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UNION ELECTRIC

September 9, 1994

Donald F. Schnell
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Nuclear

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, D.C. 20555

ULNRC-3071

Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT
REVISION TO TECHNICAL SPECIFICATIONS 3/4.8.2.1, 3/4.8.2.2, 3/4.8.3.1 AND 3/4.8.3.2 ELECTRICAL POWER SYSTEMS D.C. SOURCES AND ONSITE POWER DISTRIBUTION

References: 1) ULNRC-2873 dated October 6, 1993
2) ULNRC-3020 dated May 13, 1994

Union Electric Company herewith transmits an application for amendment to Facility Operating License No. NPF-30 for Callaway Plant. This amendment request revises the 125-volt D.C. Sources Specifications (3.8.2.1 and 3.8.2.2) for battery bank and chargers to address the 125-volt D.C. busses and includes provisions for installed swing chargers which will be added to the plant design at the next refueling outage. The Onsite Power Distribution Specifications 3.8.3.1 and 3.8.3.2 are revised to address only the 120-volt A.C. Vital Busses. The Specifications 3.8.3.1 and 3.8.3.2 provisions for the 4160-volt and 480-volt A.C. Emergency Busses are not necessary since they supply power to the battery chargers which have more restrictive Limiting Conditions for Operation, Action Statements, and Surveillances in Specifications 3.8.2.1 and 3.8.2.2. The Specification 3.8.3.1 and 3.8.3.2 requirements for the 125-volt D.C. busses are incorporated into Specifications 3.8.2.1 and 3.8.2.2.

This amendment request revises Specifications 3.8.3.1 and 3.8.3.2 such that the amendment requested by Reference 1 and supplemented by Reference 2 will no longer be needed. The Reference 1 request is withdrawn upon approval of this request.

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

A001
1/1

request. This change has been approved by the Callaway Onsite Review Committee and the Nuclear Safety Review Board.

This amendment includes provisions for flexibility provided by installed swing battery chargers which are being added to the plant design at Refuel 7 in Spring 1995. We request approval of this amendment request by March 31, 1995.

Very truly yours,

for Donald F. Schnell

DS/dls

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

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.

BARBARA LUNGWITZ NOTARY PUBLIC NOTARY SEAL STATE OF MISSOURI

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

SUBSCRIBED and sworn to before me this 12th day of September, 1994.

Barbara Lungwitz

BARBARA LUNGWITZ
NOTARY PUBLIC — STATE OF MISSOURI
MY COMMISSION EXPIRES SEPT. 2, 1995
CITY OE ST. LOUIS

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ATTACHMENT ONE

SAFETY EVALUATION

SAFETY EVALUATION

Proposed Changes

This amendment request proposes a revision to the 125-volt D.C. Sources Specifications 3.8.2.1 and 3.8.2.2 and the Onsite Power Distribution Specifications 3.8.3.1 and 3.8.3.2. These specifications are restructured and simplified such that all requirements for the 125-volt D.C. Sources are included in Specifications 3.8.2.1 and 3.8.2.2. The Onsite Power Distribution Specifications 3.8.3.1 and 3.8.3.2 will be limited to the 120-volt A.C. Vital Busses.

The 125-volt D.C. Sources Specifications 3.8.2.1 and 3.8.2.2 for battery banks and chargers is revised to also address the 125-volt D.C. busses. A surveillance (4.8.2.1.a.3)) is added to assure the busses are energized by verifying correct breaker alignment and indicated voltage on the busses at least once per 7 days. Specifications 3.8.2.1 and 3.8.2.2 are also revised to include provisions for installed swing chargers which will be added to the plant design at the next refueling outage.

The Onsite Power Distribution Specifications 3.8.3.1 and 3.8.3.2 are revised to address only the 120-volt A.C. Vital Busses. The specifications for the 4160-volt and 480-volt Emergency Busses are not necessary since these busses supply power to the battery chargers which have more restrictive Limiting Conditions for Operation (LCO), Action and Surveillance Requirements (SR) in Specification 3.8.2.1 and 3.8.2.2. The definition of "Operable" as used by Union Electric requires that when a line is de-energized the most restrictive allowed outage times (AOT) for the bus and/or the loads it supplies governs the plant actions as prescribed by the Technical Specifications.

Plant Description

Figure 1 is a simplified drawing of the existing safety-related 125-volt D.C. system at Callaway. This figure shows the connections from the two 4160-volt A.C. Emergency Busses (NB01 and NB02) through the four 480-volt A.C. Emergency Busses (NG01/NG03, NG04/NG02). The NG Busses supply power to the four full capacity chargers (NK21/NK23, NK22/NK24). Each charger supplies a Class 1E 125-volt D.C. bus (NK01, NK03, NK02, and NK04) and an associated 125-volt battery bank (NK11, NK13, NK12, or NK14).

