

May 28, 1996

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

SUBJECT: AMENDMENT NO. 111 TO FACILITY OPERATING LICENSE NO. NPF-30 -  
CALLAWAY PLANT, UNIT 1 (TAC NO. M94801)

Dear Mr. Schnell:

The Commission has issued the enclosed Amendment No. 111 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consists of changes to the Technical Specifications (TS) in response to your application dated February 9, 1996 as superseded by letter dated March 22, 1996. The March 22, 1996 submittal was required to correct errors and weaknesses identified by the NRC in the initial submittal of February 9, 1996.

The amendment revises TS 1.7, 4.6.1.1, 3.6.1.3, 4.6.1.3, 6.8.4 and the associated Bases section to directly reference Regulatory Guide 1.163 as required by 10 CFR 50, Appendix J, Option B for the Type A containment integrated leak rate tests and the Type B and C local leak rate tests.

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

Kristine M. Thomas, Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosures: 1. Amendment No. 111 to NPF-30  
2. Safety Evaluation

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DATE	4/11/96	4/23/96	5/9/96	5/13/96

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*with noted change!*



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

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Docket No. 50-483

Enclosures: 1. Amendment No. 111 to NPF-30  
2. Safety Evaluation

cc w/encls: See next page

Mr. D. F. Schnell

- 2 -

May 28, 1996

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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. 111  
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  - A. The application for amendment by Union Electric Company (UE, the licensee) dated February 9, 1996, as superseded by letter dated March 22, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's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. 111 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 to be implemented within 30 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*Kristine M. Thomas*

Kristine M. Thomas, Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: May 28, 1996

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 111 TO FACILITY OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Replace the following pages of the Appendix A Technical Specifications with the enclosed 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.

<u>REMOVE</u>	<u>INSERT</u>
1-1*	1-1
1-2	1-2
3/4 6-1	3/4 6-1
3/4 6-4	3/4 6-4
3/4 6-5	---
6-19	6-19
6-19a	6-19a
6-19b	6-19b
6-20*	6-20
B 3/4 6-1	B 3/4 6-1

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\*No changes were made to these pages. Pages being reissued to become overleaf pages.

## 1.0 DEFINITIONS

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The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications.

### ACTION

1.1 ACTION shall be that part of a Technical Specification which prescribes remedial measures required under designated conditions.

### ACTUATION LOGIC TEST

1.2 An ACTUATION LOGIC TEST shall be the application of various simulated input combinations in conjunction with each possible interlock logic state and verification of the required logic output. The ACTUATION LOGIC TEST shall include a continuity check, as a minimum, of output devices.

### ANALOG CHANNEL OPERATIONAL TEST

1.3 An ANALOG CHANNEL OPERATIONAL TEST shall be the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY of alarm, interlock and/or trip functions. The ANALOG CHANNEL OPERATIONAL TEST shall include adjustments, as necessary, of the alarm, interlock and/or Trip Setpoints such that the Setpoints are within the required range and accuracy.

### AXIAL FLUX DIFFERENCE

1.4 AXIAL FLUX DIFFERENCE shall be the difference in normalized flux signals between the top and bottom halves of a two section excore neutron detector.

### CHANNEL CALIBRATION

1.5 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel such that it responds within the required range and accuracy to known values of input. The CHANNEL CALIBRATION shall encompass the entire channel including the sensors and alarm, interlock and/or trip functions and may be performed by any series of sequential, overlapping, or total channel steps such that the entire channel is calibrated.

### CHANNEL CHECK

1.6 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

## DEFINITIONS

### CONTAINMENT INTEGRITY

1.7 CONTAINMENT INTEGRITY shall exist when:

- a. All penetrations required to be closed during accident conditions are either:
  - 1) Capable of being closed by an OPERABLE containment automatic isolation valve system, or
  - 2) 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. All equipment hatches are closed and sealed.
- c. Each air lock is in compliance with the requirements of Specification 3.6.1.3.
- d. The sealing mechanism associated with each penetration (e.g., welds, bellows, or O-rings) is OPERABLE.
- e. The containment leakage rates are determined per Specification 4.6.1.1.d and are within the limits listed in the Containment Leakage Rate Testing Program of Specification 6.8.4.g.
- f. Structural integrity is assured via the program described in Specification 6.8.5.c.

### CONTROLLED LEAKAGE

1.8 CONTROLLED LEAKAGE shall be that seal water flow from the reactor coolant pump seals.

### CORE ALTERATION

1.9 CORE ALTERATION shall be the movement or manipulation of any component within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATION shall not preclude completion of movement of a component to a safe conservative position.

### CORE OPERATING LIMITS REPORT

1.10 The CORE OPERATING LIMITS REPORT (COLR) is the unit specific document that provides core operating limits for the current operating reload cycle. The cycle specific core operating limits shall be determined for each reload cycle in accordance with Specification 6.9.1.9. Plant operation within these operating limits is addressed in individual specifications.

### DOSE EQUIVALENT I-131

1.11 DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microCurie/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, "Calculation of Distance Factors for Power and Test Reactor Sites."

