

March 25, 1998

Mr. Garry L. Randolph
Vice President and Chief Nuclear Officer
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

SUBJECT: CALLAWAY PLANT - AMENDMENT NO. 123 TO FACILITY
OPERATING LICENSE NO. NPF-30 (TAC NO. M98418)

Dear Mr. Randolph:

The Commission has issued the enclosed Amendment No.123 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated August 8, 1997, as supplemented by letter dated January 16, 1998.

The amendment revises TS Table 3.3-3 Functional Units 4.b.2 and 5.a.2 to make the number of MSFIS channels consistent with the solid state protection system, add a clarifying note, delete action statements and change Table 4.3-2 Functional Units 4.b.2 and 5.a.2 slave relay quarterly test to a monthly staggered actuation logic test.

A copy of our related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,
Original Signed By
Barry C. Westreich, 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. ¹²³ to NPF-42
2. Safety Evaluation

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cc w/encls:

Professional Nuclear
Consulting, Inc.
19041 Raines Drive
Derwood, Maryland 20855

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

Mr. H. D. Bono
Supervising Engineer
Quality Assurance Regulatory Support
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

U.S. Nuclear Regulatory Commission
Resident Inspector Office
8201 NRC Road
Steedman, Missouri 65077-1302

Mr. J. V. Laux, Manager
Quality Assurance
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

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

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavilion
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

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

Mr. Otto L. Maynard
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 63130

Mr. Lee Fritz
Presiding Commissioner
Callaway County Court House
10 East Fifth Street
Fulton, Missouri 65151

Mr. Alan C. Passwater, Manager
Licensing and Fuels
Union Electric Company
Post Office Box 66149
St. Louis, Missouri 63166-6149



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. 123
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Callaway Plant Unit 1 (the facility) Facility Operating License No. NPF-30 filed by the Union Electric Company (the Company), dated August 8, 1997, as supplemented by letter dated January 16, 1998, 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, as amended, 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 license 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. 123 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. The license amendment is effective as of its date of issuance to be implemented within 30 days from its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Barry C. Westreich, 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: March 25, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 123

FACILITY OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change. Overleaf pages are provided to maintain document completeness

REMOVE

3/4 3-16
3/4 3-17
3/4 3-20
3/4 3-21
3/4 3-21(a)
3/4 3-35

INSERT

3/4 3-16
3/4 3-17
3/4 3-20
3/4 3-21
3/4 3-21(a)
3/4 3-35

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
3. Containment Isolation (continued)					
2) Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3, 4	17
3) Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	2	1	2	1, 2, 3, 4	17
4) Phase "A" Isolation	See Item 3.a. for all Phase "A" Isolation initiating functions and requirements.				
4. Steam Line Isolation					
a. Manual Initiation					
1) Individual	1/steam line	1/steam line	1/operating steam line	1, 2, 3	23
2) System	2	1	2	1, 2, 3	22
b. 1) Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3	34
2) Automatic Actuation Logic and Actuation Relays (MSFIS)	2 ⁺⁺⁺	1	2 ⁺⁺⁺	1, 2, 3	34
c. Containment Pressure-High-2	3	2	2	1, 2, 3	33*
d. Steam Line Pressure-Low	3/steam line	2/steam line any steam line	2/steam line	1, 2, 3#	33*
e. Steam Line Pressure-Negative Rate-High	3/steam line	2/steam line any steam line	2/steam line	3##	33*

CALLAWAY - UNIT 1

3/4 3-16

Amendment No. 64, 117, 123

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
5. Feedwater Isolation & Turbine Trip					
a. 1) Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2	27
2) Automatic Actuation Logic and Actuation Relays (MSFIS)	2 ^{***}	1	2 ^{***}	1, 2	27
b. Steam Generator Water Level High-High	4/stm. gen.	2/stm. gen. in any operating stm. gen.	3/stm. gen. in each operating stm. gen.	1, 2	33*
c. Safety Injection	See Item 1. above for all Safety Injection initiating functions and requirements.				
6. Auxiliary Feedwater					
a. Manual Initiation	3(1/pump)	1/pump	1/pump	1, 2, 3	24
b. Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3	34
c. Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	2	1	2	1, 2, 3	21
d. Steam Generator Water Level Low-Low					
1) Start Motor-Driven Pumps					
a) Steam Generator Water Level Low-Low (Adverse Containment Environment)	4/stm. gen.	2/stm. gen. in any operating stm. gen.	3/stm. gen. in each operating stm. gen.	1, 2, 3	33*, 35

