Radiological Surveys
- c. Environmental Surveillance and Laboratory Analyses

2. Radioactive Liquid Waste Disposal Log

3. Solid Radioactive Waste Disposal Log

4. Quarterly Inspections of Physical Barriers and Intrusion Alarms
5. Licensee Event Reports (LER)
6. Records of Review and Audit Committee Meetings
7. File of Annual Reports to the U.S. Nuclear Regulatory Commission
8. Drawings, prints, layouts and specifications for the ship.

3.3 Radiological Criteria for Radiation Control Areas

Any authorized visitor aboard the ship will be accompanied by representatives of the license holder until all radiation control areas are locked and sealed. All entries into radiation control areas by visitors or employees shall be under the direction of a health physicist in accordance with the licensee's health physics procedures manual. However, in the event of fire, entry may be made into all radiation control areas except the reactor containment vessel, without the direction of a health physicist.

A radiation control area is defined as an area of the ship with radiation levels from reactor generated radioactive materials in excess of 0.25mR/hr above natural background as measured at one meter from any surface, and/or surface contamination in excess of those limits prescribed in Table I of NRC Reg. Guide 1.86.

For radiological protection of visitors and employees, all radiation control area entrances will be posted with appropriate caution and warning signs, locked and secured with chains, and sealed with numbered seals. Keys and seals will be maintained by a designated representative of the license holder, and a log maintained.

An intrusion alarm with an interlock will be maintained on the B Deck entry door into the reactor compartment with audible and visual signals located at a manned security guard post. These signals shall be both seen and heard by the security guard on duty.

3.3.1 Radiological Criteria for Unrestricted Areas

An unrestricted area is defined as an area that is accessible to employees, contractor personnel, escorted guests and official visitors. These areas include those areas not previously defined as Radiation Control Areas (para. 3.3). The radiation levels from reactor generated radioactive materials for unrestricted areas shall be less than 5uR/hr above natural background as measured at one meter from any surface. All surfaces shall be decontaminated and maintained at levels less than those prescribed in Table I of NRC Reg. Guide 1.86.

The radiation levels from reactor generated radioactive materials for all areas of the ship identified as being restricted to only employees, contractor personnel, escorted guests and official visitors shall be less than 5uR/hr above natural background as measured at one meter from any surface except as discussed below. Surface contamination levels shall be less than those prescribed in Table I of NRC Reg. Guide 1.86 in all cases, however. Restricted areas of the ship with radiation levels in excess of 5uR/hr but less than 0.25mR/hr may be entered without health physics supervision under the following conditions:

- a. A health physicist has determined that potential exposures to any individual will not exceed 5% of 10 CFR 20.101 exposure limits.
- b. The Review and Audit Committee has reviewed and accepted the proposed use of the space.

Prior to any areas being opened for uncontrolled access, the licensee shall survey the areas for radiation levels with appropriate portable instrumentation and make a contamination survey of the areas in accordance with his established health physics procedures to determine that the areas meet the criteria for access. Records of these surveys shall be maintained for inspection and review by the Review and Audit Committee.

3.3.2 Access Control and Security

The license holder shall control all access to the vessel through assignment of designated personnel with appropriate administrative procedures and physical security provisions.

When in layup, the vessel shall be positioned in a secure position in the James River Reserve Fleet, Fort Eustis, Virginia, alongside or in close proximity to the decommissioned U.S. Army MH-1A Floating Nuclear Power Plant STURGIS. Security for the vessel shall be provided by the license holder at all times, whether in layup in the JRRF or off-site for infrequent required ship maintenance, in which case 30-days prior notice in writing shall be given to NRC Region II.

3.4 Reports

The Senior Technical Advisor, U.S. Maritime Administration, Washington, D.C. shall make the following reports:

1. A written annual report shall be submitted to the Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, prior to March 1 of each year. The report shall include the following:
 - a. The status of the facility.

- b. The results of the radiation surveys and monitoring station dosimeter readings.
- c. The results of environmental sample analysis surveys.
- d. The results of quarterly intrusion alarm system checks.
- e. The amount of radioactive materials removed from the N.S. Savannah by releases, discharges, and shipments of radioactive waste material.
- f. A description of the principal maintenance performed on the vessel .
- g. Any unauthorized entry into radiation control areas by visitors or employees and corrective action taken to improve access control.
- h. Any degradation of one of the several boundaries which contain the radioactive materials aboard the N.S. Savannah.
- i. Results of occupational exposure indicated by personal dosimetry.

2. Licensee Event Report (LER)

A LER shall be made to the USNRC Regional Office, Region II, by telephone within 24 hours of a reportable event. Reportable events are as follows:

- a. The entrance of an unauthorized person or persons into any controlled radiation area.
- b. A significant change in the radiation or contamination levels in the vessel.
- c. Any release of radioactive material to the environment in excess of 10% of the limits of applicable sections of 10 CFR Part 20.
- d. Any major damage to the vessel due to severe weather conditions or other causes.
- e. Major floodings or sinking of the vessel.

