

January 24, 1992

Docket No. STN 50-483

Mr. Donald F. Schnell
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Dear Mr. Schnell:

SUBJECT: AMENDMENT NO. 66 TO FACILITY OPERATING LICENSE NO. NPF-30
(TAC NO. M79971)

The Commission has issued the enclosed Amendment No. 66 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. This amendment revises the Technical Specifications (TSs) in response to your application dated March 15, 1991, as clarified by letters dated August 15, 1991 and January 23, 1992.

The amendment revises TS 3.4.6.2.f and the associated Bases to change the maximum allowable leakage rate of the reactor coolant system pressure isolation valves (PIVs). This change establishes maximum leakage criteria based on PIV size. Additionally, TS Table 3.4-1 is revised to provide a more detailed description of the 35 affected PIVs including the addition of the maximum allowable leakage rate in accordance with the revision to TS 3.4.6.2.f and to correct some valve identification numbers and descriptions.

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

L. Raynard Wharton, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 66 to License No. NPF-30
2. Safety Evaluation

cc w/enclosures:
See next page

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DET: EMEB

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D:PDIII-3:DRPW

JHannon

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Union Electric Company

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. 66
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 March 15, 1991, as clarified by letters dated August 15, 1991, and January 23, 1992, 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:

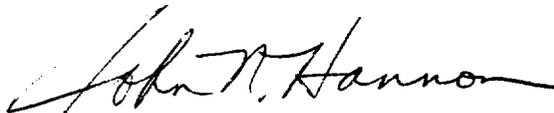
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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 66, 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 as of its date of issuance.

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

Attachment:
Changes to the Technical
Specifications

Date of issuance: January 24, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 66

OPERATING LICENSE NO. NPF-30

DOCKET NO. STN 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.

REMOVE

3/4 4-19

3/4 4-21

B 3/4 4-5

INSERT

3/4 4-19

3/4 4-21

B 3/4 4-5

REACTOR COOLANT SYSTEM

OPERATIONAL LEAKAGE

LIMITING CONDITION FOR OPERATION

3.4.6.2 Reactor Coolant System leakage shall be limited to:

- a. No PRESSURE BOUNDARY LEAKAGE,
- b. 1 gpm UNIDENTIFIED LEAKAGE.
- c. 1 gpm total reactor-to-secondary leakage through all steam generators not isolated from the Reactor Coolant System and 500 gallons per day through any one steam generator,
- d. 10 gpm IDENTIFIED LEAKAGE from the Reactor Coolant System,
- e. 8 gpm per RC pump CONTROLLED LEAKAGE at a Reactor Coolant System pressure of 2235 ± 20 psig, and
- f. The leakage from each Reactor Coolant System Pressure Isolation Valve specified in Table 3.4-1 shall be limited to 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm, at a Reactor Coolant System pressure of 2235 ± 20 psig.*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With any PRESSURE BOUNDARY LEAKAGE, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With any Reactor Coolant System leakage greater than any one of the above limits, excluding PRESSURE BOUNDARY LEAKAGE and leakage from Reactor Coolant System Pressure Isolation Valves, reduce the leakage rate to within limits within 4 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With any Reactor Coolant System Pressure Isolation Valve leakage greater than the above limit, reduce the leakage rate to within limits within 4 hours, or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours with an RCS pressure of less than 600 psig.

*Test pressures less than 2235 psig but greater than 150 psig are allowed. Observed leakage shall be adjusted for the actual test pressure up to 2235 psig assuming the leakage to be directly proportional to pressure differential to the one-half power.

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS

4.4.6.2.1 Reactor Coolant System leakages shall be demonstrated to be within each of the above limits by:

- a. Monitoring the containment atmosphere gaseous or particulate radioactivity monitor at least once per 12 hours;
- b. Monitoring the containment normal sump inventory and discharge at least once per 12 hours;
- c. Measurement of the CONTROLLED LEAKAGE from the reactor coolant pump seals when the Reactor Coolant System pressure is 2235 ± 20 psig at least once per 31 days. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 or 4;
- d. Performance of a Reactor Coolant System water inventory balance at least once per 72 hours; and
- e. Monitoring the Reactor Head Flange Leakoff System at least once per 24 hours.

4.4.6.2.2 Each Reactor Coolant System Pressure Isolation Valve specified in Table 3.4-1 shall be demonstrated OPERABLE by verifying leakage to be within its limit:

- a. At least once per 18 months;
- b. Prior to entering MODE 2 whenever the unit has been in COLD SHUTDOWN for 72 hours or more and if leakage testing has not been performed in the previous 9 months;
- c. Prior to returning the valve to service following maintenance, repair or replacement work on the valve; and
- d. Within 24 hours following valve actuation due to automatic or manual action or flow through the valve except for valves BBPV8702 A/B and EJHV8701 A/B.

The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 or 4.

TABLE 3.4-1

REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>VALVE SIZE(in.)</u>	<u>FUNCTION</u>	<u>MAXIMUM ALLOWABLE LEAKAGE (gpm)</u>
BB8948A	10	RCS Loop 1 Cold Leg SI Accu Chck	5.0
BB8948B	10	RCS Loop 2 Cold Leg SI Accu Chck	5.0
BB8948C	10	RCS Loop 3 Cold Leg SI Accu Chck	5.0
BB8948D	10	RCS Loop 4 Cold Leg SI Accu Chck	5.0
BB8949A	6	RCS Loop 1 Hot Leg SI/RHR Pump Chck	3.0
BB8949B	6	RCS Loop 2 Hot Leg SI/RHR Pump Chck	3.0
BB8949C	6	RCS Loop 3 Hot Leg SI/RHR Pump Chck	3.0
BB8949D	6	RCS Loop 4 Hot Leg SI/RHR Pump Chck	3.0
BBV0001	1.5	RCS Loop 1 Cold Leg SI/BIT Chck	0.75
BBV0022	1.5	RCS Loop 2 Cold Leg SI/BIT Chck	0.75
BBV0040	1.5	RCS Loop 3 Cold Leg SI/BIT Chck	0.75
BBV0059	1.5	RCS Loop 4 Cold Leg SI/BIT Chck	0.75
BBPV8702A	12	RCS Loop 1 Hot Leg to RHR Pumps ISO	5.0
BBPV8702B	12	RCS Loop 4 Hot Leg to RHR Pumps ISO	5.0
EJ8841A	6	RHR TRNS SIS Hot Leg Loop 2 Recirc	3.0
EJ8841B	6	RHR TRNS SIS Hot Leg Loop 3 Recirc	3.0
EJHV8701A	12	RHR Pump A Suction ISO	5.0
EJHV8701B	12	RHR Pump B Suction ISO	5.0
EMV0001	2	SI Pump A Disch to Hot Leg Loop 2 Chck	1.0
EMV0002	2	SI Pump A Disch to Hot Leg Loop 3 Chck	1.0
EMV0003	2	SI Pump B Disch to Hot Leg Loop 1 Chck	1.0
EMV0004	2	SI Pump B Disch to Hot Leg Loop 4 Chck	1.0
EM8815	3	BIT CVCS Out Check	1.5
EPV0010	2	SI Pumps to RCS Cold Leg Loop 1 Chck	1.0
EPV0020	2	SI Pumps to RCS Cold Leg Loop 2 Chck	1.0
EPV0030	2	SI Pumps to RCS Cold Leg Loop 3 Chck	1.0
EPV0040	2	SI Pumps to RCS Cold Leg Loop 4 Chck	1.0
EP8818A	6	RHR Pumps to RCS Cold Leg Loop 1 Chck	3.0
EP8818B	6	RHR Pumps to RCS Cold Leg Loop 2 Chck	3.0
EP8818C	6	RHR Pumps to RCS Cold Leg Loop 3 Chck	3.0
EP8818D	6	RHR Pumps to RCS Cold Leg Loop 4 Chck	3.0
EP8956A	10	SI Accu TK A Out Upstream Chck	5.0
EP8956B	10	SI Accu Tk B Out Upstream Chck	5.0
EP8956C	10	SI Accu TK C Out Upstream Chck	5.0
EP8956D	10	SI Accu TK D Out Upstream Chck	5.0

REACTOR COOLANT SYSTEM

3/4.4.7 CHEMISTRY

LIMITING CONDITION FOR OPERATION

3.4.7 The Reactor Coolant System chemistry shall be maintained within the limits specified in Table 3.4-2.

APPLICABILITY: At all times.

ACTION:

MODES 1, 2, 3, and 4.

- a. With any one or more chemistry parameter in excess of its Steady-State Limit but within its Transient Limit, restore the parameter to within its Steady-State Limit within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With any one or more chemistry parameter in excess of its Transient Limit, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.

At All Other Times:

With the concentration of either chloride or fluoride in the Reactor Coolant System in excess of its Steady-State Limit for more than 24 hours or in excess of its Transient Limit, reduce the pressurizer pressure to less than or equal to 500 psig, if applicable, and perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the Reactor Coolant System; determine that the Reactor Coolant System remains acceptable for continued operation prior to increasing the pressurizer pressure above 500 psig or prior to proceeding to MODE 4.

SURVILLANCE REQUIREMENTS

4.4.7 The Reactor Coolant System chemistry shall be determined to be within the limits by analysis of those parameters at the frequencies specified in Table 4.4-3.

REACTOR COOLANT SYSTEM

BASES

OPERATIONAL LEAKAGE (Continued)

The leakage from any RCS pressure isolation valve is sufficiently low to ensure early detection of possible in-series check valve failure. It is apparent that when pressure isolation is provided by two in-series check valves and when failure of one valve in the pair can go undetected for a substantial length of time, verification of valve integrity is required. Since these valves are important in preventing overpressurization and rupture of the ECCS low pressure piping which would result in a LOCA that bypasses containment, these valves should be tested periodically to ensure low probability of gross failure.

The Surveillance Requirements for RCS pressure isolation valves provide added assurance of valve integrity thereby reducing the probability of gross valve failure and consequent intersystem LOCA. Leakage from the RCS pressure isolation valves is IDENTIFIED LEAKAGE and will be considered as a portion of the allowed limit.

3/4.4.7 CHEMISTRY

The limitations on Reactor Coolant System chemistry ensure that corrosion of the Reactor Coolant System is minimized and reduces the potential for Reactor Coolant System leakage or failure due to stress corrosion. Maintaining the chemistry within the Steady-State Limits provides adequate corrosion protection to ensure the structural integrity of the Reactor Coolant System over the life of the plant. The associated effects of exceeding the oxygen, chloride, and fluoride limits are time and temperature dependent. Corrosion studies show that operation may be continued with contaminant concentration levels in excess of the Steady-State Limits, up to the Transient Limits, for the specified limited time intervals without having a significant effect on the structural integrity of the Reactor Coolant System. The time interval permitting continued operation within the restrictions of the Transient Limits provides time for taking corrective actions to restore the contaminant concentrations to within the Steady-State Limits.

The Surveillance Requirements provide adequate assurance that concentrations in excess of the limits will be detected in sufficient time to take corrective action.

3/4.4.8 SPECIFIC ACTIVITY

The limitations on the specific activity of the reactor coolant ensure that the resulting 2-hour doses at the SITE BOUNDARY will not exceed an appropriately small fraction of 10 CFR Part 100 dose guideline values following a steam generator tube rupture accident in conjunction with an assumed steady state reactor-to-secondary steam generator leakage rate of 1 gpm. The values for the limits on specific activity represent limits based upon a parametric evaluation by the NRC of typical site locations. These values are conservative in that specific site parameters of the Callaway site, such as SITE BOUNDARY location and meteorological conditions, were not considered in this evaluation.

REACTOR COOLANT SYSTEM

BASES

SPECIFIC ACTIVITY (Continued)

The ACTION statement permitting POWER OPERATION to continue for limited time periods with the reactor coolant's specific activity greater than 1 microCurie/gram DOSE EQUIVALENT I-131, but within the allowable limit shown on Figure 3.4-1, accommodates possible iodine spiking phenomenon which may occur following changes in THERMAL POWER.

Reducing T_{avg} to less than 500°F prevents the release of activity should a steam generator tube rupture since the saturation pressure of the reactor coolant is below the lift pressure of the atmospheric steam relief valves. The Surveillance Requirements provide adequate assurance that excessive specific activity levels in the reactor coolant will be detected in sufficient time to take corrective action. Information obtained on iodine spiking will be used to assess the parameters associated with spiking phenomenon. A reduction in frequency of isotopic analyses following power changes may be permissible if justified by the data obtained.

3/4.4.9 PRESSURE/TEMPERATURE LIMITS

The temperature and pressure changes during heatup and cooldown are limited to be consistent with the requirements given in the ASME Boiler and Pressure Vessel Code, Section III, Appendix G:

1. The reactor coolant temperature and pressure and system heatup and cooldown rates (with the exception of the pressurizer) shall be limited in accordance with Figures 3.4-2 and 3.4-3 for the service period specified thereon:
 - a. Allowable combinations of pressure and temperature for specific temperature change rates are below and to the right of the limit lines shown. Limit lines for cooldown rates between those presented may be obtained by interpolation, and
 - b. Figures 3.4-2 and 3.4-3 define limits to assure prevention of non-ductile failure only. For normal operation, other inherent plant characteristics, e.g., pump heat addition and pressurizer heater capacity, may limit the heatup and cooldown rates that can be achieved over certain pressure-temperature ranges.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 66 TO FACILITY OPERATING LICENSE NO. NPF-30

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

1.0 INTRODUCTION

In its letter dated March 15, 1991, as supplemented by letters dated August 15, 1991 and January 23, 1992, the Union Electric Company (the licensee) requested a revision to Technical Specification 3.4.6.2.f and the associated Bases for the Callaway Plant, Unit 1. The proposed revision would replace the present maximum allowable leakage rate of 1-gallon per minute (gpm) from any of the reactor coolant system pressure isolation valves (PIVs) specified in Table 3.4-1 of the Callaway Technical Specifications (TSs). This new set of maximum allowable leakage rates would be dependent on the size of the PIVs. The proposed maximum allowable leakage of these PIVs would be limited to 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm.

Additionally, the licensee proposed in its application cited above that Table 3.4-1 be expanded to provide a more detailed description of the 35 affected PIVs and to correct some valve identification numbers and descriptions.

2.0 EVALUATION

The subject TS (i.e., TS 3.4.6.2) establishes six separate criteria of reactor coolant system (RCS) maximum allowable leakage rates. One of these is the maximum allowable leakage rate from the RCS PIVs which are presently limited to 1 gpm for each PIV (TS 3.4.6.2.f). The licensee proposed that this single value be replaced by limiting leakage rates dependent on the nominal diameter of the PIVs. Specifically, the licensee has proposed that the maximum allowable leakage rate for the 35 PIVs listed in Table 3.4-1 of the Callaway TSs be established as 0.5 gpm per nominal inch of valve size up to a maximum value of 5 gpm at an RCS pressure of 2235 ±20 pounds per square inch gauge (psig).

The present value of the maximum allowable leakage rate of 1 gpm for each PIV, independent of size, is arbitrary in that this TS limit does not recognize that leakage through check valves tends to be larger as valve size increases. (This is related to the leakage area being proportional to the valve diameter.) As a result, this use of a single, relatively low limiting value of PIV leakage for the larger valves requires them to be reworked for the same limiting leakage rate as that for a small PIV. However, a measured leakage rate of 1 gpm from a 2-inch PIV is more significant than a leakage of 1 gpm from a 10-inch PIV in that it is indicative of greater degradation.

The net result is that the larger PIVs will tend to be reworked more frequently than justified, considering the significance of the 1 gpm leakage through these larger valves. The licensee's proposal, to the extent that it reduces excessive reworking of the larger PIVs, will thereby reduce radiation exposure to the plant operating personnel.

The licensee's proposal to revise the leakage limit for the PIVs in TS Table 3.4-1 introduces a more rational correlation between the size of a PIV and its limiting leakage rate. Inasmuch as this proposed revision does not change the limits on identified or unidentified leakage from the RCS, there will be no significant increase in the total leakage outside the reactor primary containment and no significant increase in the amount of radioactivity released to the environment under normal or accident conditions. The proposed change will allow operation with some increase in the leakage from certain PIVs, however plant operation will continue to be restricted by the TS limits on total leakage. The slight increase in allowable leakage from individual PIVs is still sufficiently conservative to permit the identification of significant valve degradation. Additionally, the Bases section is revised to delete the specific reference to 1 gpm leakage for any RCS pressure isolation valve, consistent with the proposed change to TS 3.4.6.2.f.

The licensee stated in its supplemental letter dated August 15, 1991 that there is more than sufficient pressure relief capacity downstream of the PIVs to prevent overpressurization of piping and equipment as a result of the proposed higher limiting leakage rates.

Based on discussions with the staff, the licensee revised its original request on January 23, 1992. The revised request changed the leakage limit for valves which are 2-inches or smaller to 0.5 gpm per nominal inch of valve size. This change is consistent with the Standard Technical Specifications. The revised limits are more conservative than those originally proposed by the licensee and therefore, this revision does not alter the staff's original proposed no significant hazards determination.

Accordingly, the NRC staff finds the licensee's proposal acceptable on the basis that it will tend to decrease radiation exposure to plant operating personnel and will allow continued plant operation without a significant increase in the resulting leakage from the reactor primary containment. The staff concludes, therefore, that there is no significant increased risk to public health and safety.

3.0 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.

4.0 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. 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 (56 FR 24220). 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.

5.0 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: M. D. Lynch

Date: January 24, 1992