

December 16, 1992

Docket No. 50-483

DISTRIBUTION

Mr. Donald F. Schnell
Senior Vice President - Nuclear
Union Electric Company
Post Office Box 149
St. Louis, Missouri 63166

Docket File	GHill(4)	McCracken
NRC & Local PDRs	Wanda Jones	MDLynch
PD33 Reading	CGrimes	
JRoe	ACRS(10)	
JZwolinski	OPA	
JHannon	OC/LFMB	
PKreutzer	BClayton,RIII	
LRWharton	PD33 Gray	
OGC	DHagan	

Dear Mr. Schnell:

SUBJECT: AMENDMENT NO. 75 TO FACILITY OPERATING LICENSE NO. NPF-30
(TAC NO. M80399)

The Commission has issued the enclosed Amendment No. 75 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. This amendment revises the Technical Specifications (TS) in response to your application dated March 15, 1991, as supplemented by letters dated December 13, 1991, September 16, 1992 and October 30, 1992.

The amendment revises the ACTION statement in TS 3.6.1.2 and the surveillance criteria in TS 4.6.1.2.b and associated bases to establish two conditions for determining the acceptability of the periodic Type A tests conducted pursuant to Appendix J to 10 CFR Part 50. These conditions are the "as found" and the "as left" conditions; each has separate acceptance criteria. The amendment also revises TS 4.6.1.2.a to eliminate the requirement to conduct the third test of each set of three Type A tests during the shutdown for the 10-year plant inservice inspection.

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

Sincerely,

original signed by
L. Raynard Wharton, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

9212300373 921216
PDR ADOCK 05000483
P PDR

Enclosures:

1. Amendment No. 75 to License No. NPF-30
2. Safety Evaluation

cc w/enclosures: 230027
See next page

LA:PD33:DRPW
PKreutzer *pk*
12/13/92

SPE:PD3-2:DRPW
MDLynch *
8/04/92

PM:PD33:DRPW
LRWharton/bsj
12/13/92

BC:SPLB:DST
McCracken
12/7/92

BC:SCSB:DSSA
RBarrett *
12/9/92

BC:OTSB:DORS
CGrimes
12/9/92

D:PD33:DRPW
JHannon
12/16/92

OGC-OWF
JHannon
12/14/92

* See previous concurrence
modified on clipped page

OFFICIAL RECORD COPY DOCUMENT NAME: CAL80399.AMD

if technically acceptable this generic change will be incorporated into STS

NRC FILE CENTER COPY

DF01

Mr. D. F. Schnell
Union Electric Company

Callaway Plant
Unit No. 1

cc:

Cermak Fletcher Associates
18225 Flower Hill Way #A
Gaithersburg, Maryland 20879-5334

Gerald Charnoff, Esq.
Thomas A. Baxter, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Mr. T. P. Sharkey
Supervising Engineer,
Site Licensing
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
RR#1
Steedman, Missouri 65077

Mr. Alan C. Passwater, Manager
Licensing and Fuels
Union Electric Company
Post Office Box 149
St. Louis, Missouri 63166

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

Regional Administrator
U.S. NRC, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

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

Mr. Bart D. Withers
President and Chief
Executive Officer
Wolf Creek Nuclear Operating
Corporation
P.O. Box 411
Burlington, Kansas 66839

Mr. Dan I. Bolef, President
Kay Drey, Representative
Board of Directors Coalition
for the Environment
6267 Delmar Boulevard
University City, Missouri 65130



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

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 75
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by Union Electric Company (UE, the licensee) dated March 15, 1991, as supplemented by letters dated December 13, 1991, September 16, 1992 and October 30, 1992, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and 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:

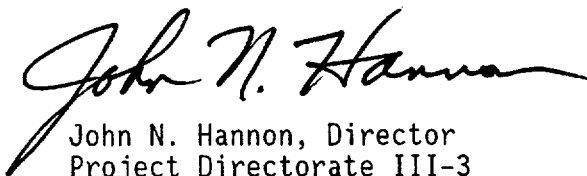
9212300375 921216
PDR ADOCK 05000483
P PDR

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 75, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into the license. UE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, reading "John N. Hannon". The signature is fluid and cursive, with a long horizontal stroke at the end.