Such information shall be reported within 24 hours by telephone, telecopier, or telegraph to the Administrator, U.S. Nuclear Regulatory Commission, Region II, Atlanta, Georgia, and followed by a written report within two weeks, with a copy to the Director, Office of Nuclear Reactor Regulation of the U.S. NRC in Washington, D.C.

3.5 Procedures and Operating Instructions

All modifications and maintenance of the vessel which may affect the safety of visitors, employees, or maintenance personnel shall be carried out in accordance with written procedures that cover the following:

- a. Emergency conditions involving potential or actual release of radioactivity, e.g., fire and flooding.
- b. Surveys in controlled areas.
- c. Access control.
- d. Radiation protection.

These procedures and any subsequent revisions shall be reviewed and approved by the Senior Technical Advisor, U.S. Maritime Administration, Washington, D.C. or his designated alternate, and the Review and Audit Committee.

3.6 Review and Audit Committee

1. There shall be a Review and Audit Committee (Committee) consisting as a minimum of the following personnel:
 - a. Committee Chairman: Senior Technical Advisor, U.S. Maritime Administration, Washington, D.C.
 - b. Alternate Chairman: Chief, Division of Ship Maintenance and Repair, U.S. Maritime Administration, Washington, D.C. 20590.
 - c. Member: Fleet Superintendent, James River Reserve Fleet.
 - d. Member: Fleet Captain or Fleet Engineer, James River Reserve Fleet.
 - e. Designated representative of U.S. Army Center for Public Works, Humphries Engineering Center (formerly the U.S. Army Engineering and Housing Support Center, Safety and Occupational Health Office)
 - f. Four members shall constitute a quorum provided that at least:
 - I. One member of such quorum shall be either the Senior Technical Advisor, U.S. Maritime Administration, Washington, D.C. or the Chief, Division of Ship Maintenance and Repair, U.S. Maritime Administration, Washington, D.C. 20590.
 - II. One member of such quorum shall be either the Chief, Division of Ship Maintenance and Repair, U.S. Maritime Administration, Washington, D.C. 20590, or the Superintendent, JRRF, or the Fleet Engineer, JRRF, or his designated alternate.
 - III. One member of such quorum shall be either the designated representative of U.S. Army Center for Public Works, Humphries Engineering Center (formerly the U.S. Army Engineering and Housing Support Center, Safety and Occupational Health Office), or his designated alternate.
2. Members of the Committee shall conduct audits, on-the-spot checks, and evaluations to assure that all work is being done safely and in accordance with established procedures. If a deficiency is discovered,

the Senior Technical Advisor, U.S. Maritime Administration, Washington, D.C., is to be notified immediately. The license holder is to take the necessary immediate corrective action, and a written report of the deficiency is to be prepared for review by the Committee.

3. The Committee will review all of the following, including the determination of whether any proposed change involves an unreviewed safety question as defined in 10 CFR 50.59. These reviews may be accomplished and concurred with by members of the Committee without a formal meeting.
 - a. Proposed changes to Technical Specifications.
 - b. Proposed changes or modifications to the vessel's controlled radiation area entry alarm system or containment system.
 - c. Substantive changes to radiation surveys or security surveillance procedures.
 - d. Reported violations of Technical Specifications.
 - e. Licensee Event Reports.
 - f. Annual reports to the NRC.
4. The Committee shall be convened by the Chairman and shall meet annually to review and discuss events of the preceding period. The Committee will meet when necessary in the event of grounding or sinking of the vessel. Written minutes of all meetings shall be prepared and distributed to all committee members.

3.7 Ship Access Control and Surveillance

Applicability

Applies to routine access control and surveillance of the ship.

Objective

To prevent unauthorized entry into radiation control areas and to determine change in radiation levels or integrity of the ship.

Specification

1. Access Control
 - 1.1 Containment vessel entry shield plugs will be in place, sealed, and the lifting equipment partially disassembled.
 - 1.2 All entrances into the reactor compartment will be secured from the outside except the B Deck entry at Frame 122, which will be chained, posted, sealed, and double locked.

- 1.3 All radiation control areas will be posted, locked and sealed.
- 1.4 All entrances to the ship not in use will be secured at all times.
- 1.5 The entrance in Item 1.2 above, will be fitted with an intrusion alarm with audible and visual signals located at a location that is manned by a guard or security officer.
- 1.6 Security personnel will patrol the vessel at least once during a twenty-four (24) hour period.
- 1.7 Deviations from the above access control conditions will be in accordance with appropriate parts of Section 3 of these Technical Specifications, Administrative Controls.

