March 10, 1987

Docket No.: 50-483

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

Dear Mr. Schnell:

Subject: Callaway Plant, Unit 1 - Amendment No. ¹⁸ to Facility Operating License NPF-30

The Commission has issued the enclosed Amendment No. 18 to Facility Operating License NPF-30 for the Callaway Plant, Unit 1. The amendment consists of a change to the Technical Specifications in response to your application dated September 29, 1986, and supplemented February 26, 1987.

The amendment changes the Technical Specifications pertaining to the main steam isolation valves and the main feedwater isolation valves. The amend-ment is effective as of its date of issuance.

A copy of the related Safety Evaluation is enclosed. Notice of issuance will be included in the Commission's next regular bi-weekly Federal Register Notice.

Sincerely,

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Paul O'Connor, Project Manager PWR Project Directorate #4 Division of PWR Licensing-A

Enclosures: 1. Amendment No. 18 to License No. NPF-30

2. Safety Evaluation Report

PDR

cc w/enclosures: See next page

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Mr. D. F. Schnell Union Electric Company

cc:

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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. 18 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 Union Electric Company (the licensee) dated September 29, 1986, and supplemented February 26, 1987, 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.
- 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:

Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 18, and the Environmental Protection Plan

8703190588 870310 PDR ADDCK 05000483 P PDR contained in Appendix B, both of which are attached hereto, are hereby incorporated into the license. Union Electric shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION

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Paul O'Connor, Project Manager PWR Project Directorate #4 Division of PWR Licensing-A

Attachment: Changes to the Technical Specifications

Date of Issuance: March 10, 1987

PWR#4/DPWR-A MDuncan/mac 02/20/87 *ρωσ* PWR#4/DPWR-A PO'Connor 02/2μ /87

OGC-Bethesda



ATTACHMENT TO LICENSE AMENDMENT NO. 18

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. Corresponding overleaf pages are provided to maintain document completeness.

Amended Page	Overleaf Page		
3/4 3-29 3/4 3-30 3/4 3-31	3/4 3-32		
3/4 6-30 3/4 7-9a (new page)	3/4 6-29 3/4 7-9 3/4 7-10		
B3/4 7-3	B3/4 7-4		

TABLE 3.3-5

ENGINEERED SAFETY FEATURES RESPONSE TIMES

INITIATING SIGNAL AND FUNCTION		G SIGNAL AND FUNCTION	RESPONSE TIME IN SECONDS	
1.	Manu	al Initiation		
	a.	Safety Injection (ECCS)	N.A.	
	b.	Containment Spray	N.A.	
	c.	Phase "A" Isolation	N.A.	
	d.	Phase "B" Isolation	N.A.	
	e.	Containment Purge Isolation	N.A.	
	f.	Steam Line Isolation	N.A.	
	g.	Feedwater Isolation	N.A.	
	h.	Auxiliary Feedwater	N.A.	
	i.	Essential Service Water	N.A.	
	j.	Containment Cooling	N.A.	
	k.	Control Room Isolation	N.A.	
	 Reactor Trip m. Emergency Diesel Generators 		N. A.	
			N.A.	
	n. Component Cooling Water		N.A.	
	o. Turbine Trip		N.A.	
2. <u>Containment</u> Pressure-High-1				
	a. Safety Injection (ECCS)		$\leq 29^{(1)}/12^{(4)}$	
		1) Reactor Trip	< 2	
		2) Feedwater Isolation	$\leq 2^{(5)}$	
		3) Phase "A" Isolation	$\leq 1.5^{(5)}$	
		4) Auxiliary Feedwater	<u><</u> 60	
		5) Essential Service Water	$\leq 60^{(1)}$	
		6) Containment Cooling	$\leq 60^{(1)}$	
		7) Component Cooling Water	N.A.	
		8) Emergency Diesel Generators	$\leq 14^{(6)}$	
		9) Turbine Trip	N. A.	

