

August 23, 2006

MEMORANDUM TO: David Terao, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: */RA/*
Timothy J. Kobetz, Chief
Technical Specifications Branch
Division of Inspection and Regional Support

SUBJECT: SAFETY EVALUATION INPUT FOR CALLAWAY PLANT
AMENDMENT TO ADOPT TSTF-491

The Technical Specifications Branch (ITSB) has completed its plant-specific safety evaluation (SE) in response to submittal of AmericanEU of 06/18/2006, which requested adoption of TSTF-491. ITSB found the licensee's submittal acceptable.

This completes ITSB's work on TAC number MD2030. Based on previous approvals of amendments adopting TSTF-491, ITSB does not recommend routing the final amendment package through the Office of General Counsel.

CONTACT: P. C. Hearn, DIRS/ITSB
(301) 415-1189

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PROPOSED SAFETY EVALUATION
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Technical Specification Task Force (TSTF) Change Traveler TSTF-491,
Removal of Main Steam and Feedwater Isolation Times

1.0 Introduction

By letter dated May 11, 2006, AmericanUE (the licensee) proposed changes to the technical specifications (TS) for the Callaway Plant. The requested changes are the adoption of TSTF-491, Revision 2, "Removal of Main Steam and Feedwater Valve Isolation Times" which was proposed by the Technical Specification Task Force (TSTF) by letter on May 18, 2006. The proposed changes would revise Technical Specification 3.7.2 "Main Steam Isolation Valves (MSIVs)" and 3.7.3 "Main Feedwater Isolation Valves (MFIVs), Feedwater Regulating Valves (MFRVs) and Main Feedwater Regulating Valve Bypass Valves. (MFRVBVs)." The proposed TSTF would allow relocating the isolation valve closure times to the Bases.

2.0 Regulatory Evaluation

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to include TS as part of the license. The TS ensure the operational capability of structures, systems and components that are required to protect the health and safety of the public. The Commission's regulatory requirements related to the content of the TS are contained in 10 CFR Section 50.36. That regulation requires that the TS include items in the following specific categories: (1) safety limits, limiting safety systems settings, and limiting control settings (50.36(c))(1)); (2) Limiting Conditions for Operation (50.36(c))(2)); (3) Surveillance Requirements (50.36(c))(3)); (4) design features (50.34(c))(4)); and (5) administrative controls (50.36(c))(5)).

In general, there are two classes of changes to TS: (1) changes needed to reflect modifications to the design basis (TS are derived from the design basis), and (2) voluntary changes to take advantage of the evolution in policy and guidance as to the required content and preferred format of TS over time. This amendment deals with the second class of changes.

In determining the acceptability of revising STS 3.7.2 and 3.7.3, the staff used the accumulation of generically approved guidance in; NUREG-1431, Revision 3, "Standard Technical Specifications, Westinghouse Plants," dated June, 2004.

Licensees may revise the TS to adopt current improved STS format and content provided that plant-specific review supports a finding of continued adequate safety because: (1) the change is editorial, administrative or provides clarification (i.e., no requirements are materially altered), (2) the change is more restrictive than the licensee's current requirement, or (3) the change is less restrictive than the licensee's current requirement, but nonetheless still affords adequate

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assurance of safety when judged against current regulatory standards. The detailed application of this general framework, and additional specialized guidance, are discussed in Section 3.0 in the context of specific proposed changes.

3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the justification for the proposed TSTF as described in the May 18, 2006, submittal. The detailed evaluation below will support the conclusion that: (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) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

3.1 Main Steam Isolation Valves (MSIV)

One MSIV is located in each main steam line outside of the containment. Closing the MSIVs isolates each steam generator from the others and isolates the turbine, steam bypass system and other auxiliary steam supplies from the steam generator.

By isolating the steam flow from the secondary side of the steam generator the MSIVs prevent over cooling the reactor core following a high energy line break (HELB). By preventing core overcooling the MSIVs protect the reactor core from being damaged.

TSTF-491 is proposing to relocate the required closure times for the MSIVs to the Bases. Changes to Bases are subject to the 10 CFR 50.59 process. The 10 CFR 50.59 criteria provide adequate assurance that prior staff review and approval will be requested by the licensee for changes to the Bases requirements with the potential to affect the safe operation of the plant. Furthermore, the MSIVs are subject to periodic testing and acceptance criteria in accordance with the Inservice Testing (IST) Program. Compliance with the IST Program is required by Section 5.5.7 of the Standard Technical Specifications (STS) and 10 CFR 50.55. The IST Program includes specific reference value baseline operating times for valves that are not subject to arbitrary changes.

10 CFR 50.36 requires the inclusion of the periodic testing of the MSIVs in the Surveillance Requirements not the actual closure time of the valves. TSTF-491 change maintains the periodic testing requirements for MSIVs in accordance with 10 CFR 50.36.

Based on the requirements of 10 CFR 50.36, 10 CFR 50.59 and IST Program, the staff concludes that relocating the MSIV closure time to the Bases is acceptable.

3.2 Main Feedwater Isolation Valve (MFIV), Main Feedwater Regulation Valve (MFRV) and Main Feedwater Regulation Valve Bypass Valves (MFRVBV)

The MFIVs or the MFRVs and MFRVBVs isolate the nonsafety related portions from the safety related portions of the system. In the event of a secondary side pipe rupture inside containment, these valves limit the quantity of high energy fluid that enters the containment through the break and provide a pressure boundary for the controlled addition of auxiliary feedwater to the intact loops.

By isolating the feedwater flow from the affected steam generator the MFIVs, MFRVs and MFRVBVs prevent overcooling the reactor core and over pressurizing of the containment from feedwater pump runout.

As with the MSIVs, TSTF-491 is also proposing to relocate the required closure times for the MFIVs, MFRVs and MFRVBVS to the Bases. Changes to the Bases are subject to the 10 CFR 50.59 process. The 10 CFR 50.59 criteria provide adequate assurance that prior staff review and approval will be requested by the licensee for changes to the Bases requirements with the potential to affect the safe operation of the plant. Furthermore, the MFIVs, MFRVs and MFRVBVs are subject to periodic testing and acceptance criteria in accordance with the Inservice Testing (IST) Program. Compliance with the IST Program is required by Section 5.5.7 of the Standard Technical Specifications (STS) and 10 CFR 50.55. The IST Program includes specific reference value baseline operating times for valves that are not subject to arbitrary changes.

10 CFR 50.36 requires the inclusion of the periodic testing of the MFIVs, MFRVs and MFRVBVs in the Surveillance Requirements not the actual closure time of the valves. TSTF-491 maintains the periodic testing requirements for MFIVs, MFRVs and MFRVBVs in accordance with 10 CFR 50.36.

Based on the requirements of 10 CFR 50.36, 10 CFR 50.59 and the IST Program, the staff concludes that relocating the MFIVs, MFRVs and MFRVBVs closure times to the Bases is acceptable.

4.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. Proposed No Significant Hazards Consideration Determination Description of Amendment Request: Callaway Plant requests adoption of an approved change to the standard technical specifications (STS) for Westinghouse PWR STS Revision 3.0 of NUREG-1431 plant specific technical specifications (TS), to allow relocating the main steam and main feedwater isolation valve closure times to the Bases. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-491, Revision 2.