2. Surveillance

- 2.1 Periodically and at least once a quarter, MARAD's designated personnel will inspect the seals on the control area doors and test the intrusion alarm in Item 1.5.
- 2.2 Radiation surveys of the ship shall be made annually, and environmental surveillance shall be made semi-annually by the designated representative of U.S. Army Center for Public Works, Humphries Engineering Center (formerly the U.S. Army Engineering and Housing Support Center, Safety and Occupational Health Office) or alternative contractor personnel designated by the license holder.
- 2.3 Radiological surveys will be made:
 - a. In unrestricted and restricted employee areas of the ship.
 - b. In the compartment below the containment vessel for radiation levels and water leakage.
 - c. In the Port and Starboard Stabilizer rooms.
 - d. In the Forward control areas.
 - e. In Charge pump rooms.
 - f. In the Hot Chem. Lab. in the control room area.
 - g. In the accessible areas adjacent to the entries to the controlled areas.
- 2.4 In addition to the periodic radiological surveys, thermoluminescent dosimeters (TLDs) or equivalent monitoring devices shall be placed at strategic locations throughout the vessel to monitor the radiation from reactor generated materials. MARAD shall determine these locations on the vessel and shall require dosimeter readings at least semi-annually.

- 2.5 Semi-annually, water samples and bottom sediment will be taken adjacent to the ship and analyzed by a qualified laboratory for radioactivity.
3. Two draft level stripes will be painted fore and aft (at the draft markers), one will be just above the water level and the upper stripe will be one foot above the lower. These will be observed daily to check if the draft has increased. Both stripes must always be visible. If the lower stripe is not visible, the ship shall be surveyed and the water leakage located. The source of leakage will be determined, the ship pumped out, and repairs made as may be required, including drydocking if determined necessary, in order to assure that the integrity of the hull is maintained.
 4. A cathodic protection system will be provided and properly maintained to protect the underwater areas of the vessel's hull to minimize corrosion damage to the hull.
 5. An underwater inspection of the hull will be conducted at least every four (4) years. The vessel will be drydocked if the inspection determines that such action is necessary due to localized severe pitting, underwater plate thinning in excess of 40 percent, or other damage that would require corrective action and/or removal of the vessel to an off-site ship repair facility.
 6. An inspection will be conducted at least annually by MARAD's designated personnel to determine any degradation of the primary and secondary systems.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 12 TO AMENDED FACILITY LICENSE NO. NS-1
STATE OF SOUTH CAROLINA PATRIOTS POINT DEVELOPMENT AUTHORITY

U.S. MARITIME ADMINISTRATION

N.S. SAVANNAH

DOCKET NO. 50-238

1 INTRODUCTION

By letter dated May 19, 1994, as supplemented on May 24 and 27, 1994, and June 3, 1994, State of South Carolina Patriots Point Development Authority (PPDA) and the U.S. Maritime Administration (MARAD) (the licensees) submitted a request for an amendment to Amended Facility License No. NS-1 for the N.S. Savannah. The requested changes would (1) delete the PPDA as a co-licensee, (2) allow relocation of the N.S. Savannah to the James River Reserve Fleet (JRRF), a U.S. Maritime Administration facility, (3) change the performance of radiological health physics coverage, surveillance, and response to the U.S. Army Center for Public Works, Humphries Engineering Center, (4) change the composition of the review and audit committee to be consistent with the deletion of PPDA as a co-licensee, (5) discontinue public access to the facility, and (6) make other minor changes to the Technical Specifications (TSs).

2 EVALUATION

2.1 Introduction

The nuclear-powered merchant ship, N.S. Savannah, used a pressurized-water reactor that operated at a maximum power level of 80 megawatts thermal. The reactor was shut down in November 1970, and all reactor fuel was removed from the ship. Primary and secondary reactor system water has been drained and all radioactive resins were removed from the ship. The reactor has been rendered inoperable. The remaining radioactive material, estimated at 13,600 Curies, is primarily the activated pressure vessel and components in the pressure vessel.

The primary system, including the pressure vessel, is sealed and is, in turn, enclosed within a containment vessel. The containment vessel is made of 1.5-inch-thick steel. Concrete and lead surround the containment vessel to provide shielding. The two access ports to the containment vessel have been sealed with shield plugs. Lifting equipment for the shield plugs has been partially disassembled to prevent unauthorized access into the containment vessel.