TABLE 3.3-5 (Continued)

ENGINEERED SAFETY FEATURES RESPONSE TIMES

INIT	IATING	SIGNAL AND FUNCTION	RESPONSE TIME IN SECONDS		
3.	Pressu	rizer Pressure-Low			
	a. Sa	fety Injection (ECCS)	$\leq 29^{(1)}/12^{(4)}$		
	1) Reactor Trip	≤ 2		
	2 3) Feedwater Isolation) Phase "A"Isolation	$\frac{2}{2}$ (5)	1	
	4 5) Auxiliary Feedwater) Essential Service Water	$\frac{\leq}{\leq} \frac{60}{60}(1)$		
	6) Containment Cooling	$\leq 60^{(1)}$		
	7) Component Cooling Water	N.A.		
	e) Emergency Diesel Generators	$\leq 14^{(6)}$		
	g) Turbine Trip	N. A.		
4.	Steam	Line Pressure-Low			
	a. S	afety Injection (ECCS)	$\leq 24^{(3)}/12^{(4)}$		
	1	.) Reactor Trip	<u><</u> 2	1	
	2	Feedwater Isolation	$\leq 2^{(5)}$	ļ	
	3	B) Phase "A" Isolation	$\leq 2^{(5)}$		
	4) Auxiliary Feedwater	<u><</u> 60		
	Ę	b) Essential Service Water	$\leq 60^{(1)}$		
	6	5) Containment Cooling	$\leq 60^{(1)}$		
	7	') Component Cooling Water	N.A.		
	8	B) Emergency Diesel Generators	≤ 14 ⁽⁶⁾		
	9) Turbine Trip	N.A.		
	b. 9	Steam Line Isolation	≤ 2 ⁽⁵⁾		

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TABLE 3.3-5 (Continued) ENGINEERED SAFETY FEATURES RESPONSE TIMES

INIT	TIATING SIGNAL AND FUNCTION	RESPONSE TIME IN SECONDS
5.	Containment Pressure-High-3	
	a. Containment Spray b. Phase "B" Isolation	$\leq 32^{(1)}/20^{(2)}$ ≤ 31.5
6.	<u>Containment Pressure-High-2</u> Steam Line Isolation	≤ 2 ⁽⁵⁾
7.	<u>Steam Line Pressure-Negative</u> <u>Rate-High</u> Steam Line Isolation	≤ 2 ⁽⁵⁾
8.	<u>Steam Generator Water Level-High-High</u> a. Feedwater Isolation b. Turbine Trip	$\leq 2^{(5)}$ ≤ 2.5
9.	 <u>Steam Generator Water Level-Low-Low</u> a. Start Motor-Driven Auxiliary Feedwater Pumps b. Start Turbine-Driven Auxiliary Feedwater Pump 	≤ 60 ≤ 60
10.	<u>Loss-of-Offsite Power</u> Start Turbine-Driven Auxiliary Feedwater Pump	N.A.
11.	<u>Trip of All Main Feedwater Pumps</u> Start Motor-Driven Auxiliary Feedwater Pumps	N. A.

TABLE 3.3-5 (Continued)

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ENGINEERED SAFETY FEATURES RESPONSE TIMES

INIT	IATIN	G SIGNAL AND FUNCTION	RESPONSE TIME IN SECONDS			
12.	<u>Auxi</u> Pres	liary Feedwater Pump Suction sure-Low				
		Transfer to Essential Service Water	N.A.			
13.	<u>RWST</u> Safe	Level-Low-Low Coincident with ty Injection				
		Automatic Switchover to Containment Sump	<u><</u> 60			
14.	Loss	of Power				
	a.	4 kV Bus Undervoltage- Loss of Voltage	<u><</u> 14			
	Þ.	4 kV Bus Undervoltage- Grid Degraded Voltage	<u><</u> 144			
15.	Phas	e "A" Isolation				
	a.	Control Room Isolation	N.A.			
	b.	Containment Purge Isolation	$\leq 2^{(5)}$			
TABLE NOTATIONS						
	(1)	Diesel generator starting and sequence loa	ding delays included.			
	(2)	Diesel generator starting delay <u>not</u> includ available.	ed. Offsite power			
	(3)	Diesel generator starting and sequence loa pumps <u>not</u> included.	ding delay included. RHR			
	(4)	Diesel generator starting and sequence loa Offsite power available. RHR pumps <u>not</u> in	ding delays not included. cluded.			
	(5)	Does not include valve closure time.				
	(6)	Includes time for diesel to reach full spe	ed.			

