



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 24, 2000

Mr. Garry L. Randolph
Vice President and Chief Nuclear Officer
Union Electric Company
Post Office Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 - ISSUANCE OF AMENDMENT RE: PRESSURE
TEMPERATURE LIMITS REPORT (TAC NOS. MA5631 AND MA7287)

Dear Mr. Randolph:

The Commission has issued the enclosed Amendment No. 134 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1 (Callaway). The amendment consists of changes to the improved Technical Specifications (ITSs) in response to your application dated December 3, 1999 (ULNRC-04158).

The present amendment revises Section 5.6.6, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)," of the ITSs that were issued on May 28, 1999, in Amendment No. 133. There are no changes to the current Technical Specifications that remain in effect at Callaway until the ITSs are implemented on or before April 30, 2000.

The amendment adds criticality to the list of conditions for the reactor coolant system pressure-temperature (RCS P/T) limits, expands the PTLR to include the analytical methods for the low temperature overpressure protection (LTOP) power operated relief valve (PORV) lift settings, and changes the list of documents that provide the analytical methods for the RCS P/T limits and PORV lift settings in ITS Section 5.6.6. In your plant-specific language, the LTOP system is the cold overpressure mitigation system (COMS).

This letter documents the NRC staff approval of (1) the methodology proposed by you for calculating the RCS P/T limit curves and the COMS PORV lift settings, and (2) the PTLR for Callaway. Therefore, this letter is the first document listed in ITS Section 5.6.6.b that provides the approved analytical methods that will be used by your staff to calculate these limits and lift settings for Callaway. The staff concludes that the methodology is acceptable for referencing in the administrative controls section (i.e., ITS Section 5.6.6) of the ITSs to the extent and under the limitations delineated in your submittals and the enclosed Safety Evaluation associated with the amendment. The methodology for the RCS P/T limit curves and COMS PORV lift settings is provided in Westinghouse Topical Report WCAP-14040-NP-A and in your submittals listed above. Because the WCAP contains most of the PTLR methodology for Callaway, it is also listed in ITS Section 5.6.6.b.

The methodology in the WCAP report and your submittals must be used to calculate updates to the P/T limit curves and PORV lift settings and, if this methodology is used, these updates can be made in the PTLR without prior staff approval. Previous updates to the P/T limits and PORV lift settings were required to be submitted for staff approval because they involved changes to the Technical Specifications, which is no longer true. The approved methodology and PTLR for

Mr. Garry L. Randolph

- 2 -

March 24, 2000

Callaway is in accordance with Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits," dated January 31, 1996. Any changes to the approved methodology that do not meet the criteria in 10 CFR 50.59 must be approved by the staff. System limits may be subject to audit by the staff through inspections. The approved methodology includes the use of American Society of Mechanical Engineers (ASME) Code Case N-514 as an alternative to the ASME Code requirements for reactor vessel pressure limits at low temperature. The exemption to use the code case was granted in the staff's letter of April 30, 1998, under TAC No. MA4955.

The PTLR was Change No. 9-01-LG for CTS 3/4.4 in developing the ITSs, and this change was specially addressed in the staff's letter of May 28, 1999, that approved the ITSs in Amendment No. 133 for Callaway. The issuance of this amendment and the approval of the methodology for the PTLR for Callaway closes out the issue raised about Change No. 9-01-LG, and your proposal for ITS Section 5.6.6 in your letter of May 28, 1999 (ULNRC-4043). The application of December 3, 1999, superceded your request in the letter of May 28, 1999.

The current P/T limits and LTOP PORV lift settings are in the CTSSs, and were approved in Amendment No. 124, which was issued April 2, 1998. After the ITSs are implemented, the P/T limit curves and LTOP PORV lift settings for Callaway will be in the PTLR.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,
/RA/

Jack Donohew
Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosures: 1. Amendment No. 134 to NPF-30
2. Safety Evaluation

cc w/encls: See next page

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Callaway Plant, Unit 1

cc:

Professional Nuclear
Consulting, Inc.
19041 Raines Drive
Derwood, MD 20855

John O'Neill, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Mr. J. Schnock
Supervising Engineer
Quality Assurance Regulatory Support
Union Electric Company
Post Office Box 620
Fulton, MO 65251

