

September 26, 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: USE OF ADMINISTRATIVE CONTROLS FOR OPEN CONTAINMENT PENETRATIONS DURING REFUELING (TAC NO. MA9591)

Dear Mr. Randolph:

The Commission has issued the enclosed Amendment No. 138 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated July 21, 2000 (ULNRC-04285), as supplemented August 16, 2000.

The amendment revises Limiting Condition for Operation (LCO) 3.9.4, "Containment Penetrations," of the Callaway TS to allow containment penetrations with direct access to the outside atmosphere to be open under administrative controls during refueling operations, by adding a note to the LCO that states "containment penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls." In addition, there is a format and editorial correction to TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Start Air," to correct an error in the conversion to the improved TS issued May 28, 1999, in Amendment No. 133.

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, 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. 138 to NPF-30  
2. Safety Evaluation

cc w/encls: See next page

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DFO 1

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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. 138  
License No. NPF-30

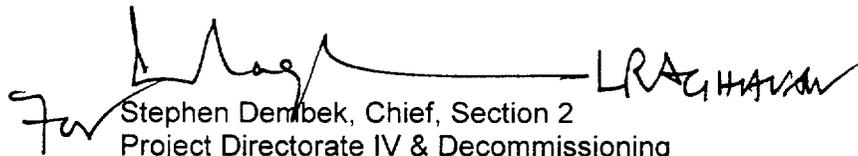
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Union Electric Company (UE, the licensee) dated July 21, 2000, as supplemented August 16, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the 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. 138 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 (including the completion of the administrative procedures that ensure that open containment penetrations, with direct access to the outside atmosphere during refueling operations with core alterations and irradiated fuel movement inside containment, will be promptly closed in the event of a fuel handling accident inside containment) before refueling operations during refueling outage 11, the next refueling outage for Callaway Plant, Unit 1, scheduled to begin in Spring 2001.

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: September 26, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 138

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.

REMOVE

3.8-20  
3.9-6

INSERT

3.8-20  
3.9-6

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>E. One or more DGs with two starting air receivers in service with pressure &lt; 435 psig and ≥ 250 psig.</p> <p><u>OR</u></p> <p>One or more DGs with only one starting air receiver in service with pressure &lt; 610 psig and ≥ 300 psig.</p>	<p>E.1 Restore two starting air receivers with pressure ≥ 435 psig.</p> <p><u>OR</u></p> <p>E.2 Restore one starting air receiver with pressure ≥ 610 psig.</p>	<p>48 hours</p> <p>48 hours</p>
<p>F. Required Action and associated Completion Time not met.</p> <p><u>OR</u></p> <p>One or more DGs diesel fuel oil, lube oil, or starting air subsystems not within limits for reasons other than Condition A, B, C, D, or E.</p>	<p>F.1 Declare associated DG inoperable.</p>	<p>Immediately</p>

3.9 REFUELING OPERATIONS

3.9.4 Containment Penetrations

LCO 3.9.4

The containment penetrations shall be in the following status:

- a. The equipment hatch closed and held in place by four bolts;
- b. One door in the emergency air lock closed and one door in the personnel air lock capable of being closed; and
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere either:
  - 1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or
  - 2. capable of being closed by an OPERABLE Containment Purge Isolation valve.

----- NOTE -----

Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.

-----

APPLICABILITY: During CORE ALTERATIONS,  
During movement of irradiated fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more containment penetrations not in required status.	A.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	A.2 Suspend movement of irradiated fuel assemblies within containment.	Immediately



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 138 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

1.0 INTRODUCTION

By application dated July 21, 2000, Union Electric Company (the licensee) requested changes to the Technical Specifications (TS, Appendix A to Facility Operating License No. NPF-30) for the Callaway Plant, Unit 1 (Callaway). The proposed amendment would primarily revise Limiting Condition for Operation (LCO) 3.9.4, "Containment Penetrations," of the Callaway TS to allow containment penetrations with direct access to the outside atmosphere to be open under administrative controls during refueling operations with core alterations and irradiated fuel movement inside containment.

