

UNION ELECTRIC COMPANY

1901 GRATIOT STREET  
ST. LOUIS, MISSOURI

DONALD F. SCHNELL  
VICE PRESIDENT

October 3, 1984

MAILING ADDRESS:  
P. O. BOX 149  
ST. LOUIS, MISSOURI 63166

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

Dear Mr. Denton:

ULNRC-937

DOCKET NUMBER 50-483  
CALLAWAY PLANT, UNIT 1  
ADDITION TO TECHNICAL SPECIFICATION TABLE 4.11-1

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.

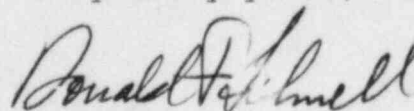
This application requests that Technical Specification Table 4.11-1 be revised to include two additional Batch Waste Release Tanks. Two 100,000 gallon tanks are required for storage and/or discharge due to an increase in the volume of secondary liquid waste, specifically waste from condensate demineralizer regenerations. Originally, the volume of waste from regeneration of the condensate demineralizers was estimated at 17,000 gallons per day. Recent operating experience has shown waste volumes averaging 43,000 gallons per day. Two additional 100,000 gallon tanks should provide adequate capability based on revised estimates.

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 application fee as requested by 10CFR171.21.

Very truly yours,

8410090312 841003  
PDR ADDCK 05000483  
P PDR



Donald F. Schnell

DJW/lw

Attachments

Acc'd  
1/1

Rec'd w/ check \$150.00

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 3rd day of October, 1984

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

10/3/84

Attachment 1

Enclosure A	Safety Evaluation
Enclosure B	Significant Hazards Consideration
Enclosure C	Marked Technical Specification Pages
Enclosure D	Environmental Evaluation

### Safety Evaluation

This amendment request is for revision of Technical Specification Table 4.11-1 to include two additional Batch Waste Release Tanks. These two 100,000 gallon tanks are required for storage and/or discharge due to an increase in the volume of secondary liquid waste; specifically waste from condensate demineralizer regenerations. Originally, the volume of waste from regeneration of the condensate demineralizers was estimated at 17,000 gallons per day. Recent operating experience has shown waste volumes averaging 43,000 gallons per day. Waste water from demineralizers will be neutralized and processed through a filter to remove total suspended solids. No other treatment will be provided unless it is required to meet NPDES limits for discharge or Technical Specification limits. If a primary to secondary leak should occur, this waste stream would be processed through a filter, the secondary liquid waste evaporator, and a demineralizer for discharge or for recycle.

The tanks will be located near the southwest corner of the radwaste building and will be protected by a concrete dike built to contain one tank volume in the event of a tank failure. Tank overflows will be piped directly to the diked area sump. The drain from this sump will be directed to the Dirty Radwaste Equipment and Floor Drain system. High level alarms on the tanks will immediately signal valves to close on the tank fill lines and to trip off the system's transfer pumps which will terminate flow going to the tanks. A radiation monitor located inside the radwaste building will continuously monitor waste water being discharged from the tanks to the discharge line. A valve located downstream of this monitor will be isolated on a high radiation signal which will terminate the discharge.

Quality requirements and design features of the system will comply with Regulatory Guide 1.143.

Water can also be routed to these tanks from liquid radwaste and steam generator blowdown; however, the volume of waste from these waste streams is not expected to increase from the expected flows given in the FSAR Chapter 11. Since the proposed tanks will contain mainly secondary liquid waste, the activity in these tanks is expected to be considerably less than that of the refueling water storage tank. A greater volume of waste water will be discharged than originally estimated; however, because the activity of the secondary liquid waste system is normally negligible, the amount of radioactivity released to the environment will not increase significantly and will not approach the activities for liquid effluents given in Table 11.2-1 of the FSAR. Therefore, the revision to this Technical Specification does not adversely affect or endanger the health or safety of the general public and does not involve an unreviewed safety question.



10/3/84

Significant Hazards Consideration

This amendment request is for revision of Technical Specification Table 4.11-1 to include two additional Batch Waste Release Tanks. These two 100,000 gallon tanks are required for storage and/or discharge due to an increase in the estimated volume of secondary liquid waste, specifically waste from condensate demineralizer regenerations. Originally, the volume of waste from regeneration of the condensate demineralizers was estimated at 17,000 gallons per day. Recent operating experience has shown waste volumes averaging 43,000 gallons per day. The two tanks will be protected by a concrete dike built to contain one tank volume in the event of a tank failure. Tank overflows will be piped directly to the diked area sump. The drain from this sump will be directed to the Dirty Radwaste Equipment and Floor Drain system. The activity in these tanks is expected to be considerably less than the activity in the refueling water storage tank, or in the reactor makeup water storage tank, since the largest portion of water going to these tanks will be secondary liquid waste. Although a greater volume of waste water will be discharged from original estimates, the volume of waste from waste streams is not expected to increase from the flows given in Chapter 11 of the FSAR. In addition the activity of the secondary liquid waste system is normally negligible and the amount of radioactivity released to the environment will not increase significantly. The activities will not approach the activities for liquid effluents given in Table 11.2-1 of the FSAR.

The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (48 FR 14870). One of the examples of actions involving no significant hazards consideration relates to a change that constitutes an additional limitation, restriction, or control not presently in the Technical Specifications. The addition of two 100,000 gallon tanks will provide additional liquid waste system control not presently in the Technical Specifications.

This amendment request does not involve a significant increase in the probability or consequence of an accident or other adverse condition over previous evaluations; or create the possibility of a new or different kind of accident or condition over previous evaluations; or involve a significant reduction in a margin of safety. Based on this information, the requested license amendment does not present a significant hazard.