

May 20, 1999

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

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT
FOR THE PROPOSED CONVERSION TO THE IMPROVED STANDARD
TECHNICAL SPECIFICATIONS FOR CALLAWAY PLANT, UNIT 1
(TAC NO. M98803)

Dear Mr. Randolph:

Enclosed is a copy of the Environmental Assessment and Finding of No Significant Impact related to your application of May 15, 1997 (ULNRC-3578), as supplemented by (1) the letters in 1998 dated June 26 (ULNRC-03853), August 4 (ULNRC-03877), August 27 (ULNRC-03889), September 24 (ULNRC-03900), October 21 (ULNRC-03905 and ULNRC-03908), November 23 (ULNRC-03926), November 25 (ULNRC-03927), December 11 (ULNRC-03937), and December 22 (ULNRC-03946), and (2) the letters in 1999 dated February 5 (ULNRC-03957), March 9 (ULNRC-03979), April 7 (ULNRC-04007), April 21, (ULNRC-04018), and April 30, 1999 (ULNRC-04024) on your proposed conversion of the current Technical Specifications (CTS) for the Callaway Plant, Unit 1 to the Improved Technical Specifications (ITS). The ITS are based on the CTS, NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 1, dated April 1995, and guidance provided in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132).

The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,

/s/
Mel Gray, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure: Environmental Assessment

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,

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Mel Gray, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure: Environmental Assessment

cc w/encl: See next page

Callaway Plant, Unit 1

cc w/encl:

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UNITED STATES NUCLEAR REGULATORY COMMISSIONUNION ELECTRIC COMPANYDOCKET NO. 50-482CALLAWAY PLANT, UNIT 1ENVIRONMENTAL ASSESSMENT AND FINDING OFNO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering the issuance of an amendment to Facility Operating License No. NPF-30 that was issued to Union Electric Company (the licensee) for operation of the Callaway Plant, Unit 1 located in Callaway County, Missouri.

ENVIRONMENTAL ASSESSMENTIdentification of the Proposed Action:

The proposed amendment will revise the current Technical Specifications (CTS) for Callaway Plant, Unit 1 in their entirety based on the guidance provided in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 1, dated April 1995, and in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132). The proposed action is in accordance with the licensee's amendment request dated May 15, 1997, as supplemented by (1) the letters in 1998 dated June 26, August 4, August 27, September 24, October 21 (two letters), November 23, November 25, December 11, and December 22, and (2) the letters in 1999 dated February 5, March 9, April 7, April 21 and April 30.

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The Need for the Proposed Action:

It has been recognized that nuclear safety in all nuclear power plants would benefit from an improvement and standardization of plant Technical Specifications (TS). The NRC's "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Plants" (52 FR 3788), contained proposed criteria for defining the scope of TS. Later, the NRC's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132), incorporated lessons learned since publication of the interim policy statement and formed the basis for revisions to 10 CFR 50.36, "Technical Specifications." The "Final Rule" (60 FR 36953) codified criteria for determining the content of TS. To facilitate the development of standard TS for nuclear power reactors, each power reactor vendor owners' group (OG) and the NRC staff developed standard TS. For Callaway Plant, Unit 1, the Improved Standard Technical Specifications (ISTS) are in NUREG-1431. This document formed part of the basis for the Callaway Plant, Unit 1 Improved Technical Specifications (ITS) conversion. The NRC Committee to Review Generic Requirements (CRGR) reviewed the ISTS, made note of its safety merits, and indicated its support of the conversion by operating plants to the ISTS.

Description of the Proposed Change

The proposed changes to the CTS are based on NUREG-1431 and on guidance provided by the Commission in its Final Policy Statement. The objective of the changes is to completely rewrite, reformat, and streamline the CTS (i.e., to convert the CTS to the ITS). Emphasis is placed on human factors principles to improve clarity and understanding of the TS. The Bases section of the ITS has been significantly expanded to clarify and better explain the purpose and foundation of each specification. In addition to NUREG-1431, portions of the CTS were also used as the basis for the development of the Callaway Plant, Unit 1 ITS. Plant-specific issues

(e.g., unique design features, requirements, and operating practices) were discussed with the licensee, and generic matters with Westinghouse and other OGs.