U.S. Nuclear Regulatory Commission
Resident Inspector Office
8201 NRC Road
Steedman, MO 65077-1302

Mr. J. V. Laux, Manager
Quality Assurance
Union Electric Company
Post Office Box 620
Fulton, MO 65251

Manager - Electric Department
Missouri Public Service Commission
301 W. High
Post Office Box 360
Jefferson City, MO 65102

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavilion
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Mr. Ronald A. Kucera, Deputy Director
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, KA 66839

Mr. Dan I. Bolef, President
Kay Drey, Representative
Board of Directors Coalition
for the Environment
6267 Delmar Boulevard
University City, MO 63130

Mr. Lee Fritz
Presiding Commissioner
Callaway County Court House
10 East Fifth Street
Fulton, MO 65151

Mr. Alan C. Passwater, Manager
Licensing and Fuels
Union Electric Company
Post Office Box 66149
St. Louis, MO 63166-6149



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

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 134
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Union Electric Company (UE, the licensee) dated December 3, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate 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 Commission's regulations;
 - 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 Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-30 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 134 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective as of its date of issuance and shall be implemented no later than April 30, 2000.

FOR THE NUCLEAR REGULATORY COMMISSION



Stephen Dembek, Chief, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: March 24, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 134

FACILITY OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE

5.0-30

5.0-31

INSERT

5.0-30

5.0-31

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued)

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
1. WCAP-9272-P-A, "WESTINGHOUSE RELOAD SAFETY EVALUATION METHODOLOGY", July 1985 (W Proprietary).
 2. WCAP-10216-P-A, REV. 1A, "RELAXATION OF CONSTANT AXIAL OFFSET CONTROL AND FQ SURVEILLANCE TECHNICAL SPECIFICATION," February 1994 (W Proprietary).
 3. WCAP-10266-P-A, REV. 2, "THE 1981 VERSION OF WESTINGHOUSE EVALUATION MODEL USING BASH CODE," March 1987 (W Proprietary).
 4. NRC Safety Evaluation Reports dated July 1, 1991, "Acceptance for Referencing of Topical Report WCAP-12610 'VANTAGE + Fuel Assembly Reference Core Report' (TAC NO 77268)," and September 15, 1994, "Acceptance for Referencing of Topical Report WCAP-12610, Appendix B, Addendum 1, 'Extended Burnup Fuel Design Methodology and ZIRLO Fuel Performance Models' (TAC No. M86416)" (WCAP-12610-P-A).
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, hydrostatic testing and PORV lift setting as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

(continued)

5.6 Reporting Requirements

5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued)

1. Specification 3.4.3, "RCS Pressure and Temperature (P/T) Limits," and
 2. Specification 3.4.12, "Cold Overpressure Mitigation System (COMS)."
- b. The analytical methods used to determine the RCS pressure and temperature and COMS PORV limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
1. NRC letter, CALLAWAY PLANT, UNIT 1 – ISSUANCE OF AMENDMENT RE: PRESSURE TEMPERATURE LIMITS REPORT (TAC NOS. MA5631 and MA7287), dated March 24, 2000.
 2. WCAP-14040-NP-A, Revision 2, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves, January, 1996".
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6.7 Not used.

5.6.8 PAM Report

When a report is required by Condition B or G of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.9 Not used.

(continued)



UNITED STATES
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WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 134 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

1.0 INTRODUCTION

By application dated December 3, 1999, Union Electric Company (the licensee) requested changes to the improved Technical Specifications (ITSs, Appendix A to Facility Operating License No. NPF-30) for the Callaway Plant, Unit 1 (Callaway). The proposed changes would revise Section 5.6.6, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)," of the ITSs that were issued on May 28, 1999, in Amendment No. 133. There are no proposed changes to the current Technical Specifications (CTSs) that remain the Technical Specifications in effect at Callaway until the ITSs are implemented on or before April 30, 2000.

The proposed changes to the ITSs would add criticality to the list of conditions for the reactor coolant system pressure-temperature (RCS P/T) limits, expand the PTLR to include the analytical methods for the low temperature overpressure protection (LTOP) power operated relief valve (PORV) lift settings, and change the list of documents that provide the analytical methods for the RCS P/T limit curves and PORV lift settings in ITS Section 5.6.6. There is a separate P/T limit curve for reactor heatup to power operation and for reactor cooldown from power operation to shutdown. The LTOP system for Callaway, in the plant-specific technical description, is the cold overpressure mitigation system (COMS).

