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September 24, 1993

Donald F. Schnell
Senior Vice President
Nuclear

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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ULNRC-2855

Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT
REVISION TO TECHNICAL SPECIFICATION 6.9.1.7
SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

Union Electric Company herewith transmits an application for amendment to Facility Operating License No. NPF-30 for Callaway Plant.

This amendment application changes the Semiannual Radioactive Effluent Release Report frequency from semiannually to annually and changes the report submission date from 60 days after January 1 and July 1 of each year to before May 1 of each year. These changes implement an amendment to 10 CFR 50.36a noticed in the Federal Register dated Monday, August 31, 1992 (57 FR 39353).

Attachments 1, 2, 3, and 4 contain the Safety Evaluation, the Significant Hazards Evaluation, the Environmental Consideration, and the Proposed Technical Specification Changes in support of this amendment request. This change request has been approved by the Callaway Onsite Review Committee and the Nuclear Safety Review Board.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Donald F. Schnell".

Donald F. Schnell

RMD/dls

Attachments: Attachment 1 - Safety Evaluation
Attachment 2 - Significant Hazards Evaluation
Attachment 3 - Environmental Consideration
Attachment 4 - Proposed Technical Specification Changes

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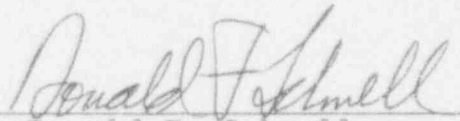
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CITY OF ST. LOUIS)

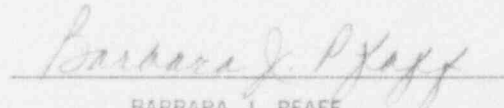
Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Senior Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power 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



Donald F. Schnell
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this 24th day
of September, 1993.



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A140.01 (1143)

SAFETY EVALUATION

Proposed Changes

The proposed technical specification changes extend the reporting period of the Semiannual Radioactive Effluent Release Report from semiannually to annually and change the report submission date from 60 days after January 1 and July 1 of each year to before May 1 of each year. The changes to the reporting period and report date are being made to implement the August 31, 1992 amendment to 10 CFR 50.36a. Other references in the Technical Specifications to the Semiannual Radioactive Effluent Release Report will also be changed to reflect an annual submittal. The affected Technical Specification Sections are 1.18, 3.11.1.4, 3.11.2.6, 6.9.1.7, 6.14c, and the Index.

Evaluation

Changing the reporting period from semiannual to annual is consistent with the final rule published in the Federal Register on August 31, 1992 (57 FR 39353), amending 10 CFR 50.36a. The amendment to 10 CFR 50.36a "reduces the requirements for the submission of reports concerning the quantity of principal nuclides released to unrestricted areas in liquid and gaseous effluents from semiannually to annually."

It is also proposed to change the report submission date from 60 days after January 1 and July 1 of each year to before May 1 of each year. This report date would then be consistent with the reporting requirement for the Annual Radiological Environmental Operating Report as stipulated by Callaway Technical Specification 6.9.1.6. This revised report date would also allow for the compilation of a more comprehensive report resulting from the 12 month report period.

Other references to the Semiannual Radioactive Effluent Release Report will also be changed to annual. These references are located in Technical Specification 1.18, 3.11.1.4, 3.11.2.6, 6.14c, and the Index. These sections require reporting of events or submittal of changes to the Offsite Dose Calculation Manual with the Semiannual Radioactive Effluent Release Report. Changing the reporting to an annual frequency does not change the required actions, controls, or administrative requirements. Only the reporting time frame is proposed to be changed to make it consistent with the proposed reporting requirement.

The proposed changes do not alter any administrative controls over radioactive effluent, nor do the proposed changes involve any physical alterations to the plant with respect to radioactive effluent. The proposed changes are administrative in nature and will not affect or impact plant components, systems, or equipment.

The proposed changes to the Technical Specifications do not involve an unreviewed safety question because operation of the Callaway Plant with these changes would not:

1. Increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report.

The proposed changes do not affect accident initiators or assumptions. The radiological consequences of any accident previously evaluated remain unchanged.

2. Create the possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report.

These changes do not impact any administrative controls nor do they involve physical alterations to the plant with respect to radioactive effluent. There is no new type of accident or malfunction created and the method and manner of plant operation will not change.

3. Reduce the margin of safety as defined in the basis for any technical specifications.

The margin of safety remains unaffected since no design change is made and plant operation remains the same. The proposed changes do not affect any safety limits or boundary or system performance.

On the basis of the above discussions and the considerations presented in the Significant Hazards Evaluation, the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

SIGNIFICANT HAZARDS EVALUATION

The proposed technical specification changes extend the reporting period of the Semiannual Radioactive Effluent Release Report from semiannually to annually and change the report submission date from 60 days after January 1 and July 1 of each year to before May 1 of each year. The changes to the reporting period and report date are being made to implement the August 31, 1992 amendment to 10 CFR 50.36a. Other references in the Technical Specifications to the Semiannual Radioactive Effluent Release Report will also be changed to reflect an annual submittal. The affected Technical Specification Sections are 1.18, 3.11.1.4, 3.11.2.6, 6.9.1.7, 6.14c, and the Index.

The proposed changes do not involve a significant hazards consideration because operation of Callaway Plant with these changes would not:

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

The proposed changes do not affect accident initiators or assumptions. The radiological consequences of any accident previously evaluated remain unchanged.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

These changes do not impact any administrative controls nor do they involve physical alterations to the plant with respect to radioactive effluent. There is no new type of accident or malfunction created and the method and manner of plant operation will not change.

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. The proposed changes do not affect any safety limits or boundary or system performance.

As discussed above, the proposed changes are strictly administrative in nature and have no affect on plant operations. They do 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. These changes do not result in a significant reduction in a margin of safety. Therefore, it has been determined that the proposed changes do not involve a significant hazards consideration.

ENVIRONMENTAL CONSIDERATION

This amendment application requests revisions to Technical Specification Sections 1.18, 3.11.1.4, 3.11.2.6, 6.9.1.7, and 6.14c to extend the reporting period of the Semiannual Radioactive Effluent Release Report from semiannual to annual and change the report date to before May 1 of each year. The nature of the changes is administrative and does not require additional exposure by personnel nor affect levels of radiation present.

Union Electric has determined that the proposed amendment involves changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared in connection with the issuance of this amendment.

PROPOSED TECHNICAL SPECIFICATION CHANGES

Specifications:	Index	Markup
	1.18	Markup
	3.11.1.4	Markup
	3.11.2.6	Markup
	6.9.1.7	Markup
	6.14	Markup

Specifications:	Index	Retyped
	1.18	Retyped
	3.11.1.4	Retyped
	3.11.2.6	Retyped
	6.9.1.7	Retyped
	6.14	Retyped