UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20666

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 87 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 August 1, 1991, the licensee requested revisions to Technical Specification (TS) 3/4.7.8, "Snubbers," and associated Bases to change the snubber visual inspection intervals and corrective actions. TS 3/4.7.8 imposes surveillance requirements for visual inspection on all safety-related snubbers. The proposed change provides alternative requirements for snubbers based on the guidance contained in NRC Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990. Based on discussions with the NRC staff, the licensee revised its request by letter dated February 19, 1992, to more closely conform with the recommendations of GL 90-09. As this revision is more conservative in defining snubber visual inspection acceptance criteria than the original proposal, the staff's proposed no significant hazards determination, dated September 4, 1991, remains valid.

2.0 EVALUATION

The current requirements in TS 3/4.7.8 specify a schedule for snubber visual inspections that is based on the number of inoperable snubbers found during the previous visual inspection. A visual inspection is the observation of the condition of installed snubbers to identify those that are damaged, degraded, or inoperable as caused by physical means, leakage, corrosion or environmental exposure. To verify snubber operability, a functional test is performed that involves removing the snubber and performing a bench test. A visual inspection complements the functional test and provides additional confidence in snubber operability. The schedules for visual inspection and for functional testing assume that refueling intervals will not exceed 18 months. Because the current visual inspection schedule is based only on the number of inoperable snubbers found during the last visual inspection irrespective of the size of the snubber population, plants with large numbers of snubbers find that the visual inspection schedule is excessively restrictive.

All safety-related snubbers are required to be operable to ensure that the structural integrity of all safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. The visual inspection frequency is based on maintaining a constant level of snubber protection during a seismic or severe transient event. In order to establish the inspection frequency for each type of snubber on a safety-related system, it was assumed that the frequency of snubber failure and the initiating event is constant with time, and that the failure of any snubber could cause the system to be unprotected. The alternate inspection schedule contained in GL 90-09 is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the snubber populations or

categories. The licensee has determined that the proposed change to TS 3/4.7.8 will reduce future operational radiation exposure to personnel, and would be highly cost effective. The NRC staff has stated in GL 90-09 that the alternative schedule for visual inspections maintains the same confidence level as the existing schedule, and generally will allow the licensee to perform visual inspections and take corrective actions during plant outages. The staff has reviewed the proposed changes to TS 3/4.7.8 and finds that they are consistent with the guidance contained in GL 90-09. Therefore, the license amendment is acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Missouri State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves changes to requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to surveillance requirements. 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 (56 FR 43817). Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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.

5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, 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 this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Lombardo

Date: March 5, 1992