

October 24, 2006

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

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

SUBJECT: SAFETY EVALUATION FOR CALLAWAY PLANT AMENDMENT  
TO ADOPT TSTF-419

The Technical Specifications Branch (ITSB) has completed its plant-specific safety evaluation (SE) in response to submittal of AmericanEU of 09/20/2006, which requested adoption of TSTF-419. ITSB found the licensee's submittal acceptable.

This completes ITSB's work on TAC number MD3053. Based on previous approvals of amendments adopting TSTF-419, ITSB does not recommend routing the final amendment package through the Office of General Counsel.

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Distribution:

ITSB RF      TKobetz                  PCHearn

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OFC	DIRS/ITSB	DIRS/ITSB/BC
NAME	PHearn	TKobetz
DATE	10/23/2006	10/24/2006

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SAFETY EVALUATION ON THE  
REVISION TO TECHNICAL SPECIFICATION (TS) BY ADOPTING THE  
TECHNICAL SPECIFICATION TASK FORCE (TSTF) CHANGE TRAVELER, TSTF-419 R0,  
ON THE PRESSURE TEMPERATURE LIMITS REPORT (PTLR)

INTRODUCTION:

AmericanEU, the licensee, submitted a request, by letter dated September 20, 2006, for an amendment to License No. NPF-30 for the Callaway Plant's technical specifications (TS), that are generically approved by Technical Specification Task Force (TSTF) change traveler TSTF-419 R0. The proposed TS changes would: (1) revise the definition section of the TS on the pressure temperature limits report (PTLR) by deleting reference to specifications containing limits in the PTLR; and (2) revise the administrative controls TS section 5.5.6, on the PTLR, by requiring the NRC approval documents to be identified by date and the Topical Reports to be identified by number and title.

BACKGROUND

The licensee has requested that the Callaway Plant TS be modified to incorporate the changes in TSTF-491 R0 that have been approved generically for Westinghouse Standard Technical Specifications (STS), NUREG-1431, Revision 2.

NRC Generic Letter 96-06, "Release of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits," dated January 31, 1996, allows licensees to relocate the pressure temperature (P/T) curves from their plant TS to a PTLR or similar document. The Low Temperature Overpressure Protection (LTOP) System limits were also allowed to be relocated to the same document. The methodology used to determine the P/T and LTOP System limit parameters must comply with the specific requirements of Appendix G and H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR), be documented in an NRC approved topical report or an NRC approved Plant-specific submittal, and be incorporated by reference into the TS. Subsequent changes in the methodology must be approved by a license amendment.

The TSTF-419 proposed changes to the Callaway Plant TS are:

Enclosure

A. Change to the TS Definition Section on PTLR

The definition of Pressure Temperature Limit Report (PTLR) is revised to delete the reference to the Specifications containing the limits specified in the PTLR.

B. Changes to the Administrative Controls Section 5.6.6, Pressure Temperature Limits Report

The requirements in ITS 5.6.6, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)," to identify the NRC staff approved document by date is revised to allow identification of the Topical Report(s) by number and title, or the NRC Safety Evaluation for a plant methodology by NRC letter and date. A requirement is added to the Reviewers Note in the STS to specify that the complete citation in the PTLR for each Topical Report include the report number, title, revision, date, and any supplements.

EVALUATION

The proposed changes to the Callaway Plant are evaluated below.

A. Changes to the TS Definition Section on PTLR

The definition of PTLR identifies the specifications in which the pressure and temperature limits are addressed. Specification 5.6.6.a requires that the individual specifications that address RCS pressure and temperature limits be referenced. The proposed changes to the definition eliminate the duplication between the definition of PTLR and Section 5.6.6.

B. Changes to the Administrative Controls Section 5.6.5, Pressure Temperature Limits Report

The revision to ITS 5.6.6 to allow Topical Reports to be identified by number and title, or the NRC Safety Evaluation for a plant specific methodology by NRC letter and date, would allow licensees to use current Topical Reports to support limits in the PTLR without having to submit an amendment to facility operating license every time the Topical Report is revised. The PTLR would provide the specific information identifying the particular approved Topical Report(s) used to determine the P/T limits or LTOP System limits. This still provides the assurance that only the approved versions of the referenced Topical Reports or plant specific methodologies will be used for the determination of the P/T limits or LTOP System limits since the complete citation will be provided in the PTLR, and those limits must be approved by the NRC.

The requirements to operate within the limits in the PTLR are specified in and controlled by the Technical Specifications. Only the figures, values, and parameters associated with the P/T limits and the LTOP setpoints are relocated to the PTLR. The methodology for their development must be reviewed and approved by the NRC. The proposed changes do not change the requirements associated with the review and approval of the methodology or the requirements to operate within limits specified in the PTLR.

## CONCLUSION

The ITSB staff has reviewed the licensee's proposed Callaway Plant TS changes. The proposed Callaway Plant TS changes are consistent with the STS, satisfy the 10 CFR 50.36(c)(2)(ii) criteria, maintain safety consistent with the Callaway Plant safety analysis and are acceptable for inclusion in TS.