This conversion is a joint effort in concert with three other utilities: Pacific Gas & Electric Company for Diablo Canyon Power Plant, Units 1 and 2 (Docket Nos. 50-275 and 50-323); TU Electric for Comanche Peak Steam Electric Station, Units 1 and 2 (Docket Nos. 50-445 and 50-446); and Wolf Creek Nuclear Operating Corporation for Wolf Creek Generating Station (Docket No. 50-482). It was a goal of the four utilities to make the ITS for all the plants as similar as possible. This joint effort includes a common methodology for the licensees in marking-up the CTS and NUREG-1431 specifications, and the NUREG-1431 Bases, that has been accepted by the staff.

This common methodology is discussed at the end of Enclosure 2, "Mark-Up of Current TS;" Enclosure 5a, "Mark-Up of NUREG-1431 Specifications;" and Enclosure 5b, "Mark-Up of NUREG-1431 Bases," for each of the 14 separate ITS sections that were submitted with the licensee's application. Each of the 14 ITS sections also includes the following enclosures:

- Enclosure 1, "Cross-Reference Table," provides the cross-reference table connecting each CTS specification (i.e., limiting condition for operation, required action, or surveillance requirement) to the associated ITS specification, sorted by both CTS and ITS specifications.
- Enclosures 3A and 3B, "Description of Changes to Current TS" and "Conversion Comparison Table," provides the description of the changes to the CTS section and the comparison table showing which plants (of the four licensees in the joint effort) that each change applies.
- Enclosure 4, "No Significant Hazards Considerations," provides the no significant hazards consideration (NSHC) of 10 CFR 50.91 for the changes to the CTS. A description of the NSHC organization is provided, followed by generic NSHCs for administrative, more

restrictive, relocation, and moving-out-of-CTS changes, and individual NSHCs for less restrictive changes.

- Enclosures 6A and 6B, "Differences From NUREG-1431" and "Conversion Comparison Table," provides the descriptions of the differences from NUREG-1431 specifications and the comparison table showing which plants (of the four licensees in the joint effort) that each difference applies.

The common methodology includes the convention that, if the words in a CTS specification are not the same as the words in the ITS specification, but the CTS words have the same meaning or have the same requirements as the words in the ITS specification, then the licensees do not have to indicate or describe a change to the CTS. In general, only technical changes have been identified; however, some non-technical changes have also been identified. The portion of any specification which is being deleted is struck through (i.e., the deletion is annotated using the strike-out feature of the word processing computer program or crossed out by hand). Any text being added to a specification is shown by shading the text, placing a circle around the new text, or by writing the text in by hand. The text being struck through or added is shown in the marked-up CTS and ISTS pages in Enclosures 2 (CTS pages) and 5 (ISTS and ISTS Bases pages) for each ITS section attachment to the application. Another convention of the common methodology is that the technical justifications for the less restrictive changes are in the NSHCs.

The proposed changes can be grouped into the following four categories: relocated requirements, administrative changes, less restrictive changes involving deletion of requirements, and more restrictive changes. These categories are as follows:

1. Relocated requirements (i.e., the licensee's "LG" or "R" changes) are items which are in the CTS but do not meet the criteria set forth in the Final Policy Statement. The Final Policy

Statement establishes a specific set of objective criteria for determining which regulatory requirements and operating restrictions should be included in the TS. Relocation of requirements to documents with an established control program, controlled by the regulations or the TS, allows the TS to be reserved only for those conditions or limitations upon reactor operation which are necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, thereby focusing the scope of the TS. In general, the proposed relocation of items from the CTS to the Final Safety Analysis Report (FSAR), appropriate plant-specific programs, station procedures, or ITS Bases follows the guidance of NUREG-1431. Once these items have been relocated to other licensee-controlled documents, the licensee may revise them under the provisions of 10 CFR 50.59 or other NRC-approved control mechanisms, which provide appropriate procedural means to control changes by the licensee.

2. Administrative changes (i.e., the licensee's "A" changes) involve the reformatting and rewording of requirements, consistent with the style of the ISTS in NUREG-1431, to make the TS more readily understandable to station operators and other users. These changes are purely editorial in nature, or involve the movement or reformatting of requirements without affecting the technical content. Application of a standardized format and style will also help ensure consistency is achieved among specifications in the TS. During this reformatting and rewording process, no technical changes (either actual or interpretational) to the TS will be made unless they are identified and justified.