TABLE 3.6-1 (Continued)

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CONTAINMENT ISOLATION VALVES

PENETRATIONS	VALVE NUMBER	TYP FUNCTION TES	E LEAK T REQUIRED	MAXIMUM ISOLATION TIME (Seconds)
8. Hand-Oper	ated and Check Va	lves - (Continued)		
P-58	EM V-006	Accumulator Fill Line From SI Pumps	С	N.A.
P-49	EM V-010	SI Pump Disch to Cold Leg 1	Α	N.A.
P-49	EM V-020	SI Pump Disch to Cold Leg 2	Α	N.A.
P-49	EM V-030	SI Pump Disch to Cold Leg 3	Α	N.A.
P-49	EM V- 040	SI Pump Disch to Cold Leg 4	A	N.A.
P-88	EM 8815	BIT to RCS Cold Leg Injection	A	N.A.
P-89	EN V-013	CTMT Spray Pump A to CTMT Spray Nozzles	Α	N.A.
P-66	EN V-017	CTMT Spray Pump B to CTMT Spray Nozzles	A	N.A.
P-45	EP V-046	Accumulator Nitrogen Supply Line	C	N.A.
P-43	HD V-016	Auxiliary Steam to Decon System	С	N.A.
P-43	HD V-017	Auxiliary Steam to Decon System	С	N.A.
P-63	KA V-039	Rx Bldg Service Air Supply	С	N.A.
P-63	KA V-118	Rx Bldg Service Air Supply	C	N.A.
P-30	KA V-204	Rx Bldg Instrument Air Supply	C	N.A.
n-98	KB V-001	Breathing Air Supply to Rx Eldg.	С	N.A.

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TABLE 3.6-1 (Continued)

CONTAINMENT ISOLATION VALVES

PENETRATIONS	VALVE NUMBER	FUNCTION	TYPE LEAK TEST REQUIRED	MAXIMUM ISOLATION TIME (Seconds)
8. Hand-Oper	ated and Check Va	lves - (Continued)		
P-98	KB V-002	Breathing Air Supply to Rx Bldg.	C	N.A.
P-67	KC V-478	Fire Protection Supply to RX Bldg	C	N.A.
P-57	SJ V-111	Liquid Sample from PASS to RCDT	A,C	N.A.
9. Other Aut	omatic Valves			
P-1	AB-HV-11***	Mn. Stm. Isol.	A	N.A
P-2	AB-HV-14***	Mn. Stm. Isol.	Α	N. A
P-3	AB-HV-17***	Mn. Stm. Isol.	Α	N.A.
P-4	AB-HV-20***	Mn. Stm. Isol.	А	N.A.
P-5	AE-FV-42***	Mn. FW Isol.	А	N.A.
P-6	AE-FV-39***	Mn. FW Isol.	Α	N.A.
P-7	AE-FV-40***	Mn. FW Isol.	A	N.A.
P-8	AE-FV-41***	Mn. FW Isol.	А	N.A.
P-9	BM-HV-4**	SG Blowdn. Isol.	A	10
P-10	BM-HV-1**	SG Blowdn. Isol.	A	10
P-11	BM-HV-2**	SG Blowdn. Isol.	Α	10
P-12	BM-HV-3**	SG Blowdn. Isol.	Α	10

^{**}The provisions of Specification 3.0.4 are not applicable.
***These valves are included only for table completeness. The requirements of
Specification 3.6.3 do not apply; instead, the requirements of Specifications 3.7.1.5 and 3.7.1.6 apply to the Main Steam Isolation Valves and Main Feedwater Isolation Valves, respectively.

MAIN STEAM LINE ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.7.1.5 Each main steam line isolation valve (MSLIV) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

MODE 1:

With one MSLIV inoperable but open, POWER OPERATION may continue provided the inoperable valve is restored to OPERABLE status within 4 hours; otherwise be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

MODES 2 and 3:

With one MSLIV inoperable, subsequent operation in MODE 2 or 3 may proceed provided the isolation valve is maintained closed. Otherwise, be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.5 Each MSLIV shall be demonstrated OPERABLE by verifying full closure within 5 seconds when tested pursuant to Specification 4.0.5. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3.

MAIN FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.6 Each main feedwater isolation valve (MFIV) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- MODES 1 and 2: With one MFIV inoperable but open, operation may continue provided the inoperable valve is restored to OPERABLE status within 4 hours; otherwise be in HOT STANDBY within the next 6 hours.
- MODE 3: With one MFIV inoperable, subsequent operation in Mode 3 may proceed provided the isolation valve is maintained closed. Otherwise, be in HOT SHUTDOWN with the next 6 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.6 Each MFIV shall be demonstrated OPERABLE by verifying full closure within 5 seconds when tested pursuant to Specification 4.0.5. The provisions of specification 4.0.4 are not applicable for entry into MODE 3.

