AmerenUE
Callaway Plant

PO Box 620
Fulton, MO 65251

October 26, 2005

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

Ladies and Gentlemen: ULNRC-05174

DOCKET NUMBER 50-482
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
REVISION TO TECHNICAL SPECIFICATION 3.6.6,
"CONTAINMENT SPRAY AND COOLING SYSTEMS"

Union Electric Company (AmerenUE) hereby transmits an application for amendment to Facility Operating License No. NPF-30 for the Callaway Plant. The proposed amendment would revise Technical Specification (TS) Section 3.6.6, "Containment Spray and Cooling Systems," to change a required action that currently allows 72 hours to restore one containment cooling train when two containment cooling trains are inoperable as long as both containment spray trains are operable. Based on Callaway Plant specific evaluations, this action is not conservative. The LCO is being revised to require plant shutdown if two containment cooling trains are inoperable. This proposed license amendment request is being submitted per the guidance in Administrative Letter 98-10 as a correction to a Technical Specification that was found to be non-conservative in nature.

Attachments I through IV provide the Evaluation, Markup of Technical Specifications, Retyped Technical Specifications, and Proposed TS Bases Changes, respectively, in support of this amendment request. Attachment IV contains the TS Bases changes (for information only) to assist the staff in its review of the proposed changes. Revision to the TS Bases will be implemented pursuant to the TS Bases Control Program, TS 5.5.14, upon implementation of this license amendment. Attachment V contains a list of commitments.

With regard to applicable regulatory requirements, the proposed TS changes have been evaluated pursuant to CFR 50.92 and it has been determined that this amendment application does not involve a significant hazard consideration. In addition, evaluation of the proposed changes against the requirements of 10 CFR 51.22(b) has determined that no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of a license

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amendment for the proposed changes. The bases for these determinations are included in Attachment 1.

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

AmerenUE requests approval of the proposed amendment by March 2006. It is anticipated that the license amendment, as approved, will be effective upon issuance, to be implemented within 90 days from the date of issuance. Please contact us for any questions you may have regarding this application.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Keith Young

Executed on: October 26, 2005

Keith Young
Manager, Regulatory Affairs

PMB/jdg

Attachments:
1 - Evaluation
2 - Markup of Technical Specification pages
3 - Retyped Technical Specification pages
4 - Proposed TS Bases Changes (for information only)
5 - List of Commitments

cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)
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PROPOSED REVISIONS TO TECHNICAL SPECIFICATION 3.6.6 "CONTAINMENT SPRAY AND COOLING SYSTEMS" TO REQUIRE PLANT SHUTDOWN IF TWO CONTAINMENT COOLING TRAINS ARE INOPERABLE

TABLE OF CONTENTS

EVALUATION

1.0 DESCRIPTION

The proposed amendment would revise Technical Specification (TS) Section 3.6.6, "Containment Spray and Cooling Systems," to change a required action that currently allows 72 hours of operation with both containment cooling trains out of service as long as both containment spray trains are operable. The required action is being revised to require plant shutdown if both containment cooling trains are out of service.

The Actions table for TS 3.6.6 is being restructured for clarity.

2.0 PROPOSED CHANGE

The proposed change will revise the required action for the condition when two containment cooling trains are out of service such that the plant will be required to be in MODE 3 within 6 hours and in MODE 5 within 36 hours. This revision will remove the required action that allows 72 hours to restore one containment cooling train to operability as long as two containment spray trains are operable.

The required action for two containment spray trains being inoperable is being changed from entering LCO 3.0.3 to be in MODE 3 within 6 hours and in MODE 5 within 36 hours. This revised required action is the same as the required action for two containment cooling trains being inoperable.

The Condition of "any combination of three or more trains inoperable" is being deleted from the Actions Table for TS LCO 3.6.6.

3.0 BACKGROUND

The Containment Spray and Containment Cooling system provides containment atmosphere cooling to limit post accident pressure and temperature in containment to less than the design values. Reduction of containment pressure and the iodine removal and retention capability of the spray reduces the release of fission product radioactivity from containment to the environment, in the event of a design basis accident, to within limits. The Containment Spray and Containment Cooling system are designed to meet the requirements of 10 CFR 50, Appendix A, GDC 38, "Containment Heat Removal," GDC 39, "Inspection of Containment Heat Removal Systems," GDC 40, "Testing of Containment Heat Removal Systems," GDC 41, "Containment Atmosphere Cleanup Systems," GDC 42, "Inspection of Atmosphere Cleanup Systems," GDC 43, "Testing of Atmosphere Cleanup Systems" and GDC 50, "Containment Design Basis".

