

UNION ELECTRIC COMPANY

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DONALD F. SCHNELL
VICE PRESIDENT

July 17, 1984

MAILING ADDRESS:
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Mr. Harold R. Denton
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

ULNRC-875

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
REVISIONS TO TECHNICAL SPECIFICATIONS 3.4.9.3, 4.6.1.2,
AND 3/4.6.1.2 BASES

Union Electric Company is transmitting three (3) original and forty (40) conformed copies of an application for Amendment to Facility Operating License No. NPF-25 for the Callaway Plant, Unit 1.

This application requests that Callaway Technical Specifications 3.4.9.3, 4.6.1.2, and 3/4.6.1.2 bases be revised to reflect the following changes. The Technical Specification 4.6.1.2, containment leakage surveillance requirement, and its associated bases 3/4.6.1.2 have been revised to provide clarifications on the leak rate testing of valves pressurized with fluid from a seal system. The clarifications are provided by the incorporation of Standard Technical Specifications 4.6.1.2.d.3 and 4.6.1.2.g (NUREG-0452, Revision 4) into Callaway Specifications 4.6.1.2.d.3 and 4.6.1.2.h and by an addition to bases 3/4.6.1.2 to include Callaway Plant specific requirements that are consistent with 10CFR50, Appendix J, Paragraph III.C.3. In addition the Callaway FSAR Section 6.2.6.3, Containment Isolation Valve Leakage Rate Tests (Type C tests), will be revised as attached and will be incorporated into the next revision of the FSAR.

The overpressure protection systems Technical Specification, limiting condition for operation (LCO), 3.4.9.3.a is being changed to set the allowable tolerance on the RHR suction relief valves at + 3% rather than + 1%. This change makes the Specification consistent with the requirements of the ASME Boiler and Pressure Vessel Code, Section III, Article NB 7513.1, as long as the maximum pressure allowed is less than the lowest pressure setting of the power operated relief valves (PORVs). In addition, Action item (a) for this Specification is being changed as indicated in the enclosure to make the Action item consistent with the LCO.

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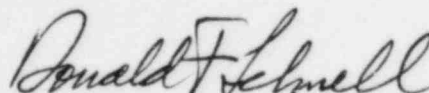
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The proposed changes would become effective for Union Electric implementation upon NRC approval. Attachment 1 to this letter describes all enclosures transmitted herewith.

Enclosed is a check for the \$150.00 application fee as requested by 10CFR170.21.

Very truly yours,

A handwritten signature in cursive script, reading "Donald F. Schnell".

D. F. Schnell

DJW/lw

Attachments

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

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is 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
Donald F. Schnell
Vice President
Nuclear

SUBSCRIBED and sworn to before me this 1th day of July, 1984.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1985
ST. LOUIS COUNTY

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7/17/84

Attachment 1

Enclosure A	Safety Evaluation
Enclosure B	Significant Hazards Consideration
Enclosure C	Marked Technical Specifications and Bases
Enclosure D	Marked FSAR Section 6.2.6.3

SAFETY EVALUATION

This amendment request revises Technical Specification 4.6.1.2, and its associated bases, and FSAR Section 6.2.6.3 to provide clarifications on the leak rate testing of valves pressurized with fluid from a seal system. These clarifications are consistent with 10CFR50, Appendix J, Paragraph III.C.3 and Standard Technical Specifications 4.6.1.2.d.3 and 4.6.1.2.g (NUREG-0452, Revision 4). In addition, a specific example of the applicability of these clarifications is cited regarding containment penetrations P-28, P-29, P-71, and P-73 (essential service water to/from containment coolers as depicted on FSAR Fig. 6.2.4-1). For these penetrations the water volume contained in the piping inside containment (from the cooler to the inboard isolation valve) provides a passive water seal on the affected valves (EF-HV-33, 34, 45, and 46 as shown on FSAR Fig. 9.2-2, sheet 2). The water inventory inside containment is sufficient to assure the sealing function for at least 30 days at a pressure of 1.10 P_a (53 psig) when the leakage for each of these penetrations is less than or equal to 7500 cc/hr as stated in the revised bases for Technical Specification 3/4.6.1.2. This leakage acceptance criterion is being added to the bases per 10CFR50, Appendix J, Paragraph II.C.3.(a) and Standard Review Plan 6.2.6 and is based upon the as-built piping configuration. The water volume from the air cooler to the nearest containment isolation valve would be depleted in 30 days if the leakage rate were greater than 7641 cc/hr.

In addition this amendment request revises Technical Specification 3.4.9.3 limiting condition for operation LCO (a) and Action item (a). For LCO (a) the allowable tolerance on the RHR suction relief valves is being changed to + 3% rather than + 1%. The + 1% tolerance was selected based on the tolerances for the pressurizer code safety valves. To be consistent with the requirements of ASME Boiler and Pressure Vessel Code, Section III, Article NB 7513.1, a tolerance of + 3% is acceptable, as long as the maximum pressure allowed is less than the lowest pressure setting of the power operated relief valves (PORVs). Also, Action item (a) as written is not consistent with the LCO as specified. The intent of the Specification is to give credit for the availability of the RHR suction relief valves for cold overpressure protection. In the Standard Technical Specifications (NUREG-0452), Revision 4), when relying on PORVs for cold overpressure protection, if one PORV becomes inoperable, seven days are allowed for restoring it or an action would be required for Callaway to open a two square inch vent. Regardless of the status of the PORVs, this same action should be applicable if Callaway loses one RHR suction relief valve while relying on RHR suction relief for cold overpressure protection.

Pursuant to the above information, this amendment request does not adversely affect or endanger the health of the general public and does not involve an unreviewed safety question.

SIGNIFICANT HAZARDS CONSIDERATION

This amendment request revises Technical Specification 4.6.1.2, and its associated bases, and FSAR Section 6.2.6.3 to provide clarifications on the leak rate testing of valves pressurized with fluid from a seal system. These clarifications are consistent with 10CFR50, Appendix J, Paragraph III.C.3 and Standard Technical Specifications 4.6.1.2.d.3 and 4.6.1.2.g (NUREG-0452, Revision 4). Containment penetrations for essential service water supply to and return from the containment coolers satisfy the sealed system exclusion allowed by 10CFR50, Appendix J, Paragraph III.C.3.

In addition this amendment request revises Technical Specification 3.4.9.3 limiting condition for operation, LCO (a) and Action item (a). The LCO is revised to make the allowable tolerance on the RHR suction relief valves consistent with ASME Boiler and Pressure Vessel Code, Section III, Article NB 7513.1. Further, Action item (a) is being modified slightly to make it consistent with the LCO as specified and consistent with the intent as given in the Standard Technical Specifications (NUREG-0452, Revision 4).

The Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (48FR14870). This amendment request is similar to the example of an action involving no significant hazards consideration which relates to a change to make the license conform to regulations, where the license amendment results in changes to facility operations clearly in keeping with the regulations.

This amendment request does not involve a significant increase in the probability or consequences of an accident or other adverse condition over previous evaluations; nor create the possibility of a new or different kind of accident or condition over previous evaluations; nor involve a significant reduction in a margin of safety. Based on the foregoing, the requested amendment does not present a significant hazard.