



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

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. STN 50-453

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 67  
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by Union Electric Company (UE, the licensee) dated August 1, 1991, as supplemented by letter dated February 19, 1992, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-30 is hereby amended to read as follows:

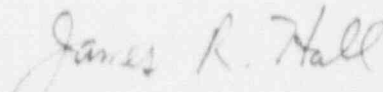
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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 67, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into the license. UE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



James R. Hall, Sr. Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of issuance: March 5, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 67

OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. Corresponding overleaf pages are provided to maintain document completeness.

REMOVE

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3/4 7-19  
3/4 7-20  
3/4 7-23  
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## PLANT SYSTEMS

### 3/4.7.8 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

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3.7.8 All snubbers shall be OPERABLE. The only snubbers excluded from the requirement are those installed on nonsafety-related systems, and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

#### ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.8g. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

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4.7.8 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program in lieu of the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment No. 67 .

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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#### c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.8f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to determine system operability with an unacceptable snubber. If operability cannot be justified, the system shall be declared inoperable and the ACTION requirements shall be met.

#### d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.



TABLE 4.7-2

## SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.





## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

#### g. Service Life Monitoring (Continued)

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers are attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the designed service.

If any snubber selected for functional testing either fails to lock up or fails to move, i.e., frozen-in-place, the cause will be evaluated and, if caused by manufacturer or design deficiency, all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.8e. for snubbers not meeting the functional test acceptance criteria.

#### h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test results shall be tested to meet the functional test criteria before installation in the unit. Mechanical snubbers shall have met the acceptance criteria subsequent to their most recent service, and the freedom-of-motion test must have been performed within 12 months before being installed in the unit.

#### i. Snubber Service Life Program

The service life of hydraulic and mechanical snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be determined and established based on engineering information and shall be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.2.

TABLE 4.7-2 (continued)

SNUBBER VISUAL INSPECTION INTERVAL (continued)

- Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation; that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.
- Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

