

October 27, 2004

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop P1-137  
Washington, DC 20555-0001

Ladies and Gentlemen:

ULNRC-05074



DOCKET NUMBER 50-483  
UNION ELECTRIC COMPANY  
CALLAWAY PLANT  
APPLICATION FOR TECHNICAL SPECIFICATION  
IMPROVEMENT TO ELIMINATE REQUIREMENTS  
TO PROVIDE MONTHLY OPERATING REPORTS AND  
OCCUPATIONAL RADIATION EXPOSURE REPORTS  
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 Callaway Plant.

The proposed amendment would delete the Technical Specification (TS) requirements to submit Monthly Operating Reports and Occupational Radiation Exposure Reports. The proposed TS changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369. "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), 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.

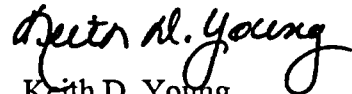
This amendment application was reviewed by the Callaway Plant Onsite Review Committee and the Nuclear Safety Review Board. In accordance with 10 CFR 50.91, a copy of this amendment application, with attachments, is being provided to the designated Missouri State official.

A001

AmerenUE requests approval of the proposed amendment request by April 29, 2005. 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.

Sincerely,



Keith D. Young  
Manager, Regulatory Affairs

PMB/jdg

Attachments:

1. Evaluation
2. Markup of Technical Specifications
3. Retyped Technical Specification
4. List of Commitments

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 27 day of OCTOBER, 2004.

LORI L. TWILLMAN  
Notary Public - Notary Seal  
STATE OF MISSOURI  
Callaway County  
My Commission Expires: Aug. 3, 2007

Lori L. Twillman  
LORI L TWILLMAN

ULNRC-05074  
October 27, 2004  
Page 4

cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)  
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**ATTACHMENT I  
EVALUATION**

## EVALUATION

### 1.0 DESCRIPTION

The proposed amendment deletes the requirements in Technical Specification (TS) 5.6.1 for an annual report on occupational radiation exposures and TS 5.6.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIP).

### 2.0 PROPOSED CHANGE

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 5.6.1 Occupational Radiation Exposure Report	Deleted
TS 5.6.4 Monthly Operating Reports	Deleted

AmerenUE is proposing not to renumber the Specifications in Section 5.6 as proposed in TSTF-369, Revision 1. This is consistent with the manner in which the current Callaway Technical Specifications have been formatted (e.g. TS 5.6.7 and TS 5.6.9). Renumbering of the Specifications in Section 5.6 would result in additional unnecessary procedure changes.

### 3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Revision 1.

### 4.0 TECHNICAL ANALYSIS

AmerenUE has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIP Notice of Availability. This verification included a review of the NRC staffs SE and the information provided to support TSTF-369, Revision 1. AmerenUE has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to Callaway Plant and justify this amendment for the incorporation of the changes to the Callaway Plant TS.

## **5.0 REGULATORY ANALYSIS**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Revision 1.

### **5.1 NO SIGNIFICANT HAZARDS CONSIDERATION**

AmerenUE has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIP. AmerenUE has concluded that the proposed determination presented in the notice is applicable to 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**

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Revision 1.

### **5.3 VERIFICATION AND COMMITMENTS**

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, AmerenUE is making the following verifications and regulatory commitments:

1. AmerenUE is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)). The regulatory commitment to provide the operating data that is described in Generic Letter 97-02 will be included in the FSAR.
2. AmerenUE does not have different reactor types or both operating and shutdown reactors.

## **6.0 ENVIRONMENTAL CONSIDERATION**

AmerenUE has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIIP. AmerenUE has concluded that the staff's findings presented in that evaluation are applicable to 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 Specifications Improvement To Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).
2. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1.

This application is being made in accordance with the CLIIP. AmerenUE is not proposing variations or deviations from the NRC staff's model SE published on June 23, 2004 (69 FR 35067).



**ATTACHMENT II**  
**MARKUP OF TECHNICAL SPECIFICATION PAGES**

## 5.0 ADMINISTRATIVE CONTROLS

### 5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

#### 5.6.1

##### Occupational Radiation Exposure Report

Not used.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totalling < 20% percent of the individual total dose need not be accounted for. In the aggregate, at least 80% percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

#### 5.6.2

##### Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period.

The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in a format similar to the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the

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5.6 Reporting Requirements

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5.6.2 Annual Radiological Environmental Operating Report (continued)

reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year, in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Not Used.

~~Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Moderator Temperature Coefficient limits in Specification 3.1.3,
  2. Shutdown Bank Insertion Limit for Specification 3.1.5,
  3. Control Bank Insertion Limits for Specification 3.1.6,
  4. Axial Flux Difference Limits for Specification 3.2.3,
  5. Heat Flux Hot Channel Factor,  $F_Q(Z)$ ,  $F_Q^{RTP}$ ,  $K(Z)$ ,  $W(Z)$  and  $F_Q$  Penalty Factors for Specification 3.2.1,
  6. Nuclear Enthalpy Rise Hot Channel Factor  $F_{\Delta H}$ ,  $F_{\Delta H}^{RTP}$ , and Power Factor Multiplier,  $PF_{\Delta H}$ , limits for Specification 3.2.2.
  7. Shutdown Margin Limits for Specifications 3.1.1, 3.1.4, 3.1.5, 3.1.6, and 3.1.8.

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**ATTACHMENT III  
RETYPE TECHNICAL SPECIFICATION PAGES**

## 5.0 ADMINISTRATIVE CONTROLS

### 5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Not Used.

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period.

The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in a format similar to the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the

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5.6 Reporting Requirements

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5.6.2 Annual Radiological Environmental Operating Report (continued)

reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year, in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Not used.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Moderator Temperature Coefficient limits in Specification 3.1.3,
  2. Shutdown Bank Insertion Limit for Specification 3.1.5,
  3. Control Bank Insertion Limits for Specification 3.1.6,
  4. Axial Flux Difference Limits for Specification 3.2.3,
  5. Heat Flux Hot Channel Factor,  $F_Q(Z)$ ,  $F_Q^{RTP}$ ,  $K(Z)$ ,  $W(Z)$  and  $F_Q$  Penalty Factors for Specification 3.2.1,
  6. Nuclear Enthalpy Rise Hot Channel Factor  $F_{\Delta H}$ ,  $F_{\Delta H}^{RTP}$ , and Power Factor Multiplier,  $PF_{\Delta H}$ , limits for Specification 3.2.2.
  7. Shutdown Margin Limits for Specifications 3.1.1, 3.1.4, 3.1.5, 3.1.6, and 3.1.8.

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**ATTACHMENT IV  
LIST OF COMMITMENTS**

**LIST OF COMMITMENTS**

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

<b>COMMITMENT</b>	<b>Due Date/Event</b>
<p><b>The proposed changes to Callaway Plant Technical Specifications will be implemented within 90 days of NRC approval.</b></p>	<p><b>Within 90 days of NRC approval.</b></p>
<p><b>AmerenUE is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be to use an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).</b></p>	<p><b>Within 90 days of NRC approval.</b></p>
<p><b>The regulatory commitment to provide the operating data that is described in Generic Letter 97-02 will be included in the FSAR. This requirement will be incorporated into the Callaway FSAR.</b></p>	<p><b>Within 90 days of NRC approval.</b></p>