Each D.C. bus also supplies a class 1E 120-volt A.C. Vital Bus (NN01, NN03, NN02, or NN04) through associated inverters (NN11, NN13, NN12, or NN14). Final Safety Analysis Report (FSAR) Figures 8.3-1 (sheets 1 and 2), 8.3-2, and 8.3-6 provide a more detailed depiction of these interconnections.

Class 1E A.C. System

The Class 1E A.C. system distributes power at 4160-volt, 480-volt, 208/120-volt, and 120-volt A.C. to all safety-related loads. Also, the Class 1E A.C. system supplies certain selected loads

which are not safety-related but are important to the plant operation. FSAR Figure 8.3-2 lists the major safety-related and isolated nonsafety-related loads supplied from the Class 1E A.C. system.

In addition to the above power distribution, the Class 1E A.C. system contains standby power sources (diesel generators) which provide the power required for safe shutdown in the event of a loss of the preferred power sources.

Each 4160-volt load group (NB) is supplied by two preferred power supply feeders and one diesel generator (standby) supply feeder. Each 4160-volt bus supplies motor loads and 4.0-kV/480-volt load center transformers with their associated 480-volt busses (NG).

The Class 1E A.C. system is divided into two redundant load groups (load groups 1 and 2). Either one of the load groups is capable of providing power to safely reach cold shutdown for that unit. Each A.C. load group consists of a 4160-volt bus, 480-volt load centers, 480-volt motor control centers, and lower voltage A.C. supplies.

Class 1E D.C. Power System

The existing D.C. power system consists of four independent Class 1E 125-volt D.C. subsystems, four non-Class 1E 125-volt D.C. subsystems, and one non-Class 1E 250-volt D.C. system. The D.C. power system is designed to provide reliable and continuous power for controls, instrumentation, inverters, and D.C. emergency auxiliaries.

The Class 1E D.C. system provides D.C. electric power to the Class 1E D.C. loads and for control and switching of the Class 1E systems. Physical separation, electrical isolation, and redundancy are provided to comply with the requirements of IEEE 308. The four Class 1E D.C. power subsystems are shown in FSAR Figure 8.3-6. Subsystems 1 and 4 provide control power for A.C. Load Groups 1 and 2, respectively. These subsystems also provide vital instrumentation and control power for channels 1 and 4, respectively, of the reactor protection and engineered safety features systems. DC subsystems 2 and 3 provide vital instrumentation and control power for channels 2 and 3, respectively, of the reactor protection and engineered safety features systems. Each Class 1E D.C. power subsystem consists of one 125-volt battery bank, one battery charger, one inverter, and distribution switchboard busses. The battery chargers for D.C. subsystems 1 and 3 are supplied 480-volt A.C. power from different Class 1E busses of Load Group 1. Similarly, the battery chargers for D.C. subsystems 2 and 4 are supplied 480-volt A.C. power from different Class 1E busses of Load Group 2. The inverters provide four independent 120-volt A.C. vital instrumentation and control power supplies for the channels of reactor protection and engineered safety features systems.

Currently, one spare battery charger and one spare inverter are provided for the power block. These items are physically located

central to all of the Class 1E D.C. systems. They are not, however, electrically connected. In the event of the failure of a charger or inverter, the spare could be connected to the affected system. Therefore, the malfunctioning equipment may be repaired without imposing long-term disruption of the system. A design change to be implemented at Refuel 7 to permanently install seismically qualified swing chargers is described below. The spare inverter will be removed in conjunction with the inverter upgrades described below.

The batteries, racks, chargers, inverters, and auxiliary distribution equipment (switchboards and transfer switches) are designated seismic Category I, and are designed to maintain their functional capability during and after a safe shutdown earthquake (SSE).

Vital Instrument A.C. Power Supply

Four independent Class 1E 120-volt vital instrument A.C. power supplies are provided to supply the four channels of the protection systems and reactor control systems. Each vital instrument A.C. power supply consists of one inverter, one distribution bus, and one manual transfer switch. Normally, the inverter is operating to supply the vital A.C. bus. Each inverter is supplied by a separate Class 1E battery system, as described in FSAR Section 8.3.2. Currently, if an inverter is inoperable or is to be removed from service, the vital A.C. bus via a 480/120-volt transformer can be supplied from the 480-volt A.C. backup bus associated with the same load group through the manual transfer switch. A key interlock is provided to ensure that only a single transfer to the inverter backup transformer can be made at one time for each load group.