The Containment Cooling System and Containment Spray System are Engineered Safety Feature systems. They are designed to ensure that the heat removal capability required during the post accident period can be attained. The Containment Spray System and the Containment Cooling System provide complementary methods to limit and maintain post accident conditions to less than the containment design values.

Callaway's current TS LCO Action 3.6.6.D states that with two containment cooler trains inoperable, one train must be restored within 72 hours. Based on Callaway specific evaluations, this action is not conservative. With the condition that two containment cooling trains are inoperable, the proposed change will require actions that the plant be in MODE 3 in 6 hours and MODE 5 in 36 hours.

4.0 TECHNICAL ANALYSIS

The containment cooling system provides containment atmosphere cooling to limit the post accident pressure and temperature in containment to less than the design values. If both containment cooling trains are inoperable, the design heat removal capacity required during a post accident period can not be met. Although containment spray can reduce temperature and pressure initially in a post accident condition, the containment spray system will not remove heat from containment.

If both containment cooling trains are inoperable, the plant is not within its analyzed operating conditions and the plant should be shut down and placed in a MODE where LCO 3.6.6 does not apply, which is MODE 5. The current TS LCO Action with both containment cooling trains inoperable would allow 72 hours of operation with no system operable that could remove heat from containment. Containment pressure and temperature design values could be exceeded in the event of a Design Basis Accident (DBA). This license amendment requests that the TS LCO Action when both containment cooling trains are inoperable be changed to require the plant to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This will place the plant in a MODE where the LCO 3.6.6 does not apply and actions can be taken to restore the containment cooling trains to operability.

The current TS LCO 3.6.6 Action for two containment spray trains inoperable is to immediately enter LCO 3.0.3. This license amendment requests that this Action be changed to be in MODE 3 within 6 hours and to be in MODE 5 within 36 hours. This change is more restrictive by one hour and it will be consistent with the TS LCO Action for two containment cooling trains being inoperable.

The TS LCO 3.6.6 Condition F of "Any combination of three or more trains inoperable" is being deleted. With the change being requested with this license amendment of

requiring shut down with two containment cooling trains inoperable, no operation is allowed with two or more trains inoperable. Therefore, there is no need to have this condition listed in the table as plant shutdown will be required by the requested change if three trains are inoperable.

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 (NSHC)

The proposed amendment would revise Technical Specification (TS) Section 3.6.6, "Containment Spray and Cooling Systems," to change a required action that currently allows 72 hours of operation with both containment cooling trains out of service as long as both containment spray trains were operable. The required action is being revised to require plant shutdown if both containment cooling trains are out of service. The required action to enter LCO 3.0.3 when two containment spray trains are inoperable is being changed to be in MODE 3 within 6 hours and MODE 5 with 36 hours.

The proposed change does not involve a significant hazards consideration for the Callaway Plant based on the three standards set forth in 10 CFR 50.92(c) as discussed below:

(1) Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change in the required action when two containment cooling trains are inoperable to require plant shutdown is more restrictive than the current required action that allows 72 hours of operation. Also the proposed change to the required action when two containment spray trains are inoperable to be in MODE 3 within 6 hours and MODE 5 within 36 hours is more restrictive than the current required action to enter LCO 3.0.3 immediately as LCO 3.0.3 requires the plant to be in MODE 3 within 7 hours. The more stringent requirements are imposed to ensure process variables, structures, systems and components are maintained consistently with the safety analysis and licensing basis.

All of these proposed changes have been reviewed to ensure no previously evaluated accident has been adversely affected. Therefore, this change does not involve a

significant increase in the probability or consequences of an accident previously evaluated.

(2) Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in controlling parameters. The proposed change does impose different requirements. However, these changes are consistent with assumptions made in the safety analysis and licensing basis. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The imposition of more stringent requirements has no impact on or will increase the margin of safety. The change in required action when two containment cooling trains are out of service will increase the margin of safety by decreasing the allowed restoration time.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Conclusion:

Based on the above, AmerenUE concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c) and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA

The regulatory basis for TS 3.6.6, "Containment Spray and Cooling Systems," is to meet the requirements of 10 CFR 50, Appendix A, GDC 38, "Containment Heat Removal," GDC 39, "Inspection of Containment Heat Removal Systems," GDC 40, "Testing of

Containment Heat Removal Systems," GDC 41, "Containment Atmosphere Cleanup Systems," GDC 42, "Inspection of Atmosphere Cleanup Systems," GDC 43, "Testing of Atmosphere Cleanup Systems" and GDC 50, "Containment Design Basis".

