Attachment 1

Marked-up Technical Specification Pages

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REVISION 1

INSTRUMENTATION

3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.2 The Engineered Safety Features Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4 and with RESPONSE TIMES as shown in Table 3.3-5.

APPLICABILITY: As shown in Table 3.3-3.

ACTION:

a. With an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 3.3-4 adjust the Setpoint consistent with the Trip Setpoint value.

b. With an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-4, either:

1. Adjust the Setpoint consistent with the Trip Setpoint value of Table 3.3-4 and determine within 12 hours that Equation 2.2-1 was satisfied for the affected channel, or

2. Declare the channel inoperable and apply the applicable ACTION statement requirements of Table 3.3.3 until the channel is restored to OPERABLE status with its Setpoint adjusted consistent with the Trip Setpoint value.

Equation 2.2-1 $Z + R + S \leq TA$

Where:

Z = The value from Column Z of Table 3.3-4 for the affected channel,
R = The "as measured" value (in percent span) of rack error for the affected channel,
S = Either the "as measured" value (in percent span) of the sensor error, or the value from Column S (Sensor Error) of Table 3.3-4 for the affected channel, and
TA = The value from Column TA (Total Allowance) of Table 3.3-4 for the affected channel.

c. With an ESFAS instrumentation channel or interlock inoperable, take the ACTION shown in Table 3.3-3.

SURVEILLANCE REQUIREMENTS

4.3.2.1 Each ESFAS instrumentation channel and interlock and the automatic actuation logic and relays shall be demonstrated OPERABLE by the performance of the ESFAS Instrumentation Surveillance Requirements specified in Table 4.3-2.

4.3.2.2 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3.

(the provisions of Specification 4.0.4 are not applicable for response time testing of the steam turbine-driven auxiliary feedwater pump for entry into MODE 3).

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

ACTION: Continued

e. With two auxiliary feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

f. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status as soon as possible.

SURVEILLANCE REQUIREMENTS

4.7.1.2.1 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

b. At least once per ~~31~~ 92 days on a STAGGERED TEST BASIS by:

1) Verifying that each motor-driven pump develops a discharge pressure of greater than or equal to 1535 psig on recirculation flow when tested pursuant to Specification 4.0.5;

INSERT FROM Page 3/4 7-5.

2) Verifying that the steam turbine-driven pump develops a discharge pressure of greater than or equal to 1625 psig at a flow of greater than or equal to 120 gpm when the secondary steam supply pressure is greater than 900 psig. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3;

SURVEILLANCE REQUIREMENTS (Continued)

a. At least once per 31 days by:

~~3)~~ 1) Verifying each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in its correct position; and

~~4)~~ 2) Verifying that each automatic valve, other than AL-HV-30, 31, 32, and 33, in the flow path is in the fully open position whenever the Auxiliary Feedwater System is placed in automatic control or when above 10% RATED THERMAL POWER.

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c. ~~b.~~ At least once per 18 months during shutdown by:

1) Verifying that automatic valves AL-HV-30, 31, 32, and 33 in the ESW supply to the auxiliary feedwater pumps actuate to their full open position upon receipt of an Auxiliary Feedwater Pump Suction Pressure-Low test signal,

2) Verifying that each Motor Driven auxiliary feedwater pump starts as designed automatically upon receipt of an Auxiliary Feedwater Actuation test signal, and

3) Verifying that each auxiliary feedwater motor-operated discharge valve limits the flow to each steam generator from the motor-driven pump to less than or equal to 320 gpm.

4.7.1.2.2 An auxiliary feedwater flow path shall be demonstrated OPERABLE following each COLD SHUTDOWN of greater than 30 days prior to entering MODE 2 by verifying normal flow to at least two steam generators from one auxiliary feedwater pump.

INSERT THE FOLLOWING

d. At least once per 18 months by verifying that the steam turbine-driven auxiliary feedwater pump starts as designed automatically upon receipt of an Auxiliary Feedwater Actuation Test signal (The provisions of Specification 4.0.4 are not applicable for entry into Mode 3).

SAFETY VALVES (Continued)

109 = Power Range Neutron Flux-High Trip Setpoint for four loop operation,

X = Total relieving capacity of all safety valves per steam line in lbs/hour, and

Y = Maximum relieving capacity of any one safety valve in lbs/hour.