Refuel 7 Modifications

Two modifications will be implemented during Refuel 7, one providing permanently installed swing chargers for the 125-volt D.C. system and a second modification providing uninterruptable power supplies (UPS) for the 120-volt A.C. Vital Instrument Power Supplies.

The current spare battery charger will be permanently installed as a swing charger for the 125-volt D.C. Busses NK01 and NK03. Another charger is being procured and will be installed as a swing charger for 125-volt D.C. Busses NK04 and NK02. Each Class 1E D.C. power subsystem will then consist of one 125-volt battery, one primary battery charger, one UPS, distribution switchboards, a shared swing battery charger, and swing battery charger transfer switches. The battery chargers for D.C. subsystems 1 and 3 will supply 480-volt A.C. power from different Class 1E busses of Load Group 1 while their shared swing battery charger will supply 480-volt A.C. power from either a Class 1E bus of Load Group 1 or a Non-class 1E bus from load group 5. Similarly, the battery chargers for D.C. subsystems 2 and 4 will be supplied 480-volt A.C. power from different Class 1E busses of Load Group 2 while their shared swing battery charger will supply 480-volt A.C. power

from either a Class 1E bus of Load Group 2 or a Non-class 1E bus from load group 6.

Two swing battery charger subsystems will be provided for the Class 1E D.C. power subsystems. One for use with Class 1E D.C. subsystems 1 and 3 and the other for use with Class 1E D.C. subsystems 2 and 4. The swing chargers are permanently connected to their respective Class 1E D.C. power subsystems via manually controlled electrically operated transfer switches. In the event of a failure of a primary battery charger, the respective swing battery charger can be quickly aligned to provide power to the affected D.C. power subsystem. Therefore, the malfunctioning equipment may be repaired without imposing long-term disruption of the system. Once the swing battery charger is aligned to a given D.C. power subsystem all of the required annunciated trouble conditions are monitored on the swing charger and an annunciator window on the main control boards is lit to alert the control room staff that a swing charger is in use.

The batteries, racks, chargers, inverters, and auxiliary distribution equipment (switchboards and transfer switches) are designated seismic Category 1, and are designed to maintain their functional capability during and after an SSE. This modification is being performed under the provisions of 10CFR50.59. The modification allows the changes to Specifications 3.8.2.1 and 3.8.2.2 to allow the 125-volt D.C. power to be supplied from the installed swing chargers, where the previous design did not allow switchover in the Technical Specification AOT of 2 hours.

The second modification is an upgrade to the existing inverters (NN11, NN13, NN12, and NN14). Each existing inverter will be replaced with a state-of-the-art uninterruptable power supply (UPS) consisting of an inverter, a standby 480 to 120-volt isolation transformer, and an automatic transfer switch. The gating and synchronization circuit of the new UPS will monitor the plant A.C. system and keep inverter output in-phase and at the same frequency as the backup supply. This allows make-before-break transfers so that the bus is not de-energized at any time. The load will be automatically transferred to the backup supply when any one of the following conditions is present:

1. Undervoltage detected on the output of the inverter SCR bridge.
2. Undervoltage detected on the output of the inverter.
3. Manual initiation.
4. Output overcurrent.

Each of these conditions will be locally alarmed and will generate a main control board annunciator and plant computer alarm. Technical Specification Action 3.8.3.1 or 3.8.3.2 will be entered when loads are transferred to the backup supply. Figure 3 provides a schematic of this design change. This modification requires no Technical Specification changes and is being performed under the provisions of 10CFR50.59. It will provide improved plant reliability in the event of inverter problems or failures.

Detailed Description of Technical Specification Changes

- Specification 3/4.8.2.1 D.C. Sources - Operating

  The LCO is modified to include in part a), Busses NK01 and NK03 and installed full-capacity charger NK25. Part b) is modified to include Busses NK02 and NK04 and installed full capacity charger NK26. The busses have been added to the LCO so this specification becomes stand-alone and does not also rely on current Specification 3.8.3.1. The swing chargers are added to the LCO to allow for the flexibility provided by the modifications being implemented at the next refueling outage. The chargers will be installed such that each can only supply one bus at a time. The chargers are equivalent to those in present design. They are seismic Category I and meet separation criteria by use of appropriate isolation devices.

  The Action is modified to replace the term battery bank and/or full capacity charger with D.C. electrical source. This term describes the battery bank, full capacity charger, and the D.C. bus. This is also clarified in the Bases.

  Surveillance 4.8.2.1.a.3) is added to this specification. This surveillance was included in Specification 4.8.3.1, but is added here also since the D.C. busses are now contained in Specification 3.8.2.1. The term D.C. electrical source is also used.

