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UNION ELECTRIC

Donald F. Schnell
Senior Vice President
Nuclear

December 1, 1992

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

ULNRC-2731

Gentlemen:

**CALLAWAY PLANT**
**DOCKET NUMBER 50-483**
**REVISION TO TECHNICAL SPECIFICATIONS 3.3.2**
**ENGINEERED SAFETY FEATURES ACTUATION SYSTEM**
**INSTRUMENTATION AND 3/4.8.1 A.C. SOURCES**
Reference: ULNRC-2717 dated November 3, 1992

The referenced letter transmitted an application for amendment to Facility Operating License Number NPF-30 for the Callaway Plant. This amendment application requests a revision to Technical Specifications 3.3.2 and 3/4.8.1 to add Mode 5 and 6 applicability for the load shedder emergency load sequencer and its supplying 4 KV Bus under voltage circuit.

Per our discussions with the NPC staff, we are submitting additional information to support the Significant Hazards Evaluations previously transmitted. The attached Significant Hazards Evaluation should be used to replace the previously submitted evaluation.

If you have any questions concerning this letter, please contact us.

Very truly yours,

080037

for Donald F. Schnell

WEK/dls

Attachment

A001

STATE OF MISSOURI )
) S S
CITY OF ST. LOUIS )

Alan C. Passwater, of lawful age, being first duly sworn upon oath says that he is Manager, Licensing and Fuels (Nuclear) for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Alan C. Passwater
Alan C. Passwater
Manager, Licensing and Fuels
Nuclear

SUBSCRIBED and sworn to before me this 1st day of December, 1992.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
ST. LOUIS COUNTY

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# SIGNIFICANT HAZARDS EVALUATION

This amendment application requests a revision to Technical Specification (T/S) 3/4.3.2 and Surveillance Requirement 4.8.1.2. These specifications are revised to require the solid-state load shedder emergency load sequencers (LSELS) and 4KV bus undervoltage devices be operable in plant modes 5 and 6.

Requiring the LSELS and 4 kV bus undervoltage devices to be operable in Modes 5 & 6 enhances plant operability and safety in the shutdown modes. Previously, T/S did not require the LOCA sequencer or 4 kV undervoltage device to be operable since LOCA is not analyzed in Modes 5 & 6. The shutdown sequencers were not required to be operable because plant operators were relied upon to take manual action to recover from a loss of offsite power. Since this proposed change adds operability requirements to T/S which result in a safety benefit, no significant hazards concern exists.

The proposed change does not involve a significant hazards consideration because operation of Callaway Plant with this change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. The Callaway Safety Analysis Report has been reviewed and been found to be unaffected by this proposed change. This change will not increase the probability or consequences of any accident or malfunction of equipment. LSELS will be required to be operable in modes 5 and 6 which enhances plant safety in shutdown modes.

2. Create the possibility of a new or different kind of accident from any previously evaluated. This change increases the operability requirement for the LSELS. There is no new type of accident or malfunction created and the method and manner of plant operation will only change by adding operability requirements for LSELS in MODES 5 & 6, which enhances plant safety in shutdown modes.

3. Involve a significant reduction in a margin of safety. The margin of safety remains unaffected since no design change is made and plant operation remains the same.

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. This change does not result in a significant reduction in a margin of safety. Therefore, it has been determined that the proposed change does not involve a significant hazards consideration.