

April 8, 2004

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Washington, DC 20555

Ladies and Gentlemen:

ULNRC-04975



**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC COMPANY  
FACILITY OPERATING LICENSE NPF-30  
APPLICATION FOR TECHNICAL SPECIFICATION  
IMPROVEMENT TO EXTEND THE INSPECTION INTERVAL  
FOR REACTOR COOLANT PUMP FLYWHEELS  
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

Pursuant to 10 CFR 50.90, AmerenUE hereby requests an amendment to Facility Operating License No. NPF-30 for the Callaway Plant.

The proposed amendment will extend the reactor coolant pump (RCP) motor flywheel examination frequency from the currently approved 10-year inspection interval, to an interval not to exceed 20 years. The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)." The availability of this Technical Specification (TS) improvement was announced in the Federal Register on October 22, 2003, as part of the consolidated line item improvement process (CLIIP).

Attachment 1 provides a description of the proposed change and the requested confirmation of applicability. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides revised, clean TS pages. Attachment 4 provides a list of commitments made in this application.

This amendment application was reviewed by the Callaway Plant Onsite Review Committee and the Nuclear Safety Review Board. In accordance with 10 CFR 50.91, a copy of this amendment application, with attachments, is being provided to the designated Missouri State official.

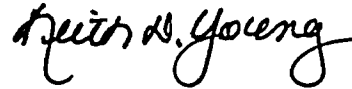
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AmerenUE requests approval of the proposed amendment request by October 1, 2004. It is anticipated that the license amendment, as approved, will be effective upon issuance and will be implemented within 90 days from the date of issuance.

If you have any questions on this amendment application, please contact us.

Very truly yours,



Keith D. Young  
Manager, Regulatory Affairs

PMB/mlo

Attachments: 1 Evaluation  
2 Markup of Technical Specifications  
3 Retyped Technical Specification  
4 Summary of Regulatory Commitments

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cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)  
Attn: Document Control Desk  
Mail Stop P1-137  
Washington, DC 20555-0001

Mr. Bruce S. Mallett  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-4005

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Mr. Jack N. Donohew (2 copies)  
Licensing Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop 7E1  
Washington, DC 20555-2738

Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
PO Box 360  
Jefferson City, MO 65102-0360

STATE OF MISSOURI     )  
                                  )  
COUNTY OF CALLAWAY )

SS

Keith D. Young, of lawful age, being first duly sworn upon oath says that he is Manager, Regulatory Affairs, for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Keith D. Young  
Keith D. Young  
Manager, Regulatory Affairs

SUBSCRIBED and sworn to before me this 8<sup>th</sup> day of April, 2004.



Cathy J. Crisp  
Notary Public  
State of Missouri  
Callaway County  
Expiration 1-29-06

**ATTACHMENT 1  
EVALUATION**

## EVALUATION

### **1.0 DESCRIPTION**

The proposed amendment would revise Technical Specification (TS) 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program." The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)." The availability of this TS improvement was announced in the Federal Register on October 22, 2003, as part of the consolidated line item improvement process (CLIIP).

### **2.0 PROPOSED CHANGE**

Consistent with the NRC-approved TSTF-421, the proposed TS change includes the following revision to TS 5.5.7:

The examination interval for the reactor coolant pump (RCP) flywheels is changed from approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI to 20 year intervals.

### **3.0 BACKGROUND**

The background for this application is adequately addressed by the NRC Notice of Availability published on October 22, 2003 (68 FR 60422), NRC Notice for Comment published June 24, 2003 (68 FR 37590), TSTF-421, WCAP-15666, "Extension of Reactor Coolant Pump Motor Flywheel Examination," and the related NRC safety evaluation (SE) dated May 5, 2003.

### **4.0 TECHNICAL ANALYSIS**

AmerenUE has reviewed the model SE published on June 24, 2003 (68 FR 37590), and verified its applicability as part of the CLIIP. This verification included a review of the NRC staff's model SE, as well as the information provided to support TSTF-421 (including WCAP-15666 and the related SE dated May 5, 2003). AmerenUE has concluded that the justifications presented in the TSTF proposal and the model SE prepared by the NRC staff are applicable to the Callaway Plant and justify this amendment for the incorporation of the changes to the Callaway Plant TS.

## **5.0 REGULATORY ANALYSIS**

This section addresses the standards of 10 CFR 50.92 as well as the applicable regulatory requirements and acceptance criteria.

### **5.1 No Significant Hazards Consideration**

AmerenUE has reviewed the proposed no significant hazards consideration determination published on June 24, 2003 (68 FR 37590) as part of the CLIIP. AmerenUE has concluded that the proposed determination presented in the notice is applicable to the Callaway Plant and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91 (a).

### **5.2 Applicable Regulatory Requirements/Criteria**

A description of this proposed change and its applicable regulatory requirements and guidance was provided in the NRC notices related to the CLIIP, TSTF-421, topical report WCAP-15666, and the associated NRC SE.

## **6.0 ENVIRONMENTAL CONSIDERATION**

AmerenUE has reviewed the environmental evaluation included in the model SE published on June 24, 2003 (68 FR 37590) as part of the CLIIP. AmerenUE has concluded that the staff's findings presented in that evaluation are applicable to the Callaway Plant and the evaluation is hereby incorporated by reference for this application.

## **7.0 REFERENCES**

1. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published October 22, 2003 (68 FR 60422).
2. Federal Register Notice: Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published June 24, 2003 (68 FR 37590).

3. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)," Revision 0, November 2001.
4. WCAP-15666-A, "Extension of Reactor Coolant Pump Motor Flywheel Examination," Revision 1, October 2003.
5. NRC letter dated May 5, 2003, from H. Berkow to R. Bryan (WOG), "Safety Evaluation of Topical Report WCAP-15666, "Extension of Reactor Coolant Pump Motor Flywheel Examination" (TAC NO. MB2819)."



**ATTACHMENT 2**  
**MARKUP OF TECHNICAL SPECIFICATIONS**

5.5 Programs and Manuals

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5.5.4 Radioactive Effluent Controls Program (continued)

- j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190;
- k. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the FSAR, Section 3.9(N).1.1, "Design Transients", cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with FSAR Chapter 16.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

In lieu of Position C.4.b(1) and C.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels may be conducted at approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI.

20 year intervals.

**ATTACHMENT 3  
RETIPTED TECHNICAL SPECIFICATIONS**

## 5.5 Programs and Manuals

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### 5.5.4 Radioactive Effluent Controls Program (continued)

- j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190;
- k. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

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In lieu of Position C.4.b(1) and C.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels may be conducted at 20 year intervals.

**ATTACHMENT 4  
SUMMARY OF REGULATORY COMMITMENTS**

**SUMMARY OF REGULATORY COMMITMENTS**

The following table identifies those actions committed to by AmerenUE in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Dave E. Shafer, Superintendent Licensing, (314) 554-3104.

<b>COMMITMENT</b>	<b>Due Date/Event</b>
The proposed changes to the Callaway Plant Technical Specifications will be implemented within 90 days of NRC approval.	Within 90 days of NRC approval.