- Specification 3/4.8.2.2 D.C. Sources - Shutdown

  The LCO is modified to address the D.C. busses and the swing chargers consistent with 3/4.8.2.1, with the exception that only one D.C. Source is required in Modes 5 and 6.

  The Action is modified to use the term D.C. electrical source consistent with 3/4.8.2.1.

  The SR is modified to use the term D.C. electrical source.

- Specification 3/4.8.3.1 Onsite Power Distribution - Operating

  The LCO is modified to address only the 120-volt A.C. Vital Busses and their associated inverters (UPS). The requirements for 4160-volt A.C. Emergency Busses (NB01 and NB02) and 480-volt A.C. Emergency Busses (NG01, NG03, NG05E, NG02, NG04, and NG06E) are deleted. The definition of "OPERABLE" as used by Union Electric requires that when a bus is de-energized the most restrictive AOT for the bus and/or the loads it supplies governs the plant actions as described by Technical Specifications. Busses NB01/NG01 and NB02/NG02 will supply a Class 1E battery charger. If they are de-energized, the 2-hour AOT of LCO 3.8.2.1 will apply since a battery charger will be de-energized. As an example, busses NG03 and NG04 will normally supply Class 1E battery chargers. If one or both of these busses were de-energized and the D.C. bus was supplied by the associated swing charger, the AOTs of its

remaining loads would be assessed. In all likelihood, it would be restricted to the AOT associated with a containment isolation valve which would be 4 hours. Busses NG05E and NG06E supply loads associated with auxiliary equipment of the Essential Service Water System. The AOT for them would be 72 hours which is consistent with Specification 3/4.7.4.

LCO 3.8.3.1 contained a requirement that tie breakers between redundant busses be open. This requirement pertains to tie breakers 52 NG0116 between 480-volt busses NG01 and NG03 and tie breaker 52 NG0216 between 480-volt busses NG02 and NG03. The purpose is to assure the 4 kV grid degraded voltage setpoints are appropriate. This requirement is relocated to Table 3.3-3. Functional Unit 8.b. (Loss of Power 4 kV Bus Undervoltage - grid degraded voltage) which allows a single bus tie breaker to be closed for up to 8 hours. This is justified based on the small probability that voltage requirements on the system would be low enough to affect the setpoint, and the redundant train is fully independent and protected by its grid degraded voltage instrumentation and logic. A requirement has also been added to Table 4.3-2, Functional Unit 8.b. to verify on a weekly basis that these breakers are open.

The portion of LCO 3.8.3.1 which addresses the 125-volt D.C. busses NK01 - NK04 is deleted since it will be incorporated into 3.8.2.1.

Action 3.8.3.1.a is deleted. It only provided actions in the event an A.C. emergency bus was not fully energized. As described above, this action is not necessary because the loads the busses supply power to dictate the appropriate actions to be taken to meet Technical Specification requirements.

Action 3.8.3.1.c is deleted. It is covered by proposed LCO 3.8.2.1 and its action statement. Action 3.8.3.1.c is actually less restrictive than 3.8.2.1 because of the logical connector "or" and should also be deleted to eliminate a source of possible confusion.

- Specification 3/4.8.3.2 Onsite Power Distribution - Shutdown

  The LCO is modified to address only the 120-volt A.C. Vital and delete those portions that address the A.C. Emergency Busses and the 125-volt D.C. busses. This is consistent with Specification 3/4.8.3.1 proposed changes.

  The action is also modified to address only the 120-volt A.C. Vital Busses consistent with 3/4.8.3.1.

Evaluation

The changes represent a restructuring, so that all requirements associated with the D.C. Sources, including the busses, are addressed in a single specification. Provisions are added to

allow use of installed swing chargers to meet the LCO. The installed swing chargers are equivalent to existing full capacity chargers. The Onsite Power Distribution Specifications are revised to delete LCO and Action Statements for the A.C. Emergency Busses. The actions associated with equipment which are powered from these busses will dictate the plant actions as prescribed by Technical Specifications.