## 3/4.6 CONTAINMENT SYSTEMS

### 3/4.6.1 PRIMARY CONTAINMENT

#### CONTAINMENT INTEGRITY

#### LIMITING CONDITION FOR OPERATION

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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

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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;
- c. Deleted.
- d. By performing containment leakage rate testing in accordance with the Containment Leakage Rate Testing Program of Specification 6.8.4.g; and
- e. By verifying containment structural integrity in accordance with the Containment Tendon Surveillance Program of Specification 6.8.5.c.

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\*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 AIR LOCKS

#### LIMITING CONDITION FOR OPERATION

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3.6.1.3 Each containment air lock shall be OPERABLE with both doors closed except when the air lock is being used for normal transit entry and exits through the containment, then at least one air lock door shall be closed.

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

#### ACTION:

- a. With one containment air lock door inoperable:
  1. Maintain at least the OPERABLE air lock door closed and either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed,
  2. Operation may then continue until performance of the next required overall air lock leakage test provided that the OPERABLE air lock door is verified to be locked closed at least once per 31 days,
  3. Otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and
  4. The provisions of Specification 3.0.4 are not applicable.
- b. With the containment air lock inoperable, except as the result of an inoperable air lock door, maintain at least one air lock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

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4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:

- a. By verifying leakage rates in accordance with the Containment Leakage Rate Testing Program of Specification 6.8.4.g; and
- b. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

## ADMINISTRATIVE CONTROL

### PROCEDURES AND PROGRAMS (Continued)

#### f. Radiological Environmental Monitoring Program (Continued)

- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

#### g. Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 48.1 psig.

The maximum allowable containment leakage rate,  $L_a$ , at  $P_a$ , shall be 0.20% of the containment air weight per day.

Leakage rate acceptance criteria are:

- a. Containment leakage rate acceptance criterion is  $\leq 1.0 L_a$ . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the Type B and C tests and  $\leq 0.75 L_a$  for Type A tests;
- b. Air lock testing acceptance criteria are:
  - 1) Overall air lock leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ ;
  - 2) For each door, leakage rate is  $\leq 0.005 L_a$  when pressurized to  $\geq 10$  psig.

The provisions of Technical Specification 4.0.2 do not apply to the test frequencies in the Containment Leakage Rate Testing Program.

The provisions of Technical Specification 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

6.8.5 The following programs, relocated from the Technical Specifications to FSAR Chapter 16, shall be implemented and maintained:

#### a. Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the WASTE GAS HOLDUP SYSTEM, the quantity of radioactivity contained in gas storage tanks, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks.

## ADMINISTRATIVE CONTROLS

### PROCEDURES AND PROGRAMS (Continued)

The program shall include:

1. The limits for concentrations of hydrogen and oxygen in the WASTE GAS HOLDUP SYSTEM and a surveillance program to ensure the limits are maintained.
2. A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank is less than the amount that would result in a whole body exposure of  $\geq 0.5$  rem to a MEMBER OF THE PUBLIC at the nearest SITE BOUNDARY in the event of an uncontrolled release of the tanks' contents, consistent with Branch Technical Position ETSB 11-5, "Postulated Radioactive Releases due to Waste Gas System Leak or Failure," in NUREG-0800, July 1981.
3. A surveillance program to ensure that the quantity of radioactivity contained in the following outdoor liquid radwaste tanks, that are not surrounded by liners, dikes, or walls capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste system, is less than the amount that would result in concentrations less than the limits of 10 CFR Part 20.1 -20.602, Appendix B (redesignated at 56FR23391, May 21, 1991) at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA, in the event of an uncontrolled release of the tanks' contents:
  - a. Reactor Makeup Water Storage Tank,
  - b. Refueling Water Storage Tank,
  - c. Condensate Storage Tank, and
  - d. Outside temporary tanks, excluding demineralizer vessels and the liner being used to solidify radioactive waste.

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

b. Reactor Coolant Pump Flywheel Inspection Program

Each reactor coolant pump flywheel shall be inspected per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, dated August 1975.

c. Containment Tendon Surveillance Program

This program provides controls for monitoring tendon performance, including the effectiveness of the tendon corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial plant operation as well as periodic testing thereafter. The Containment Tendon Surveillance Program, and its inspection frequencies and acceptance criteria, shall be in accordance with the Callaway position on proposed Revision 3 of Regulatory Guide 1.35 dated April 1979.

## ADMINISTRATIVE CONTROL

### PROCEDURES AND PROGRAMS (Continued)

#### c. Containment Tendon Surveillance Program (Continued)

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the Containment Tendon Surveillance Program inspection frequencies.

### 6.9 REPORTING REQUIREMENTS

#### ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the NRC Regional Office unless otherwise noted.

#### STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the License involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The Startup Report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation) supplementary reports shall be submitted at least every 3 months until all three events have been completed.

#### ANNUAL REPORTS

6.9.1.4 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

## ADMINISTRATIVE CONTROLS

### ANNUAL REPORTS (Continued)

6.9.1.5 Reports required on an annual basis shall include a tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrems/yr and their associated man-rem exposure according to work and job functions, \*e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources should be assigned to specific major work functions.

