



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 30 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY
CALLAWAY PLANT
DOCKET NO. 50-483

1.0 INTRODUCTION

In Generic Letter 86-10, the staff recommended that licensees incorporate the approved fire protection program into the Final Safety Evaluation Report (FSAR). This program includes the fire protection and post-fire safe shutdown systems necessary to satisfy staff guidelines and requirements, administrative and technical controls and procedures, the fire brigade and fire protection technical staff, and other plant features described in the FSAR and staff safety evaluation reports.

Upon completion of this effort, including the certification required by 10 CFR 50.71(e)(2), licensees may then apply for an amendment to the operating license to substitute the standard fire protection license condition delineated in the generic letter. At the same time, licensees may request an amendment to delete the fire protection-related technical specifications which would be considered unnecessary.

By letter dated February 19, 1987, Union Electric Company (the licensee) submitted a request to revise the Callaway technical specifications and amend the operating license in accordance with the above-referenced staff guidance. The information in these submittals included proposed FSAR revisions. The staff reviewed this information and identified a number of questions/concerns with the licensee's proposals. By letter dated October 30, 1987, the licensee responded to those questions/concerns. The staff's evaluation of this information is as follows:

2.0 DISCUSSION

The licensee proposed to delete the following fire protection Technical Specifications:

- 3.3.3.7. Fire Detection Instrumentation,
- 3.7.10.1. Fire Suppression Water System,
- 3.7.10.2. Spray and/or Sprinkler Systems,
- 3.7.10.3. Halon Systems,
- 3.7.10.4. Fire Hose Stations,
- 3.7.11. Fire Barrier Penetrations.

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The following fire protection Technical Specifications will remain as is:

- 3.3.3.5. Remote Shutdown Instrumentation
- 6.2.2.e. Site Fire Brigade
- 6.5.2.8.e. Fire Protection Audits
- and f.

The licensee also proposed to revise Technical Specifications 6.5.1.6 and 6.5.1.7, On-Site Review Committee (ORC)/Plant Safety Review Committee (PSRC) responsibilities to provide specific reference to the requirement to review the plant fire protection program and submit recommended changes to the Nuclear Safety Review Committee. Technical Specification 6.8.1, Written Procedure Requirements, is revised to include the Fire Protection Program implementation.

In addition, although not specifically included in the Technical Specifications, the licensee committed in the October 30, 1987 letter to report significant degradations of fire protection features in accordance with the criteria contained in 10 CFR 50.72, 10 CFR 50.73 and 10 CFR Part 21.

3.0 EVALUATION

The staff had several concerns with the licensee's proposals, which necessitated additional written clarification. The first was that in removing certain technical specifications and relying upon the Fire Protection Program and procedures, the operating restrictions and surveillances for the fire protection features would be changed so as to be less conservative than either the original plant technical specifications or the Standard Technical Specifications. However, the information submitted in support of the amendment affirms that the operating restrictions and surveillances added to the Fire Protection Program and procedures are equivalent to those which were in the technical specifications. On this basis, the staff's concern has been resolved.

The staff was also concerned that all of the fire protection features which are necessary to satisfy staff fire protection guidelines and requirements and which were encompassed by the original technical specifications would not be adequately surveilled. While it was initially clear that the licensee intended to surveil features protecting safe-shutdown systems, it was not clear that all of the technical specification operating restrictions and surveillances for the relocated fire protection features would be included in the Fire Protection Program and procedures. The licensee responded that their commitments to surveil all fire protection features required to satisfy Appendix A to BTP APCSB 9.5-1 and Appendix R to 10 CFR Part 50 are not being changed in conjunction with the removal of certain fire protection technical specifications. The scope of fire protection features to be surveilled has not been reduced. On this basis, the staff's concern has been resolved.

The staff was also concerned that surveillance of all post-fire, safe shutdown and alternate shutdown systems would not be conducted as stipulated in Generic Letter 81-12. The licensee responded that the existing technical specifications are comprehensive with regard to post-fire shutdown systems and will remain unchanged. On this basis, the staff's concern is resolved.

The licensee had originally proposed to delete the shutdown requirement of Specification 3.7.10.1 Action b. The staff's position is that the loss of the normal fire protection water supply and the inability to establish a back-up fire suppression water system within 24 hours warrant plant shutdown. The licensee responded that the requirements of Specification 3.7.10.1 Action b. will be added to the FSAR with commitment that no modifications to these requirements will be made without prior approval from NRC. The staff considers this response to be acceptable.

The staff was concerned that significant degradations of fire protection would not be reported to the staff. The licensee committed to report such degradations as described in the Discussion section above. The staff is currently reviewing the need for additional guidance and requirements concerning the reporting of fire protection deficiencies.

Finally, the staff was concerned that the entire fire protection program would not be included in the FSAR. The FSAR presently contains information such as the fire hazards analysis, responses to staff questions, fire protection commitments, comparisons of plant design to Appendix A to BTP APCSB, and the methodology for assuring conformance with Appendix R to 10 CFR Part 50, Sections I.I.G, III.J., III.L. and III.O. The staff evaluated this information and found it acceptable as documented in the SER and in Supplements Nos. 3 and 4. The licensee has revised the FSAR to incorporate the fire protection feature operating restrictions and surveillances which have been removed from the technical specifications. This conforms with the guidance issued in Generic Letter 86-10 and therefore is acceptable.

Based on the above evaluation, the staff concludes that the licensee's proposed amendment conforms with the guidance issued in Generic Letter 86-10. The staff has also verified that the updated FSAR contains the complete Callaway Fire Protection Program.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes an inspection or surveillance requirement. 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 published a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. 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; and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: January 13, 1988