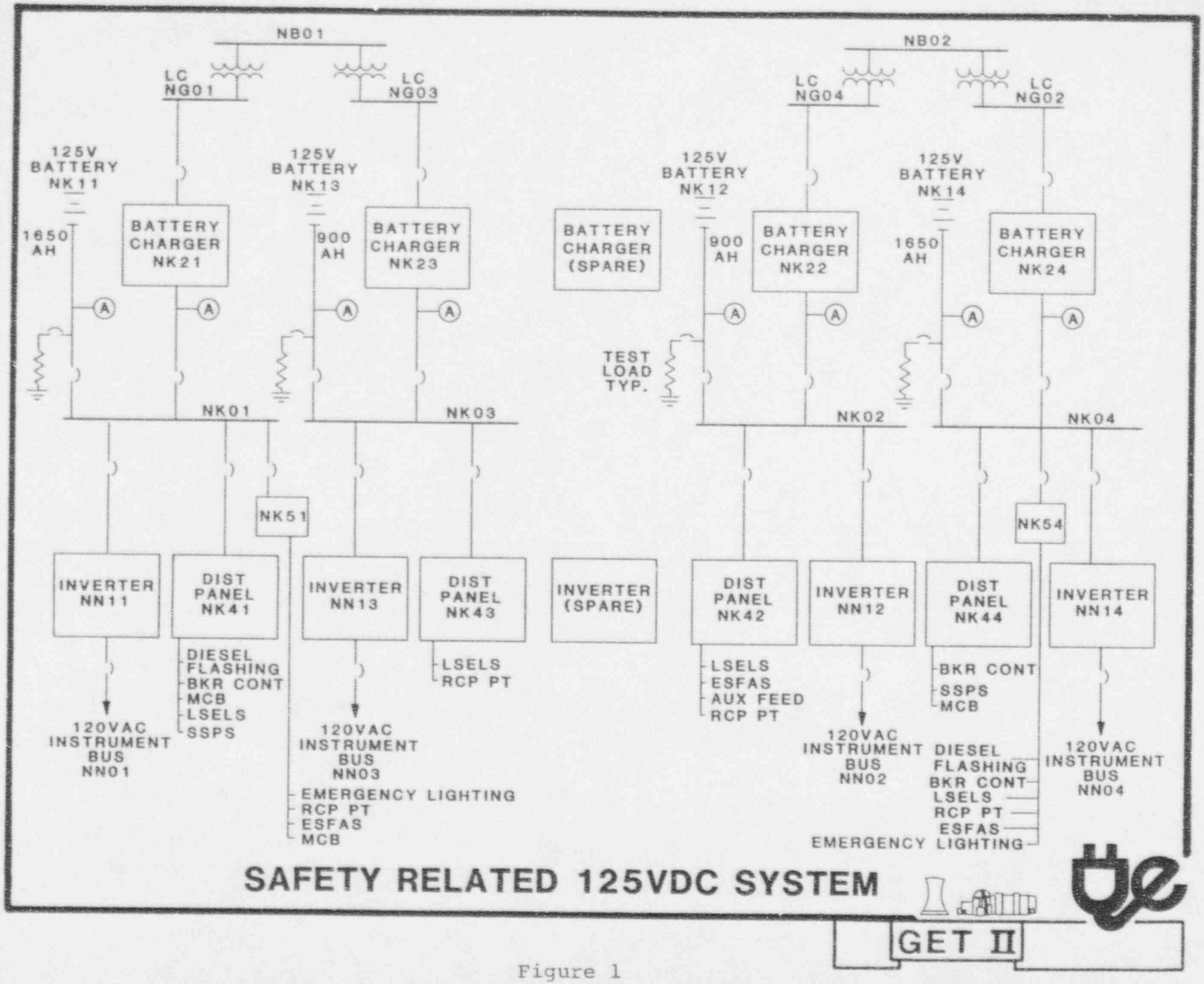
The proposed changes do not involve an unreviewed safety question because operation of Callaway Plant in accordance with these changes would not:

1) Involve an increase in the probability of occurrence or the consequence of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. These proposed Technical Specification changes do not involve any hardware changes nor do they affect the probability of any event initiators. There will be no change to normal plant operating parameters or accident mitigation capabilities. There will be no increase in the consequences of any accident or equipment malfunction.

2) Create the possibility for accident or malfunction of equipment of a different type than previously evaluated in the FSAR. The proposed Technical Specification changes do not involve any design changes nor are there any changes to the method by which any safety-related plant system performs its safety function. The normal manner of plant operation is unaffected. No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result of these changes.

3) Involve a reduction in the margin of safety as defined in the basis for any Technical Specification. There will be no affect on the manner in which safety limits or limiting safety system settings are determined, nor will there be any effect in those plant systems necessary to assure the accomplishment of protection functions. There will be no impact on DNBR limits, F_Q, F-delta-H, LOCA PCT, peak local power density or any other margin of safety.

Based on the information presented above, the proposed amendment does not involve an unreviewed safety question and will not adversely affect or endanger the health and safety of the general public.