John N. Hannon, Director
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of issuance: December 16, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 75

OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. The corresponding overleaf pages are provided to maintain document completeness.

REMOVE

3/4 6-2

B 3/4 6-1

INSERT

3/4 6-2

3/4 6-2a

B 3/4 6-1

B 3/4 6-1a

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except as provided in Table 3.6-1 of Specification 3.6.3;
- b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3; and
- c. After each closing of each penetration subject to Type B testing, except the containment air locks, if opened following a Type A or B test, by leak rate testing the seal with gas at a pressure not less than P_a , 48.1 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Specification 4.6.1.2d. for all other Type B and C penetrations, the combined leakage rate is less than $0.60 L_a$.

* Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.

CONTAINMENT SYSTEMS

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

- a. An overall integrated leakage rate of less than or equal to L_a , 0.20% by weight of the containment air per 24 hours at P_a , 48.1 psig.
- b. A combined leakage rate of less than $0.60 L_a$, for all penetrations and valves subject to Type B and C tests, when pressurized to P_a , 48.1 psig.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the overall integrated containment leakage rate exceeding $1.0 L_a$, perform the ACTION of Specification 3.6.1.1.
- b. With the as left overall integrated containment leakage rate exceeding $0.75 L_a$, restore the overall integrated leakage rate to less than $0.75 L_a$ prior to increasing the Reactor Coolant System temperature above 200°F .
- c. With the combined leakage rate for all penetrations and valves subject to Type B and C tests exceeding $0.60 L_a$:
 - 1) Restore the combined leakage rate to less than $0.60 L_a$ within 4 hours, or
 - 2) Isolate each failed penetration within 4 hours by use of at least one closed manual valve or blind flange, or a deactivated automatic valve secured in the closed position, or
 - 3) Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR Part 50 using the methods and provisions of ANSI N45.4-1972:

CONTAINMENT SYSTEMS

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

- a. An overall integrated leakage rate of less than or equal to L_a , 0.20% by weight of the containment air per 24 hours at P_a , 48.1 psig.
- b. A combined leakage rate of less than $0.60 L_a$, for all penetrations and valves subject to Type B and C tests, when pressurized to P_a , 48.1 psig.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the overall integrated containment leakage rate exceeding $1.0 L_a$, perform the ACTION of Specification 3.6.1.1.
- b. With the as left overall integrated containment leakage rate exceeding $0.75 L_a$, restore the overall integrated leakage rate to less than $0.75 L_a$ prior to increasing the Reactor Coolant System temperature above 200°F.
- c. With the combined leakage rate for all penetrations and valves subject to Type B and C tests exceeding $0.60 L_a$:
 - 1) Restore the combined leakage rate to less than $0.60 L_a$ within 4 hours, or
 - 2) Isolate each failed penetration within 4 hours by use of at least one closed manual valve or blind flange, or a deactivated automatic valve secured in the closed position, or
 - 3) Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR Part 50 using the methods and provisions of ANSI N45.4-1972:

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- a. Three Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at 40 ± 10 month intervals during shutdown at a pressure not less than P_a , 48.1 psig, during each 10-year service period.
- b. If any periodic as found Type A test fails to meet L_a , the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive as found Type A tests fail to meet L_a , a Type A test shall be performed at least every 18 months until two consecutive as found Type A tests meet L_a , at which time the above test schedule may be resumed. The as left overall integrated containment leakage rate shall be less than $0.75 L_a$;

3/4.6 CONTAINMENT SYSTEMS

BASES

3/4.6.1 PRIMARY CONTAINMENT

3/4.6.1.1 CONTAINMENT INTEGRITY

Primary CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the safety analyses. This restriction, in conjunction with the leakage rate limitation, will limit the SITE BOUNDARY radiation doses to within the dose guideline values of 10 CFR Part 100 during accident conditions.

3/4.6.1.2 CONTAINMENT LEAKAGE

The limitations on containment leakage rates ensure that the total containment leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure, P_a . As an added conservatism, the measured overall integrated leakage rate is further limited to less than or equal to $0.75 L_a$, during performance of the periodic test to account for possible degradation of the containment leakage barriers between leakage tests.

The surveillance testing for measuring leakage rates are consistent with the requirements of Appendix J of 10 CFR Part 50.

The following exemptions have been granted to the requirements of Appendix J of 10 CFR Part 50:

1. Section III.A.1(a) - an exemption to the requirement to stop the Type A test if excessive leakage is determined. This exemption allows the satisfactory completion of the Type A test if the leakage can be isolated and appropriately factored into the results.
2. Section III.A.5(b) - an exemption for the acceptance criteria, in lieu of the present single criterion of the total measured containment leakage rate being less than 0.75 of the maximum allowable leakage rate, L_a , the "as found" allowable leakage rate will be L_a and the "as left" allowable leakage rate will be less than $0.75 L_a$.
3. Section III.D.1(a) - an exemption that removes the requirement that the third test of each set of three Type A tests be conducted when the plant is shutdown for the 10-year plant inservice inspection.

CONTAINMENT SYSTEMS

BASES

CONTAINMENT LEAKAGE (Continued)

Exemption 1 allows the continuance of a Type A test when excessive leakage is found provided that significant leaks are identified and isolated. After completion of the modified Type A test (i.e., a Type A test with the significant leakage paths isolated during the test), local leakage rates of those paths isolated during the modified Type A test will be measured before and after repairs to those paths. The adjusted "as found" leakage rate for the Type A test can be determined by adding the local leakage rates measured, before any repairs to those previously isolated leakage paths, to the containment integrated leakage determined in the modified Type A test plus any leakage improvements (defined below) made prior to the test. This adjusted "as found" leakage rate is to be used in determining the scheduling of the periodic Type A test in accordance with Section III.A.6 of Appendix J.

The acceptability of the modified Type A test can be determined by calculating the adjusted "as left" containment overall integrated leakage rate and comparing it to the acceptance criteria of $0.75 L_a$. The adjusted "as left" Type A leakage rate is determined by adding the local leakage rates measured, after any repairs and/or adjustments to those previously isolated leakage paths, to the leakage rate determined in the modified Type A test. It should be noted that additional adjustments for non-standard lineup and changes in containment volume are added to the measured leakage rate for both "as found" and "as left" determinations.

Leakage improvements are defined as the difference between the pre-repair LLRT and post-repair LLRT done on containment penetrations prior to the start of the Type A test.

The only differences between this approach and Appendix J requirements are that: (1) the potentially excessive leakage paths will be repaired and/or adjusted after the Type A test is completed; and (2) the Type A test leakage rate is partially determined by calculation rather than by direct measurement.

3/4.6.1.3 CONTAINMENT AIR LOCKS

The limitations on closure and leak rate for the containment air locks are required to meet the restrictions on CONTAINMENT INTEGRITY and containment leak rate. Surveillance testing of the air lock seals provides assurance that the overall air lock leakage will not become excessive due to seal damage during the intervals between air lock leakage tests.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 75 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

1.0 INTRODUCTION

In a letter dated March 15, 1991, the Union Electric Company (the licensee) requested three exemptions from certain requirements in 10 CFR Part 50, Appendix J, Sections III.A.1.(a), III.A.5.(b) and III.D.1.(a). The licensee also requested two revisions to the Callaway Technical Specifications (TSs), 3/4.6.1.1 and 3/4.6.1.2, one of which was dependent on the granting of the exemption requests. The exemptions were issued on October 22, 1991. The proposed TS revision that was dependent on the exemptions is TS 3/4.6.1.2, which revises the ACTION statement for 3.6.1.2 and clarifies the Surveillance Requirements for 4.6.1.2.a, and 4.6.1.2.b. Each of these three items is considered separately in the following evaluation. In a letter dated December 13, 1991, the licensee withdrew a portion of its original amendment request for Surveillance Requirement 4.6.1.2.a. The revision to TS 3/4.6.1.1 was made in Amendment No. 62 to the Callaway license, issued on September 11, 1991. In letters dated September 16, 1992 and October 30, 1992, the licensee provided clarifying information and bases revisions associated with TS 3/4.6.1.2 that did not change the initial proposed determination of no significant hazards consideration or affect the notice published September 4, 1991 (56 FR 43816).

2.0 EVALUATION

2.1 TS 3.6.1.2

The present ACTION statement in TS 3.6.1.2 is based on the acceptance criteria for the periodic measured overall integrated leakage rate test (ILRT which is also identified as a Type A test) as well as for the Types B and C tests as stated in Sections III.A, III.B, and III.C of Appendix J. The present TS acceptance criteria for the periodic Type A tests requires that, if the measured overall integrated containment leakage rate exceeds 75 percent of the maximum allowable leakage rate (L_a) at the calculated peak containment internal pressure (P_a) related to the design basis accident (DBA), then the overall integrated leakage rate shall be restored to less than $0.75 L_a$ prior to increasing the reactor coolant system (RCS) temperature above 200°F.

The licensee proposed that this requirement for the Type A tests be clarified and made more specific by establishing an "as found" condition and an "as left" condition, each with its own acceptance criteria. In that the present requirement cited above is in conformance with, and reflects the requirements of, Section III.A.5.(b)(2) of Appendix J, the licensee requested and the Commission granted an exemption from the specific Appendix J requirement as cited above.

The licensee proposes that the acceptable leakage rate for the "as found" Type A condition be the leakage rate calculated by adding the differences between the "as found" and "as left" measured local leakage rates from each Type B and Type C test to the leakage rate measured in the Type A test. These Type B and Type C tests are usually conducted prior to conducting the Type A test. In the event that potentially excessive leakage paths are identified which would interfere with the satisfactory completion of a periodic Type A test and such paths are isolated during the test, the Type B or Type C "as found" leakage rates measured on the isolated penetrations after the completion of the Type A test would be added to the Type A "as found" leakage rate total. The "as left" condition is represented by the periodic Type A leakage rate after any required repairs and/or adjustments are made.

The licensee's specific proposal for the revised acceptance criteria in lieu of the present single criterion cited above (i.e., L_{am} less than $0.75 L_a$) is that the "as found" allowable leakage rate should be L_a and the "as left" allowable leakage rate should be less than $0.75 L_a$.

The licensee's basis for this proposal is that the acceptance criterion for L_{am} was established in Appendix J as $0.75 L_a$ in order to provide a margin of 25 percent (i.e., $0.25 L_a$) to account for possible deterioration of the reactor primary containment leak-tightness between the periodic Type A tests. The licensee also states the value of L_a is the leakage rate assumed in the accident analyses in Chapter 15 of the Final Safety Analysis Report (FSAR). (Refer to Item III.2.2 of Table 15A-1 of the Callaway FSAR.) The licensee further states that there is no need for the 25 percent margin at the end of a Type A test interval to account for deterioration during this interval.

The NRC staff finds that the licensee's proposal for the acceptance criterion for the "as found" maximum allowable leakage rate of L_a is acceptable on the basis that, throughout the prior Type A test interval, the reactor primary containment leakage would have been at or below the value assumed in the Callaway accident analyses. Furthermore, the licensee's proposal continues to maintain the requirement that the reactor primary containment leakage rate prior to restart of the plant (i.e., the "as left" condition) be reestablished as less than $0.75 L_a$.

The NRC staff further finds that there is added assurance that there will not be any significant undetected degradation in the reactor primary containment leakage during each Type A test interval in that the primary contributors to potentially excessive leakage paths will be measured during the required Type B and Type C tests. These latter tests will be conducted at least during

each 18-month refueling outage but in no case at intervals greater than 2 years (Refer to Section III.D.2 and III.D.3 of Appendix J). The principal contributors to any deterioration in the containment leakage rate would thereby be detected and corrected at least once during a 36-month Type A test interval. The air locks will also continue to be tested at intervals of 6 months.

The staff finds that the proposed revision to the ACTION statement in TS 3.6.1.2 does not pose any undue risk to public health and safety in that the licensee will continue to demonstrate the containment overall integrated leak rate will be less than $0.75 L_a$ prior to restart after a refueling outage. In this regard, the margin to account for possible deterioration of the reactor primary containment leak-tightness between periodic Type A tests will be maintained. Further, any potentially excessive leakage paths will continue to be repaired and/or adjusted prior to restart and at intervals no greater than 24 months, except for air locks tested at 6-month intervals, thereby continuing to ensure the integrity of the containment.

The licensee also proposes to expand the ACTION statement of TS 3.6.1.2 with regard to the acceptance criterion for the combined leakage rate for all penetrations subject to Type B and Type C tests. The present criterion is that the combined leakage rate be less than $0.60 L_a$ prior to increasing the RCS temperature above 200°F.

In its letter of March 15, 1991, the licensee proposes three alternative actions in the event that the combined leakage rate for all penetrations and valves subject to Type B and Type C tests exceed $0.60 L_a$. These are: (1) restore the combined leakage rate to less than $0.60 L_a$ within 4 hours; or (2) isolate each "failed" penetration within 4 hours; or (3) be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

These proposed revisions to the ACTION statement of TS 3.6.1.2 are an improvement over the present TS requirements in that the three action items cited above now establish reasonable time intervals (i.e., either 4 or 6 hours) to accomplish one of the three proposed alternatives. At present, the ACTION statement does not address the possibility that the LCO might not be met during plant operations, even though Type B and C tests are sometimes conducted during plant operation (Modes 1 through 4). The staff considers this to be an inadequacy of current standard TS. If the LCO was not met, the licensee would be in TS 3.0.3 and required to initiate plant mode shut down within 1 hour. Such precipitous action is unnecessary and it is inconsistent with the philosophy of response times generally expressed by the TS. These three proposed actions and their associated time constraints are consistent with the ACTION statement in TS 3.6.3, "Containment Isolation Valves." Furthermore, the acceptance criteria for the combined leakage rate for all penetrations and valves subject to Type B and Type C tests remains unchanged at $0.60 L_a$.

On the basis that the proposed ACTION statement for TS 3.6.1.2 maintains the present Types A, B, and C test requirements for the leak-tightness of the reactor primary containment and establishes actions with prudent time requirements in the event that the acceptance criteria for Types B and C tests are not met, the staff finds that the proposed revision to TS 3.6.1.2 is acceptable.

2.2 TS 4.6.1.2.a

The present surveillance requirements in TS 4.6.1.2.a establish two schedular requirements for the periodic Type A tests. The first of these is that the Type A tests be conducted at 40 ± 10 -month intervals while the second schedular requirement is that the third test of each set of three Type A tests be conducted during the shutdown for the 10-year plant inservice inspection (ISI). In that this latter requirement is in conformance with, and reflects the requirements of, Section III.D.1.(a) of Appendix J, the licensee requested and the Commission granted an exemption from this specific Appendix J requirement as cited above.

With respect to the coupling requirement that the third Type A test of each set of three be conducted when the plant is shutdown for the 10-year plant ISI, the licensee states in its letter dated March 15, 1991, that it is performing the inservice volumetric, surface and visual examinations of components and system pressure tests in accordance with 10 CFR 50.55a(g)(4) throughout the 10-year inspection intervals. The major portion of this effort is presently being performed every 18 months during the refueling outages.