CALLAWAY - UNIT 1

3/4 3-17

Amendment No. 43, 64, 117, 123

TABLE 3.3-3 (CONTINUED)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
8. Loss of Power					
a. 4 kV Bus Undervoltage -Loss of Voltage	4/Bus	2/Bus	3/Bus	1, 2, 3, 4, 5++, 6++	19*
b. 4 Kv Bus Undervoltage -Grid Degraded Voltage	4/Bus	2/Bus	3/Bus	1, 2, 3, 4, 5++, 6++	19*
9. Control Room Isolation					
a. Manual Initiation	2	1	2	All	26****
b. Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3, 4	26
c. Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	2	1	2	All	26****
d. Phase "A" Isolation	See Item 3.a above for all Phase "A" Isolation initiating functions and requirements.				
10. Load Shedder Emergency Load Sequencer	2-1/Train	1/Train	2-1/Train	1, 2, 3, 4, 5+, 6+	25
11. Engineered Safety Features Actuation System Interlocks					
a. Pressurizer Pressure, P-11	3	2	2	1, 2, 3	20
b. Reactor Trip, P-4	4-2/Train	2/Train	2/Train	1, 2, 3	22

TABLE 3.3-3 (Continued)

TABLE NOTATION

- # Trip function may be blocked in this MODE below the P-11 (Pressurizer Pressure Interlock) Setpoint.
- ## Trip function automatically blocked above P-11 and may be blocked below P-11 when Safety Injection on low steam line pressure is not blocked.
- ### Trip function may be blocked just before shutdown of the last operating main feedwater pump and restored just after the first main feedwater pump is put into service (following its startup trip test).
- * The provisions of Specification 3.0.4 are not applicable.
- ** One in Separation Group 1 and one in Separation Group 4.
- *** The de-energization of one train of BOP ESFAS actuation logic and actuation relays renders two of the four channels inoperable. Action Statement 21 applies to both Functional Units 6.c and 6.g in this case.
- **** The provisions of Specification 3.0.4 are not applicable in Modes 5 and 6.
- + Only the shutdown portion of one sequencer is required to be OPERABLE in Modes 5 and 6 which corresponds to the OPERABLE Emergency Diesel Generator.
- ++ Operability is only required for associated OPERABLE bus in Modes 5 and 6.
- +++ Each MSFIS channel (train) requires a minimum of two programmable logic controllers to be OPERABLE.

ACTION STATEMENTS

- ACTION 14 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 12 hours and in COLD SHUTDOWN within the following 30 hours; however, one channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1, provided the other channel is OPERABLE.
- ACTION 15 - With the number of OPERABLE channels one less than the Total Number of Channels, operation may proceed until performance of the next required ANALOG CHANNEL OPERATIONAL TEST provided the inoperable channel is placed in the tripped condition within 1 hour.
- ACTION 16 - With the number of OPERABLE channels one less than the Total Number of Channels, operation may proceed provided the inoperable channel is placed in the bypass condition and the Minimum Channels OPERABLE requirement is met. One additional channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1.
- ACTION 17 - With less than the Minimum Channels OPERABLE requirement, operation may continue provided the containment purge supply and exhaust valves are maintained closed.

TABLE 3.3-3 (continued)

ACTION STATEMENTS (continued)

- ACTION 25 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, declare the affected diesel generator and off-site power source inoperable and take the ACTION required by Specification 3.8.1.1 or 3.8.1.2.
- ACTION 26 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or initiate and maintain operation of the Control Room Emergency Ventilation System.
- ACTION 27 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 12 hours; however, one channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.

(NOTE: ACTION STATEMENTS 28 THROUGH 31 ARE LOCATED ON OTHER TABLES.)

TABLE 3.3-3 (Continued)

ACTION STATEMENTS (Continued)

- ACTION 32 - With the number of OPERABLE channels one less than the Total Number of Channels, except for testing, STARTUP and/or POWER OPERATION may proceed for up to 72 hours provided the following conditions are satisfied:
- a. The inoperable channel is placed in the tripped condition within 6 hours, and
 - b. The Minimum Channels OPERABLE requirement is met; however, the inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels per Specification 4.3.2.1.

Restore the inoperable channel to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

With the number of OPERABLE channels one less than the Total Number of Channels due to testing of a channel, that channel may be tripped for up to 4 hours for surveillance testing per Specification 4.3.2.1.

- ACTION 33 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the following conditions are satisfied:
- a. The inoperable channel is placed in the tripped condition within 6 hours, and
 - b. The Minimum Channels OPERABLE requirement is met; however, the inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels per Specification 4.3.2.1.

- ACTION 34 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 12 hours and in at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.

- ACTION 35 - With an inoperable delay timer in the Trip Time Delay circuitry, STARTUP and/or POWER OPERATION may proceed provided that the Vessel ΔT (Power-1, Power-2) channels in the affected protection sets are placed in the tripped condition within 6 hours.

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

CALLAWAY - UNIT 1

3/4 3-35

Amendment No. 64, 117, 123

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>ANALOG CHANNEL OPERATIONAL TEST</u>	<u>TRIP ACTUATING DEVICE OPERATIONAL TEST</u>	<u>ACTUATION LOGIC TEST</u>	<u>MASTER RELAY TEST</u>	<u>SLAVE RELAY TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>	
4. Steam Line Isolation									
a. Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3	
b. 1) Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2, 3	
2) Automatic Actuation Logic and Actuation Relays (MSFIS)	N.A.	N.A.	N.A.	N.A.	M(1)	N.A.	N.A.	1, 2, 3	
c. Containment Pressure-High-2	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3	
d. Steam Line Pressure-Low	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3	
e. Steam Line Pressure-Negative Rate-High	S	R	Q	N.A.	N.A.	N.A.	N.A.	3	
5. Feedwater Isolation & Turbine Trip									
a. 1) Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q(3)	1, 2	
2) Automatic Actuation Logic and Actuation Relays (MSFIS)	N.A.	N.A.	N.A.	N.A.	M(1)	N.A.	N.A.	1, 2	
b. Steam Generator Water Level-High-High	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2	
c. Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.								
6. Auxiliary Feedwater									
a. Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3	
b. Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2, 3	



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 123 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

1.0 INTRODUCTION

By letter dated August 8, 1997, and January 16, 1998, Union Electric Company (UE), proposed an amendment to the operating license of the Callaway Plant, to revise the plant Technical Specifications (TS). The proposed revisions involve Table 3.3-3, Engineered Safety Feature Actuation System Instrumentation, functional units 4.b.2 and 5.a.2. Specifically, UE proposes to edit Table 3.3-3 to make the entries for the number of main steam and feedwater isolation system (MSFIS) channels consistent with the requirements of the solid state protection system (SSPS), add a clarification note, delete action statements, and change Table 4.3-2 functional units 4.b.2 and 5.a.2 surveillance requirements from a quarterly slave relay test to a monthly staggered actuation logic test.

The January 16, 1998, supplemental letter provided additional clarifying information and did not change the staff's original no significant hazards consideration determination published in the Federal Register on December 17, 1997 (62 FR 66143).

2.0 BACKGROUND

On October 1, 1996, the staff approved Callaway Plant TS amendment number 117 which replaced fixed logic portions of the MSFIS with programmable digital processor equipment. The new configuration utilized programmable logic controllers and associated application software. With that change, MSFIS automatic actuation logic functional units were added to TS Table 3.3-3. The intent was to add requirements for MSFIS similar to those of the SSPS. Action Statements 27a and 34a were added to TS Table 3.3-3 to provide guidance in the event of an inoperable MSFIS logic channel. In addition, MSFIS surveillance requirements were added to functional units 4.b and 5.a of Table 4.3-2.

3.0 EVALUATION

The SSPS and the MSFIS are arranged in a tandem configuration and together form the logic functions for main steam and feedwater isolation. Circuits in each SSPS train provide coincidence logic and the appropriate signals are sent, via a slave relay, to an associated MSFIS train. Each MSFIS train consists of three programmable logic controller (PLC) channels

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hat use a two-out-of-three voting scheme to drive actuation relays that energize or deenergize the solenoids required for isolation valve operation. No software or hardware component changes are proposed in the licensee's submittal.

3.1 Table 3.3-3, Functional Units 4.b.2 and 5.a.2

Proposed Change

The licensee proposes to change MSFIS table designations associated with the Total Number Channels to 2, Channels to Trip to 1, and Minimum Channels Operable to 2.