3/4.7.1.2 AUXILIARY FEEDWATER SYSTEM

The OPERABILITY of the Auxiliary Feedwater System ensures that the Reactor Coolant System can be cooled down to less than 350°F from normal operating conditions in the event of a total loss-of-offsite power in conjunction with a feedwater line break to one steam generator.

Testing of each electric motor-driven auxiliary feedwater pump on a fixed orifice recirculation flow and ensuring a discharge pressure of greater than or equal to 1535 psig verifies ~~the capability of each pump to deliver a total feedwater~~ pump flow of 575 gpm at a ~~pressure~~ steam generator of 1221 psig. ~~to the entrance of the steam generators~~. The steam-driven auxiliary feedwater pump is capable of delivering a total ~~feedwater~~ pump flow of 1145 gpm at a ~~pressure~~ steam generator of 1221 psig. ~~to the entrance of the steam generators~~. This capacity is sufficient to ensure that adequate feedwater flow is available to remove decay heat and reduce the Reactor Coolant System temperature to less than 350°F when the RHR System may be placed into operation.

3/4.7.1.3 CONDENSATE STORAGE TANK

The OPERABILITY of the condensate storage tank with the minimum water volume ensures that sufficient water is available to maintain the RCS at HOT STANDBY conditions for 4 hours with steam discharge to the atmosphere concurrent with total loss-of-offsite power and then a cooldown to 350°F at 50°F per hour. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics.

3/4.7.1.4 SPECIFIC ACTIVITY

The limitations on Secondary Coolant System specific activity ensure that the resultant offsite radiation dose will be limited to a small fraction of 10 CFR Part 100 dose guideline values in the event of a steam line rupture. This dose also includes the effects of a coincident 1 gpm reactor to secondary tube leak in the steam generator of the affected steam line. These values are consistent with the assumptions used in the safety analyses.

Attachment 2

Re-typed Technical Specification Pages

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3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.2 The Engineered Safety Features Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4 and with RESPONSE TIMES as shown in Table 3.3-5.

APPLICABILITY: As shown in Table 3.3-3.

ACTION:

a. With an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 3.3-4 adjust the Setpoint consistent with the Trip Setpoint value.

b. With an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-4, either:

   1. Adjust the Setpoint consistent with the Trip Setpoint value of Table 3.3-4 and determine within 12 hours that Equation 2.2-1 was satisfied for the affected channel, or

   2. Declare the channel inoperable and apply the applicable ACTION statement requirements of Table 3.3.3 until the channel is restored to OPERABLE status with its Setpoint adjusted consistent with the Trip Setpoint value.

   Equation 2.2-1 $Z + R + S \leq TA$

   Where:

   Z = The value from Column Z of Table 3.3-4 for the affected channel.
   R = The "as measured" value (in percent span) of rack error for the affected channel.
   S = Either the "as measured" value (in percent span) of the sensor error, or the value from Column S (Sensor Error) of Table 3.3-4 for the affected channel, and
   TA = The value from Column TA (Total Allowance) of Table 3.3-4 for the affected channel.

c. With an ESFAS instrumentation channel or interlock inoperable, take the ACTION shown in Table 3.3-3.

SURVEILLANCE REQUIREMENTS

4.3.2.1 Each ESFAS instrumentation channel and interlock and the automatic actuation logic and relays shall be demonstrated OPERABLE by the performance of the ESFAS Instrumentation Surveillance Requirements specified in Table 4.3-2.

4.3.2.2 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months (the provisions of Specification 4.0.4 are not applicable for response time testing of the steam turbine-driven auxiliary feedwater pump for entry into MODE 3). Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3.

LIMITING CONDITION FOR OPERATION

ACTION: Continued

e. With two auxiliary feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

f. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status as soon as possible.

