June 15, 2001

MEMORANDUM TO: Biweekly Notice Coordinator

FROM: Jack N. Donohew, Senior Project Manager, Section 2
Project Directorate IV ***/RA/***
Division of Licensing Project Management

SUBJECT: REQUEST FOR PUBLICATION IN BI-WEEKLY FR NOTICE - NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO FACILITY OPERATING LICENSE AND PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION AND OPPORTUNITY FOR HEARING (TAC NO. MB2083)

Union Electric Company, Docket No. 50-483, Callaway Plant, Unit 1, Callaway County, Missouri

Date of amendment request: May 30, 2001 (ULNRC-04481)

Description of amendment request: The proposed amendment changes the technical specifications to remove the phrase "and the charging flow control valve full open" from Limiting Condition for Operation 3.5.5, Required Action A.1, and Surveillance Requirement 3.5.5.1 for the reactor coolant pump seal injection flow.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

   The emergency core cooling system (ECCS) analysis models the reactor coolant pump (RCP) seal injection flow path as a hydraulic flow resistance. The proposed change clarifies that RCP seal injection flow is a function of system conditions. The seal injection flow rate can vary during operation, but the hydraulic flow resistance is fixed by positioning the manual seal injection throttle valves. The resistance does not change if the valve adjustments are not changed. Thus, RCP seal injection flow variation due to changing reactor coolant system (RCS) backpressure following a loss of coolant accident (LOCA) is explicitly accounted for as a result of modeling the RCP seal injection flow path resistance.

The proposed change does not impact the way the RCP seal injection flow should be established per the safety analysis and does not affect RCP seal integrity. The seal injection flow resistance only affects ECCS flow. Since ECCS flow occurs after an accident, the proposed change cannot impact the probability of an accident.

Overall ECCS performance will remain within the bounds of the previously performed accident analyses since there are no hardware changes. The ECCS will continue to function in a manner consistent with the plant design basis. All design, material, and construction standards that were applicable prior to the proposed change are [still] maintained.

The proposed change will not affect the probability of any event initiators. There will be no degradation in the performance of, or an increase in the number of challenges imposed on, safety-related equipment assumed to function during an accident situation. There will be no change to normal plant operating parameters or accident mitigation performance.

The proposed change will not alter any assumptions or change any mitigation actions in the radiological consequence evaluations in the FSAR [Final Safety Analysis Report].

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

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

There are no hardware changes nor are there any changes in the method by which any safety-related plant system performs its safety function. The proposed change will not affect the normal method of plant operation. No performance requirements will be affected.

Since the proposed change continues to assure that the assumed ECCS flow is available after a large break LOCA, no new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result [of the proposed change]. There will be no adverse effect or challenges imposed on any safety-related system as a result of this request.

The proposed change does not alter the design or performance characteristics of the ECCS. It simply corrects the description of how to properly set the position of the RCP seal injection throttle valves in support of the ECCS flow balance assumptions.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

   There will be no effect on the manner in which safety limits or limiting safety system settings are determined nor will there be any effect on those plant systems necessary to assure the accomplishment of protection functions. There will be no impact on the overpower limit, departure from nucleate boiling ratio limits, heat flux hot channel factor (F_Q) nuclear enthalpy rise hot channel factor (FN/ΔH), loss of coolant accident peak cladding temperature (LOCA PCT), peak local power density, or any other margin of safety. The radiological dose consequence acceptance criteria listed in the Standard Review Plan will continue to be met.

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

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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

NRC Section Chief: Stephen Dembek

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