

March 22, 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. 52 TO FACILITY OPERATING LICENSE NO. NPF-30
(TAC NO. 75507)

The Commission has issued the enclosed Amendment No. 52 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 November 14, 1989.

The amendment revises TS Section 4.0.2 and its associated bases to remove the 3.25 limit for surveillances as provided in Generic Letter 89-14 dated August 21, 1989.

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,

/s/

S. V. Athavale, 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. 52 to License No. NPF-30
2. Safety Evaluation

cc w/enclosures:
See next page

9003300003 900322
PDR ADOCK 05000483
P PIC

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Date: 2/20/90

PM/PDIII-3
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 22, 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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Sincerely,

A handwritten signature in cursive script, appearing to read "S. V. Athavale".

S. V. Athavale, Project Manager
Project Directorate III-3
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

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2. Safety Evaluation

cc w/enclosures:
See next page

Mr. D. F. Schnell
Union Electric Company

Callaway Plant
Unit No. 1

cc:

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St. Louis Region
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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. 52
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 November 14, 1989 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:

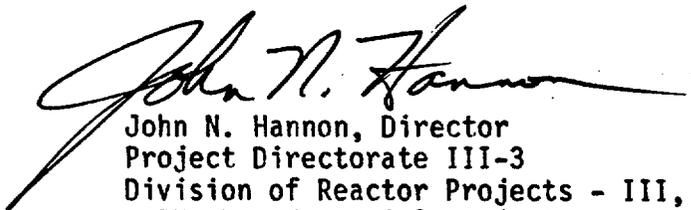
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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 52, 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 the date of its issuance.

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: March 22, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 52

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.

REMOVE

3/4 0-2
B 3/4 0-2

INSERT

3/4 0-2
B 3/4 0-2

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour ACTION shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in:

- a. At least HOT STANDBY within the next 6 hours,
- b. At least HOT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications.

This specification is not applicable in MODE 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i):

3/4.0 APPLICABILITY

BASES

The specifications of this section provide the general requirements applicable to each of the Limiting Conditions for Operation and Surveillance Requirements within Section 3/4. In the event of a disagreement between the requirements stated in these Technical Specifications and that stated in an applicable Federal Regulation or Act the requirements stated in the applicable Federal Regulation or Act shall take precedence and shall be met.

3.0.1 This specification defines the applicability of each specification in terms of defined OPERATIONAL MODES or other specified conditions and is provided to delineate specifically when each specification is applicable.

3.0.2 This specification defines those conditions necessary to constitute compliance with the terms of an individual Limiting Condition for Operation and associated ACTION requirement.

3.0.3 The specification delineates the measures to be taken for those circumstances not directly provided for in the ACTION statements, and whose occurrence would violate the intent of a specification. For example, Specification 3.5.2 requires two independent ECCS subsystems to be OPERABLE and provides explicit ACTION requirements if one ECCS subsystem is inoperable. Under the requirements of Specification 3.0.3, if both the required ECCS subsystems are inoperable, within 1 hour measures must be initiated to place the unit in at least HOT STANDBY within the next 6 hours, and in at least HOT SHUTDOWN within the following 6 hours. As a further example, Specification 3.6.2.1 requires two Containment Spray Systems to be OPERABLE and provides explicit ACTION requirements if one Containment Spray System is inoperable. Under the requirements of Specification 3.0.3 if both the required Containment Spray Systems are inoperable, within 1 hour measures must be initiated to place the unit in at least HOT STANDBY within the next 6 hours, in at least HOT SHUTDOWN within the following 6 hours, and in COLD SHUTDOWN within the subsequent 24 hours. It is acceptable to initiate and complete a reduction in OPERATIONAL MODES in a shorter time interval than required in the ACTION statement and to add the unused portion of this allowable out-of-service time to that period for operation in subsequent lower OPERATIONAL MODE(S). Stated allowable out-of-service times are applicable regardless of the OPERATIONAL MODE(S) in which the inoperability is discovered but the times provided for achieving a mode reduction are not applicable if the inoperability is discovered in a mode lower than the applicable mode. For example, if the Containment Spray System was discovered to be inoperable while in STARTUP, the ACTION Statement would allow up to 156 hours to achieve COLD SHUTDOWN. If HOT STANDBY is attained in 16 hours rather than the allowed 78 hours, 140 hours would still be available before the plant would be required to be in COLD SHUTDOWN. However, if this system was discovered to be inoperable while in HOT STANDBY, the 6 hours provided to achieve HOT STANDBY would not be additive to the time available to achieve COLD SHUTDOWN so that the total allowable time is reduced from 156 hours to 150 hours.

APPLICABILITY

BASES

3.0.4 This specification provides that entry into an OPERATIONAL MODE or other specified applicability condition must be made with: (1) the full complement of required systems, equipment, or components OPERABLE and (2) all other parameters as specified in the Limiting Conditions for Operation being met without regard for allowable deviations and out-of-service provisions contained in the ACTION statements.

The intent of this provision is to ensure that facility operation is not initiated with either required equipment or systems inoperable or other specified limits being exceeded.

Exceptions to this provision have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. These exceptions are stated in the ACTION statements of the appropriate specifications.

4.0.1 This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

4.0.2 This specification establishes the limit for which the specified surveillance interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

4.0.3 The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under these criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements. Items may be determined inoperable during use, during surveillance tests or in accordance with this specification. Therefore, ACTION statements are entered when the Surveillance Requirements should have been performed rather than at the time it is discovered that the tests were not performed.

APPLICABILITY

BASES

3.0.4 This specification provides that entry into an OPERATIONAL MODE or other specified applicability condition must be made with: (1) the full complement of required systems, equipment, or components OPERABLE and (2) all other parameters as specified in the Limiting Conditions for Operation being met without regard for allowable deviations and out-of-service provisions contained in the ACTION statements.

The intent of this provision is to ensure that facility operation is not initiated with either required equipment or systems inoperable or other specified limits being exceeded.

Exceptions to this provision have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. These exceptions are stated in the ACTION statements of the appropriate specifications.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 52 TO FACILITY OPERATING LICENSE NO. NPF-30

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

1.0 INTRODUCTION

By letter dated November 14, 1989, Union Electric Company (the licensee) proposed changes to the Technical Specifications (TS) for the Callaway Plant. The proposed changes would remove the provision of Specification 4.0.2 that limits the combined time interval for three consecutive surveillances to less than 3.25 times the specified interval. Guidance on this proposed change to the TS was provided to all power reactor licensees and applicants by Generic Letter 89-14 dated August 21, 1989.

2.0 EVALUATION

Specification 4.0.2 includes the provision that allows a surveillance interval to be extended by 25 percent of the specified time interval. This extension provides flexibility for scheduling the performance of surveillances and to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. Specification 4.0.2 further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. The purpose of this provision is to assure that surveillances are not extended repeatedly as an operational convenience to provide an overall increase in the surveillance interval.

Experience has shown that the 18-month interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25-percent allowance for extending surveillances that are performed on a refueling outage basis.

Extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the surveillance. This may occur when transient

plant operating conditions exist or when safety systems are out of service for maintenance or other surveillance activities. In such cases, the benefit to safety of extending a surveillance interval would exceed any safety benefit derived by limiting the use of the 25-percent allowance to extend a surveillance. Furthermore, there is the administrative burden associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit.

In view of these findings, the staff concluded that Specification 4.0.2 should be changed to remove the 3.25 limit for all surveillances because its removal will have an overall positive effect on safety. The guidance provided in Generic Letter 89-14 included the following change to this specification and removes the 3.25 limit on three consecutive surveillances with the following statement:

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

In addition, the Bases of this specification were updated to reflect this change and noted that it is not the intent of the allowance for extending surveillance intervals that it be used repeatedly merely as an operational convenience to extend surveillance intervals beyond those specified.

The licensee has proposed changes to Specification 4.0.2 that are consistent with the guidance provided in Generic Letter 89-14, as noted above. On the basis of its review of this matter, the staff finds that the above changes to the TS for the Callaway plant are acceptable.

3.0 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 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.

4.0 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; 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.

Principal Contributor: Thomas G. Dunning OSB/DDEA
S. V. Athavale, PDIII-3

Dated: March 22, 1990