



UNION ELECTRIC COMPANY

1901 Gratiot Street, St. Louis

August 9, 1985

Donald F. Schnell
Vice President

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

Dear Mr. Denton:

ULNRC-1151

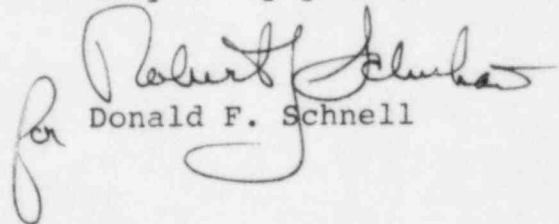
DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
REFUELING INTERVAL TECHNICAL SPECIFICATION CHANGE REQUEST

- References: 1) ULNRC-1134 dated July 10, 1985
2) Letter from B. J. Youngblood to
D. F. Schnell dated August 6, 1985

Reference 1 transmitted a technical specification change request to provide an extension of the initial 18-month interval for certain surveillance tests. Reference 2 requested that we expand the no significant hazards evaluation from Reference 1.

Provided herewith is the expanded evaluation as requested. If there are any questions, please contact us.

Very truly yours,


for Donald F. Schnell


DS/bjk
Attachment

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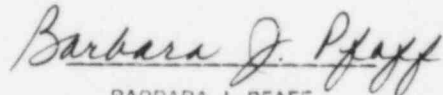
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STATE OF MISSOURI)
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CITY OF ST. LOUIS)

Robert J. Schukai, of lawful age, being first duly sworn upon oath says that he is General Manager-Engineering (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.

By 
Robert J. Schukai
General Manager-Engineering
Nuclear

SUBSCRIBED and sworn to before me this 9th day of August, 1985.


BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1989
ST. LOUIS COUNTY

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SIGNIFICANT HAZARDS EVALUATION

Reference: ULNRC-1134 dated July 10, 1985

As discussed in the Safety Evaluation transmitted by Reference 1, the extensions requested are considered to be justified based on a combination of preoperational test results, surveillances that are current into Refuel I, surveillances that are periodically performed at power, and system performance verification following two operational occurrences. The following discussions address each of the parts of the amendment request and provide an analysis using the standards of 10CFR50.92 (i.e., the three factor test):

1) T.S. 4.3.1.1-17 Safety Injection Input From ESF

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The equipment tested by this surveillance is safety-related and highly reliable. In addition because of overlap testing, all portions of this circuit are tested in other surveillance tests with the exception of the control board manual switches as described in Item 2, below.

This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

2) T.S. 4.3.2.1-1.a Safety Injection - Manual Initiation

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The equipment tested by this surveillance is safety-related and highly reliable. Based on system performance verification following an operational occurrence (SI) on 3/30/85 and through the process of overlap testing, all portions of this circuit have been exercised within the past 18 months with the exception of the control board manual switches. These control board switches and their contacts require no calibration, are not required to respond to setpoints and have historically exhibited a low failure rate.

This change does not create the possibility of a new or different kind of accident from any accident previously

evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

3&4) T.S. 4.3.2.1-2.a Containment Spray - Manual Initiation,
T.S. 4.3.2.1-3.b.1) Phase B Isolation - Manual Initiation

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The equipment tested by these surveillances is safety-related and highly reliable. In addition because of overlap testing, all portions of these circuits are tested in other surveillance tests with the exception of the control board manual switches and the load sequencer output relay driver cards between the load sequencer and the containment spray pumps. In this case simultaneous depression of two switches is required for actuation which results in both containment spray actuation and phase B isolation. These control board switches and their contacts require no calibration, are not required to respond to setpoints and have historically exhibited a low failure rate.

This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

5) T.S. 4.5.2.e.2 ECCS Actuation on Safety Injection Signal

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. This is based on system performance verification following an operational occurrence (SI) on 3/30/85 and through the process of overlap testing.

This change does not create the probability of a new or different kind of accident from any accident previously evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

6) T.S. 4.6.2.1.c.2 Containment Spray Actuation Test

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Through the process of overlap testing, each of the components in this circuit is tested on a periodic basis between 18-month test intervals, with the exception of the load sequencer output relay driver cards.

This change does not create the probability of a new or different kind of accident from any accident previously evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

7&8) T.S. 4.6.3.2.a and b Phase A and B Isolation Test

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. This is based on system performance verification following an operational occurrence (SI) on 3/30/85 which exercised Phase A and for Phases A and B through the process of overlap testing.

This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

9) T.S. 4.7.3.b.2 CCW Actuation on Safety-Injection Signal

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. This is based on system performance verification following an operational occurrence (SI) on 3/30/85 and through the process of overlap testing.

This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

10) T.S. 4.7.4.b.2 ESW Actuation on Safety Injection Signal

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. This is based on system performance verification following an operational occurrence (SI) on 3/30/85 and through the process of overlap testing.

This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

11) 4.8.1.1.2.f Diesel Generator Testing

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. This is based on performance of monthly diesel surveillances and a portion of the 18-month diesel surveillance test which are current into Refuel 1 [i.e., 4.8.1.1.2.f.1), 3) and 11)]; system performance verification following two operational occurrences; overlap testing of components; and previous operational history of the Callaway diesels.

This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

12) T.S. 4.8.2.1.d Battery Service Test

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. This is based on the performance of the batteries during preoperational testing; the fact that no substantial loads have been added to the batteries since the preoperational tests; Callaway is in its first cycle of operation and the batteries are relatively new; and weekly or quarterly battery surveillances which look at electrolyte level, float voltage, specific gravity, total battery terminal voltage, visible corrosion, terminal connection resistance and electrolyte temperature.

This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. This is based on the fact that no design change is involved and the method and manner of plant operations is unchanged.

This change does not involve a significant reduction in a margin of safety since the plant design bases, safety limits, limiting safety system settings, and limiting conditions for operation remain unchanged.

Conclusion

Based on the safety evaluation provided in Reference 1 and the preceeding discussions, Union Electric deems the request for extension of surveillance intervals for those Specifications listed in Reference 1 to involve no significant hazard because the amendment as submitted does not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.