3. Less restrictive changes and the deletion of requirements involves portions of the CTS (i.e., the licensee's "LS" and "TR" changes) which (1) provide information that is descriptive in nature regarding the equipment, systems, actions, or surveillances, (2) provide little or no safety benefit, and (3) place an unnecessary burden on the licensee. This information is proposed to

be deleted from the CTS and, in some instances, moved to the proposed Bases, FSAR, or procedures. The removal of descriptive information to the Bases of the TS, FSAR, or procedures is permissible because these documents will be controlled through a process that utilizes 10 CFR 50.59 and other NRC-approved control mechanisms. The relaxation of requirements were the result of generic NRC actions or other analyses. They will be justified on a case-by-case basis for the Callaway Plant, Unit 1 and described in the safety evaluation to be issued with the license amendment.

4. More restrictive requirements (i.e., the licensee's "M" changes) are proposed to be implemented in some areas to impose more stringent requirements than are in the CTS. In some cases, these more restrictive requirements are being imposed to be consistent with the ISTS. Such changes have been made after ensuring the previously evaluated safety analysis for the Callaway Plant, Unit 1 was not affected. Also, other more restrictive technical changes have been made to achieve consistency, correct discrepancies, and remove ambiguities from the TS. Examples of more restrictive requirements include: placing a Limiting Condition for Operation (LCO) on station equipment, which is not required by the CTS to be operable; more restrictive requirements to restore inoperable equipment; and more restrictive surveillance requirements.

There are twenty-four other proposed changes to the CTS that are included in the proposed amendment to convert the CTS to the ITS. These are beyond scope issues (BSIs) in that they are changes to both the CTS and the ISTS. For the Callaway Plant, Unit 1, these are the following:

1. Change 2-06-M (CTS Section 3/4.2). The proposed change to CTS Surveillance Requirement (SR) 4.2.2.2.d would add a frequency of once within 24 hours for verifying the axial heat flux hot channel factor is within limits after achieving equilibrium conditions.
2. Change 1-54-LS-37 (CTS Section 3/4.3). The proposed change would revise Action 5.b of CTS Table 3.3-1 to increase the verification interval for unborated water source isolation valve position from 14 days to 31 days.
3. Change 1-15-M (CTS Section 3/4.4). The proposed change would revise steam generator (SG) level requirements from 10% wide range to 4% narrow range in CTS SRs 4.4.1.2.2 and 4.4.1.3.2 for Modes 3 and 4, and from 10% wide range to 66% wide range for Mode 5, to ensure SG tubes are covered and provide an adequate heat sink.
4. Change 9-17-LS-24 (CTS Section 3/4.4). The proposed change would revise the applicability note to CTS Limiting Condition for Operation (LCO) 3.4.9.3 to allow a longer time, up to one hour, for both centrifugal charging pumps to be capable of injecting into the reactor coolant system.
5. Change 11-03-M (CTS Section 3/4.9). The proposed change would revise the reference for the spent fuel pool level from that above top of fuel stored in racks to that above the top of racks in CTS LCO 3.9.11.
6. Change 3-15-M (CTS Section 6.0). The proposed change would add the refueling boron concentration to the Core Operating Limits Report in CTS 6.9.1.9.
7. Change 3-11-A (CTS Section 6.0). The proposed changes would revise limits for high radiation areas in CTS 6.12.1 to reflect the requirements of revised 10 CFR Part 20.

8. Change 1-34-LS-2 (CTS Section 1.0). The proposed change would add notes to CTS Table 1.2 to identify the number of reactor vessel head closure bolts required to be fully tensioned for Modes 4 and 5. A Note is also proposed to address Mode 6 bolt requirements.
9. Change 1-7-LS-3 (CTS Section 3/4.3). The proposed change to CTS Table 3.3-1 would (1) extend the completion time for CTS Action 3.b from no time specified to 24 hours for channel restoration or changing the power level to either below P-6 or above P-10, (2) change the applicable modes and delete CTS Action 3.a because it is now outside the revised intermediate range neutron flux channel applicability, and (3) add a less restrictive new action that requires immediate suspension of operations involving positive reactivity additions and a power reduction below P-6 within two hours, but no longer requires a reduction to Mode 3.
10. Change 1-22-M (CTS Section 3/4.3). The proposed change would add quarterly channel operational tests (COTs) to CTS Table 4.3-1 for the power range neutron flux-low, intermediate range neutron flux, and source range neutron flux trip functions. The CTS only require a COT prior to startup for these functions. New Note 19 (which is from the STS) would be added to require that the new quarterly COT be performed within 12 hours after reducing power below P-10 for the power range and intermediate range (P-10 is the dividing point marking the applicability for these trip functions), if not performed in the previous 92 days. New Note 20 (which is from the STS), would be added to state that the P-6 and P-10 interlocks are verified to be in their required state during all COTs on the power range neutron flux-low and intermediate range neutron flux trip functions.