The proposed change would add a note to the LCO that states "containment penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls." The change to TS 3.9.4 would incorporate an NRC-approved improvement (identified by a Technical Specifications Task Force (TSTF) number) to the improved Standard TS for Westinghouse plants, such as Callaway. The improvement is TSTF-312, Revision 1, which allows containment penetrations with direct access from the containment atmosphere to the outside atmosphere to be unisolated under administrative controls during refueling operations. There are also changes to the TS Bases for the proposed changes to TS 3.9.4.

In addition, there would be a format and editorial correction to TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Start Air," to correct an error in the conversion to the improved TS issued May 28, 1999, in Amendment No. 133.

The supplement dated August 16, 2000, (ADAMS Accession No. ML003743151) provided additional clarifying information, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination published in the *Federal Register* on August 23, 2000 (65 FR 51364).

## 2.0 EVALUATION

The licensee has proposed to (1) modify TS 3.9.4 on containment penetrations to allow penetrations providing direct access from containment to the atmosphere to be open during refueling operations and (2) correct a required action for LCO 3.8.3.

### 2.1 Unisolated Containment Penetrations During Refueling

In modifying TS 3.9.4, the licensee has proposed a generic change to the improved Standard TS for Westinghouse plants, NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 1, dated April 1995. The generic change is TSTF-312, Revision 1, which is a change to the requirements on refueling operations that allows containment penetrations with direct access from the containment atmosphere to the outside atmosphere to be unisolated under administrative controls with core alterations and irradiated fuel movement inside containment. Because NUREG-1431 was part of the basis for the current TS for Callaway by the improved TS conversion in Amendment No. 133 issued May 28, 1999, and TSTF-312, Revision 1, is an improvement approved by the staff for NUREG-1431, the change in TSTF-312, Revision 1, is applicable to the TS for Callaway.

The licensee has proposed to add the note to LCO 3.9.4 to state that penetration flow paths providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls and delete the exception in SR 3.9.4.1 to the requirement to verify each required containment penetration is in the required position. The proposed note to LCO 3.9.4 is similar to the change approved in TSTF-312, Revision 1.

The justification for the NRC-approved TSTF is that (1) the dose calculations for the design-basis fuel handling accident (FHA) indicate acceptable radiological consequences, and (2) the licensee will implement administrative procedures that ensure that unisolated containment penetrations can and will be promptly closed in the event of a FHA. The time to close the penetrations shall be documented by the licensee and included in the dose calculations. The review of the proposed changes to TS 3.4.9 will be in terms of the potential dose consequences of the FHA inside containment and the administrative controls to close the open containment penetrations during the FHA inside containment. The FHA inside containment is the limiting or bounding event for activities during refueling when there are core alterations or fuel handling inside containment.

#### Dose Consequences of FHA Inside Containment

The limiting event during refueling when there are core alterations or fuel handling inside containment is the FHA inside containment. The licensee has described this event in Section 15.7.4 of the Final Safety Analysis Report (FSAR) for Callaway and the staff's acceptance criteria is given in Standard Review Plan (SRP) 15.7.4 of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants."

The licensee's and the staff's calculated potential dose consequences for the FHA inside containment at the exclusion area boundary and the assumptions used for the calculated dose consequences are in the attached Tables 1 and 2, respectively. The staff's calculated values of the potential dose consequences to the control room operators are also given in Table 1, and

the assumptions are provided in Table 2. The acceptance criteria for the exposure of the control room operators is General Design Criterion (GDC) 19 in Appendix A to 10 CFR Part 50.