The N.S. *Savannah* has been on display at the Naval and Maritime Museum at Patriots Point. The PPDA has exercised its option to terminate public display of the N.S. *Savannah* and return the vessel to MARAD. Amendment No. 8, dated May 19, 1976, amended the N.S. *Savannah* license to possession-only status. Amendment No. 9, dated August 14, 1981, added PPDA to the license as a co-licensee with MARAD. At this time the N.S. *Savannah* was moved to the PPDA museum. With the vessel located at Patriots Point, the PPDA became responsible for radiation safety, security, and maintenance. The licensees request that these responsibilities be returned to MARAD because the ship has been permanently moved from Patriots Point.

After performing routine drydocking and hull maintenance, MARAD plans to place the vessel for indefinite storage in the JRRF which is a MARAD facility. The ship was removed from its pier at the PPDA museum on May 24, 1994, and was then towed to a secure MARAD pier in the Norfolk, Virginia area. The ship will remain there until mid-June 1994, when it will be drydocked in Baltimore, Maryland for maintenance.

2.2 Deletion of PPDA as Co-Licensee

The licensees have requested that the PPDA be removed from the license as a co-licensee. This will reinstate MARAD as the sole licensee of the N.S. *Savannah*, as was the case before Amendment No. 9 was issued. Amendment No. 9 did not affect the status of MARAD as the sole owner of the N.S. *Savannah*.

The staff, in making its decision to delete PPDA as a co-licensee, has applied the criteria and review areas required by 10 CFR 50.80, "Transfer of Licenses," as appropriate. The review of the deletion of PPDA as co-licensee of the N.S. *Savannah* is simplified by the fact that MARAD is currently a co-licensee and the sole owner of the N.S. *Savannah*. Before PPDA was added to the license as a co-licensee, MARAD was the sole licensee. No new licensee is being added to the license by this action. An additional simplification is the fact that the N.S. *Savannah* is in a possession-only status. As described above, all fuel has been removed from the reactor and the reactor has been made inoperable. Because of this, many of the requirements for operating power reactors are not applicable in this situation.

As the current licensee, MARAD complies with the regulatory requirements of 10 CFR 50.33, 50.34, and 50.37. The information required by 10 CFR 50.33(a)-(e) is not changed. As a Government agency, MARAD is financially qualified as a licensee. The existing license complies with the technical requirements of 10 CFR 50.33 and 50.34. The changes requested by the licensees are discussed and justified in their application for license amendment.

MARAD will again assume responsibility for those aspects of the license that were assigned to PPDA. These responsibilities had belonged to MARAD but were transferred to PPDA by Amendment No. 9 because the ship was to be located at the PPDA pier. The MARAD Senior Technical Advisor (position is called Senior Advisor for Research and Development in the existing TSs) will be the license

holder for MARAD with the authority and responsibility to ensure that the obligations of MARAD under the license and TSs are fulfilled. Even though the TSs assigned responsibility for certain aspects of the N.S. *Savannah* to PPDA, as co-licensees both PPDA and MARAD are responsible for ensuring the health and safety of the public.

MARAD will be responsible for access control, security, environmental surveillance, radiological monitoring, reporting to the NRC, and ship maintenance. MARAD will assume the responsibilities held by the South Carolina Department of Health and Environmental Control, Bureau of Radiological Health (SCBRH) for radiation surveys, environmental sampling and surveillance, and laboratory analysis. The U.S. Army Center for Public Works, Humphries Engineering Center (ACPW) (formerly the U.S. Army Engineering and Housing Support Center, Safety and Occupational Health Office), will perform these activities for MARAD. The qualifications for personnel performing these duties in the TSs remain unchanged. The ACPW currently has radiological health and safety responsibility for the floating nuclear power barge Sturgis, alongside which the N.S. *Savannah* will be anchored at the JRRF. The staff has reviewed the qualifications of the ACPW contractor, a certified health physicist who has 35 years of experience, and finds that qualified technical personnel will provide health physics support to ACPW and MARAD.

The experience of MARAD with the N.S. *Savannah* harkens back to the earliest days of the joint MARAD/AEC program. The person holding the title of Senior Technical Advisor (formally, the Senior Advisor for Research and Development) participated as a supervisor in the design and construction of the ship's reactor and served as the license holder for MARAD when the N.S. *Savannah* was moved to Patriots Point in 1981. Since MARAD is the agency responsible for U.S. Government maritime affairs, the NRC staff concludes that MARAD staff personnel are knowledgeable in marine engineering and the N.S. *Savannah*, and that MARAD is technically qualified to assume the responsibilities for the N.S. *Savannah* held by PPDA.

The changes to the TSs proposed by the licensees that involve deletion of PPDA as a co-licensee are discussed below.

The licensees have proposed that TS 3.1 be amended to remove PPDA as a license holder and to relieve PPDA of the responsibility for access control, security, environmental surveillance, radiological monitoring, reporting to the NRC, and ship maintenance and assign that responsibility to MARAD. It is also proposed that this TS be amended to transfer responsibility for radiation surveys, environmental sampling and surveillance, and laboratory analysis from the SCBRH to ACPW. Finally, it is proposed that the requirement for a health physicist to be on duty within two hours of being called, and the requirement to provide an emergency radiological assistance team, be changed from PPDA to MARAD.