11. Change 1-46-M (CTS Section 3/4.3). The proposed change would revise CTS Table 3.3-1 Action 13 and CTS Table 3.3-3 Action 36 to require an inoperable SG low-low level (normal containment environment) instrument channel be placed in the tripped condition within 6 hours. The option to place the associated environmental allowance monitor (EAM) channels in trip would be deleted.
12. Change 4-09-LS-36 (CTS Section 3/4.4). The proposed change would limit the CTS SR 4.4.4.2 requirement to perform the 92-day surveillance of the pressurizer power operated relief (PORV) block valves so that it is not required to be performed if the block valve is closed to meet CTS LCO 3.4.4 Action a. A note is also proposed to be added to action d to state that the Action does not apply if the block valve is inoperable solely to satisfy CTS LCO 3.4.4 Action b or c.
13. Change 10-20-LS-39 (CTS Section 3/4.7). The proposed change would add an action to CTS LCO 3.7.6 for ventilation system pressure envelope degradation that allows 24 hours to restore the control room pressure envelope through repairs before requiring the unit to perform an orderly shutdown. The new action has a longer allowed outage time than LCO 3.0.4 which the CTS would require to be entered immediately. The change would recognize that the ventilation trains associated with the pressure envelope would still be operable.
14. Change 2-25-LS-23 (CTS Section 3/4.8). The proposed change would allow substitution of a modified performance discharge test for the battery service test in CTS SR 4.8.2.1.e.
15. Change 1-09-A (CTS Section 6.0). The proposed change would replace CTS 6.2.2.e requirements concerning overtime with a reference to administrative procedures for the control of working hours.

16. Change 1-15-A (CTS Section 6.0). The proposed change would revise CTS 6.2.2.g to eliminate the title of Shift Technical Advisor (STA). The engineering expertise would be maintained on shift, but not as a separate individual, as allowed by the Commission's Policy Statement on engineering expertise.
17. Change 2-17-LS-1 (CTS Section 6.0). The proposed change would add an allowance to the CTS for the reactor coolant pump flywheel inspection program to permit an exception to the examination requirements specified in CTS SR 6.8.5.b (Regulatory position C.b.4 of NRC Regulatory Guide 1.14, "Reactor Coolant Pump Flywheel Integrity," Revision 1.) The exception would allow either an ultrasonic volumetric or surface examination as an acceptable inspection method.
18. Change 2-18-A (CTS Section 6.0). The proposed change would revise the CTS 6.8.4.e.7 dose rate limits in the radiological effluents controls program to reflect 10 CFR Part 20 requirements.
19. Change 2-22-A (CTS Section 6.0). The proposed change would revise the radiological effluents controls program in CTS 6.8.3.e to add clarifying statements denoting that the provisions of CTS 4.0.2 and 4.0.3, which allow extensions to surveillance frequencies, are also applicable to these program activities.
20. Change 3-18-LS-5 (CTS Section 6.0). The CTS 6.9.1.8 requirement to provide documentation of all challenges to the power operated relief valves (PORVs) and safety valves on the reactor coolant system would be deleted. This would be based on NRC Generic Letter (GL) 97-02, "Revised Contents in the Monthly Operating Report," which reduced the requirements for submitting such information to the NRC. The GL did not include these valves for information to be submitted.

