AmerenUE
Callaway Plant

PO Box 620
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September 17, 2004

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

ULNRC-05056

Ladies and Gentlemen:

DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT
TECHNICAL SPECIFICATION REVISIONS ASSOCIATED WITH THE
STEAM GENERATOR REPLACMENT PROJECT

AmerenUE herewith transmits an application for amendment to Facility Operating License Number NPF-30 for the Callaway Plant in support of replacement steam generators to be installed during Refuel 14 (fall 2005).

The proposed amendment would revise the following Technical Specifications (TS):

- TS 2.1.1, "Reactor Core Safety Limits";
- TS 3.3.1, "Reactor Trip System (RTS) Instrumentation";
- TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation";
- TS 3.4.1, "RCS Pressure, Temperature, and Flow DNB Limits";
- TS 3.4.5, "RCS Loops - MODE 3";
- TS 3.4.6, "RCS Loops - MODE 4";
- TS 3.4.7, "RCS Loops - MODE 5, Loops Filled";
- TS 3.4.13, "RCS Operational Leakage";
- TS 3.7.1, "Main Steam Safety Valves";
- TS 5.5.9, "Steam Generator (SG) Tube Surveillance Program";
- TS 5.5.16, "Containment Leakage Rate Testing Program"; and
- TS 5.6.10, "Steam Generator Tube Inspection Report."

In addition, the proposed amendment would add new TS 3.4.17, "Steam Generator Tube Integrity," pursuant to Technical Specification Task Force (TSTF) Improved Standard Technical Specifications Change Traveler TSTF-449 Revision 2.

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Attachments 1 through 5 provide the Evaluation, Markup of Technical Specifications, Retyped Technical Specifications, Proposed Technical Specification Bases Changes, and Summary of Regulatory Commitments, respectively, in support of this amendment request. Attachment 4 is provided for information only. Final Bases changes will be implemented pursuant to TS 5.5.14, Technical Specifications Bases Control Program, at the time the amendment is implemented. Appendix A provides the Westinghouse licensing report in support of the replacement steam generators.

Sections 5.5.2.2 and 6.5.2.3 of Appendix A discuss the application of leak-before-break (LBB) criteria to the pressurizer surge line and take credit for WCAP-15983-P which was not approved by NRC in Callaway License Amendment 161 dated April 12, 2004. Prior to November 30, 2004, AmerenUE will submit the documentation requested by NRC regarding effective mitigation measures to be applied at the Alloy 82/182 pressurizer nozzle safe end weld at the base of the pressurizer. A description of the mitigation measures and a commitment to apply those measures at this weld should allow us to pursue the application of LBB for the entire pressurizer surge line and approval of WCAP-15983-P to support modifications related to the replacement steam generators to be installed during Refuel 14.

Section 6.6.1.2.2 of Appendix A discusses the credit taken for the main feedwater control (flow regulating) valves in the analysis of steam line break mass and energy releases inside containment. Credit is taken for these valves if the postulated single failure is a main feedwater isolation valve that fails in the open position. Therefore, a separate amendment application will be submitted based on Technical Specification 3.7.3 of STS NUREG-1431, Revision 3, adding the main feedwater control and bypass valves to LCO 3.7.3 with 72-hour Completion Times in Conditions A, B, and C.

Westinghouse has determined that information contained in Appendix A is proprietary, and is thereby supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.390. Accordingly, it is respectfully requested that the information that is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR 2.390. This letter transmits proprietary and non-proprietary copies of Appendix A. Also enclosed are Westinghouse authorization letter CAW-04-1868, its accompanying affidavit, Proprietary Information Notice, and Copyright Notice. Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-04-1868 and should be addressed to J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company, LLC, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10CFR50.92. Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment. The Callaway Onsite Review Committee and Nuclear Safety Review Board have reviewed and approved these licensing evaluations and have approved the submittal of this amendment application. Approval of this amendment application is requested by August 15, 2005 to support final Refuel 14 outage preparations. This amendment will be implemented prior to MODE 5 entry ascending during startup from the Refuel 14 outage when the replacement steam generators will be installed. In accordance with 10CFR50.91, a copy of this amendment application is being provided to the designated Missouri State official.

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

Very truly yours,

Keith D. Young
Manager-Regulatory Affairs

GGY/

Attachments:

1 Evaluation
2 Markup of Technical Specifications
3 Retyped Technical Specifications
4 Proposed Technical Specification Bases Changes (for information only)
5 Summary of Regulatory Commitments

Appendix A WCAP-16265-P Callaway Replacement Steam Generator Program NSSS Licensing Report (proprietary and non-proprietary versions)

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STATE OF MISSOURI)
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CATHY J. CRISP
MY COMM. EXP.
NOTARY
SEAL
NOTARY
PUBLIC
JAN. 29, 2008
STATE OF MISSOURI

Cathy J. Crisp

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 17th day of September, 2004.