The staff finds that there is no benefit to be gained by the coupling requirement cited above in that elements of the Callaway ISI program are conducted throughout the 10-year cycles at the 18-month refueling outages rather than at the end of the 10-year cycles. Consequently, the subject coupling requirement offers the Callaway facility no benefit either to safety or to economical operation of the facility.

Moreover, each of these two surveillance tests (i.e., the Type A tests and the 10-year ISI program) is independent of the other and provides assurances of different plant characteristics. The Type A tests assure the required leak-tightness for the reactor primary containment to demonstrate compliance with the guidelines of 10 CFR Part 100. The 10-year ISI program provides assurance of the structural integrity of the plant's structures, systems, and components as well as verifying operational readiness of pumps and valves in compliance with 10 CFR 50.55a. There is no safety-related concern necessitating their coupling in the same refueling outage. Accordingly, the staff finds that the proposed revision to TS 4.6.1.2.a is acceptable.

With respect to the first schedular requirement for the periodic Type A tests in TS 4.6.1.2.a, the licensee proposed in its letter dated March 15, 1991, that the present prescriptive Type A test interval of 40 ± 10 months be replaced with a nonprescriptive requirement that the Type A tests "...be conducted during each 10-year service period at approximately equal

intervals..." This wording is compatible with the schedular requirement in Section III.D.1.(a) of Appendix J. However, the Commission's present policy with respect to TS surveillances implementing Appendix J requirements is to establish specific numerical values for an acceptable range of time during which the Type A tests shall be performed (e.g., 40 ± 10 months).

After discussing this issue with the staff, the licensee stated in its letter dated December 13, 1991, that it was withdrawing its prior request to modify TS 4.6.1.2.a. Its basis for this decision was that a forthcoming revision to Appendix J of 10 CFR Part 50 would permit it the flexibility to match its present 18-month refueling schedule with the schedular requirements for Type A tests in the revised Appendix J.

The staff anticipates that the pending decision by the Commission regarding a revision to Appendix J will provide the relief needed by the licensee in that the pending revision to Appendix J, if adopted in its present form, will permit a significantly longer test interval. Accordingly, the staff has deferred its decision regarding the licensee's proposed deletion of the 40 ± 10 -month Type A test interval from TS 4.6.1.2.a, pending Commission approval of the proposed revision to Appendix J. On this basis, the present schedular requirement in TS 4.6.1.2.a for a Type A test interval of 40 ± 10 months will remain.

2.3 TS 4.6.1.2.b

The present surveillance criteria in TS 4.6.1.2.b for a periodic Type A test has a single acceptable value for the maximum allowable leakage rate (i.e., $0.75 L_a$). In the event that a Type A test fails to satisfy this acceptance criterion, the test schedule for subsequent Type A tests must be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet the $0.75 L_a$ acceptance criterion, the Type A tests must be conducted on an accelerated test schedule (i.e., at least every 18 months) until two consecutive Type A tests meet the acceptance criterion.

In order to provide a more rational approach to the acceptance criteria for the periodic Type A tests, the licensee proposes to establish an "as found" condition and an "as left" condition, each with its own acceptance criterion. This proposal was discussed and found acceptable in Section 2.1 of this Safety Evaluation.

Since the exemption from certain requirements of Section III.A.5.(b)(2) of Appendix J was granted on October 22, 1991, and the staff has found the acceptance criteria for the "as found" and the "as left" conditions acceptable, the staff finds the proposed revision to TS 4.6.1.2.b acceptable.

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

This amendment involves a change to 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 or a change to a surveillance requirement. The 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 this amendment involves no significant hazards consideration and there has been no public comment on such finding (56 FR 43816). Accordingly, this 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 this amendment.

5.0 CONCLUSION

The staff 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 this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: M. D. Lynch

Date: December 16, 1992