21. Change 9-14-M (CTS Section 3/4.4). The proposed change would add a new surveillance requirement to CTS LCO 3.4.9.3 on overpressure protection systems to verify each accumulator is isolated when the accumulator pressure is greater than or equal to the maximum reactor coolant system (RCS) pressure for the existing RCS cold leg temperature allowed by the pressure/temperature limit curves provided in the Pressure Temperature Limit Report.
22. Change 14-09-M (CTS Section 3/4.7). The proposed change would add a new LCO, with actions and surveillance requirements from the ITS, to the CTS for the allowable fuel storage boron concentration. The new specification would be based on ITS 3.7.17 with the proposed minimum acceptable boron concentration for the spent fuel storage pool being 2165 ppm boron.
23. Change 1-15-A (CTS Section 3/4.3). The proposed change would modify the applicability of the reactor trip on turbine trip function in CTS Table 3.3-1 by adding a new footnote (c) stating that this function would only be required to be operable above the P-9 interlock. This is proposed since this function is blocked below the P-9 interlock. The applicability change would also be reflected in the revised trip actuating device operational test (TADOT) requirements for functional unit #16 in CTS Table 4.3-2.
24. Change 1-30-M (CTS Section 3/4.3). The proposed change would add a new LCO with actions and SR from the ITS for the boron dilution mitigation system. Additional restrictions not in the CTS would be added to address the requirement that one RCS loop shall be in operation for Modes 2 (below P-6), 3, 4 and 5. This is not included in the CTS or ITS 3.3.9.

Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed conversion of the CTS to the ITS for Callaway Plant, Unit 1, including the beyond scope issues discussed above.

Changes which are administrative in nature have been found to have no effect on the technical content of the TS. The increased clarity and understanding these changes bring to the TS are expected to improve the operators' control of Callaway Plant, Unit 1 in normal and accident conditions.

Relocation of requirements from the CTS to other licensee-controlled documents does not change the requirements themselves. Future changes to these requirements may then be made by the licensee under 10 CFR 50.59 and other NRC-approved control mechanisms which will ensure continued maintenance of adequate requirements. All such relocations have been found consistent with the guidelines of NUREG-1431 and the Commission's Final Policy Statement.

Changes involving more restrictive requirements have been found to enhance station safety.

Changes involving less restrictive requirements have been reviewed individually. When requirements have been shown to provide little or no safety benefit, or to place an unnecessary burden on the licensee, their removal from the TS was justified. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of a generic action, or of agreements reached during discussions with the OG, and found to be acceptable for Callaway Plant, Unit 1. Generic relaxations contained in NUREG-1431 have been reviewed by the NRC staff and found to be acceptable.

In summary, the proposed revisions to the TS were found to provide control of station operations such that reasonable assurance will be provided that the health and safety of the public will be adequately protected.

The proposed action will not increase the probability or consequences of accidents, will not change the quantity or types of any effluent that may be released offsite, and will not significantly increase the occupational or public radiation exposure. Also, these changes do not increase the licensed power and allowable effluents for the station. The changes will not create any new or unreviewed environmental impacts that were not considered in the Final Environmental Statement related to the operation of Callaway Plant, Unit 1, NUREG-0813, dated January 1982. Therefore, there are no significant radiological impacts associated with the proposed action.

With regard to potential non-radiological impacts, the proposed action only involves features located entirely within the restricted area for the station defined in 10 CFR Part 20 and does not involve any historic sites. The proposed action does not affect non-radiological station effluents and has no other environmental impact. It does not increase any discharge limit for the station. Therefore, there are no significant non-radiological environmental impacts associated with the proposed action.

Accordingly, the Commission concludes that there are no significant environmental impacts associated with the proposed action.

Alternatives to the Proposed Action:

As an alternative to the proposed action, the staff considered denial of the proposed action (i.e., the "no-action" alternative). Denial of the licensee's application would result in no change in current environment impacts. The environmental impacts of the proposed action and the alternative action are similar.

Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the Final Environmental Statement for the Callaway Plant, Unit 1 dated January 1982.

Agencies and Persons Consulted:

In accordance with its stated policy, on May 19, 1999, the staff consulted with the Missouri State official, regarding the environmental impact of the proposed action. The State official had no comments to offer.

FINDING OF NO SIGNIFICANT IMPACT

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's application dated May 15, 1997, as supplemented by (1) the letters in 1998 dated June 26, August 4, August 27, September 24, October 21 (two letters), November 23, November 25, December 11, and December 22, and (2) the letters in 1999 dated February 5, March 9, April 7, April 21 and April 30 which are available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW., Washington, DC, and at the local

public document room located at the University of Missouri-Columbia, Elmer Ellis Library,
Columbia Missouri, 65201-5149.

Dated at Rockville, Maryland, this 20th day of May 1999.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script, appearing to read "Mel Gray", with a long, sweeping horizontal line extending to the right.

Mel Gray, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation