

ATTACHMENT 1

DESCRIPTION OF PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

DESCRIPTION OF PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

<u>Item No.</u>	<u>Section Number</u>	<u>Section Title</u>	<u>Description of Change</u>
1	3.3.3.6	Instrumentation/Accident Monitoring Instrumentation/Limiting Condition for Operation	Typographic change of singular "monitor" to plural "monitors."
2	Table 3.3-4	Engineered Safety Features Actuation System Instrumentation Trip Setpoints	Values for item 8.a should be "83V" and "83±0,-8.3V" as issued in NPF-30 rather than ">83V" and ">74.7V" as issued in NRC letter dated 11/1/84.
3	Table 3.3-10	Accident Monitoring Instrumentation	Item 15 should be described as "Containment Normal Sump Water Level" indicators to distinguish them from the recirculation sump level indicators. Instrument identification numbers are added to items 16 and 18.
4	3.6.4.1	Containment Systems/Combustible Gas Control/Hydrogen Analyzers/Limiting Condition for Operation	Less restrictive Tech Spec 3.6.4.1 is made consistent with more restrictive Tech Spec 3.3.3.6.
5	4.11.2.5	Radioactive Effluents/Explosive Gas Mixture/Surveillance Requirements	Editorial change to remove reference to Table 3.3-13. This reference was removed by previous amendment request (Ref: ULNRC-2070, 9/6/89), but text was not revised during amendment preparation (Amendment 50).
6	6.2.2	Administrative Controls/Organization/Unit Staff	Editorial change to remove reference to Assistant Superintendent, Operations. This position is to be deleted effective 6/1/91.

ATTACHMENT 2  
TECHNICAL SPECIFICATION CHANGES

INSTRUMENTATIONACCIDENT MONITORING INSTRUMENTATION

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LIMITING CONDITION FOR OPERATION

3.3.3.6 The accident monitoring instrumentation channels shown in Table 3.3-10 shall be OPERABLE.

APPLICABILITY: MODES 1; 2, and 3.

ACTION:

- a. With the number of OPERABLE accident monitoring instrumentation channels less than the Total Number of Channels shown in Table 3.3-10, restore the inoperable channel(s) to OPERABLE status within 7 days; otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With the number of OPERABLE accident monitoring instrumentation channels, except the containment radiation level ~~monitor~~ and the unit vent - high range noble gas monitor, less than the Minimum Channels OPERABLE requirements of Table 3.3-10, restore the inoperable channel(s) to OPERABLE status within 48 hours; otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. ~~With the number of OPERABLE channels for the containment radiation level monitor or the unit vent - high range noble gas monitor less than the Minimum Channels OPERABLE requirements of Table 3.3-10,~~ <sup>monitors</sup> initiate the preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours and either restore the inoperable channel to OPERABLE status within 7 days, or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days that provides actions taken, cause of the inoperability and plans and schedule for restoring the channels to OPERABLE status.
- d. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.6 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION at the frequencies shown in Table 4.3-7.

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TABLE 3.3-4 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION TRIP SETPOINTS

FUNCTIONAL UNIT	TOTAL ALLOWANCE (TA)	Z	SENSOR ERROR (S)	TRIP SETPOINT	ALLOWABLE VALUE
6. Auxiliary Feedwater (Continued)					
e. Safety Injection- Start Motor-Driven Pumps	See Item 1. above for all Safety Injection Trip Setpoints and Allowable Values.				
f. Loss-of-Offsite Power- Start Turbine-Driven Pump	N.A.	N.A.	N.A.	N.A.	N.A.
g. Trip of All Main Feedwater Pumps- Start Motor-Driven Pumps	N.A.	N.A.	N.A.	N.A.	N.A.
h. Auxiliary Feedwater Pump Suction Pressure- Low (Transfer to ESW)	N.A.	N.A.	N.A.	$\geq 21.71$ psia	$\geq 20.64$ psia
7. Automatic Switchover to Containment Sump					
a. Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	N.A.
b. RWST Level-Low-Low Coincident with Safety Injection	3.4	1.21	2.0	$\geq 36\%$	$\geq 35.2\%$
See Item 1. above for Safety Injection Trip Setpoints and Allowable Values.					
8. Loss of Power					
a. 4 kV Undervoltage -Loss of Voltage	N.A.	N.A.	N.A.	83V <del>82V</del> (120V Bus) w/1s delay	83+0, -8.3V <del>74.7</del> (120V Bus) w/1+0.2, -0.5s delay

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TABLE 3.3-10

## ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	TOTAL NO. OF CHANNELS	MINIMUM CHANNELS OPERABLE
1. Containment Pressure	2	1
a. Normal Range	2	1
b. Extended Range	2	1
2. Reactor Coolant Outlet Temperature - $T_{HOT}$ (Wide Range)	2	1
3. Reactor Coolant Inlet Temperature - $T_{COLD}$ (Wide Range)	2	1
4. Reactor Coolant Pressure - Wide Range	2	1
5. Pressurizer Water Level	2/steam generator	1/steam generator
6. Steam Line Pressure	1/steam generator	1/steam generator
7. Steam Generator Water Level - Narrow Range	1/steam generator	1/steam generator
8. Steam Generator Water Level - Wide Range	2	1
9. Refueling Water Storage Tank Water Level	2	1
10. Containment Hydrogen Concentration Level	1/steam generator	1/steam generator
11. Auxilliary Feedwater Flow Rate	1/Valve	1/Valve
12. PORV Position Indicator*	1/Valve	1/Valve
13. PORV Block Valve Position Indicator**	1/Valve	1/Valve
14. Safety Valve Position Indicator	2	1
15. Containment Water Level (Normal Sump)	N.A.	1
16. Containment Radiation Level (High Range, GT-RIC-59, -60)	4/core quadrant	2/core quadrant
17. Thermocouple/Core Cooling Detection System	N.A.	1
18. Unit Vent - High Range Noble Gas Monitor (GT-RIC-21B)		

REVISION 1

REVISION 1

CONTAINMENT SYSTEMS3/4.6.4 COMBUSTIBLE GAS CONTROLHYDROGEN ANALYZERSLIMITING CONDITION FOR OPERATION

3.6.4.1 Two independent containment hydrogen analyzers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3

ACTION:

- a. With one containment hydrogen analyzer inoperable, restore the inoperable analyzer to OPERABLE status within ~~20~~ 7 days or be in at least HOT STANDBY within the next 6 hours, and HOT SHUTDOWN within the following 6 hours.
- b. With both hydrogen analyzers inoperable, restore at least one analyzer to OPERABLE status within ~~72~~ 48 hours or be in at least HOT STANDBY within the next 6 hours, and HOT SHUTDOWN within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.6.4.1 Each containment hydrogen analyzer shall be demonstrated OPERABLE by the performance of an ANALOG CHANNEL OPERATIONAL TEST at least once per 31 days, and at least once per 31 days on a STAGGERED TEST BASIS by performing a CHANNEL CALIBRATION using sample gas containing ten volume percent hydrogen, balance nitrogen.

RADIOACTIVE EFFLUENTS

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

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3.11.2.5 The concentration of oxygen in the WASTE GAS HOLDUP SYSTEM shall be limited to less than or equal to 3% by volume whenever the hydrogen concentration exceeds 4% by volume.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of oxygen in the WASTE GAS HOLDUP SYSTEM greater than 3% by volume but less than or equal to 4% by volume, reduce the oxygen concentration to the above limits within 48 hours.
- b. With the concentration of oxygen in the WASTE GAS HOLDUP SYSTEM greater than 4% by volume and the hydrogen concentration greater than 4% by volume, immediately suspend all additions of waste gases to the system and reduce the concentration of oxygen to less than or equal to 4% by volume, then take ACTION a. above.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

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4.11.2.5 The concentrations of hydrogen and oxygen in the WASTE GAS HOLDUP SYSTEM shall be determined to be within the above limits by continuously monitoring the waste gases in the WASTE GAS HOLDUP SYSTEM with the hydrogen and oxygen monitors required OPERABLE by ~~Table 3.3-10~~ of Specification 3.3.3.10.

## ADMINISTRATIVE CONTROLS

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### 5.2 ORGANIZATION (Continued)

#### UNIT STAFF

6.2.2 The Unit organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Operator shall be in the control room;
- c. An individual from the Health Physics organization<sup>#</sup>, qualified in radiation protection procedures, shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. A site Fire Brigade of at least five members<sup>#</sup> shall be maintained onsite at all times. The Fire Brigade shall not include the Shift Supervisor, and the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency;
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, health physics personnel, equipment operators, and key maintenance personnel.

The amount of overtime worked by Unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12); and

- g. The Superintendent, Operations, ~~or the Assistant Superintendent, Operations,~~ Shift Supervisors, and Operating Supervisors shall hold a senior reactor operator license. The Unit Reactor Operator shall hold a reactor operator license or a senior reactor operator license.

<sup>#</sup>May be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

ATTACHMENT 3  
SAFETY EVALUATION

### SAFETY EVALUATION

This amendment application requests revisions to various Technical Specifications described in Attachment 1.

The proposed changes to the Technical Specifications do not involve an unreviewed safety question because operation of the Callaway Plant with this change would not:

- 1) Increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report.
- 2) Create the possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report, or
- 3) Reduce the margin of safety as defined in the basis for any technical specification.