SURVEILLANCE REQUIREMENTS

4.7.1.2.1 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

a. At least once per 31 days by:

1) Verifying that each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in its correct position; and

2) Verifying that each automatic valve, other than AL-HV-30, 31, 32, and 33, in the flow path is in the fully open position whenever the Auxiliary Feedwater System is placed in automatic control or when above 10% RATED THERMAL POWER.

b. At least once per 92 days on a STAGGERED TEST BASIS by:

1) Verifying that each motor-driven pump develops a discharge pressure of greater than or equal to 1535 psig on recirculation flow when tested pursuant to Specification 4.0.5;

2) Verifying that the steam turbine-driven pump develops a discharge pressure of greater than or equal to 1625 psig at a flow of greater than or equal to 120 gpm when the secondary steam supply pressure is greater than 900 psig. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3;

SURVEILLANCE REQUIREMENTS (Continued)

c. At least once per 18 months during shutdown by:

1) Verifying that automatic valves AL-HV-30, 31, 32, and 33 in the ESW supply to the auxiliary feedwater pumps actuate to their full open position upon receipt of an Auxiliary Feedwater Pump Suction Pressure-Low test signal,

2) Verifying that each motor-driven auxiliary feedwater pump starts as designed automatically upon receipt of an Auxiliary Feedwater Actuation test signal, and

3) Verifying that each auxiliary feedwater motor-operated discharge valve limits the flow to each steam generator from the motor-driven pump to less than or equal to 320 gpm.

d. At least once per 18 months by verifying that the steam turbine-driven auxiliary feedwater pump starts as designed automatically upon receipt of an Auxiliary Feedwater Actuation Test signal (the provisions of Specification 4.0.4 are not applicable for entry into Mode 3).

4.7.1.2.2 An auxiliary feedwater flow path shall be demonstrated OPERABLE following each COLD SHUTDOWN of greater than 30 days prior to entering MODE 2 by verifying normal flow to at least two steam generators from one auxiliary feedwater pump.

SAFETY VALVES (Continued)

109 = Power Range Neutron Flux-High Trip Setpoint for four loop operation,

X = Total relieving capacity of all safety valves per steam line in lbs/hour, and

Y = Maximum relieving capacity of any one safety valve in lbs/hour.

3/4.7.1.2 AUXILIARY FEEDWATER SYSTEM

The OPERABILITY of the Auxiliary Feedwater System ensures that the Reactor Coolant System can be cooled down to less than 350°F from normal operating conditions in the event of a total loss-of-offsite power in conjunction with a feedwater line break to one steam generator.

Testing of each electric motor-driven auxiliary feedwater pump on a fixed orifice recirculation flow and ensuring a discharge pressure of greater than or equal to 1535 psig verifies the capability of each pump to deliver a total pump flow of 575 gpm at a steam generator pressure of 1221 psig. The steam-driven auxiliary feedwater pump is capable of delivering a total pump flow of 1145 gpm at a steam generator pressure of 1221 psig. This capacity is sufficient to ensure that adequate feedwater flow is available to remove decay heat and reduce the Reactor Coolant System temperature to less than 350°F when the RHR System may be placed into operation.

3/4.7.1.3 CONDENSATE STORAGE TANK

The OPERABILITY of the condensate storage tank with the minimum water volume ensures that sufficient water is available to maintain the RCS at HOT STANDBY conditions for 4 hours with steam discharge to the atmosphere concurrent with total loss-of-offsite power and then a cooldown to 350°F at 50°F per hour. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics.

3/4.7.1.4 SPECIFIC ACTIVITY

The limitations on Secondary Coolant System specific activity ensure that the resultant offsite radiation dose will be limited to a small fraction of 10 CFR Part 100 dose guideline values in the event of a steam line rupture. This dose also includes the effects of a coincident 1 gpm reactor to secondary tube leak in the steam generator of the affected steam line. These values are consistent with the assumptions used in the safety analyses.

Attachment 3

Safety Evaluation

SAFETY EVALUATION

This amendment application requests a revision to Technical Specifications (TS) 4.3.2.2, 4.7.1.2.1, and Bases Section 3/4.7.1.2. Specification 4.3.2.2 is being revised to provide an exception to Specification 4.0.4 for entry into Mode 3 for response time testing of the Turbine Driven Auxiliary Feedwater Pump (TDAFP). Specification 4.7.1.2.1 is being revised as follows: (1) The frequency of testing each auxiliary feedwater pump will be reduced from once per 31 days to once per 92 days, (2) Specification 4.7.1.2.1.b.2 surveillances will be revised to remove the requirement that the surveillance for the TDAFP be performed only during shutdown, and (3) Specification 4.7.1.2.1.b.2 will be modified to provide an exception to Specification 4.0.4 for entry into Mode 3 for verifying the TDAFP automatically starts upon receipt of an Auxiliary Feedwater Actuation test signal. The Bases for Specification 3/4.7.1.2 will be modified to clarify the performance requirements of the Auxiliary Feedwater System (AFWS).

Background

The Auxiliary Feedwater System (AFWS) supplies feedwater to the steam generators to remove decay heat from the reactor coolant system upon the loss of normal feedwater supply. The system is served by two motor-driven pumps and one steam turbine-driven pump.

To ensure that the three auxiliary feedwater pumps are capable of performing their intended safety function, Callaway Technical Specifications require the operability of the pumps to be demonstrated. In part, Surveillance Requirement 4.7.1.2.1.b.2 ensures that the TDAFP will automatically start in the event an Auxiliary Feedwater Actuation Signal (AFAS) is generated because of a plant transient. This surveillance is performed once per 18 months at shutdown. In addition, all three pumps are tested at least once per 31 days per Specification 4.7.1.2.1.a. Surveillance Requirement 4.7.1.2.1.a.2 includes an exception to the provisions of Specification 4.0.4 for entry into Mode 3 for the TDAFP. Technical Specification 4.0.4 states, "Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with a Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements." The exception to the requirements of Specification 4.0.4 allows suitable testing conditions to be established for the TDAFP. It is necessary to have adequate steam pressure available for the

surveillance testing to prevent damage to the pump and to ensure the validity of the surveillance. However, Surveillance Requirement 4.7.1.2.1.b.2 does not have a similar provision. This appears to have been an administrative oversight. A similar condition exists for Surveillance Requirement 4.3.2.2 as it relates to the turbine-driven auxiliary feedwater pump testing to support Engineered Safety Features (ESF) response time testing. Therefore, a modification to Surveillance Requirement 4.3.2.2 is also required.

As stated previously, the Surveillance Requirement to verify the auxiliary feedwater pumps automatically start upon receipt of an AFAS (4.7.1.2.1.b.2) is required to be performed at shutdown. For the TDAFP, the requirement to perform the surveillance only at shutdown is inconsistent with the exception to Specification 4.0.4 since suitable steam conditions are not established until Mode 3 (Hot Standby) is attained. Therefore, Specification 4.7.1.2.1.b.2 will be modified to remove the "at shutdown" requirement for the TDAFP.

The three auxiliary feedwater pumps are currently required to be tested pursuant to Specification 4.7.1.2.1.a at least once per 31 days. This amendment request also proposes to modify Specification 4.7.1.2.1.a to lengthen the interval between Auxiliary Feedwater pump surveillance tests from 31 days to 92 days. This adopts the provisions of the improved Standard Technical Specifications - Westinghouse Plants (NUREG 1431) and incorporates the recommendations of NRC Generic Letter 93-05, Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation. This will eliminate approximately 24 pump tests and the associated out-of-service time per year. This change has been evaluated for impact on the Callaway Probabilistic Risk Assessment Model. This change will slightly reduce the Callaway Plant core damage frequency (CDF) and will eliminate unnecessary pump starts and decrease the possibility of human errors associated with restoration from testing. This change is compatible with Callaway's operating experience since all Auxiliary Feedwater pumps consistently meet the acceptance criteria for ASME Section XI testing when tested pursuant to Specification 4.0.5.

Bases Section 3/4.7.1.2 is to be changed to clarify the assumed conditions the Auxiliary Feedwater pumps are required to function under and the performance requirements for each pump. The Auxiliary Feedwater Safety System Functional Assessment (SSFA 94-02(AL)) identified errors in the wording in the Technical Specification bases. The bases are to be modified to clarify that the 575 GPM and 1145 GPM

flow values are total pump flows (not flow to the entrance of the steam generators). This is consistent with Final Safety Analysis Report Table 10.4-12 which describes the components. These values include an allowance for recirculation flow to the CST. The Motor Driven Auxiliary Feedwater Pumps (MDAFP's) have a minimum recirculation flow of 75 GPM back to the CST and the TDAFP has a minimum recirculation flow of 120 GPM back to the CST with an additional 25 GPM being recirculated through an integral bearing cooler. This results in nominal flow rates of 500 GPM for the MDAFP's and 1000 GPM for the TDAFP to the steam generators. The FSAR Main Feedwater Line Break analysis assumes 563 GPM is delivered to three intact steam generators with 470 GPM being supplied by the TDAFP and 93 GPM provided from one running MDAFP. Nominal cooldown values for the Auxiliary Feedwater System are estimated at 250 GPM per steam generator.

Bases section 3/4.7.1.2 is also changed to clarify that the associated pressure is intended to be steam generator pressure. The pressure of 1221 psig corresponded to a steam generator pressure equivalent to the setting of the lowest Main Steam Safety valve plus accumulation (1185 psig + 3%). Union Electric has proposed an amendment to the operating license via letter ULNRC-3069 on September 12, 1994 (NRC TAC No. M90476) which would allow the steam generator safety valves to be modeled without accumulation. However, the valves would be modeled with a plus 3%, minus 1% setpoint tolerance. Therefore, the maximum steam generator pressure remains 1221 psig remains unchanged. These changes are editorial in nature and simply correct errors in the original wording. The flow values are design values found in the FSAR and in design documentation.

Evaluation

The proposed changes to Technical Specifications 4.3.2.2, 4.7.1.2.1, and the Bases for Specification 3/4.7.1.2 do not involve an unreviewed safety question because operation of the Callaway Plant with the changes would not:

1. Increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety evaluated previously in the safety analysis report.

   The changes proposed by this Technical Specification amendment do not affect the performance parameters of the Auxiliary Feedwater System (AFWS). The changes proposed involve a decrease in the frequency of pump testing from once per 31 days to once per 92 days as recommended by NRC Generic Letter 93-05 and reflected in NUREG 1431 (T/S 4.7.1.2.1.a). This change will decrease the out-of-service time of the AFWS due to

testing. This change will also decrease the number of component manipulations performed on the system and will therefore decrease the probability of a restoration error rendering the system incapable of performing its intended function. The pumps will be required to meet the same acceptance criteria and will continue to be monitored as required by ASME Section XI. As stated earlier, the overall effect is a slight decrease in the CDF for Callaway. These proposed changes will also eliminate an inconsistency among Specifications 4.7.1.2.1.b.2 and 4.3.2.2 and Specification 4.7.1.2.1.a.2 regarding an exception to Specification 4.0.4 for entry into Mode 3 for the TDAFP. The methodology and acceptance criteria of surveillance testing will not be changed. The ability of the AFWS to perform its intended function during accident conditions will continue to be demonstrated via surveillance testing. The proposed changes to the Technical Specifications do not affect any accident initiators for any accident evaluated in the Safety Analysis Report. The Bases changes are corrections to errors which have no effect on any accident initiators nor equipment failure modes.

2. Create a possibility for an accident or malfunction of a different type than any previously evaluated in the Safety Analysis Report. The proposed Technical Specification changes do not modify any equipment nor create any potential accident initiators. The proposed change herein of potential interest is the exception to Specification 4.0.4 for entry into Mode 3 for TDAFP response time testing and auto-start testing. This allowance is already recognized via Specification 4.7.1.2.1.a.2 and NUREG 1431, Standard Technical Specifications - Westinghouse Plants. No new failure modes are created since the method and acceptance criteria for surveillance testing are unchanged.

3. Reduce the margin of safety as defined in the basis for any technical specification. The Bases for Specification 3/4.7.1.2 are to be clarified to correctly state the design flow and pressure parameters for the AFWS. No plant design changes are involved and the method and manner of plant operation remain the same. The specific surveillance test methodology and acceptance criteria remain unchanged.

Based on the previous discussions as well as those presented in the Significant Hazards Evaluation, the proposed Technical Specification 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 a revision to Technical Specifications (TS) 4.3.2.2, 4.7.1.2.1, and Bases Section 3/4.7.1.2. Specification 4.3.2.2 is being revised to provide an exception to Specification 4.0.4 for entry into Mode 3 for response time testing of the Turbine Driven Auxiliary Feedwater Pump (TDAFP). Specification 4.7.1.2.1 is being revised as follows: (1) The frequency of testing each auxiliary feedwater pump will be reduced from once per 31 days to once per 92 days, (2) Specification 4.7.1.2.1.b.2 surveillances will be revised to remove the requirement that the surveillance for the TDAFP be performed only during shutdown, and (3) Specification 4.7.1.2.1.b.2 will be modified to provide an exception to Specification 4.0.4 for entry into Mode 3 for verifying the TDAFP automatically starts upon receipt of an Auxiliary Feedwater Actuation test signal. The Bases for Specification 3/4.7.1.2 will be modified to clarify the performance requirements of the Auxiliary Feedwater System (AFWS).