The licensee's dose consequences in Table 1 came from FSAR Table 15.7-8 (exclusion area boundary dose consequences for the FHA inside the reactor building and containment) and Table 15.6-8 (for the control room operator doses for the large-break loss-of-coolant accident which bounds the FHA). The assumptions for these values are in FSAR Tables 15.7-7, 15.A-1, and 15.A-2. The staff's dose consequences were reported in Amendment No. 114 issued July 15, 1996, and Amendment No. 129 issued January 19, 1999. The potential dose consequences in Amendment No. 114 were part of the basis of the approval to have both containment personnel airlock doors open during refueling with core alterations or irradiated fuel movement inside containment. The dose consequences reported by the staff in Amendment No. 129 are higher than that in Amendment No. 114 because, as reported in the safety evaluation for Amendment No. 129, the staff's assumptions were increased to 1.2 fuel assemblies damaged and 30 percent noble gases released from the damaged fuel.

Because the licensee has assumed the same 2-hour period of release that the staff assumed for the FHA inside containment, the staff concludes that the time to close the containment penetrations under the licensee's administrative controls discussed above will not be more than the 2-hour period assumed in the licensee's and staff's dose calculations reported in Table 1.

Because the potential dose consequences from the licensee and the staff given in Table 1 for the FHA inside containment are within the acceptance criteria given in SRP Section 15.7.4 and GDC 19, the staff concludes that the potential dose consequences are acceptable.

#### Administrative Controls and Procedures

In its application, the licensee stated that the proposed amendment would allow containment penetrations providing direct access to the outside atmosphere to be opened during refueling operations under administrative controls. This is currently not permitted for any of the containment penetrations. The proposed amendment is to allow the licensee to conduct additional refueling outage activities concurrent with the fuel handling work in the outage to permit more efficient performance of outage work while maintaining an acceptable barrier against the release of fission product radioactivity to the outside atmosphere during core alterations or irradiated fuel handling activities inside containment.

The licensee stated that the procedural controls would require that specified personnel would be designated to maintain an awareness of the open status of the containment penetrations during core alterations or irradiated fuel movement inside containment, and to be readily available to promptly close the open penetrations in the event of an accident. The licensee stated that the time expected to close the penetrations is on the order of minutes, the penetrations would be opened only as needed in the outage, such as for maintenance and testing purposes, and the containment evacuation signal within the containment for the FHA inside containment would inform the specified personnel to close the penetrations. Based on this, the staff concludes that the administrative controls during refueling operations on the open containment penetrations with direct access to the outside atmosphere are acceptable.

The licensee stated that it has not completed revising its procedures for maintaining administrative controls, but will complete them during the implementation of the proposed amendment. This is acceptable to the staff because the revised procedures will be available before the penetrations are unisolated during refueling operations under administrative controls.

Although the licensee stated that it believed that the penetrations could be closed within minutes of an event inside containment, it has not used a time on the order of minutes to calculate the potential consequences of the FHA inside containment. Because both the licensee and the staff have used the two-hour release period in Regulatory Guide (RG) 1.25, "Assumptions Used for Evaluating the Potential Radiological Consequences of a Fuel Handling Accident in the Fuel Handling and Storage Facility for Boiling and Pressurized Water Reactors," for the puff of radioactivity radioiodines and noble gases from the damaged fuel to leave containment, the staff concludes that the time to close the penetrations has been conservatively included in the calculation of potential dose consequences of the FHA inside containment.

#### Previous Amendments to the TS

In Amendment No. 114, issued July 15, 1996, the staff approved the containment personnel airlock doors being open during refueling with core alterations or irradiated fuel movement inside containment. The containment is provided with two airlocks, a personnel airlock and an emergency airlock. The personnel airlock is two doors with a personnel chamber between the two doors. The personnel airlock provides access between the auxiliary building and the containment at the operating floor level and are provided for the purpose of permitting personnel to enter and exit the containment without breaking the integrity of the containment pressure boundary. There are redundant mechanical interlocks provided between the two airlock doors to ensure that both doors cannot be opened at the same time, and that one door will always be closed to maintain the containment pressure boundary.

Amendment No. 114 permits the interlocks to be disabled to permit both personnel airlock doors to be opened during core alterations or irradiated fuel handling inside containment when containment integrity is required for core alterations and movement of irradiated fuel inside containment. This would allow both personnel airlock doors to be open during core alterations and irradiated fuel movement inside containment to permit frequent containment access and the quick evacuation of personnel inside containment during an accident. With the personnel airlocks open during the FHA, there would be no filtration of the radioactivity released through the airlocks during the FHA and the containment personnel airlock being open would be equivalent to a containment penetration that is open to the atmosphere.

In the safety evaluation (SE) for Amendment No. 114, the staff pointed out that the airlock doors will be closed as soon as possible after evacuation of containment is completed and the actual doses should be much lower than assumed in the staff's dose calculations. This would also be true for the containment penetrations because of the administrative controls proposed by the licensee to close the penetrations after the accident. The licensee also pointed out that the dispersion of radioactive gases through and outside containment will not be driven by any pressure differential resulting from the accident, but only due to the containment air circulation, so that the actual doses should be lower than the values in Table 1.

## Conclusion

In the proposed amendment, the licensee has proposed to add the note in TSTF-312, Revision 1, to LCO 3.9.4 that states "Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere." Based on the proposed amendment to TS 3.4.9 being the implementation of NRC-approved TSTF-312, Revision 1, which is applicable to the TS for Callaway, the acceptable dose consequences of the FHA inside containment and administrative controls for the containment penetrations (with direct access to the outside atmosphere) that are unisolated during refueling with core alterations or irradiated fuel movement inside containment, and the previous amendment approving the containment personnel airlock doors being open under administrative controls during refueling, the staff concludes that the proposed addition of the note to LCO 3.4.9 is acceptable.

### 2.2 Format and Editorial Correction to the TS

In its application, the licensee also proposed a format and editorial correction to Required Action E.2 of TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Start Air." This correction is to correct an error issued in Amendment No. 133.

For Required Action E.2 of TS 3.8.3, the licensee has proposed to add the completion time of 48 hours. For Condition E of TS 3.8.3 for one or more diesel generators being inoperable because the starting air receiver pressure is too low, there are two required actions -- E1 for restoring the air pressure to more than 435 psig in two receivers, and E.2 for air pressure more than 610 psig in one receiver. As stated in the Bases for TS 3.8.3, there are two air receivers for each diesel generator and there is sufficient receiver air pressure for 5 successive diesel generator starts if there is more than 435 psig in both receivers or more than 610 psig in one receiver. The diesel generator operability requirements on the air receiver are to assure there is at least 5 such starts and the Required Actions E.1 and E.2 are to restore the diesel generator to operability by having either of the two acceptable pressure-receiver conditions (i.e., both receivers greater than 435 psig or one receiver greater than 610 psig). The current TS have a single completion time of 48 hours specified for Condition E, and it may appear that this completion time applies only to Required Action E.1 because the 48 hours appears directly to the left of that required action. The licensee has proposed that the same completion time of 48 hours also be specified to the left of Required Action E.2. Because the diesel generators may be restored to operability by either of the two required actions, both actions do not have to be performed, and the two required actions are similar, the completion times for the two required actions should be same. Because the licensee has proposed for Required Action E.2 the same 48 hours that is clearly specified for required Action E.1, the staff concludes that the proposed addition of the completion time of 48 hours to Required Action E.2 is acceptable.

### 2.3 Conclusion

Based on the evaluation given in Sections 2.1 and 2.2 above, the staff concludes that the proposed amendment in the licensee's application of July 21, 2000, as supplemented August 16, 2000, is acceptable. In reviewing the proposed amendment, the staff also looked at the licensee's proposed changes to the Bases for TS 3.4.9. The staff did not have a disagreement with the changes to the Bases.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Missouri State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to 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 (65 FR 51364). 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.