In issuing the ITSs, the RCS P/T limit curves and the COMS PORV lift settings were removed from the technical specifications and placed in the PTLR. In this safety evaluation, the acceptability of the PTLR proposed for Callaway will be addressed.

The application dated December 3, 1999, superseded the licensee's request in its letter of May 28, 1999. The letter of May 28, 1999, was submitted as part of the staff's review of the conversion of the CTSs to the ITSs. The PTLR was Change No. 9-01-LG for CTS 3/4.4 in developing the ITSs, and this change was specifically addressed in the staff's letter of May 28, 1999, that approved the ITSs in Amendment No. 133 for Callaway. The issuance of this amendment and the staff's review of the methodology for the PTLR for Callaway closes out the issue raised by the staff regarding Change No. 9-01-LG, and the licensee's proposal for the PTLR in ITS Section 5.6.6 in the letter of May 28, 1999.

2.0 BACKGROUND

2.1 Cold Overpressure Mitigation System

The COMS is a system designed to protect the reactor pressure vessel (RPV) from low temperature over-pressurization by having pressure-temperature limits for the RPV that meet the requirements of Appendix G, "Fracture Toughness Requirements," to 10 CFR Part 50. The COMS provides overpressure protection using the PORVs on the pressurizer and the associated lift settings for the valves. The PORVs would lift at their settings to relieve the pressure in the RPV. Additional overpressure relief can be provided by the residual heat removal (RHR) suction relief valves, however, these valves are not part of the COMS.

Callaway is equipped with two PORVs and both have settings in tandem to protect the vessel. The COMS design basis considers both mass and heat addition transients. The mass addition transient accounts for injection from a normal and one centrifugal charging pump, with concurrent instrument air failure resulting in the charging line to fail in the fully open and the letdown line to fail in the closed position. The heat addition transient accounts for heat input from an inadvertent startup of a reactor coolant pump with a maximum of 50°F mismatch between the RCS and the hotter of the steam generators. The transient analyses take into account: mass and heat input transient pressure overshoot, the reactor coolant pump seal pressure limit, the pressure difference from the wide range pressure transmitter to the beltline region and the 10 CFR 50 Appendix G limits. Either one of the PORVs provides adequate flow to avoid over-pressurization, thus the design satisfies the single failure criteria.

2.2 Previous Approved Callaway Overpressure Limits

The request in the application of December 3, 1999, is based on the licensee's earlier submittal dated October 17, 1997, which requested revision of CTS 3/4.4 regarding the P/T limit curves and the PORV lift settings. The requested revision was to extend the limit curves and lift settings from 17 to 20 effective full power years (EFPYs) of operation. This request was supported by additional information concerning (1) the peak pressure for the mass and heat injection transients, and (2) the estimation of instrument uncertainty, injection flow rates, PORV relieving capacities, peak pressures for various PORV settings, PORV piping and the limitations of the methodology, submitted by the licensee in letters dated March 3, 1998, and March 17, 1998. Based on the information provided by the licensee, the staff approved the new limits for up to 20 EFPYs in Amendment No. 124 dated April 2, 1998, for the CTSS.

In support of its request for Amendment No. 124, the licensee submitted the following plant specific reports: (1) WCAP-14895, "Analysis of Capsule V from the Union Electric Company Callaway Unit 1 Reactor Vessel Radiation Surveillance Program," (2) WCAP-14894, "Callaway Unit 1 Heatup and Cooldown Limit Curves for Normal Operation," and (3) WCAP-14896, "Evaluation of Pressurized Thermal Shock for Callaway Unit 1." The methodologies in WCAP-14895, WCAP-14894, and WCAP-14896 comply with the methodology for the PTLR in WCAP-14040NP-A.

The limits approved in Amendment No. 124 account for the licensee's use of American Society of Mechanical Engineers (ASME) Code Case N-514 as an alternative to the ASME Code requirements for reactor vessel pressure P/T limits at low temperature. The exemption to use the code case was granted to the licensee in the staff's letter of April 30, 1998.

