



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 50 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY  
CALLAWAY PLANT, UNIT 1  
DOCKET NO. STN 50-483

1.0 INTRODUCTION

By letter dated September 6, 1989, Union Electric Company (the licensee) proposed to incorporate programmatic controls for radiological effluents and radiological environmental monitoring in the Administrative Controls section of the Technical Specifications (TS) consistent with the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. At the same time, the licensee proposed to transfer the procedural details of the Radiological Effluent Technical Specifications (RETS) from the TS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP) for solid radioactive wastes as appropriate. With these changes, the specifications related to RETS reporting requirements were simplified. Finally, changes to the definitions of the ODCM and PCP were proposed consistent with these changes. Guidance on these proposed changes was provided to all power reactor licensees and applicants by Generic Letter 89-01 dated January 31, 1989.

2.0 EVALUATION

The licensee's proposed changes to the TS are in accordance with the guidance provided in Generic Letter 89-01 and are addressed below.

- (1) The licensee has proposed to incorporate programmatic controls for radioactive effluents and radiological environmental monitoring in Specification 6.8, "Procedures and Programs," of the TS as noted in the guidance provided in Generic Letter 89-01. The programmatic controls ensure that programs are established, implemented, and maintained to ensure that operating procedures are provided to control radioactive effluents consistent with the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50.
- (2) The licensee has confirmed that the detailed procedural requirements addressing Limiting Conditions for Operation, their applicability, remedial actions, associated surveillance requirements, or reporting requirements for the following specifications have been prepared for inclusion in the ODCM or PCP. These changes to the ODCM and PCP have been prepared in accordance with the new Administrative Controls in the TS on changes to the ODCM and PCP so that they will be implemented in the ODCM or PCP following issuance of this amendment and upon the licensee's completion of the necessary departmental procedural changes within approximately 90 days.

The specifications and associated procedural details discussed above that the licensee is proposing to delete from the TS and include in the ODCM or PCP are as follows:

| <u>SPECIFICATION</u> | <u>TITLE</u>   |
|----------------------|--|
| 3/4.3.3.9            | RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION   |
| 3/4.3.3.10           | RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION  |
| 3/4.11.1.1           | RADIOACTIVE EFFLUENTS: LIQUID EFFLUENTS CONCENTRATION  |
| 3/4.11.1.2           | RADIOACTIVE EFFLUENTS: LIQUID EFFLUENTS DOSE   |
| 3/4.11.1.3           | RADIOACTIVE EFFLUENTS: LIQUID RADWASTE TREATMENT SYSTEM  |
| 3/4.11.2.1           | RADIOACTIVE EFFLUENTS: GASEOUS EFFLUENTS DOSE RATE   |
| 3/4.11.2.2           | RADIOACTIVE EFFLUENTS: DOSE - NOBLE GASES  |
| 3/4.11.2.3           | RADIOACTIVE EFFLUENTS: DOSE - IODINE-131, IODINE-133,<br>TRITIUM, AND RADIOACTIVE MATERIAL IN PARTICULATE FORM |
| 3/4.11.2.4           | RADIOACTIVE EFFLUENTS: [GASEOUS RADWASTE TREATMENT] SYSTEM   |
| 3/4.11.3             | RADIOACTIVE EFFLUENTS: SOLID RADIOACTIVE WASTES  |
| 3/4.11.4             | RADIOACTIVE EFFLUENTS: TOTAL DOSE  |
| 3/4.12.1             | RADIOLOGICAL ENVIRONMENTAL MONITORING: MONITORING PROGRAM  |
| 3/4.12.2             | RADIOLOGICAL ENVIRONMENTAL MONITORING: LAND USE CENSUS   |
| 3/4.12.3             | RADIOLOGICAL ENVIRONMENTAL MONITORING: INTERLABORATORY<br>COMPARISON PROGRAM                                   |
| 6.9.1.6              | ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT   |
| 6.9.1.7              | SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT   |
| 6.15                 | MAJOR CHANGES TO LIQUID, GASEOUS, AND SOLID RADWASTE<br>TREATMENT SYSTEMS                                      |

These procedural details that have been removed from the TS are not required by the Commission's regulations to be included in TS. They have been prepared for incorporation in the ODCM or PCP upon implementation of this license amendment and may be subsequently changed by the licensee without prior NRC approval. Changes to the ODCM and PCP are documented and will be retained for the duration of the operating license in accordance with Specification 6.10.2o.

- (3) The licensee has proposed replacing the existing specifications in the Administrative Controls section of the TS for the Annual Radiological Environmental Operating Report, Specification 6.9.1.6 for the Semiannual Radioactive Effluent Release Report, Specification 6.9.1.7, for the Process Control Program, Specification 6.13, and for the Offsite Dose Calculation Manual, Specification 6.14, with the updated specifications that were provided in Generic Letter 89-01.

The following specifications that are included under the heading of Radioactive Effluents have been retained in the TS. This is in accordance with the guidance of Generic Letter 89-01.

| <u>SPECIFICATION</u> | <u>TITLE</u>   |
|----------------------|--|
| 3/4.3.3.10           | EXPLOSIVE GAS MONITORING INSTRUMENTATION<br>(Retained existing requirements of this specification) |
| 3/4.11.1.4           | LIQUID HOLDUP TANKS  |
| 3/4.11.2.5           | EXPLOSIVE GAS MIXTURE  |
| 3/4.11.2.6           | GAS STORAGE TANKS  |

On the basis of the above, the staff finds that the changes included in the proposed TS amendment request are consistent with the guidance provided in Generic Letter 89-01. Because the control of radioactive effluents continues to be limited in accordance with operating procedures that must satisfy the regulatory requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50, the NRC staff concludes that this change is administrative in nature and there is no impact on plant safety as a consequence. An additional change deletes inappropriate footnote references to a multiple unit station.

### 3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or a change to a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or

cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). This amendment also involves changes in record-keeping, reporting or administrative procedures or requirements. Accordingly, with respect to these items, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

#### 4.0 CONCLUSION

On the basis of the considerations discussed above, the staff concludes 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 these amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: February 12, 1990