The licensees have proposed a change to TS 3.2 to change responsibility for maintaining records from PPDA to MARAD and the Senior Technical Advisor.

The licensees have requested that TS 3.3 be amended so that authorized visitors are accompanied by representatives of the license holder until all radiation control areas are locked and sealed. The licensees also requested that the responsibility for maintaining keys and seals be transferred to a designated representative of the license holder. These were the responsibilities of PPDA.

The licensees have proposed that TS 3.3.2 be changed to transfer responsibility for access control and security from PPDA to the license holder. The licensees also proposed that TS 3.4 be amended to move responsibility for reports from PPDA to the Senior Technical Advisor at MARAD.

The licensees have proposed a change to TS 3.5 for the approval of procedures and revisions of procedures. This responsibility is being changed from the PPDA Executive Director to the MARAD Senior Technical Advisor.

The staff concludes that these changes are acceptable because, for the reasons discussed, MARAD is qualified to perform these duties that were assigned to PPDA by the TS.

The licensees have proposed changes in the makeup of the review and audit committee to reflect the deletion of PPDA as a co-licensee. The committee has representation from three areas: MARAD as the ship owner, PPDA, where the ship was located, and SCBRH, which carried out health physics duties. These changes consist of replacing the Executive Director of the PPDA as chairman with the MARAD Senior Technical Advisor; replacing the Deputy Director of the PPDA as alternate Chairman with the Chief, Division of Ship Maintenance and Repair, MARAD; replacing the Chief of the SCBRH with the designated representative of the ACPW; and adding the Fleet Superintendent and Fleet Captain or Fleet Engineer of the JRRF to the committee. The committee will continue to have representation from the three areas: MARAD as the ship owner; the JRRF, where the ship will be located; and the ACPW, which will carry out health physics activities.

A quorum of the committee remains four members, but the members who must be present is proposed to be changed. The Director or Deputy Director of PPDA is replaced by the Senior Technical Advisor or the Chief of the Ship Maintenance and Repair Division of MARAD. The Senior Advisor or Chief of the Division of Ship Management, MARAD, is replaced by the Chief, Division of Ship Maintenance or Repair, MARAD or the Fleet Superintendent, or Fleet Engineer, or designated alternate, JRRF. The Chief, SCBRH is replaced by a designated representative of the ACPW.

The licensees also requested a change so that the license holder instead of the Executive Director of the PPDA, will take immediate corrective action if a deficiency is discovered.

The staff finds these changes acceptable because the committee makeup and expertise will match the existing committee and will comprise senior people representing MARAD, the JRRF (where the ship will be located), and the ACPW (which will carry out health physics duties). The quorum composition continues to require the presence of an individual from each of the three areas discussed above.

The licensees have proposed that TS 3.7.2 be amended to change responsibility for surveillances from PPDA to MARAD's designated personnel for inspection of door seals and testing of intrusion alarms. As discussed above, the ACPW or alternate contractor personnel, will be responsible for radiation surveys and environmental surveys. MARAD assumes responsibility from SCBRH for determining the placement of dosimeters and will continue to require semi-annual readings. As discussed above, the SCBRH is removed as the group to analyze water and sediment samples. It is proposed that this work be done by a qualified laboratory. Finally, the responsibility to inspect the primary and secondary systems for degradation is transferred from PPDA to MARAD's designated personnel.

The staff has concluded, for the reasons discussed above, that the deletion of PPDA as a co-licensee is acceptable. The staff also concludes (based on the past experience of MARAD as the sole licensee and the discussion above) that it is acceptable for MARAD to reassume complete responsibility for the N.S. *Savannah*. The staff also finds acceptable, as discussed above, the transfer of duties from the SCBRH to the ACPW.

2.3 License Conditions

Throughout the license document, license conditions are modified by this license amendment to reflect MARAD as the sole licensee. These are administrative changes necessary to effect the deletion of PPDA as a co-licensee and are acceptable to the staff.

2.4 Relocation of the N.S. Savannah

The licensees have proposed that the N.S. *Savannah* be moved from the PPDA pier to the JRRF after drydock. The requirement to move the vessel into drydock when repairs are dictated is in the current TSs and will not change. The N.S. *Savannah* sailed over 500,000 miles from 1965 until 1970 visiting many ports under port entry plans which AEC reviewed and approved. After defueling, the N.S. *Savannah* has been towed to various locations for storage and repairs under port entry plans. As discussed above, PPDA has decided to discontinue museum operations on the N.S. *Savannah* and has returned the ship to MARAD under the charter agreement and the legislation that authorized placing the N.S. *Savannah* at the PPDA site.

