

August 6, 1992

Mr. A. Bert Davis
Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

ULNRC-2679

Dear Mr. Davis:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
REQUEST FOR REGIONAL TEMPORARY
WAIVER OF COMPLIANCE

This letter is to confirm the results of a teleconference between Union Electric and the NRC Region III Staff on August 6, 1992, in which Union Electric requested a Regional Waiver of Compliance from 0600 CDT August 7, 1992, until 0600 CDT August 8, 1992, from the Technical Specification Limiting Conditions of Operation (LCO) for the inoperability of a Safety Injection accumulator. This would allow completion of repairs to the 'D' Emergency Core Cooling Safety Injection accumulator vent valve. Currently, Callaway Plant is in Mode 1, 100 percent power.

The basis for this request is provided below:

BACKGROUND

On July 1, 1992, at 0800 CDT, the 'D' Safety Injection accumulator vent valve, EP-HV-8950F, was discovered leaking nitrogen. The licensed operators observed the leak after noticing the accumulator had to be repressurized on a daily basis. During a containment entry, the valve seat leak rate was quantified at 1 liter per second.

REQUIREMENTS FOR WHICH THE WAIVER IS REQUESTED

Replacement of valve EP-HV-8950F requires 'D' Safety Injection accumulator to be depressurized. The Technical Specification (T/S) 3.5.1.d Limiting Condition for Operation (LCO) would not be satisfied with nitrogen cover-pressure of less than 602 psig.

9208140088 5/0807
PDR ADOCK 05000483
PDR

With this 'D' Safety Injection accumulator depressurized, the Technical Specification LCO action statement allows 1 hour to restore the accumulator operable or shut down to Hot Standby (Mode 3) within the next 6 hours and reduce Reactor Coolant System (RCS) pressure to less than 1000 psig within the following 6 hours. This waiver request would extend the allowable outage time for up to 24 hours to complete the maintenance and necessary tests of the 'D' Safety Injection accumulator.

CIRCUMSTANCES/NEED FOR PROMPT ACTION/WHY SITUATION COULD NOT HAVE BEEN AVOIDED

Extension of the 1 hour allowed outage time limit is needed to permit valve replacement and avoid a cooldown transient that would be imposed upon the plant by an unnecessary shutdown to Mode 3 conditions. Since the onset of valve EP-HV-8950F leakage could not have been reasonably predicted, this situation could not have been avoided. Prompt action is needed to eliminate the need for frequent operator action to maintain the accumulator pressure within the Technical Specification limits and reduce unnecessary cycling of other plant components.

COMPENSATORY ACTIONS

During the time frame this waiver of compliance would be in effect, the following compensatory actions will be taken:

Procedure OTS-EP-00005, the governing procedure to control replacement of valve EP-HV-8950F, has been written and approved to provide actions for the licensed operators in the event accumulator level or pressure begins to decrease on one of the other three Safety Injection accumulators. Additionally, the pre-job brief will stress the importance of increased monitoring of pressure in the three operable accumulators. Potential leakage through the accumulator discharge check valve, EP-8956D, will be closely monitored and appropriate Technical Specification action statements for check valve leakage will be followed including plant shutdown if required.

SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES OF PROPOSED REQUEST

This is a one-time request for approval of an allowed outage time of 24 hours with one Safety Injection Accumulator inoperable. This request would extend the existing Technical Specification allowed outage time by 23 hours to permit completion of the maintenance and necessary tests to the 'D' Safety Injection accumulator. Additional discussions regarding safety significance are presented below in the Hazards Consideration.

DURATION JUSTIFICATION

The proposed waiver of compliance is for a one-time approval of plant operation for up to 24 hours with one Safety Injection accumulator inoperable for maintenance. The additional time will provide sufficient time to replace the valve and restore the 'D' safety injection accumulator to operable status. If the accumulator is not restored within the extended allowable outage time we will comply with the Technical Specification LCO to shut down the plant to Hot Standby within the next 6 hours and reduce RCS pressure to less than 1000 psig within the following 6 hours.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

Union Electric has concluded that the requested temporary waiver of compliance does not involve a significant hazard in that it would not:

1. Involve a significant increase in the probability or consequences of any accident previously evaluated.

This change involves extending the 1 hour LCO action allowed outage time to 24 hours with an inoperable Safety Injection accumulator. As such, this change does not increase the probability of any accident previously analyzed.