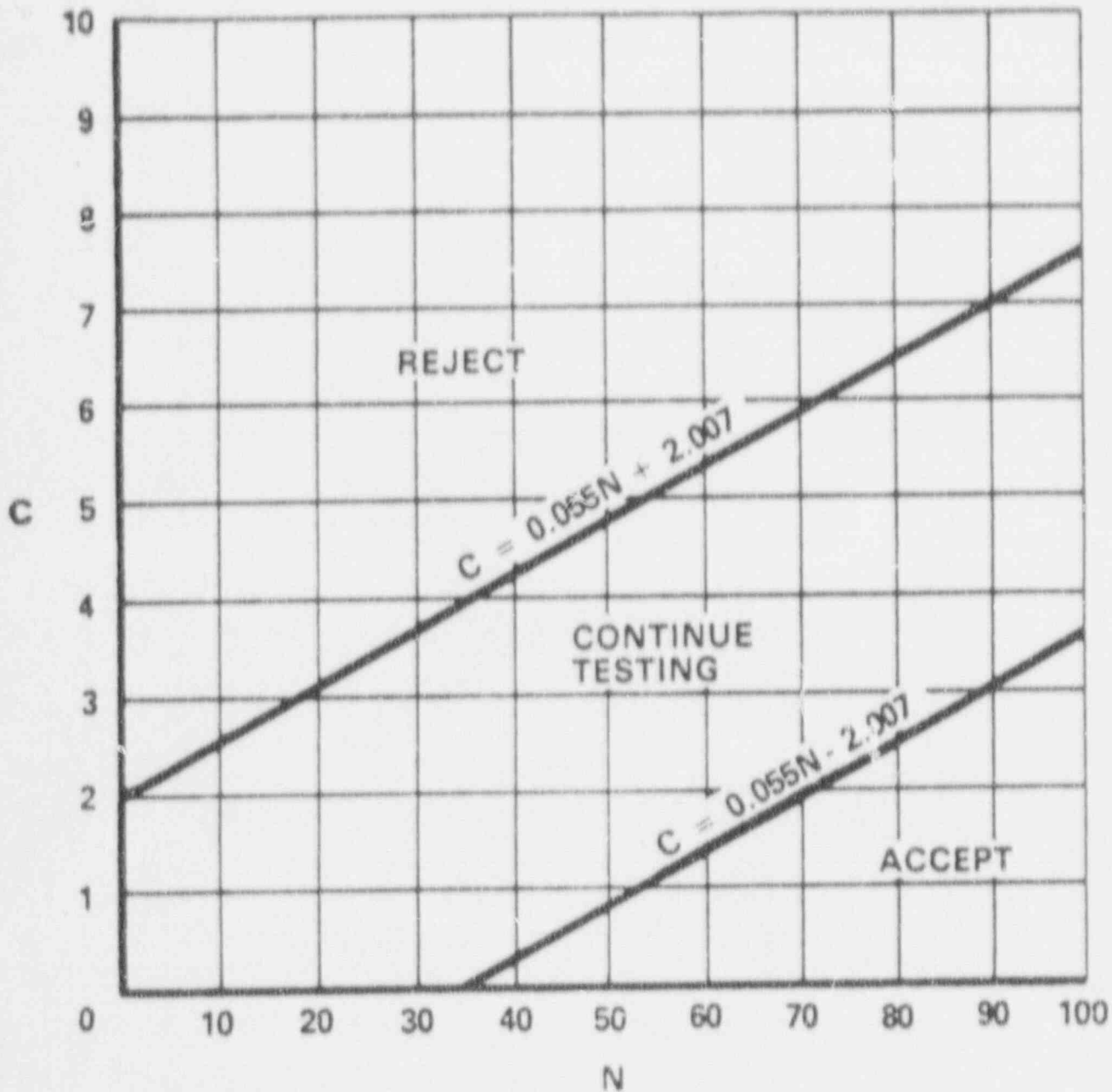


FIGURE 4.7-1

SAMPLE PLAN 2) FOR SNUBBER FUNCTIONAL TEST

## PLANT SYSTEMS

### BASES

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#### 3/4.7.8 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant System and all other safety-related systems are maintained during and following a seismic or other event initiating dynamic loads.

Snubbers are classified and grouped by design and manufacturer, but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer. Snubbers may also be classified and grouped by accessibility or accessible for visual inspection purposes. Therefore, each snubber type may be grouped for inspection in accordance with accessibility.

A list of individual snubbers with detailed information of snubber location and size and of systems affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the On-Site Review Committee. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location etc.), and the recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection frequency is based on the number of unacceptable snubbers found during the previous inspection in proportion to the size of the various snubber populations or categories. The Snubber Visual Inspection Interval is determined in accordance with Table 4.7-2. The maximum inspection interval can be as long as two refuel cycles but not more than 48 months, provided the requirements of Table 4.7-2 are met. A snubber is considered unacceptable if it fails the acceptance criteria of visual inspection.

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers. For example, if a fluid port of a hydraulic

## PLANT SYSTEMS

### BASES

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#### SNUBBERS (Continued)

snubber is found to be uncovered, the snubber shall be declared inoperable and shall not be determined OPERABLE via functional testing. Since the visual inspections are augmented by functional testing program, the visual scrutiny sufficient to assure that fasteners or mountings for connecting the snubbers to supports or foundations shall have no visible bolts, pins or fasteners missing, or other visible signs of physical damage such as cracking or loosening.

To provide assurance of snubber functional reliability one of three functional testing methods are used with the stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure, or
2. Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7-1, or
3. Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation.

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

#### 3/4.7.9 SEALED SOURCE CONTAMINATION

The limitation on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(a)(3) limits for plutonium. This limitation will ensure that leakage from Byproduct, Source, and Special Nuclear Material sources will not exceed allowable intake values.