All necessary preparations for towing the vessel have been specified and reviewed by MARAD staff naval architects, marine engineers, and ship surveyors. The ship will only be towed if the U.S. Coast Guard issues a permit that allows it to be towed. MARAD has initiated and directed the towing of hundreds of vessels.

The ship will be placed in the JRRF, a MARAD facility near Fort Eustis, Virginia. The N.S. *Savannah* will be moored alongside the decommissioned U.S. Army Corps of Engineers MH-1A floating nuclear power barge Sturgis. The TS aspects of the storage of the N.S. *Savannah* will be similar to the requirements in effect at the PPDA site.

MARAD has submitted a revised Port Operating Plan for the James River Reserve Fleet, Virginia. The plan discusses the location of the JRRF, including area meteorology and tides. The requirements for contacting the U.S. Coast Guard, and the use of tugs and pilot service while in transit are outlined. Security and fire protection and response for the N.S. *Savannah* in the reserve fleet are covered in the plan. Details of transit operations and berthing are provided. Because the plan discusses the aspects of the entry into the JRRF that are applicable to the N.S. *Savannah* in its defueled, inoperable status, the staff finds the plan for the JRRF to be acceptable.

The licensees have proposed amending TSs 3.1, 3.3.2, and 3.7.1.6 to describe the location of the ship as the JRRF. In addition, it is proposed that TS 3.3.2 be amended to require 30 days' notice in writing to the NRC Region II Office if the vessel is moved elsewhere for maintenance.

The staff concludes that the relocation of the N.S. *Savannah* to the JRRF is acceptable because the defueled ship will be moved under a U.S. Coast Guard permit and will be moved to and moored in the JRRF in accordance with the Port Operating Plan.

2.5 Other TS Changes

The licenses have proposed amending TSs 1.0, 3.3.1, and 3.7.1.1.4 and removing TS 3.6.3.g to delete wording that allows sections of the ship to be used as a museum, for lodging visitors, and for restaurant and concession facilities. The staff concludes that these changes are acceptable because they change the descriptions of the uses of the ship, they are consistent with the amendment request removing PPDA as a co-licensee, and have no safety significance.

TS 3.7.5 is amended to clarify the fact that drydocking the vessel would require removal of the vessel to an offsite ship repair facility. This change is acceptable to staff because it clarifies the TSs only and has no safety significance.

The licensees have proposed amending TSs 2.1, 2.2, 2.3, and 2.4 concerning radioactive releases and surveillance to clarify the TSs and add wording about meeting applicable Federal regulations in addition to the requirement in the existing TSs to meet specific regulations. The staff finds this acceptable because the meaning of the TSs is not changed and radioactive releases and surveillance will still be in accordance with applicable regulations.

3 EXIGENT CIRCUMSTANCES

In a letter dated May 19, 1994, the licensees requested that their application for license amendment be processed as involving exigent circumstances.

The Commission regulation, 10 CFR 50.91, provides special exceptions for the issuance of amendments when the usual 30-day public notice period cannot be met. One type of special exception is an exigency. An exigency is a case in which the staff and the licensee need to act quickly and time does not permit the Commission to publish a Federal Register notice allowing 30 days for public comment, and the Commission also determines that the amendment involves no significant hazards considerations. In this instance, it was essential to move the ship on the spring tide and because of this movement, the licensees requested that PPDA be removed from the license as a co-licensee. In accordance with 10 CFR 50.91(a)(6)(i)(B), the Commission used the local media to provide reasonable notice to the public in the area of Charleston, South Carolina, and Newport News and Norfolk, Virginia, of the licensees' amendment request and of the proposed determination by the Commission that a no significant hazards consideration is involved.

The NRC published a public notice of the proposed amendment, issued a proposed finding of no significant hazards consideration, and requested that any comments on the proposed no significant hazards consideration be submitted to the staff by the close of business on June 2, 1994. The notice was published in the Virginian-Pilot/Ledger-Star, Norfolk, Virginia, on Sunday, May 29, 1994, the Daily Press, Newport News, Virginia, on Friday, May 27, 1994, and the Post and Courier, Charleston, South Carolina, on Friday, May 27, 1994.