3/4.7.2 STEAM GENERATOR PRESSURE/TEMPERATURE LIMITATION

LIMITING CONDITION FOR OPERATION

3.7.2 The temperatures of both the reactor and secondary coolants in the steam generator shall be greater than 70° F when the pressure of either coolant in the steam generator is greater than 200 psig.

APPLICABILITY: At all times.

ACTION:

With the requirements of the above specification not satisfied:

- a. Reduce the steam generator pressure of the applicable side to less than or equal to 200 psig within 30 minutes, and
- b. Perform an engineering evaluation to determine the effect of the overpressurization on the structural integrity of the steam generator. Determine that the steam generator remains acceptable for continued operation prior to increasing its temperatures above 200°F.

SURVEILLANCE REQUIREMENTS

4.7.2 The pressure in each side of the steam generator shall be determined to be less than 200 psig at least once per hour when the temperature of either the reactor or secondary coolant is less than 70°F.

BASES

3/4.7.1.5 MAIN STEAM LINE ISOLATION VALVES

The OPERABILITY of the main steam line isolation valves ensures that no more than one steam generator will blow down in the event of a steam line rupture. This restriction is required to: (1) minimize the positive reactivity effects of the Reactor Coolant System cooldown associated with the blowdown, and (2) limit the pressure rise within containment in the event the steam line rupture occurs within containment. The OPERABILITY of the main steam line isolation valves within the closure times of the Surveillance Requirements are consistent with the assumptions used in the safety analyses.

3/4.7.1.6 FEEDWATER ISOLATION VALVES

The OPERABILITY of the feedwater isolation valves: 1) provides a pressure boundary to permit auxiliary feedwater addition in the event of a main steam or feedwater line break inside containment; and 2) ensure that no more than one steam generator will blow down in the event of a steam line rupture which a) minimizes the positive reactivity effects of the Reactor Coolant System cooldown associated with the blowdown, and b) limits the pressure rise within containment. The OPERABILITY of the feedwater isolation valves within the closure times of the Surveillance Requirements are consistent with the assumptions used in the safety analysis.

3/4.7.2 STEAM GENERATOR PRESSURE/TEMPERATURE LIMITATION

The limitation on steam generator pressure and temperature ensures that the pressure-induced stresses in the steam generators do not exceed the maximum allowable fracture toughness stress limits. The limitations of 70°F and 200 psig are based on a steam generator RT_{NDT} of 60°F and are sufficient to prevent brittle fracture.

3/4.7.3 COMPONENT COOLING WATER SYSTEM

The OPERABILITY of the Component Cooling Water System ensures that sufficient cooling capacity is available for continued operation of safetyrelated equipment during normal and accident conditions. The redundant cooling capacity of this system, assuming a single failure, is consistent with the assumptions used in the safety analyses. Each independent CCW loop contains two 100% capacity pumps and, therefore, the failure of one pump does not affect the OPERABILITY of that loop.

3/4.7.4 ESSENTIAL SERVICE WATER SYSTEM

The OPERABILITY of the Essential Service Water System ensures that sufficient cooling capacity is available for continued operation of safetyrelated equipment during normal and accident conditions. The redundant cooling capacity of this system, assuming a single failure, is consistent with the assumptions used in the safety analyses.

3/4.7.5 ULTIMATE HEAT SINK

The limitations on the ultimate heat sink level and temperature ensure that sufficient cooling capacity is available either to: (1) provide normal cooldown of the facility, or (2) mitigate the effects of accident conditions within acceptable limits.

CALLAWAY - UNIT 1

B 3/4 7-3

Amendment No. 18

BASES

ULTIMATE HEAT SINK (Continued)

The limitations on minimum water level and maximum temperature are based on providing a 30-day cooling water supply to safety-related equipment without exceeding its design basis temperature and are consistent with the recommendations of Regulatory Guide 1.27, "Ultimate Heat Sink for Nuclear Plants," March 1974.

3/4.7.6 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

The OPERABILITY of the Control Room Emergency Ventilation System ensures that: (1) the ambient air temperature does not exceed the allowable temperature for continuous-duty rating for the equipment and instrumentation cooled by this system, and (2) the control room will remain habitable for operations personnel during and following all credible accident conditions. Operation of the system with the heaters operating to maintain low humidity using automatic control for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the charcoal adsorbers and HEPA filters. The OPERABILITY of this system in conjunction with Control Room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rems or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criterion 19 of Appendix A, 10 CFR Part 50. ANSI N510-1975 will be used as a procedural guide for surveillance testing.

3/4.7.7 EMERGENCY EXHAUST SYSTEM

The OPERABILITY of the Emergency Exhaust System assures that radioactive materials leaking from the ECCS equipment within the pump room following a LOCA are filtered prior to reaching the environment. Operation of the system with the heaters operating to maintain low humidity using automatic control for at least 10 continuous hours in a 31-day period is sufficient to reduce the huildup of moisture on the charcoal adsorbers and HEPA filters. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the safety analyses. ANSI N510-1975 will be used as a procedural guide for surveillance testing.





INTRODUCTION

AUOLEAR REGULA,

By letter dated September 29, 1986, and supplement thereto dated February 26, 1987, Union Electric Company (the licensee) submitted an amendment request for changes to the Technical Specifications for the Callaway Plant. The changes pertain to the main steam isolation valves (MSIVs) and to the main feedwater isolation valves (MFIVs). The principal effect of the proposed changes would be to clarify the Technical Specifications pertaining to the MSIVs and to the MSIVs and to the MFIVs in particular. We have reviewed the proposed changes and find them to be acceptable as discussed below.

DISCUSSION AND EVALUATION

The licensee summarizes their amendment request by stating that the request provides clarification and restructures the Technical Specifications associated with the MSIVs and MFIVs. Further, no changes are being made to the valves or their response times, and therefore the original design bases are met.

For the Engineered Safety Features Response Times (Table 3.3-5), the licensee proposes to separate the response times for the MSIVs and the MFIVs into two parts. The response time for the sensor, associated electronics and actuation relays would be indicated in Table 3.3-5, whereas the valve closure time, for the valve to be considered operable, would be given in a separate specification. Thus, the MSIV and MFIV response times in Table 3.3-5 would be changed from the present \leq 7 seconds to \leq 2 seconds, with a footnote added that the response time does not include valve closure time. A separate specification would require valve closure time within five seconds for the valve to be OPERABLE. As a result, there would be no effective change in the overall response times. We therefore find this proposed change to be acceptable.

The Containment Isolation Valves (Table 3.6-1) include a list of the MSIVs and MFIVs under the table notation "Other Automatic Valves." The maximum isolation time for these valves is presently indicated as 5 seconds. The licensee proposes to replace the 5 seconds with N.A. (not applicable). The 5 seconds requirement would then appear in other technical specifications as discussed previously.

The licensee partially justifies the changes in Table 3.6-1 on the basis that the MSIVs and MFIVs are not containment isolation valves because the valves are not required to meet containment isolation criteria since the containment

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barrier integrity is maintained by the steam generator tubes, the shell of the secondary side of the steam generator, and the lines emanating from the steam generator secondary shells. We find that the licensee's contention that the MSIVs and MFIVs are not containment isolation valves conflicts with General Design Criterion 57 which states in part:

Each line that penetrates primary reactor containment and is neither part of the reactor coolant pressure boundary nor connected directly to the containment atmosphere shall have at least one containment isolation valve which shall be either automatic, or locked closed, or capable of remote manual operation.

Although we disagree with the licensee's contention that the MSIVs and MFIVs are not containment isolation valves, we find the changes to Table 3.6-1 are acceptable because the specifications for the MSIVs and MFIVs appear elsewhere in the Technical Specifications and there is no effective change in the overall response time of the valve closures. Also the licensee states and the staff finds that the licensee's proposed change in Table 3.6-1 for the Callaway plant is similar to the existing Table 3.6-1 for the Wolf Creek plant.

A footnote pertaining to the MSIVs and MFIVs would also be added stating:

***These valves are included only for table completeness. The requirements of Specification 3.6.3 do not apply; instead, the requirements of Specification 3.7.1.5 and 3.7.1.6 apply to the Main Steam Isolation Valves and Main Feedwater Isolation Valves, respectively.