Evaluation

For SSPS steam line and feedwater isolation logic functions, TS Table 3.3-3 specifies Total Number of Channels as 2, Channels to Trip as 1, and Minimum Channels Operable as 2. As applied to the SSPS logic functions, the term "channels" , in Table 3.3-3, refers to SSPS actuation trains. For MSFIS logic functions, TS Table 3.3-3 specifies Total Number of Channels as 3 per SSPS train, Channels to Trip as 2 per SSPS train, and Minimum Channels Operable as 2 per SSPS train. As applied to MSFIS logic functions, the term "channels" refers to MSFIS PLC channels. After implementing the then new TS designations for MSFIS logic functions, the licensee determined that the nomenclature used in Table 3.3-3 (channel versus train) was misleading and confusing since the term "channels" referred to both SSPS actuation trains and MSFIS PLC channels. The proposed changes would also make the term "channels" for MSFIS logic functions refer to MSFIS actuation trains. As described below in Section 3.2, the licensee proposes clarification regarding PLC channels. The staff finds the proposed change consistent with the requirements for the SSPS and editorial in nature. Therefore, the staff finds the proposed change acceptable.

3.2 Table Notation

Proposed Change

The licensee proposes to add table notation: +++ Each MSFIS channel (train) requires a minimum of two programmable logic controllers to be OPERABLE.

Evaluation

The MSFIS consist of two independent actuation trains with each train configured in a two out of three PLC logic channel design. The proposed change is added to clarify that a minimum of two PLCs are required in each MSFIS train for operability. The staff considers the change editorial and therefore, acceptable.

3.3 Action Statements 27a and 34a

Proposed Change

The licensee proposes to delete MSFIS action statements 27a and 34a and to utilize SSPS actions statements 27 and 34.

Evaluation

Action statements 27a and 34a were previously added to Table 3.3-3 to provide guidance in the event of an inoperable MSFIS PLC channel. Action statements 27a and 34a require the plant to be in HOT STANDBY within 12 hours when two of the three PLC channels per MSFIS train become inoperable. The loss of the two required PLC channels or all three PLC channels constitutes an inoperable MSFIS train. After implementation of the TS, the licensee determined that Action Statements 27a and 34a do not provide action if all three PLC channels in a MSFIS train become inoperable. For that case, the licensee determined Technical Specification 3.0.3 requires the plant to be in HOT STANDBY within 7 hours. However, the licensee determined that since steam and feedwater isolation signals are generated in the SSPS and passed to the MSFIS, the intent of action statements 27a and 34a was to provide actions consistent with those for the SSPS. Therefore, the licensee maintains that actions required for loss of a MSFIS train should be no more restrictive than actions required for the loss of a SSPS train. Action Statements 27 and 34 require the plant to be in HOT STANDBY within 12 hours when one train is determined inoperable. This is consistent with NUREG-1431, Revision 1, Westinghouse Standard Technical Specifications, and is based on the tandem configuration of the SSPS and MSFIS. Therefore, the staff finds the proposed changes acceptable.

3.4 Table 4.3-2, Functional Units 4.b.2 and 5.a.2

Proposed change

The licensee proposes to change the MSFIS automatic actuation logic and actuation relays surveillance requirement for functional units 4.b.2 and 5.a.2 from a quarterly slave relay test to a monthly staggered actuation logic test.

Evaluation

Coincidence logic circuits of the SSPS send isolation signals, via a slave relay, to the MSFIS. The logic channels of the MSFIS determine the appropriate signals that are routed to the appropriate actuation relay for valve isolation. The intent of the new quarterly slave relay surveillance requirement was to test the slave relay and the MSFIS PLC logic channels. After a review of Generic Letter 96-01, "Testing of Safety Related Logic Circuits," the licensee determined the surveillance requirements for the automatic actuation logic and actuation relays should be reclassified as an actuation logic test and not a slave relay test. The proposed change is consistent with the surveillance requirements of the SSPS and consistent with

NUREG-1431, Revision 1, Westinghouse Standard Technical Specifications. Therefore, the staff finds the proposed change acceptable.

3.5 Conclusion

The staff has reviewed UE's proposed changes to the Callaway Plant TS to modify the description of the number of MSFIS channels, add a clarification note, delete and replace action statements, and change a slave relay test to an actuation logic test. The changes improve TS clarity, are consistent with SSPS TS requirements, and are consistent with NUREG-1431, Revision 1. Based on the review of UE's submittal, the staff concludes that the above TS changes are 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 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 (62 FR 66143). 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.

Principal Contributor: A. Bryant

Date: March 25, 1998