### 5.0 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.

Attachments: 1. Table 1, Calculated Radiological Dose Consequences (Rem)  
2. Table 2, Assumptions Used in Calculating Radiological Dose Consequences

Principal Contributor: Jack Donohew

Date: September 26, 2000

Table 1

CALCULATED RADIOLOGICAL DOSE CONSEQUENCES (REM)

<u>Exclusion Area Boundary</u>	<u>Licensee Doses<sup>1</sup></u>	<u>Staff Doses</u>		<u>NRC Acceptance Criteria</u>
		<u>Amdt 114<sup>2</sup></u>	<u>Amdt 129<sup>3</sup></u>	<u>SRP 15.7.4 Guidelines</u>
Whole Body	0.334	Not Given	Not Given	6
Thyroid	73.0	52	62.5	75
<u>Control Room (operator)</u>	<u>Licensee Doses</u>	<u>Staff Doses</u>		<u>NRC Acceptance Criteria</u>
		<u>Amdt 114</u>	<u>Amdt 129</u>	<u>GDC-19 Guidelines</u>
Whole Body	0.453	Not Given	Not Given	5
Thyroid	25.55	3.3	3.94	Equivalent to 5 rem whole body**

<sup>1</sup> Doses from Callaway Final Safety Analysis Report Table 15.7-8 for the radiological consequences at the exclusion area boundary for a fuel handling accident (FHA) in the reactor building (containment), and Table 15.6-8 for the control room operator doses for a large-break loss-of-coolant accident (which bounds the FHA in the reactor building).

<sup>2</sup> Doses from Amendment No. 114, issued July 15, 1996.

<sup>3</sup> Doses from Amendment No. 129, issued January 19, 1999.

\*\* Guideline doses provided in Standard Review Plan (SRP) Section 6.4 define the dose equivalent as 30 rem to the thyroid.

TABLE 2

ASSUMPTIONS USED IN CALCULATING RADIOLOGICAL DOSE CONSEQUENCES  
FUEL HANDLING ACCIDENT INSIDE CONTAINMENT

<u>Parameters</u>	<u>Licensee Value<sup>1</sup></u>	<u>Staff Value<sup>2</sup> (Amdt 114)</u>	<u>Staff Value<sup>3</sup> (Amdt 129)</u>
Power level (MWt)	3636	3565	3565
Number of fuel rods damaged		264	317
Total number of fuel rods		50,952	50,952
Number of assemblies affected	1.2	1.0	1.2
Shutdown time (hours)	100	100	100
Power radial peaking factor*	1.65	1.65	1.65
Fission product release duration (hours)	2.0	2.0	2.0
Release fractions:*			
Radioiodine	10.0% <sup>5</sup>	12.0% <sup>4</sup>	12.0% <sup>4</sup>
Noble gases	10.0%	10.0%	30.0%
Krypton gases	30.0%	30.0%	30.0%
Radioiodine forms:*			
Elemental	75.0%	75.0%	75.0%
Organic	25.0%	25.0%	25.0%
<u>Receptor Point Variables (per TID-14844)</u>			
Exclusion area boundary			
Atmospheric relative concentration, X/Q (sec/m <sup>3</sup> ) 0-2 hours	1.5 x 10 <sup>-4</sup>	1.5 x 10 <sup>-4</sup>	1.5 x 10 <sup>-4</sup>
Control room			
Atmospheric Dispersion, X/Q (sec/m <sup>3</sup> )	7.2 x 10 <sup>-4</sup>	7.6 x 10 <sup>-4</sup>	7.6 x 10 <sup>-4</sup>
Control room volume (feet <sup>3</sup> )	1.5 x 10 <sup>+5</sup>	1.5 x 10 <sup>+5</sup>	Not Given
Maximum filtration rate (feet <sup>3</sup> /minute)	1440	1350-2025	Not Given
Iodine Protection factor		80	80.3

<sup>1</sup> Callaway Final Safety Analysis Report Tables 15.7-7, 15A-1, and 15.A-2 on parameters (including control room and atmospheric dispersion factors) used in evaluating the accident analysis of a fuel handling accident inside containment.

<sup>2</sup> Staff parameters from Amendment No. 114, issued July 15, 1996.

<sup>3</sup> Staff parameters from Amendment No. 129, issued January 19, 1999.

<sup>4</sup> Higher extended burnup release fraction for Iodine 131 from NUREG/CR-5009

<sup>5</sup> ADAMS Accession No. ML00374xxxx (Regulatory Guide 1.25 value)

\* NRC Regulatory Guide (RG) 1.25