The proposed Technical Specification changes do not involve a significant hazards consideration per 10 CFR50.92 because operation of Callaway Plant with the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. The Callaway Final Safety Analysis Report has been reviewed and been found to be unaffected by these proposed changes. The changes proposed by this Technical Specification amendment do not affect the performance parameters of the Auxiliary Feedwater System (AFWS). The changes proposed involve a decrease in the frequency of pump testing from once per 31 days to once per 92 days as recommended by NRC Generic Letter 93-05 and reflected in NUREG 1431 (T/S 4.7.1.2.1.a). This change will decrease the out-of-service time of the AFWS due to testing. This change will also decrease the number of component manipulations performed on the system and will therefore decrease the probability of a restoration error rendering the system incapable of performing its intended function.

   The pumps will be required to meet the same acceptance criteria and will continue to be monitored as required by ASME Section XI. As stated earlier, the overall effect is a slight decrease in the CDF for Callaway. These proposed changes will also eliminate an inconsistency among Specifications 4.7.1.2.1.b.2 and 4.3.2.2 and Specification 4.7.1.2.1.a.2 regarding an exception to Specification 4.0.4 for entry into Mode 3 for the TDAFP. The methodology and acceptance criteria of surveillance testing will not be changed. The

ability of the AFWS to perform its intended function during accident conditions will continue to be demonstrated via surveillance testing. The proposed changes to the Technical Specifications do not affect any accident initiators for any accident evaluated in the Final Safety Analysis Report (FSAR). The Bases changes are corrections to errors which have no effect on any accident initiators nor equipment failure modes.

2. Create the possibility of a new or different kind of accident from any previously evaluated. The proposed Technical Specification changes do not modify any equipment nor create any potential accident initiators. The proposed change herein of potential interest is the exception to Specification 4.0.4 for entry into Mode 3 for TDAFP response time testing and auto-start testing. This allowance is already recognized via Specification 4.7.1.2.1.a.2 and NUREG 1431, Standard Technical Specifications - Westinghouse Plants.

3. Involve a significant reduction in a margin of safety. The Bases for Specification 3/4.7.1.2 are to be clarified to correctly state the design flow and pressure parameters for the AFWS. No plant design changes are involved in any of the proposed changes and the method and manner of plant operation remain the same. The specific surveillance test methodology and acceptance criteria remain unchanged.

As discussed above, the proposed change does 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. These changes do not result in a significant reduction in a margin of safety. Therefore, it has been determined that the proposed changes do not involve a significant hazards consideration.

Attachment 5

Environmental Consideration

ENVIRONMENTAL CONSIDERATION

This amendment application requests a revision to Technical Specifications (TS) 4.3.2.2, 4.7.1.2.1, and Bases Section 3/4.7.1.2. Specification 4.3.2.2 is being revised to provide an exception to Specification 4.0.4 for entry into Mode 3 for response time testing of the Turbine Driven Auxiliary Feedwater Pump (TDAFP). Specification 4.7.1.2.1 is being revised as follows: (1) The frequency of testing each auxiliary feedwater pump will be reduced from once per 31 days to once per 92 days, (2) Specification 4.7.1.2.1.b.2 surveillances will be revised to remove the requirement that the surveillance for the TDAFP be performed only during shutdown, and (3) Specification 4.7.1.2.1.b.2 will be modified to provide an exception to Specification 4.0.4 for entry into Mode 3 for verifying the TDAFP automatically starts upon receipt of an Auxiliary Feedwater Actuation test signal. The Bases for Specification 3/4.7.1.2 will be modified to clarify the performance requirements of the Auxiliary Feedwater System (AFWS).

The proposed amendment involves changes with respect to the use of facility components located within the restricted areas as defined in 10 CFR Part 20. Union Electric has determined that the proposed amendment involves no significant hazards consideration, no significant increase in the amounts nor significant change in the types of any effluents that may be released offsite, and no significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR51.22 (c) (9). Pursuant to 10 CFR51.22 (b, no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.