March 9, 2001

MEMORANDUM TO: File

FROM: Jack N. Donohew, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning ***/RA/***
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: CLARIFICATION OF APPLICATION TO ELIMINATE BORON DILUTION MITIGATION SYSTEM - CALLAWAY PLANT, UNIT 1 (TAC NO. MA9065)

Attached is an e-mail from the licensee that clarifies the application dated May 25, 2000, that requested the elimination of the boron dilution mitigation system (BDMS) from the technical specifications. The e-mail dated January 21, 2001, from the licensee clarifies the statements in the application about operator action with the BDMS eliminated. The e-mail addresses the following about operator action: (1) What are the specific actions that the operators must perform, (2) are the actions taken in the control room, and (3) how long is it expected for the operators to perform these actions and on what basis?

Docket No. 50-483

Attachment: E-mail dated January 21, 2001

March 9, 2001

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FROM: Jack N. Donohew, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning ***/RA/***
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Docket No. 50-483

Attachment: E-mail Dated January 21, 2001

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DATE	3/8/2001		3/2/01		3/8/01	

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E-MAIL DATED JANUARY 21, 2001

From: "Yates, G Bert" <GYates@ameren.com>
To: "Jack Donohew (E-mail)" <jnd@nrc.gov>
Date: Wed, Feb 14, 2001 11:55 AM
Subject: RE: Callaway BDMS Amendment

Jack:

Regarding items 1 and 2, operator actions are discussed in the BDMS LAR Attachment 1 (page 3 of 7) and Appendix A (page 16). The specific operator actions credited in the reanalysis, after diagnosing the event, would be performed from the control room to fully open the RWST isolation valves (BNLCV0112D/E) and then fully close the VCT isolation valves (BGLVC0112B/C). The valve stroke times are included in the analysis as sequential actions, as discussed in LAR Appendix A (total of 25 seconds).

Regarding item 3, no specific simulator runs were performed since 1) it was assumed that meeting the SRP 15.4.6 acceptance criteria (demonstrating the availability of 15 minutes for operator action) would be sufficient and 2) the required operator actions are the same as those currently credited in MODES 1 and 2 to prevent a loss of shutdown margin as a result of an inadvertent dilution event (see FSAR pages 15.4-26a through 15.4-28 and Table 15.4-1, sheet 3). However, based on operating experience, it is anticipated that the operator would terminate this event in 10 minutes or less:

1. Simulator training on this event includes postulated malfunctions of the automatic BDMS to effect valve position changes. If the desired automatic response is not obtained, the operators are directed by procedure to remote-manually reposition the valves from the control room. Based on the experience of licensed SROs at Callaway, this step in the response procedure would be reached in approximately 5-10 minutes.

2. The annunciator response procedure to be issued for implementation of this license amendment will cover the response to the new high VCT level alarms being added to the BGL-0112 and BGL-0185 level instrument loops. This procedure will include a caution that will highlight the need to ensure the valves are repositioned and the basis for that requirement. It is expected that valve repositioning would occur in 10 minutes or less.

Bert Yates

-----Original Message-----
From: Jack Donohew [mailto:JND@nrc.gov]
Sent: Monday, February 12, 2001 3:22 PM
To: david_e_shafer@ameren.com
Subject: Callaway BDMS Amendment

This e-mail is on the operator action needed to prevent the dilution event. The application dated May 25, 2000, does not appear to address the specific actions that the operators must perform in the 15 minutes after the alarm.

Questions: (1) What are the specific actions that the operators must perform? (2) Are the actions taken in the control room? and (3) How long is it expected for the operators to perform these actions and on what basis? <JND>

CC: "Passwater, Alan C" <APasswater@ameren.com>, "Shaf...