August 28, 1991

Docket No. STN 50-483

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

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NRC & Local PDRs PDIII-3 gray JZwolinski MDLynch EJordan GPA/PA

Dear Mr. Schnell:

SUBJECT: ENVIRONMENTAL ASSESSMENT RELATED TO A REQUEST FOR A PARTIAL

EXEMPTION FROM THE REQUIREMENTS OF SECTION III.D.1.(a) OF

APPENDIX J TO 10 CFR PART 50 (TAC NO. M80398)

Enclosed for your information is a copy of an Environmental Assessment and Finding of No Significant Impact. The assessment relates to Item 4 of your request dated March 15, 1991, for an exemption from the requirements of Section III.D.1.(a) of Appendix J to 10 CFR Part 50.

This Environmental Assessment has been forwarded to the Office of the Federal Register for publication.

Sincerely.

original signed by

M. D. Lynch, Sr. Project Manager Project Directorate III-3 Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

Enclosure: As stated

cc: See next page

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Mr. D. F. Schnell Union Electric Company

cc:

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Mr. Ronald A. Kucera, Deputy Director Department of Natural Resources P. O. Box 176 Jefferson City, Missouri 65102 Callaway Plant Unit No. 1

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UNITED STATES NUCLEAR REGULATORY COMMISSION

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. STN 50-483

ENVIRONMENTAL ASSESSMENT AND FINDING OF

NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of a partial exemption from the requirements of Section III.D.1.(a) of Appendix J to 10 CFR Part 50 to the Union Electric Company (the licensee) for the Callaway Plant, Unit 1, located in Callaway County, Missouri.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action

The proposed action would grant a partial exemption from the requirements of Section III.D.1.(a) of Appendix J to 10 CFR Part 50. This section requires that a set of three Type A tests be performed at approximately equal intervals during each 10-year service period and that the third test of each set be conducted when the plant is shut down for the 10-year plant inservice inspection (ISI). The licensee request is for an exemption from the requirement to perform the third Type A test when the plant is shut down for the 10-year plant inservice inspection (ISI).

The proposed action is in accordance with Item 4 of the licensee's request for exemption dated March 15, 1991.

The Need for the Proposed Action

The proposed exemption is needed since the licensee has adopted an 18-month fuel cycle, which does not lend itself to equal intervals for the

periodic Type A tests. Assuming that no incident interferes with the 18-month fuel cycle, the Type A test intervals will be 36 months, 36 months, and 54 months. These intervals can be implemented in any order. Moreover, the licensee does not conduct its ISI program in one refueling outage; rather, the ISI program is conducted throughout each 10-year service period. Without this exemption, the licensee might otherwise be forced to conduct a fourth Type A test during each 10-year service period. Environmental Impacts of the Proposed Action

The Commission has determined that granting the proposed exemption would have no impact on the reactor primary containment leakage relative to that currently required by Section III.D.1.(a) in that the same number of Type A tests will continue to be made as presently required though one of the intervals (i.e., the 54-month interval) will be 4 months longer than that presently specified in the Callaway Technical Specifications.

Accordingly, there will be no increase in either the probability or the amount of radiological release from the Callaway Plant in the event of an accident. Therefore, the Commission concludes that there are no significant radiological environmental impacts associated with the requested exemption.

with regard to potential nonradiological impacts, the proposed subject exemption causes no change in the manner of the plant operation. It does. not affect nonradiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed exemption.

Alternative to the Proposed Action

Since the Commission concluded that there are no significant environmental impacts associated with the proposed action, any alternative with equal or greater environmental impacts need not be evaluated.

The principal alternative would be to deny the requested exemption. This would not reduce environmental impacts attributed to the facility, but could add to the cost of operating the plant by requiring a fourth Type A test during each 10-year service period. This would result in the expenditure of resources without any compensating benefit.

Alternative Use of Resources

This action does not involve the use of any resources not previously considered in the "Final Environmental Statement related to the operation of Callaway Plant, Unit No. 1," dated January 1982.

Agencies and Persons Consulted

The NRC staff reviewed the licensee's request and did not consult other agencies or persons.

FINDING OF NO SIGNIFICANT IMPACT

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

Based upon the foregoing environmental assessment, the staff concludes that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this action, refer to Item 4 of the request for exemptions dated March 15, 1991, which is available for public inspection at the Commission's Public Document Room, 2120 L Street., N.W., Washington, D.C., and at Callaway County Public Library, 710 Court

Street, Fulton, Missouri 65251 and the John M. Olin Library, Washington University, Skinker and Lindell Boulevards, St. Louis, Missouri 63130.

Dated at Rockville, Maryland, this 28th

day of August

1991.

FOR THE NUCLEAR REGULATORY COMMISSION

John N. Hannon, Director Project Directorate III-3

Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation