

November 2, 1990

Docket No. 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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Dear Mr. Schnell:

SUBJECT: AMENDMENT NO. 59 TO FACILITY OPERATING LICENSE NO. NPF-30
(TAC NO. 77727)

The Commission has issued the enclosed Amendment No. 59 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. This amendment revises the Technical Specifications in response to your application dated September 26, 1990.

The amendment revises Technical Specification (TS) 3/4 7.1.7 issued to you during the past operating cycle in Amendment No. 45, dated May 16, 1989. The amendment allows an exception to TS 4.0.4. The exception facilitates the performance of Surveillance Requirement (SR) 4.7.1.7 by allowing sufficient plant conditions (Mode 3) to be established and completion of the required surveillance prior to applying the TS 3/4 7.1.7 Action Statement on atmospheric steam dump valve (ASD) operability.

We have reviewed the circumstances associated with your amendment request and have concluded that these changes to the TS are necessary to allow the Callaway Plant to resume operation following the current refueling outage. We have also concluded that due to the untimely discovery of the TS deficiency there is sufficient basis for determining that the exigent circumstances could not have been avoided, as required by 10 CFR 50.91(a)(6).

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Donald F. Schnell

- 2 -

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 Robert Samworth for/

Anthony T. Gody, Jr., Project Manager
Project Directorate III-3
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 59 to License No. NPF-30
2. Safety Evaluation

cc w/enclosures:
See next page

LA/PDIII-3
PKreitzer
10/17/90
w/10 changes

PM/PDIII-3
TGody/bj
10/20/90

RL for
OTSB
JCalvo
10/24/90

PD/PDIII-3
JHannon
10/23/90

OGC-WF1
STW
11/1/90

DOCUMENT NAME: 77727 AMD

Mr. Donald F. Schnell
Union Electric Company

-2-

Callaway Plant
Unit No. 1

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

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. STN 50-483

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 59
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by Union Electric Company (UE, the licensee) dated September 26, 1990 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.
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:

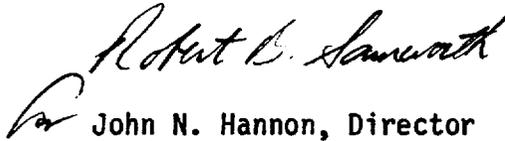
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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 59, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into the license. UE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective immediately to be implemented no later than 30 days from the date of its issuance. The licensee will immediately inform the Commission, in writing, of the implementation date.

FOR THE NUCLEAR REGULATORY COMMISSION



John N. Hannon, Director
Project Directorate III-3
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of issuance: November 2, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 59

OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Revise Appendix A Technical Specifications by removing the page identified below and inserting the enclosed page. The revised page is identified by the captioned amendment number and contains marginal lines indicating the area of change. The corresponding overleaf page is provided to maintain document completeness.

REMOVE

3/4 7-9b

INSERT

3/4 7-9b



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 59 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY
CALLAWAY PLANT, UNIT 1
DOCKET NO. STN 50-483

INTRODUCTION

By letter dated September 26, 1990 from Donald F. Schnell, Union Electric Company (UE), to the NRC, UE proposed to amend the Technical Specifications (TS) for the Callaway Plant related to the surveillance of the Steam Generator Atmospheric Steam Dump Valves (ASDs). The amendment includes the addition of an exception to TS 4.0.4 upon entry into Mode 3, which would allow sufficient plant conditions to be established for performance of the required surveillance to demonstrate ASD operability before TS 3.7.1.7 becomes applicable.

The proposed change has been requested because TS 3.7.1.7, issued in Amendment No. 45 dated May 16, 1989, does not allow sufficient time to perform the required surveillance. Amendment No. 45 provided TSS as required by License Condition (C11), Steam Generator Tube Rupture (SGTR), contained in the Callaway Plant Operating License, dated October 18, 1984. TS 3.7.1.7 requires that at least three ASD valves be operable when the Callaway Plant is in Modes 1, 2, and 3.

EVALUATION

To satisfy the assumptions used in the Callaway Plant's SGTR analysis, a minimum of at least three ASDs must be operable while in Modes 1, 2, and 3. This provides assurance that at least one operable ASD on an intact loop is available to cool the plant down following a postulated SGTR event assuming an active failure of one ASD.

The Callaway Plant ASD valves are configured with Masoneilan control valves. These valves are designed such that the Steam Generator System (SG) pressure acts on top of the valve plug. When the valve is required to move to the open position the actuator must act against this SG pressure. For the ASD surveillance requirement to demonstrate operability properly it should be performed at nominal SG operating temperature and pressure, which for the Callaway Plant is in the upper portion of Mode 3. As stated above, TS 3.7.1.7 is applicable for Mode 3 requiring, as a minimum, three operable ASDs. Typically, surveillance requirements for other plant systems such as main steam line isolation valves and main feedwater isolation valves are performed upon entry into Mode 3. The above mentioned surveillances are performed prior to raising plant pressure and temperature to the point where the ASD surveillance requirement can be adequately performed. While the current TS 3.7.1.7 allows entry into Mode 3 to perform the required ASD surveillance it

does not provide enough time to complete the ASD surveillance when other surveillances are sequentially performed upon entry into Mode 3. The staff has reviewed the licensee's request for an exception of TS 4.0.4 and has found that the requested exception is acceptable, since the benefit gained by testing the ASD values at conditions similar those at which they may be required to operate would outweigh any risk associated with delaying the surveillances beyond initial entry into Mode 3.

The staff concludes that the provisions of Specification 4.0.4 should not be applicable for entry into Mode 3 when it is necessary to perform required ASD surveillances in Mode 3 to adequately demonstrate ASD valve operability. When this exception is utilized, the licensee shall make timely progress to complete the required ASD surveillances and verify operability. Ascension into Mode 2 shall be prohibited until ASD operability can be demonstrated to satisfy the TS 3.7.1.7 requirements for the applicable modes.

EXIGENT CIRCUMSTANCES

The Commission's regulations, 10 CFR 50.91, contain provisions for issuance of amendments when the usual 30-day public notice period cannot be met. One type of special exception is an exigency. An exigency is a case where the staff and licensee need to act promptly, but failure to act promptly does not involve a plant shutdown, derating, or delay in startup. The exigency case usually represents an amendment involving a safety enhancement to the plant.

Under such circumstances, the Commission notifies the public in one of two ways: by issuing a Federal Register notice providing an opportunity for hearing and allowing at least two weeks for prior public comments, or by issuing a press release discussing the proposed changes, using the local media. In this case, the Commission used the first approach.

The licensee submitted the request for amendment on September 26, 1990. It was noticed in the Federal Register on October 15, 1990 (55 FR 41780), at which time the staff proposed a no significant hazards consideration determination. There were no public comments in response to the notice.

UE discovered the TS inadequacy and first identified it to the staff on September 26, 1990. The TS inadequacy needs to be corrected before the Callaway Plant enters Mode 3 following the current refueling outage. The Callaway Plant is scheduled to enter Mode 3 on November 4, 1990. Without approval of this TS change the Callaway Plant would be forced to comply with the current TS resulting in an inadequate surveillance of the ASDs. Since Mode 3 conditions are necessary to perform an adequate surveillance test on the ASDs, the requested TS change is necessary.

An exigent TS change has been requested since the full 30-day Federal Register notice period may not be possible before the required surveillance is necessary. To provide a full 30-day notice, the amendment would not be able to be issued prior to close of business on November 4, 1990. This would force the Callaway Plant to remain in a shutdown condition.

The staff has reviewed the circumstances described above with respect to the proposed TS change and agrees that the amendment is necessary for startup of the Callaway Plant and that failure to act on the request in a timely manner would require UE to unnecessarily maintain the Callaway Plant in a shutdown condition. The TS inaccuracy requiring this change was not discovered until mid September 1990. The licensee made a good faith effort to expedite submittal of the TS amendment application. The staff has concluded that these circumstances could not have reasonably been avoided and, therefore, valid exigent circumstances exist, as defined by 10 CFR 50.91(a)(6).

FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

Operation of the facility in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed amendment will allow the ASD valves to be tested at conditions similar to those at which they may be required to operate, such as during a postulated SGTR. Since no plant modification will be made, the proposed amendment would not involve a significant increase in the probability of an accident previously evaluated. Demonstrating ASD valve operability at conditions similar to those at which they may be required to operate will provide assurance that the consequences of postulated accidents and the probability of ASD equipment related malfunctions are within the assumptions utilized in the Callaway Plant Final Safety Analysis Report (FSAR).

Operation of the facility in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated based on the fact that no plant design modifications or changes in operating philosophy are involved.

Operation of the facility in accordance with the proposed change will not involve a significant reduction in a margin of safety because this would allow favorable plant conditions to be established for performance of the ASD valve surveillance. Performing the ASD valve surveillance under plant conditions similar to what they would experience during a postulated SGTR accident would provide assurance that the ASD valves will perform as designed to mitigate the consequences of a postulated SGTR event. This added assurance that the ASD valves will perform as designed would offset any risk increase associated with delaying the surveillance beyond initial entry into Mode 3.

Based on the above considerations, the staff concludes that the amendment meets the three criteria of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendment does not involve a significant hazards consideration.

STATE CONSULTATION

The staff made a good-faith effort to consult with the state of Missouri by telephone on October 29, 1990. The state offered no comments on this amendment.

ENVIRONMENTAL CONSIDERATION

This amendment involves a change to 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 or a change to a surveillance requirement. 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 issued a proposed finding that this 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 this amendment.

CONCLUSION

The staff 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; 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.

ACKNOWLEDGEMENT

Principal Contributor: Anthony T. Gody, Jr.

Dated: November 2, 1990