NB01
LC NG01
LC NG03
125V BATTERY NK11
1650 AH
BATTERY CHARGER NK21
125V BATTERY NK13
900 AH
BATTERY CHARGER NK23
NK01
NK03
NK51
INVERTER NN11
DIST PANEL NK41
INVERTER NN13
DIST PANEL NK43
DIESEL
FLASHING
BKR CONT
MCB
LSELS
SSPS
LSELS
RCP PT
120VAC INSTRUMENT BUS NN01
120VAC INSTRUMENT BUS NN03
EMERGENCY LIGHTING
RCP PT
ESFAS
MCB
NB02
LC NG04
LC NG02
BATTERY CHARGER (SPARE)
125V BATTERY NK12
900 AH
BATTERY CHARGER NK22
125V BATTERY NK14
1650 AH
BATTERY CHARGER NK24
TEST LOAD TYP.
NK02
NK04
NK54
INVERTER (SPARE)
DIST PANEL NK42
INVERTER NN12
DIST PANEL NK44
INVERTER NN14
LSELS
ESFAS
AUX FEED
RCP PT
BKR CONT
SSPS
MCB
120VAC INSTRUMENT BUS NN02
DIESEL
FLASHING
BKR CONT
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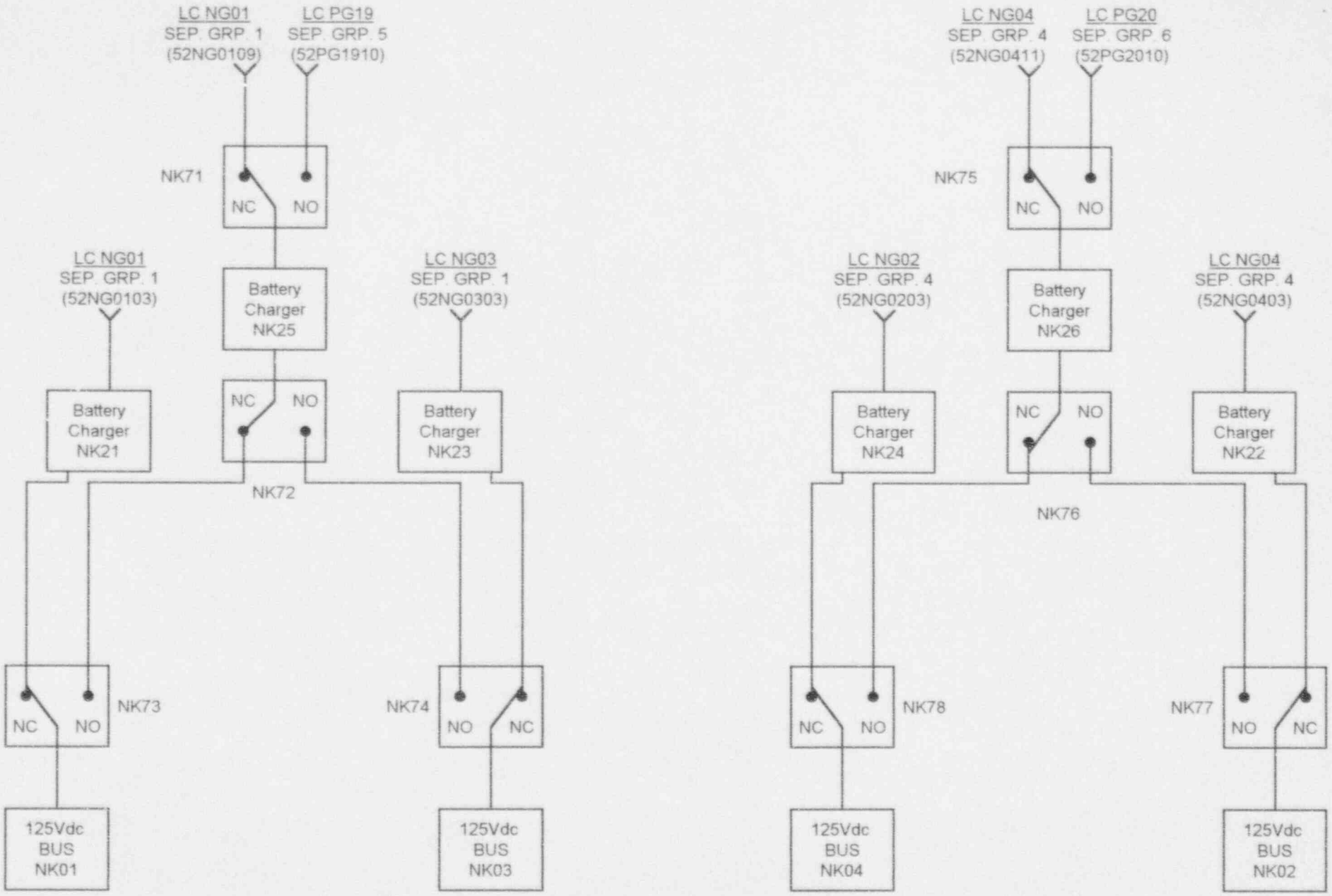
ESFAS
EMERGENCY LIGHTING
120VAC INSTRUMENT BUS NN04
SAFETY RELATED 125VDC SYSTEM
GET II

Figure 1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NK71
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(52NG0103)
Battery
Charger
NK25
LC NG03
SEP. GRP. 1
(52NG0303)
Battery
Charger
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NK23
NK72
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NK73
NK74
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NK01
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BUS
NK03
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Charger
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Battery
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NK77
NO
NC
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BUS
NK04
125Vdc
BUS
NK02

FIGURE 2

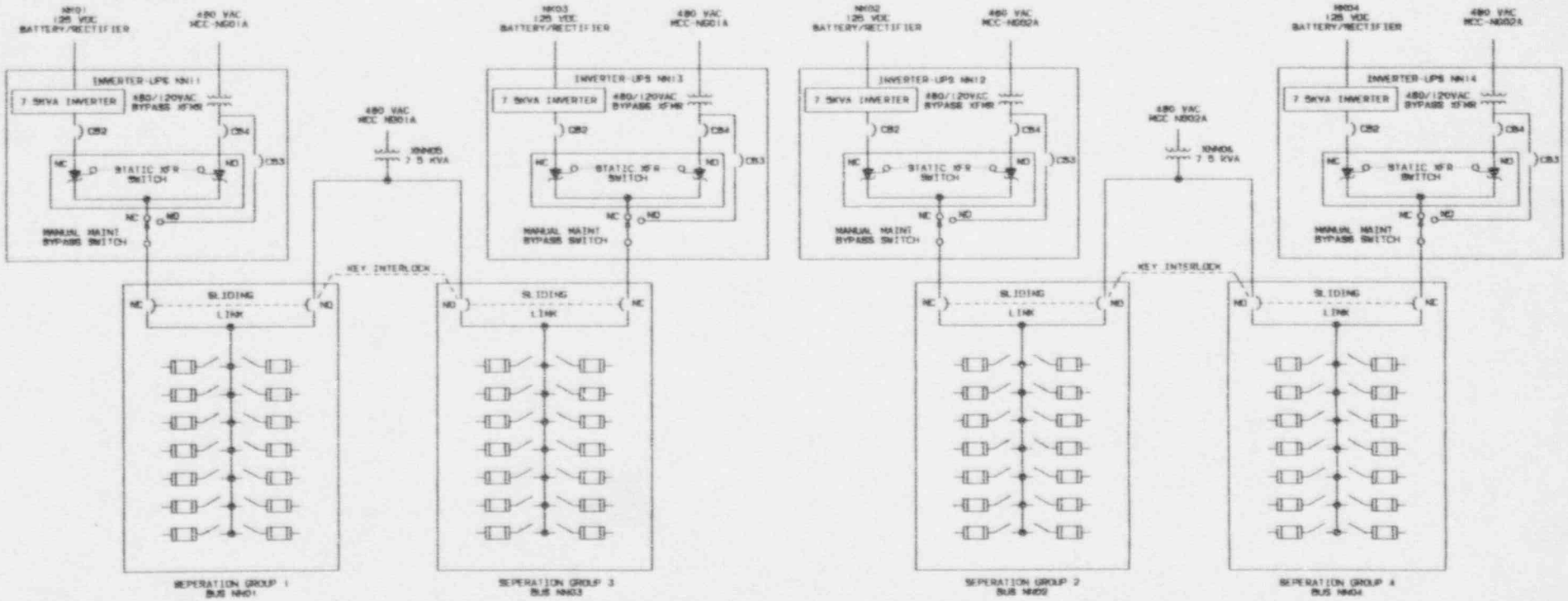

Figure 3

(GAD-0290)

ATTACHMENT TWO

SIGNIFICANT HAZARD EVALUATION

SIGNIFICANT HAZARD EVALUATION

Proposed Changes

This amendment request proposes a revision to the 125-volt D.C. Sources Specifications 3.8.2.1 and 3.8.2.2 and the Onsite Power Distribution SpecificationS 3.8.3.1 and 3.8.3.2. These specifications are restructures and simplified such that all requirements for the 125-volt D.C. Sources are included in Specification 3.8.2.1 and 3.8.2.2. The Onsite Power Distribution Specifications 3.8.3.1 and 3.8.3.2 will be limited to the 120-volt A.C. Vital Busses.