Criterion 38 - Containment heat removal. A system to remove heat from the reactor containment shall be provided. The system safety function shall be to reduce rapidly, consistent with the functioning of other associated systems, the containment pressure and temperature following any loss-of-coolant accident and maintain them at acceptably low levels. Suitable redundancy in components and features, and suitable interconnections, leak detection, isolation, and containment capabilities shall be provided to assure that for onsite electric power system operation (assuming offsite power is not available) and for offsite electric power system operation (assuming onsite power is not available) the system safety function can be accomplished, assuming a single failure.

Criterion 40 -Testing of containment heat removal system. The containment heat removal system shall be designed to permit appropriate periodic pressure and functional testing to assure (1) the structural and leaktight integrity of its components, (2) the operability and performance of the active components of the system, and (3) the operability of the system as a whole, and under conditions as close to the design as practical the performance of the full operational sequence that brings the system into operation, including operation of applicable portions of the protection system, the transfer between normal and emergency power sources, and the operation of the associated cooling water system.

Criterion 41-Containment atmosphere cleanup. Systems to control fission products, hydrogen, oxygen, and other substances which may be released into the reactor containment shall be provided as necessary to reduce, consistent with the functioning of other associated systems, the concentration and quality of fission products released to the environment following postulated accidents, and to control the concentration of hydrogen or oxygen and other substances in the containment atmosphere following postulated accidents to assure that containment integrity is maintained. Each system shall have suitable redundancy in components and features, and suitable interconnections, leak detection, isolation, and containment capabilities to assure that for onsite electric power system operation (assuming offsite power is not available) and for offsite electric power system operation (assuming onsite power is not available) its safety function can be accomplished, assuming a single failure.

Criterion 42 -Inspection of containment atmosphere cleanup systems. The containment atmosphere cleanup systems shall be designed to permit appropriate periodic inspection of important components, such as filter frames, ducts, and piping to assure the integrity and capability of the systems.

Criterion 43 -Testing of containment atmosphere cleanup systems. The containment atmosphere cleanup systems shall be designed to permit appropriate periodic pressure and functional testing to assure (1) the structural and leaktight integrity of its components, (2) the operability and performance of the active components of the systems such as fans, filters, dampers, pumps, and valves and (3) the operability of the systems as a whole and, under conditions as close to design as practical, the performance of the full operational sequence that brings the systems into operation, including operation of applicable portions of the protection system, the transfer between normal and emergency power sources, and the operation of associated systems.

Criterion 50-Containment design basis. The reactor containment structure, including access openings, penetrations, and the containment heat removal system shall be designed so that the containment structure and its internal compartments can accommodate, without exceeding the design leakage rate and with sufficient margin, the calculated pressure and temperature conditions resulting from any loss of-coolant accident. This margin shall reflect consideration of (1) the effects of potential energy sources which have not been included in the determination of the peak conditions, such as energy in steam generators and as required by 50.44 energy from metal-water and other chemical reactions that may result from degradation but not total failure of emergency core cooling functioning, (2) the limited experience and experimental data available for defining accident phenomena and containment responses, and (3) the conservatism of the calculational model and input parameters.

This TS change will not affect the compliance with any of the above General Design Criteria.

Therefore, based on the considerations discussed above:

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) Issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

AmerenUE has determined that the proposed amendment would change requirements with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, AmerenUE has evaluated the proposed amendment and has determined that the amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amount of effluent that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22 (c)(9). Therefore, pursuant to 10 CFR 51.22 (b), an environmental assessment of the proposed amendment is not required.

7.0 REFERENCES

1. NUREG 1431

ATTACHMENT 2

MARKUP OF TECHNICAL SPECIFICATION PAGES

OL CN 1260
No Changes this Page

3.6 CONTAINMENT SYSTEMS

3.6.6 Containment Spray and Cooling Systems

LCO 3.6.6 Two containment spray trains and two containment cooling trains shall be OPERABLE.