As part of the conversion of the CTSs to the ITSs, the licensee stated, in its letter dated March 9, 1999, that the COMS enable temperature was being lowered from 368°F to 275°F. Westinghouse, the nuclear steam supply system vendor for Callaway, concurred with this lower enable temperature in the Westinghouse letter of March 9, 1999, to Callaway. Because Amendment No. 124 approved a COMS enable temperature for Callaway as low as 200°F, the staff concludes that the enable temperature of 275°F proposed by the licensee is conservative and, because nothing in this proposed amendment affects this conclusion, the staff concludes that the enable temperature of 275°F is acceptable.

2.3 PTLR Requirements

The licensee has proposed to implement Generic Letter (GL) 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits," dated January 31, 1996. For the relocation of these limits, the staff approved the use of Westinghouse Topical Report WCAP-14040-NP-A, Revision 1, "Methodology Used to Develop Cold Overpressure Mitigation System Setpoints and RCS Heatup and Cooldown Curves," as the methodology for calculating P/T curves and PORV lift settings for Westinghouse plants such as Callaway. This WCAP was reissued as WCAP-14040-NP-A, Revision 2, dated January 1996, with the staff's letter dated October 16, 1995, that approved the WCAP.

Approval of the proposed changes would allow the licensee to make changes to the RCS P/T limit curves and PORV lift settings in accordance with the methodology in the PTLR. This approval will include the approval of the methodology and establishment of the PTLR which will allow the licensee to change the numerical values of the RCS P/T limit curves, the PORV lift settings, and the enable temperature, provided that the revisions to the numerical values are estimated using the NRC-approved methodology which will be listed in ITS Section 5.6.6. Without the approval of the proposed changes, updates to these limit curves and lift settings would have to be submitted for staff review and approval as a change to the technical specifications, as was done in Amendment No. 124.

The PTLR requirements are described in GL 96-03. The methodology for the calculation of the material properties and the effect of neutron embrittlement for Westinghouse plants are those outlined in WCAP-14040-NP-A.

The information submitted by the licensee in its letters of October 17, 1997, March 3 and 17, 1998, and December 3, 1999, constitute a description of the methodology used for the calculation of the P/T limit curves and the COMS PORV lift settings. The letters of October 17, 1997, and March 3 and 17, 1998, were submitted as the basis for Amendment No. 124 that was discussed in Section 2.2 above. The following evaluation addresses the compliance of the licensee's methodology used in the calculation of the P/T limit curves and COMS PORV lift settings, and of the PTLR itself, to the requirements in GL 96-03.

The current P/T limit curves and COMS PORV lift settings are in CTS Figures 3.4-2, 3.4-3, and 3.4-4. After the ITSs are implemented, the P/T limit curves and LTOP PORV lift settings for Callaway will be in the PTLR.

3.0 EVALUATION

3.1 Neutron Fluence

The revised fluence values were derived from the data of the most recently removed and tested Callaway surveillance capsule V which was removed and evaluated at the end of the 8th operating cycle. The analysis of the third surveillance capsule is reported in WCAP-14895 for Callaway and the report includes updates for Capsules U and Y which were removed at the end of the first and fourth operating cycles. Because the methodology of WCAP-14895 for the calculation of the RPV fluence is the same as that described in WCAP-14040-NP-A, the methodology for calculating the RPV fluence is acceptable. The power distribution and power generation rates were derived from core loading reports, and the power operating periods are those reported in NUREG-0020. These were addressed in the staff's review for Amendment No. 124. The staff concluded in Amendment No. 124 that fluence estimate for 20 EFPYs was acceptable.

In Amendment No. 124, Westinghouse performed the referenced fluence evaluation using the methodology described in WCAP-14040-NP-A and the evaluation was found acceptable. The methodology is proposed by the licensee for the PTLR. The methodology satisfies the GL 96-03 requirements and the staff concludes that use of the methodology for neutron fluence in the PTLR is acceptable.

3.2 RPV Overpressure Limits

The methods used by the licensee in determining the P/T limit curves conform, in general, to the methodology in WCAP-14040-NP-A. The licensee has applied the methodology as the basis for developing the RPV P/T limit curves and the COMS PORV lift settings. There is a separate P/T limit curve for reactor heatup and cooldown.

3.1.2 Adjusted Reference Temperature

RPV irradiation embrittlement is accounted for by calculating the adjusted reference temperature (ART) as shown in the following equation:

$$\text{ART} = (\text{initial } RT_{\text{NDT}}) + (\text{delta } RT_{\text{NDT}}) + (\text{margin})$$

as specified in Regulatory Guide (RG) 1.99, "Radiation Embrittlement of Reactor Vessel Materials," Revision 2, where the RT_{NDT} is the null ductility test reference temperature.

The licensee's ART calculations are valid to 20 EFPYs. The staff addressed the ART calculations and independently verified the accuracy of the licensee's ART calculations in Amendment No. 124. The details of this evaluation are in the safety evaluation for that amendment.

The licensee has stated in its application that the methodology of WCAP-14040NP-A has been applied in the estimation of the ART. In that letter, the licensee identified the lower shell plate 2708-3 as the limiting material. For shell plate 2708-3 as well as for all of the reactor vessel components at the beltline, the application lists the following: the copper and nickel content, the chemistry factor, the initial RT_{NDT} , the values of the fluence and the fluence factor, the margin and the limiting element adjusted reference temperature at the 1/4T and 3/4T locations which are 100.4°F and 84.2°F respectively. These values have been reviewed in the safety evaluation for Amendment No. 124 and were found by the staff to be acceptable. The methodology employed in the derivation complies with the requirements of WCAP-14040NP-A and, therefore, is acceptable.

3.1.3 P/T Limit Curves and COMS PORV Lift Settings

The staff has evaluated the RPV P/T limit curves based on Appendix G to 10 CFR Part 50 and Standard Review Plan (SRP) Section 5.3.2 in NUREG-0800. Appendix G to 10 CFR Part 50 requires that P/T limits must be at least as conservative as those obtained based on Appendix G to Section III of the ASME Code applicable to the plant. The staff has verified that Callaway used linear elastic fracture mechanics in Appendix G of the ASME Code.

The staff has verified that 20 EFPYs for the P/T limit curves for heatup, cooldown, criticality, and inservice hydrostatic tests in the Callaway PTLR satisfy the requirements of Appendix G to 10 CFR Part 50.

3.1.4 Callaway PTLR

The P/T limit curves in PTLR Figures 2.1-1 and 2.1-2 account for instrument error. PTLR Figure 2.2-1 which provides the PORV lift settings reflects the revised COMS enable temperature of 275°F. The PORV setpoints assume that no RCP pumps are in operation for coolant temperatures less than 100°F and that four RCP pumps are in operation for temperatures equal or higher than 100°F.

The staff has verified the credibility of the surveillance data for the limiting materials (lower shell plate R2708-3 which was fabricated using plate heat number C4499-1) for Callaway. The licensee placed its surveillance data in the proposed PTLR. The PTLR addresses the use and credibility of the surveillance data. The staff concludes that the licensee's evaluation of the surveillance data in the proposed PTLR is acceptable.

The proposed PTLR also provides the neutron fluence used in the ART calculation. The neutron fluence is 7.174×10^{18} neutrons/cm² (n/cm²) at the 1/4T location and 2.547×10^{18} n/cm² at the 3/4T location. The initial RT_{NDT} for the limiting plate was indicated at 20°F. The margin term used in calculating the ART for the limiting plate was 34 and 32°F at the 1/4T and 3/4T locations, respectively, which is permitted by RG 1.99, Revision 2. The licensee's limiting ART for the vessel flange, head flange, and upper shell plate is 40°F (the minimum requirements temperature). The staff approved these values in Amendment No. 124. Based on this approval, the staff concludes that these values are acceptable for the PTLR.

The staff also verified that the proposed PTLR has the most limiting material for the Callaway RPV.

3.2 Conclusion on the Proposed Changes

Based on the staff's evaluation, as discussed above, the staff concludes that the methodology proposed by Callaway for the PTLR and for revising the P/T limit curves and PORV lift settings without prior staff approval is acceptable. Therefore, it is acceptable for the licensee to list the cover letter for this safety evaluation and amendment as the NRC document that provides the NRC approval of the analytical methods to be used by the licensee to determine the future RCS P/T and COMS PORV limits without prior staff review and approval.

