

Ameren Missouri (Union Electric Company) Callaway Plant

Description and Assessment

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ATTACHMENT 1 - DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed change revises Section 1.3, "Completion Times," and Section 3.0, "LCO Applicability" of the Technical Specifications (TS) for the Callaway Plant to clarify the use and application of the TS usage rules, as described below:

- Section 1.3 is revised to clarify "discovery."
- Section 1.3 is revised to discuss exceptions to starting the Completion Time at condition entry.
- Limiting Condition for Operation (LCO) 3.0.4.b is revised to clarify that LCO 3.0.4.a, LCO 3.0.4.b, and LCO 3.0.4.c are independent options.
- Surveillance Requirement (SR) 3.0.3 is revised to allow application of SR 3.0.3 when an SR has not been previously performed and to clarify the application of SR 3.0.3.

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

Ameren Missouri has reviewed the safety evaluation for TSTF-529 provided to the Technical Specifications Task Force in a letter dated April 21, 2016. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-529. As described in the subsequent paragraphs, Ameren Missouri has concluded that the justifications presented in the TSTF-529 proposal and the safety evaluation prepared by the NRC staff are applicable to Callaway Plant Unit 1 and justify this amendment for the incorporation of the changes to the Callaway Plant TS.

2.2 Variations

Ameren Missouri is not proposing any variations from the TS changes described in the TSTF-529 or the applicable parts of the NRC staff's safety evaluation dated April 21, 2016.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

Ameren Missouri requests adoption of TSTF-529, "Clarify Use and Application Rules," that is an approved change to the Standard Technical Specifications (STS), into the Callaway Plant Technical Specifications (TS). The proposed change revises Section 1.3, "Completion Times," and Section 3.0, "LCO Applicability" and "SR Applicability" to clarify the use and application of the TS usage rules and revise the application of Surveillance Requirement (SR) 3.0.3. Section 1.3 is modified to clarify the concept of

"discovery" that a Limiting Condition for Operation (LCO) is not met and to describe existing exceptions to the start of Completion Times in the TS. An editorial change is made to LCO 3.0.4.b to clarify that LCO 3.0.4.a, LCO 3.0.4.b, and LCO 3.0.4.c are independent options. SR 3.0.3 is revised to allow application of SR 3.0.3 when an SR has not been previously performed.

Ameren Missouri has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes to Section 1.3 and LCO 3.0.4 have no effect on the requirement for systems to be Operable and have no effect on the application of TS actions. The proposed change to SR 3.0.3 states that the allowance may only be used when there is a reasonable expectation the surveillance will be met when performed. Since the proposed changes do not significantly affect system Operability, the proposed changes will have no significant effect on the initiating events for accidents previously evaluated and will have no significant effect on the ability of the systems to mitigate accidents previously evaluated.

Therefore, it is concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes to the TS usage rules do not affect the design or function of any plant systems. The proposed changes do not change the Operability requirements for plant systems or the actions taken when plant systems are not Operable.

Therefore, it is concluded that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed changes clarify the application of Section 1.3 and LCO 3.0.4 and do not result in changes in plant operation. SR 3.0.3 is revised to allow application of SR 3.0.3 when an SR has not been previously performed if there is reasonable expectation that the SR will be met when performed. This expands the use of SR

3.0.3 while ensuring the affected system is capable of performing its safety function. As a result, plant safety is either improved or unaffected.

Therefore, it is concluded that this change does not involve a significant reduction in a margin of safety.

Based on the above, Ameren Missouri concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.0 ENVIRONMENTAL EVALUATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.