The changes are needed because the licensees moved the ship on the spring tide on May 24, 1994, to minimize the effects of silting from Hurricane Hugo, and because the PPDA had decided to terminate use of the ship as a part of its museum program. The licensees had originally planned to move the ship in June or July 1994. The exigent circumstances resulted from the fact that the licensees did not discover the full extent of silting around the ship and agree on a course of action until April 1994. The spring tide was the highest tide of the year and movement at that tide minimized potential problems due to the silting. The licensees plan to move the ship to drydock for repairs as required by the existing TSs. There are no drydocks in the State of South Carolina that can accommodate the ship. The licensees have stated that the most economical, expedient, and safest operation is achieved by towing the vessel from its present site, out of Charleston harbor traffic lanes and to the selected repair yard in Baltimore or to a secure pier leased to the Maritime Administration in the Norfolk area. Although this movement is allowed under the existing TSs, the licensees state that it is unreasonable for PPDA and the South Carolina Department of Health and Environmental Control, which has responsibility for health physics services, to remain accountable for more than an interim transition period. Evaluations were made by the licensees and the decision was subsequently made to request an exigent license amendment.

The staff finds that the licensee did not deliberately or negligently cause the exigent situation. Failure of the Commission to act on the request of the licensees would lead to the undesirable situation of the PPDA remaining as a co-licensee for more than an interim period with the ship removed from the PPDA pier and the Charleston area.

4 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

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

The staff has analyzed the proposed amendment to determine if a significant hazards consideration exists. The proposed amendment to Amended Facility License No. NS-1:

- (1) Does not involve a significant increase in the probability or consequences of an accident previously evaluated. Twenty two years ago, the reactor was defueled, the control rods were disengaged from their mechanisms, primary system pump rotors were removed from the pumps, and other physical changes were performed to make the reactor permanently inoperable. Core internals and primary system piping and components are entombed within the heavily shielded containment vessel which is sealed and only opened for periodic inspections as required by the Technical Specifications. In addition, the radioactivity within the reactor has constantly decreased due to radioactive decay. Because the reactor is not operational and because the level of radioactivity in the reactor has decreased, there will be no significant increase in the probability or consequences of an accident previously evaluated.
- (2) Does not create the possibility of a new or different kind of accident from any previously evaluated. The ship has been moved several times in the past in its current configuration. For this reason and the reasons in 1 above, the possibility of a new or different type of accident from those previously evaluated will not be created by the implementation of the changes permitted by the approval of this amendment request.
- (3) Does not involve a significant reduction in a margin of safety. No margins of safety exist that are relevant to the defueled, partly dismantled reactor. The proposed changes reflect the movement of the ship and changes in the performance of responsibilities. As a result, these activities will not involve a significant reduction in a safety margin.

On the basis of these considerations, including the staff's safety evaluation, the staff concludes that the amendment complies with the standards in 10 CFR 50.92 for a no significant hazards determination. Therefore, the staff has made a final determination that the proposed amendment involves no significant hazards consideration.

5 STATE CONSULTATION

In accordance with the regulations of the Commission, the South Carolina and Virginia State officials were notified of the proposed issuance of the amendment. The State officials had no comments.

6 ENVIRONMENTAL CONSIDERATION

The Commission has prepared an environmental assessment (EA), which was published in the Federal Register on June 3, 1994 (59 FR 28903). On the basis of the EA and this safety evaluation, the Commission has determined that no environmental impact statement is required and that issuance of this amendment for the N.S. *Savannah* will have no significant deleterious effect on the quality of the human environment.

7 CONCLUSION

The Commission has concluded, on the basis of the considerations discussed above, that because the amendment does not involve a significant increase in the probability or consequences of accidents previously evaluated, or create the possibility of a new or different kind of accident from any accident previously evaluated, and does not involve a significant reduction in a margin of safety, (1) the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed activities, (3) such activities will be conducted in compliance with the Commission's regulations, and (4) the issuance of this amendment will not be inimical to the common defense and security or the health and safety of the public.

Principal Contributor: A. Adams, Jr.

Date: June 29, 1994

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

STATE OF SOUTH CAROLINA PATRIOTS)
POINT DEVELOPMENT AUTHORITY)
U.S. MARITIME ADMINISTRATION)

Docket No. 50-238
(License No. NS-1)

(N.S. Savannah))

ORDER APPROVING TRANSFER AND NOTICE OF ISSUANCE OF LICENSE AMENDMENT

I.

On August 5, 1965, pursuant to 10 CFR Part 50, License No. NS-1 was issued to First Atomic Ship Transport Inc., (FAST) for the N.S. Savannah. On November 9, 1970, Amendment No. 7 was issued to License No. NS-1 transferring the license from FAST to the U.S. Maritime Administration (MARAD). On May 16, 1976, Amendment No. 8 was issued to License No. NS-1 which authorized MARAD to possess but not operate the N.S. Savannah reactor facility. On August 14, 1981, Amendment No. 9 was issued to License No. NS-1 adding the State of South Carolina Patriots Point Development Authority (PPDA) to the license as a co-licensee. On July 15, 1986, Amendment No. 11 was issued renewing the license until July 15, 1996.

II.