The 125-volt D.C. Sources Specifications 3.8.2.1 and 3.8.2.2 for battery banks and charges is revised to also address the 125-volt D.C. busses. A surveillance (4.8.2.1.a.3)) is added to assure the busses are energized by verifying correct breaker alignment and indicated voltage on the busses at least once per 7 days. Specifications 3.8.2.1 and 3.8.2.2 are also revised to include provisions for installed swing charges which will be added to the plant design at the next refueling outage.

The Onsite Power Distribution Specifications 3.8.3.1 and 3.8.3.2 are revised to address only the 120-volt A.C. Vital Busses. The specifications for the 4160-volt and 480-volt Emergency Busses are not necessary since these busses supply power to the battery chargers which have more restrictive Limiting Conditions for Operation (LCO), Action and Surveillance Requirements (SR) in Specification 3.8.2.1 and 3.8.2.2. The definition of "Operable" as used by Union Electric requires that when a bus is de-energized the most restrictive allowed outage times (AOT) for the bus and/or the loads it supplies governs the plant actions as prescribed by the Technical Specifications.

Evaluation

The changes represent a restructuring, so that all requirements associated with the D.C. Sources, including the busses, are addressed in a single specification. Provisions are added to allow use of installed swing chargers to meet the LCO. The installed swing chargers are equivalent to existing full capacity chargers. The Onsite Power Distribution Specifications are revised to delete LCO and Action Statements for the A.C. Emergency Busses. The actions associated with equipment which are powered from these busses will dictate the plant actions as prescribed by Technical Specifications.

The proposed changes to the Technical Specifications do not involve a significant hazards consideration because operation of Callaway Plant in accordance with these changes would not:

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

proposed Technical Specification changes do not involve any hardware changes nor do they affect the probability of any event initiators. There will be no change to normal plant operating parameters or accident mitigation capabilities. There will be no increase in the consequences of any accident or equipment malfunction.

2) Create the possibility for accident or malfunction of equipment of a different type than previously evaluated in the FSAR. The proposed Technical Specification changes do not involve any design changes nor are there any changes to the method by which any safety-related plant system performs its safety function. The normal manner of plant operation is unaffected. No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result of these changes.

3) Involve a significant reduction in the margin of safety. There will be no affect on the manner in which safety limits or limiting safety system settings are determined, nor will there be any effect in those plant systems necessary to assure the accomplishment of protection functions. There will be no impact on DNBR limits, F_Q, F-delta-H, LOCA PCT, peak local power density or any other margin of safety.

Based on the information presented above, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any previously evaluated, or involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed changes meet the requirements of 10CFR50.92(c) and does not involve a significant hazards consideration.

ATTACHMENT THREE

ENVIRONMENTAL CONSIDERATION

ENVIRONMENTAL CONSIDERATION

This amendment request proposes a revision the 125-volt D.C. Sources Specifications 3.8.2.1 and 3.8.2.2 and the Onsite Power Distribution Specifications 3.8.3.1 and 3.8.3.2. These specifications are restructured and simplified such that all requirements for the 125-volt D.C. Sources are included in Specifications 3.8.2.1 and 3.8.2.2. The Onsite Power Distribution Specifications 3.8.3.1 and 3.8.3.2 will be limited to the 120 Volt A.C. Vital Busses.

The 125-volt D.C. Sources Specification 3.8.2.1 and 3.8.2.2 for battery banks and chargers is revised to also address the 125-volt D.C. busses. A surveillance (4.8.2.1.a.3)) is added to assure the busses are energized by verifying correct breaker alignment and indicated voltage on the busses at least once per 7 days. Specifications 3.8.2.1 and 3.8.2.2 are also revised to include provisions for installed swing chargers which will be added to the plant design at the next refueling outage.

The Onsite Power Distribution Specifications 3.8.3.1 and 3.8.3.2 are revised to address only the 120-volt A.C. Vital Busses. The specifications for the 4160-volt and 480-volt Emergency Busses are not necessary since these busses supply power to the batter chargers which have more restrictive Limiting Conditions for Operation (LCO), Action and Surveillance Requirements (SR) in Specification 3.8.2.1 and 3.8.2.2. The definition of "Operable" as used by Union Electric requires that when a bus is de-energized the most restrictive allowed outage times (AOT) for the bus and/or the loads it supplies governs the plant actions as prescribed by the Technical Specifications.

The proposed amendment involves changes with respect to the use of facility components located within the restricted area, as defined in 10CFR20, and changes surveillance requirements. Union Electric has determined that the proposed amendment does not involve:

1) A significant hazards consideration, as discussed in Attachment 2 of this amendment application;

2) A significant change in the types or significant increase in the amounts of any effluents that may be released offsite;

3) A significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.