One Safety Injection accumulator, in conjunction with other ECCS systems, is capable of mitigating the Design Basis Accidents (DBAs). If a single failure is not postulated, consequences of the DBAs are not adversely affected (i.e., the requirements of 10CFR50.46 are met). The effect on the consequences of an accident, assuming a single failure would be no different for the 24 hour period than the 1 hour period as currently allowed. Thus, the consequences of accidents are not adversely impacted by the proposed waiver of compliance.

2. Create the possibility of a new or different kind of accident.

Any previously analyzed event postulated during the 24 hour extension period can be mitigated by the remaining components of the ECCS including the other three Safety Injection accumulators if no single failure is postulated.

Since the proposed waiver would allow plant operation for an additional 23 hours with one Safety Injection accumulator inoperable, the change would increase slightly the probability of failure of the subsystem should it be required to operate to mitigate a DBA. The probability of core damage risk has been calculated for Callaway to increase by only 0.01 percent above the value determined for the Callaway Plant's Individual Plant Examination.

It should be noted that the model used to simulate removal of one accumulator from service assumed that the Residual Heat Removal and Safety Injection pump discharge paths to the 'D' RCS loop were also rendered inoperable. This slight increase in risk is not deemed large enough to warrant consideration as a new or different kind of accident.

3. Involve a significant reduction in any margin of safety.

As discussed above, the consequences of any DBA are not adversely affected if no single failures are assumed. With a single failure, the consequences and impact on margin of safety are no different during the LCO 1 hour allowed outage time than for the 24 hour allowed outage time; the only difference is in the period of time allowed. This small increase in risk (0.01 percent) does not result in a significant reduction in any margin of safety.

BASIS FOR NO IRREVERSIBLE ENVIRONMENTAL CONSEQUENCES

The proposed temporary waiver of compliance to continue power operation for 24 hours with one Safety Injection accumulator inoperable to perform the corrective maintenance has no environmental impact.

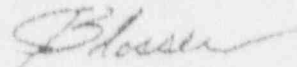
SUMMARY

The Callaway Plant On-Site Review Committee has approved this request for a temporary waiver of compliance and concurs with the above determinations.

This proposed request for a temporary waiver involves no undue safety risk and no irreversible environmental consequences.

We will continue to keep you informed on matters relevant to this request.

Very truly yours,



J. D. Blosser
Manager, Callaway Plant

JDB/TPS/lrj

cc's: distribution attached

11

cc distribution for ULNRC-

Mr. L. Raynard Wharton (2 copies)
U. S. Nuclear Regulatory Commission
OWFN-Mail Stop 13E21
Washington, D. C. 20555

Manag. Electric Department
Missouri Public Service Commission
P. O. Box 160
Jefferson City, MO 65102

Records Center
Institute of Nuclear Power Operations
Suite 1500
1100 Circle 75 Parkway
Atlanta, GA 30339

Mr. Steve Wigeman
Supervisor, Licensing
Wolf Creek Nuclear Operating Corporation
P. O. Box 411
Eurlington, KS 66839

Mr. R. L. Argue
Chief, Project Section 3C
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

NRC Senior Resident Inspector

bcc distribution for ULNRC-

D. F. Schnell (400)
G. L. Randolph
J. V. Laux
A. C. Passwater/D. E. Shafer (470)
G. A. Hughes
Z40LER
M. S. Evans
D. E. Young
M. P. Darrett (100)
T. L. Antweiler
S. L. Dale (470) MSRB/N. Date (2 copies)
M. A. Holmes
E210.0001
Z40ULNRC
A160.0761
JDB Chrono