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

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One containment spray train inoperable.	A.1	Restore containment spray train to OPERABLE status.	72 hours AND 10 days from discovery of failure to meet the LCO
B. Required Action and associated Completion Time of Condition A not met	B.1 AND B.2	Be in MODE 3. Be in MODE 5.	6 hours 84 hours
C. One containment cooling train inoperable.	C.1	Restore containment cooling train to OPERABLE status.	7 days AND 10 days from discovery of failure to meet the LCO

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
~~D. Two containment cooling trains inoperable.~~	~~D.1 Restore one containment cooling train to OPERABLE status.~~	~~72 hours~~
D. ~~E.~~ Required Action and associated Completion Time of Condition C ~~or D~~ not met.	~~E.1~~ D.1 Be in MODE 3. AND	6 hours
	~~E.2~~ D.2 Be in MODE 5.	36 hours
~~F.~~ E. Two containment spray trains inoperable. OR Two Containment Cooling ~~Any combination of three or more~~ trains inoperable.	~~F.1 Enter LCO 3.0.3.~~ E.1 Be in MODE 3 AND E.2 Be in MODE 5	~~Immediately~~ 6 hours 36 hours

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.6.6.1	Verify each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	31 days
SR 3.6.6.2	Operate each containment cooling train fan unit for ≥ 15 minutes.	31 days

(continued)

ATTACHMENT 3

RETYPED TECHNICAL SPECIFICATION PAGES

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C not met.	D.1 Be in MODE 3. AND D.2 Be in MODE 5.	6 hours 36 hours
E. Two containment spray trains inoperable. OR Two containment Cooling trains inoperable.	E.1 Be in MODE 3. AND E.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.6.1	Verify each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	31 days
SR 3.6.6.2	Operate each containment cooling train fan unit for ≥ 15 minutes.	31 days

(continued)

ATTACHMENT 4

PROPOSED TS BASES CHANGES (for information only)

TSB CN 05-006

B 3.6 CONTAINMENT SYSTEMS

B 3.6.6 Containment Spray and Cooling Systems

BASES

BACKGROUND

The Containment Spray and Containment Cooling system provides containment atmosphere cooling to limit post accident pressure and temperature (see B 3.6.5) in containment to less than the design values. Reduction of containment pressure and the iodine removal and retention capability of the spray reduces the release of fission product radioactivity from containment to the environment, in the event of a Design Basis Accident (DBA), to within limits. The Containment Spray and Containment Cooling system are designed to meet the requirements of 10 CFR 50, Appendix A, GDC 38, "Containment Heat Removal," GDC 39, "Inspection of Containment Heat Removal Systems," GDC 40, "Testing of Containment Heat Removal Systems," GDC 41, "Containment Atmosphere Cleanup," GDC 42, "Inspection of Containment Atmosphere Cleanup Systems," GDC 43, "Testing of Containment Atmosphere Cleanup Systems" and GDC 50, "Containment Design Basis" (Ref. 1).

The Containment Cooling System and Containment Spray System are Engineered Safety Feature (ESF) systems. They are designed to ensure that the heat removal capability required during the post accident period can be attained. The Containment Spray System and the Containment Cooling System provide ~~redundant~~ complementary methods to limit and maintain post accident conditions to less than the containment design values.

Containment Spray System

The Containment Spray System consists of two separate trains of equal capacity, each capable of meeting the design bases. Each train includes a containment spray pump, spray headers, nozzles, valves, and piping. Each train is powered from a separate ESF bus. The refueling water storage tank (RWST) supplies borated water to the Containment Spray System during the injection phase of operation. In the recirculation mode of operation, containment spray pump suction is transferred from the RWST to the containment sumps.

The Containment Spray System provides a spray of borated water mixed with trisodium phosphate from the Recirculation Fluid pH Control baskets into the upper regions of containment to reduce the containment pressure and temperature and to reduce fission products from the containment atmosphere during a DBA. The RWST solution temperature is an important factor in determining the ~~heat removal~~ temperature and pressure reducing capability of the Containment Spray System during the injection phase. In the

(continued)

BASES

LCO (continued)

cooling trains must be OPERABLE. Therefore, in the event of an accident, at least one train in each system operates, assuming the worst case single active failure occurs.

A Containment Spray train typically includes a spray pump, spray headers, nozzles, valves, piping, instruments, and controls to ensure an OPERABLE flow path capable of taking suction from the RWST upon an ESF actuation signal and manually transferring to the containment sump.

A Containment Cooling train typically includes cooling coils, dampers, two fans, instruments, and controls to ensure an OPERABLE flow path.

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment and an increase in containment pressure and temperature requiring the operation of the containment spray trains and containment cooling trains.