The staff has reviewed the implementation of the LTOP and concludes that the calculations of the heatup and cooldown curves, the COMS enable temperature, and the associated PORV lift settings were performed in a manner consistent with the approved methodology in WCAP-14040-NP-A and staff-approved practices.

In its evaluation of the proposed changes to the ITSs, the staff has reviewed the proposed Callaway PTLR and concludes the PTLR meets the following conditions:

- Contains the pressure/temperature limiting curves, the parameter values, the value of the fluence and related explanations for the limits and the COMS setpoints.
- The methodology for the pressure/temperature curves and the COMS setpoints complies with the requirements of WCAP-14040NP-A, which has been approved by the NRC, therefore, meets the requirement that the P/T limit curves and the COMS PORV lift settings be calculated using an approved methodology.
- The P/T limit curves and the COMS PORV lift settings are in the PTLR.

Based on this, the staff concludes that the proposed Callaway PTLR meets the GL 96-03 requirements and is, therefore, acceptable.

The licensee has also proposed to add the phrase "and COMS PORV" to ITS Section 5.6.6.b to state that the PTLR will contain the analytical methods for the RCS P/T limits and the COMS PORV limits. As discussed in the above evaluation, the PTLR addresses both the RCS P/T and the COMS PORV limits, and, thus, the licensee's proposed words should be added to the description of the PTLR in ITS Section 5.6.6. Therefore, the staff concludes that the proposed addition of the phrase "and COMS PORV" is acceptable.

The licensee also proposed to add a reference to WCAP-14040-NP-A in addition to the reference to the NRC letter that approved the methodology to be used in the PTLR. The cover letter issuing this safety evaluation is that letter, as stated above. The WCAP contains most of the methodology. Therefore, both this letter and the WCAP should be listed in ITS Section 5.6.6. The licensee's proposal is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, good-faith attempts were made to notify the Missouri State official of the proposed issuance of the amendment before the amendment was issued. On March 23, 2000, the staff contacted the Department of Natural Resources and discussed the amendment with a person who is not the state contact or the state contact backup, but on the staff of the state contact. The person on the staff stated that she would attempt to find out the State's comment and contact the staff on March 24, 2000. In the call of March 24, 2000, the staff was informed that neither the state contact or its backup would be available until March 28, 2000, to discuss the State's comment on the amendment.

On the afternoon of March 24, 2000, the licensee requested the staff to issue the amendment under the provisions of 10 CFR 50.91(b)(3) that allows the Commission to issue the amendment without comments from the State if the staff has made good faith efforts to telephone the state contact. The license requested that the amendment be issued today because the amendment is part of the major effort by the licensee to implement the improved Technical Specifications (ITs) that were approved by the Commission in the previous Amendment No. 133. The ITs were the result of changing the entire Technical Specifications for Callaway and the implementation has been a major effort by the licensee at Callaway since May 1999. The licensee is scheduled to complete the implementation on April 1, 2000, and the present amendment is a significant part of that implementation. The licensee will be working this weekend to complete paperwork involving this amendment.

The staff considered the licensee's request to issue the present amendment with the staff not having received comments on the amendment from the State. Because the licensee is implementing, in an acceptable manner, GL 96-03 that was issued by the staff and is not the first Westinghouse plant to implement this generic letter (in fact the same generic letter was approved for the similar Westinghouse plant of Wolf Creek Generating Station on December 7, 1999), the staff does not expect an objection from the State. Also, the staff has concluded that it was sufficiently important to issue the present amendment today so that the licensee could begin the implementation of the amendment as soon as practicable. Based on these considerations, the staff again called the State and asked that the state contact be paged so that the staff could inform the state contact that the amendment would still be issued today. By six o'clock on the day the staff issued the amendment, the state contact had not called the staff. The staff researched the past amendments issued to Callaway and found that in reviewing all the amendments from Amendment No. 51 to the previous Amendment No. 133, the State has not objected to any of the amendments.

The state contact will again be phoned on March 28, 2000, and the present amendment will be discussed at that time. If the state contact has any comments on the amendment, the staff will issue a letter addressing those comments. In accordance with 10 CFR 50.91(b)(5), the State can not prevent the Commission from issuing the amendment; however, the State has the right to have its comments on the amendment addressed by the staff.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has

determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (64 FR 73101). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (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.

Principal Contributors: Lambros Lois
Meena Khanna

Date: March 24, 2000