Specifically, for each item listed in Attachment 1:

#### Item No. 1

The typographic change of the singular "monitor" to the plural "monitors" merely corrects a typographical error. The change does not impact the reliability or availability of plant equipment. The change does not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The change does not involve plant design changes and does not change any system acceptance criterion.

#### Item No. 2

The changes described for item 8.a of Table 3.3-4 correctly reflect the values as issued in NPF-30 rather than the incorrect values as issued in NRC letter dated 11/1/84. The changes merely make minor editorial revisions to the text and provide consistency and clarity to the operators which will help avoid operator confusion. The changes do not impact the reliability or availability of plant equipment. The changes do not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The changes do not involve plant design changes and do not change any system acceptance criterion.

Item No. 3

The changes described for items 15, 16, and 18 of Table 3.3-10 are merely minor editorial revisions to the text and provide consistency and clarity to the operators which will help avoid operator confusion. The changes do not impact the reliability or availability of plant equipment. The changes do not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The changes do not involve plant design changes and do not change any system acceptance criterion.

Item No. 4

The change to less restrictive Tech Spec 3.6.4.1 merely makes an editorial change to be consistent with the more restrictive Tech Spec 3.3.3.6. This change provides consistency and clarity to the operators which will help avoid operator confusion. The changes do not impact the reliability or availability of plant equipment. The changes do not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The changes do not involve plant design changes and do not change any system acceptance criterion.

Item No. 5

This change removes reference to Table 3.3-13 which was removed by previous amendment request (Ref: ULNRC-2070, 9/6/89), but the text was not revised during amendment preparation (Amendment 50). This change merely corrects a typographical error. The change does not impact the reliability or availability of plant equipment. The change does not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The change does not involve plant design changes and does not change any system acceptance criterion.

Item No. 6

This change merely removes the reference to Assistant Superintendent, Operations which is to be deleted effective 6/1/91. This change is merely a minor editorial revision, and does not impact the reliability or availability of plant equipment. The change does not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The change does not involve plant design changes and does not change any system acceptance criterion.

Given the above discussions, as well as those presented in the Significant Hazards Evaluation, the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

ATTACHMENT 4  
SIGNIFICANT HAZARDS EVALUATION

### SIGNIFICANT HAZARDS EVALUATION

This amendment application requests revisions to various technical specifications described in Attachment 1.

The proposed changes do not involve a significant hazards consideration because operation of the Callaway Plant with these changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated,
2. Create the possibility of a new or different kind of accident from any previously evaluated, or
3. Involve a significant reduction in margin of safety.

Specifically, for each item listed in Attachment 1:

#### Item No. 1

The typographic change of the singular "monitor" to the plural "monitors" merely corrects a typographical error. The change does not impact the reliability or availability of plant equipment. The change does not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The change does not involve plant design changes and does not change any system acceptance criterion.

#### Item No. 2

The changes described for item 8.a of Table 3.3-4 correctly reflect the values as issued in NPF-30 rather than the incorrect values as issued in NRC letter dated 11/1/84. The changes merely make minor editorial revisions to the text and provide consistency and clarity to the operators which will help avoid operator confusion. The changes do not impact the reliability or availability of plant equipment. The changes do not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The changes do not involve plant design changes and do not change any system acceptance criterion.

#### Item No. 3

The changes described for items 15, 16, and 18 of Table 3.3-10 are merely minor editorial revisions to the text and provide consistency and clarity to the operators which will help avoid operator confusion. The changes do not impact the reliability or availability of plant equipment. The changes do

not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The changes do not involve plant design changes and do not change any system acceptance criterion.

Item No. 4

The change to less restrictive Tech Spec 3.6.4.1 merely makes an editorial change to be consistent with the more restrictive Tech Spec 3.3.3.6. This change provides consistency and clarity to the operators which will help avoid operator confusion. The changes do not impact the reliability or availability of plant equipment. The changes do not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The changes do not involve plant design changes and do not change any system acceptance criterion.

Item No. 5

This change removes reference to Table 3.3-13 which was removed by previous amendment request (Ref: ULNRC-2070, 9/6/89), but the text was not revised during amendment preparation (Amendment 50). This change merely corrects a typographical error. The change does not impact the reliability or availability of plant equipment. The change does not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The change does not involve plant design changes and does not change any system acceptance criterion.

Item No. 6

This change merely removes the reference to Assistant Superintendent, Operations which is to be deleted effective 6/1/91. This change is merely a minor editorial revision, and does not impact the reliability or availability of plant equipment. The change does not alter the function or capabilities of existing plant equipment. There is no new type of accident or malfunction being created, and the method and manner of plant operation is unchanged. The change does not involve plant design changes and does not change any system acceptance criterion.

As discussed above, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated or create the possibility of a new or different kind of accident from any previously evaluated. The proposed changes do not result in a significant reduction in a margin safety. Therefore, it has been determined that the proposed changes do not involve a significant hazards consideration.