The report shall also include the results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

### ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

### ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.7 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous calendar year of operation shall be submitted before May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

\* This tabulation supplements the requirements of § 20.407 of 10 CFR Part 20.

## 3/4.6 CONTAINMENT SYSTEMS

### BASES

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#### 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.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 111 TO FACILITY OPERATING LICENSE NO. NPF-30  
UNION ELECTRIC COMPANY  
CALLAWAY PLANT, UNIT 1  
DOCKET NO. 50-483

1.0 INTRODUCTION

By letter dated February 9, 1996, as superseded by letter dated March 22, 1996, Union Electric Company (UE, the licensee) requested changes to the Technical Specifications (TS) for Callaway Plant, Unit 1. The proposed changes would permit implementation of 10 CFR Part 50, Appendix J, Option B. The licensee has established a "Containment Leakage Rate Testing Program" and proposed adding this program to the TS. The program references Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak Test Program," dated September 1995, which specifies a method acceptable to the NRC for complying with Option B dated September 1995.

2.0 BACKGROUND

Compliance with 10 CFR Part 50, Appendix J, provides assurance that the primary containment, including those systems and components which penetrate the primary containment, do not exceed the allowable leakage rate specified in the TS and Bases. The allowable leakage rate is determined so that the leakage assumed in the safety analyses is not exceeded.

On February 4, 1992, the NRC published a notice in the Federal Register (57 FR 4166) discussing a planned initiative to begin eliminating requirements marginal to safety which impose a significant regulatory burden. Appendix J of 10 CFR Part 50 was considered for this initiative and the staff undertook a study of possible changes to this regulation. The study examined the previous performance history of domestic containments and examined the effect on risk of a revision to the requirements of Appendix J. The results of this study are reported in NUREG-1493, "Performance-Based Leak-Test Program."

Based on the results of this study, the staff developed a performance-based approach to containment leakage rate testing. On September 12, 1995, the NRC approved issuance of this revision to 10 CFR Part 50, Appendix J, which was subsequently published in the Federal Register on September 26, 1995, and became effective on October 26, 1995. The revision added Option B "Performance-Based Requirements" to Appendix J to allow licensees to voluntarily replace the prescriptive testing requirements of Appendix J with testing requirements based on both overall and individual component leakage rate performance.

Regulatory Guide 1.163, was developed as a method acceptable to the NRC staff for implementing Option B. This regulatory guide states that the Nuclear Energy Institute (NEI) guidance document NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J" provides methods acceptable to the NRC staff for complying with Option B with four exceptions which are described therein.

Option B requires that the RG or other implementation document used by a licensee to develop a performance-based leakage rate testing program must be included, by general reference, in the plant TS. The licensee has referenced RG 1.163 in the Callaway TS.

Regulatory Guide 1.163 specifies an extension in Type A test frequency to at least one test in 10 years based upon two consecutive successful tests. Type B tests may be extended up to a maximum interval of 10 years based upon completion of two consecutive successful tests and Type C tests may be extended up to 5 years based on two consecutive successful tests.

By letter dated October 20, 1995, NEI proposed TS to implement Option B. After some discussion, the staff and NEI agreed on final TS which were attached to a letter from C. Grimes (NRC) to D. Modeen (NEI) dated November 2, 1995. These TS are to serve as a model for licensees to develop plant specific TS in preparing amendment requests to implement Option B.

For a licensee to determine the performance of each component, factors that are indicative of or affect performance, such as an administrative leakage limit, must be established. The administrative limit is selected to be indicative of the potential onset of component degradation. Although these limits are subject to NRC inspection to assure that they are selected in a reasonable manner, they are not TS requirements. Failure to meet an administrative limit requires the licensee to return to the minimum value of the test interval.

Option B requires that the licensee maintain records to show that the criteria for Type A, B and C tests have been met. In addition, the licensee must maintain comparisons of the performance of the overall containment system and the individual components to show that the test intervals are adequate. These records are subject to NRC inspection.

### 3.0 EVALUATION

The licensee's March 22, 1996, letter to the NRC proposes to establish a "Containment Leakage Rate Testing Program" and proposes to add this program to the TS. The program references RG 1.163, which specifies a method acceptable to the NRC for complying with Option B. This requires a change to existing TS 1.7, 4.6.1.1, 3.6.1.3, and 4.6.1.3 and the addition of the "Containment Leakage Rate Testing Program" to Section 6.8.4. Corresponding Bases were also modified.

Option B permits a licensee to choose Type A; or Type B and C; or Type A, B and C; testing to be done on a performance basis. The licensee has elected to perform Type A, B and C testing on a performance basis.

The TS changes proposed by the licensee are in compliance with the requirements of Option B and are consistent with the guidance of RG 1.163, and the generic TS of the November 2, 1995, letter and are, therefore, acceptable.

#### **4.0 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.

#### **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 and changes surveillance requirements. 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 (61 FR 18174). 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.

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