On May 9, 1994, the State of Carolina PPDA formally informed MARAD that it was exercising its option to return the vessel upon giving 30 days notice according to the charter agreement under which MARAD made the N.S. Savannah

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available to PPDA. PPDA gave notice and stipulated that PPDA will remain a co-licensee and fulfill its obligations as a co-licensee until a license amendment is issued and effectively deletes PPDA as a co-licensee.

III.

To remove PPDA from the license as a co-licensee, PPDA and MARAD applied to the U.S. Nuclear Regulatory Commission (NRC) for an exigent amendment to License No. NS-1, by letter dated May 19, 1994, as supplemented by later filings. Under this requested license amendment, the license and Technical Specifications would reflect the deletion of PPDA as a co-licensee and would make other changes to the Technical Specifications related to the deletion of PPDA as a co-licensee. The NRC published a public notice of the proposed amendment, issued a proposed finding of no significant hazards consideration, and requested that any comments on the proposed no significant hazards consideration be submitted to the staff by the close of business on June 2, 1994. The notice was published in the Virginian-Pilot/Ledger-Star, Norfolk, Virginia, on Sunday, May 29, 1994, the Daily Press, Newport News, Virginia, on Friday, May 27, 1994, and the Post and Courier, Charleston, South Carolina, on Friday, May 27, 1994.

IV.

The transfer of rights under License No. NS-1 is subject to NRC approval under 10 CFR 50.80. On the basis of information submitted by PPDA and MARAD, and other information before the Commission, it is determined that the proposed deletion of PPDA as a co-licensee, subject to the conditions stated herein, is in the public interest and is consistent with the applicable

provisions of law, regulations, and orders issued by the Commission. These actions were evaluated by the staff as documented in a safety evaluation, dated June , 1994, which contains final no significant hazards consideration determinations. The conditions of deletion of the co-licensee, to which neither PPDA nor MARAD have objected, are:

The title on page 1 of the license shall read:

U.S. MARITIME ADMINISTRATION
DOCKET NO. 50-238
N.S. SAVANNAH
AMENDED FACILITY LICENSE

- 1.D. The licensee is technically and financially qualified to engage in the activities authorized by this amended license in accordance with the rules and regulations of the Commission;
- 1.E. The licensee has complied with the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
- 2.B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses the U.S. Maritime Administration:
 - (1) Pursuant to Section 104b of the Act and 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," to possess, but not operate, the reactor as a utilization facility in accordance with the procedures and limitations in this license; and
 - (2) Pursuant to the Act and 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material," to possess, but not separate, such byproduct material as may have been produced by operation of the facility.
- 2.C.(1) The licensee shall not reactivate the reactor without prior approval of the Commission;
- 2.C.(2) The licensee shall not dismantle or dispose of the facility without prior approval of the Commission.

V.

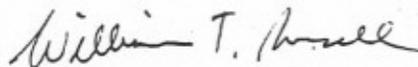
Accordingly, pursuant to Sections 104b, 161b, 161i, 184, and 187 of the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2201 et seq., and 10 CFR Part 50, IT IS HEREBY ORDERED that the deletion of PPDA as a co-licensee, is approved, and NOTICE IS GIVEN that a license amendment providing for the deletion of PPDA as a co-licensee, subject to the license conditions stated is issued.

For further details with respect to this action see (1) the application for amendment dated May 19, 1994, as supplemented by letters dated May 24 and 27, 1994, and June 3, 1994, (2) the Commission safety evaluation related to the amendment, and (3) the Environmental Assessment and Finding of No Significant Impact. Each of these items is available for public inspection at the Commission Public Document Room, 2120 L Street, N.W., Washington, D.C. 20037.

Copies of items 2 and 3 may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001, Attention: Director, Division of Operating Reactor Support.

Dated at Rockville, Maryland, this 29th day of June 1994.

FOR THE NUCLEAR REGULATORY COMMISSION



William T. Russell, Director
Office of Nuclear Reactor Regulation



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Docket No. 50-237

AGREEMENT OF INDEMNIFICATION
AMENDMENT NO. 2

Effective 06/29/1994, the Agreement of Indemnification between the United States Atomic Energy Commission, the U.S. Maritime Administration, and the State of South Carolina Patriots Point Development Authority, dated November 9, 1970, is amended as follows:

Delete the named licensee "State of South Carolina Patriots Point Development Authority" wherever it appears in the indemnity agreement.

Anthony T. Gody, Chief
Inspection and Regulatory Criteria Branch
Program Management, Policy Development
and Analysis Staff
Office of Nuclear Reactor Regulation

Accepted _____ 1994

Accepted _____ 1994

By _____
U.S. Maritime Administration

By _____
State of South Carolina
Patriots Point Development
Authority

3 SIGNED ORIGINALS
PROVIDED