Specification 3.6.3 pertains to containment isolation values other than the MSIVs and MFIVs and is applicable for Modes 1, 2, 3 and 4. Specifications 3.7.1.5 and 3.7.1.6 pertain to the MSIVs and MFIVs, respectively; apply to Modes 1, 2 and 3; and have different action statements than 3.6.3. Thus, the effect of the licensee's proposed changed is to clarify the appropriate limiting conditions for operation and associated action statements for the MSIVs and MFIVs. We find this clarification note acceptable and observe that a similar note appears in the Wolf Creek Technical Specifications.

The licensee proposes the addition of the following to the Bases section of the Technical Specifications:

3/4.7.1.6 Feedwater Isolation Valves

The OPERABILITY of the feedwater isolation valves functions to: 1) provide a pressure boundary to permit auxiliary feedwater addition in the event of a main steam or feedwater line break inside containment; and 2) ensure that no more than one steam generator will blow down in the event of a steam line rupture which a) minimizes the positive reactivity effects of the Reactor Coolant System cooldown associated with the blowdown, and b) limits the pressure rise within containment. The MSIVs and FWIVs are not considered to be containment isolation valves. The containment boundary is the steam generator secondary side and tubes. The OPERABILITY of the feedwater isolation valves within the closure times of the Surveillance Requirements are consistent with the assumptions used in the safety analysis.

As discussed previously, the staff disagrees that the MSIVs and MFIVs are not considered to be containment isolation valves. Therefore, the staff recommended that the following statements should be removed from the Bases section:

"The MSIVs and FWIVs are not considered to be containment isolation valves. The containment boundary is the steam generator secondary side and tubes"

By letter dated February 26, 1987 the licensee supplemented its amendment request by removing the above statement as requested by the staff.

The licensee also proposes the following LCO and Surveillance Requirement for the Main Feedwater System:

Plant Systems

Main Feedwater System

Limiting Condition For Operation

3.7.1.6 Each main feedwater isolation valve (MFIV) shall be OPERABLE.

Applicability: Modes 1, 2, and 3.

Action:

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- Modes 1 and 2 With one MFIV inoperable but open, operation may continue provided the inoperable valve is restored to OPERABLE status within 4 hours; otherwise be in HOT STANDBY within the next 6 hours.
- Mode 3: With one MFIV inoperable, subsequent operation in Mode 3 may proceed provided the isolation valve is maintained closed. Otherwise, be in HOT SHUTDOWN within the next 6 hours.

Surveillance Requirements

4.7.1.6 Each MFIV shall be demonstrated OPERABLE by verifying full closure within 5 seconds when tested pursuant to Specification 4.0.5. The provisions of specification 4.0.4 are not applicable for entry into MODE 3.

Staff notes that the above proposed additional LCO and Surveillance Requirement for the MFIVs is consistent with the present 3.7.1.5 LCO and 4.7.2.5 Surveillance Requirement for the MSIVs. Also, we note that the present 3.7.1.5 LCO and 4.7.1.5 Surveillance Requirement is consistent with the latest proposed revision 5 of the Westinghouse Standard Technical Specification. Finally, we find a definite functional relationship between the MSIVs and MFIVs, and would therefore expect the LCOs and Surveillance Requirements to be similar. We therefore find the proposed Technical Specification to be acceptable.

SUMMARY

The licensee for the Callaway Plant has submitted proposed Technical Specification changes pertaining to the main steam isolation valves (MSIVs) and to the main feedwater isolation valves (MFIVs). The proposed changes restructure the Technical Specifications, primarily toward the objective of clarification. No changes are being made to the valves or to their response times. We have reviewed the proposed Technical Specification changes and find them to be acceptable, except for the changes proposed in the Bases section. In two places in the Bases section, the words "The OPERABILITY" appear. We would suggest adding the words:

"of the main steam isolation valves and"

after the word OPERABILITY in each place. Also the following statements should be removed from the Bases section.

"The MSIVs and FWIVs are not considered to be containment isolation valves. The containment boundary is the steam generator secondary side and tubes."

ENVIRONMENTAL CONSIDERATION

This amendment involves changes in the use of a facility component located within the restricted area as defined in 10 CFR Part 20. 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 published a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. 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 the amendment.

CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (51 FR 45215) on December 17, 1986, and consulted with the state of Missouri. No public comments were received, and the state of Missouri did not have any comments.

We have 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: March 10, 1987

AMENDMENT NO. 18 TO FACILITY OPERATING LICENSE NPF-30 - CALLAWAY PLANT, UNIT 1

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