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Thus, the Containment Spray System and the Containment Cooling System are not required to be OPERABLE in MODES 5 and 6.

ACTIONS

A.1

With one containment spray train inoperable, the inoperable containment spray train must be restored to OPERABLE status within 72 hours. In this Condition, the remaining OPERABLE spray and cooling trains are adequate to perform the iodine removal and containment cooling functions. The 72 hour Completion Time takes into account the redundant ~~heat removal~~ temperature and pressure reducing capability afforded by the Containment Spray System, reasonable time for repairs, and low probability of a DBA occurring during this period.

The 10 day portion of the Completion Time for Required Action A.1 is based upon engineering judgment. It takes into account the low probability of coincident entry into two Conditions in this Specification coupled with the low probability of an accident occurring during this time. Refer to Section 1.3, "Completion Times," for a more detailed discussion of the purpose of the "from discovery of failure to meet the LCO" portion of the Completion Time.

(continued)

BASES

ACTIONS (continued)

B.1 and B.2

If the inoperable containment spray train cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 84 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems. The extended interval to reach MODE 5 allows additional time for attempting restoration of the containment spray train and is reasonable when considering the driving force for a release of radioactive material from the Reactor Coolant System is reduced in MODE 3.

C.1

With one of the containment cooling trains inoperable, the inoperable containment cooling train must be restored to OPERABLE status within 7 days. The remaining OPERABLE containment spray and cooling components provide iodine removal capabilities and are capable of providing at least 100% of the heat removal needs. The 7 day Completion Time was developed taking into account the ~~redundant~~ heat removal capabilities afforded by combinations of the Containment Spray System and Containment Cooling System and the low probability of DBA occurring during this period.

complementary

The 10 day portion of the Completion Time for Required Action C.1 is based upon engineering judgment. It takes into account the low probability of coincident entry into two Conditions in this Specification coupled with the low probability of an accident occurring during this time. Refer to Section 1.3 for a more detailed discussion of the purpose of the "from discovery of failure to meet the LCO" portion of the Completion Time.

~~D.1~~

~~With two containment cooling trains inoperable, one of the containment cooling trains must be restored to OPERABLE status within 72 hours. The remaining OPERABLE containment spray components provide iodine removal capabilities and are capable of providing at least 100% of the heat removal needs after an accident. The 72 hour Completion Time was developed taking into account the redundant heat removal capabilities afforded by combinations of the Containment Spray System and~~

(continued)

BASES

ACTIONS

~~D.1 (continued)~~

~~Containment Cooling System, the iodine removal function of the Containment Spray System, and the low probability of DBA occurring during this period.~~

~~E.1 and E.2~~ D.1 and D.2

If the Required Action and associated Completion Time of Condition C ~~or D~~ of this LCO are not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

~~F.1~~ E.1 and E.2

With two containment spray trains or ~~any combination of three or more~~ two containment ~~spray and~~ cooling trains inoperable, the unit is in a condition outside the accident analysis. ~~Therefore, LCO 3.0.3 must be entered immediately.~~ See insert 1

SURVEILLANCE REQUIREMENTS

SR 3.6.6.1

Verifying the correct alignment for manual, power operated, and automatic valves in the containment spray flow path provides assurance that the proper flow paths will exist for Containment Spray System operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these were verified to be in the correct position prior to locking, sealing, or securing. A valve that receives an actuation signal is allowed to be in a nonaccident position provided the valve will automatically reposition within the proper stroke time. This SR does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown (which may include the use of local or remote indicators), that those valves outside containment and capable of potentially being mispositioned are in the correct position. The 31 day Frequency is appropriate because the valves are operated under administrative control. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves and relief valves. Additionally, vent and drain valves are not within the scope of this SR.

(continued)

TSB CN 05-006
Insert 1

Therefore, the plant must be brought to a mode in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within six hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

LIST OF COMMITMENTS

The following table identifies those actions committed to by AmerenUE in Attachment 1 to this letter. Other statements in Attachment I to this letter are not considered to be regulatory commitments. Please direct questions regarding these commitments to Dave Shafer, Superintendent-Licensing, at 314-445-3104.

COMMITMENT	Due Date/Event
Revision to the TS Bases will be implemented pursuant to the TS Bases Control Program, TS 5.5.14, upon implementation of this license amendment.	Upon implementation of amendment
The license amendment, as approved, will be implemented within 90 days from the date of issuance.	Within 90 days of date of issuance of amendment