

Description and Assessment

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1.0 DESCRIPTION

Ameren Missouri (Union Electric Company) requests adoption of TSTF-577, "Revised Frequencies for Steam Generator Tube Inspections," which is an approved change to the Standard Technical Specifications (STS), into the Callaway Plant, Unit 1 Technical Specifications. The Technical Specification (TS) changes related to steam generator (SG) tube inspections and reporting are based on operating history.

2.0 ASSESSMENT

2.0 Applicability of Safety Evaluation

Ameren Missouri has reviewed the safety evaluation for TSTF-577 provided to the Technical Specifications Task Force in an NRC letter dated April 14, 2021. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-577. Ameren Missouri has concluded that the justifications presented in TSTF-577 and the safety evaluation prepared by the NRC staff are applicable to Callaway Plant, Unit 1, and justify this proposed license amendment for incorporating the proposed changes to the Callaway Technical Specifications. The affected Callaway Technical Specifications are TS 5.5.9, "Steam Generator (SG) Program" and TS 5.6.10, "Steam Generator Tube Inspection Report."

The current SG TS requirements are based on TSTF-510, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection." The SG tubes are made from thermally treated Alloy 690 (Alloy 690TT).

2.1 Variations

Ameren Missouri is not proposing any variations from the TS changes described in TSTF-577 or the applicable parts of the NRC staff's safety evaluation dated April 14, 2021.

It should be noted that on October 16, 2020, the NRC approved a one-time change to the Callaway SG Program to extend the SG inspection interval in effect at that time (Agencywide Documents Access and Management System Accession No. ML20246G570). The allowance for the one-time interval extension was incorporated into the TS via a footnote attached (via an asterisk) to subpart d.2 of TS 5.5.9, as incorporated per License Amendment 223. The allowed one-time extension expired once the required SG tube inspections were completed during Refuel 25 (conducted in the April-May 2022 timeframe). Because the extended interval is no longer in effect, the footnote (and asterisk) is being removed as part of this proposed change. This removal has no effect on the applicability of TSTF-577 to the Callaway TS, nor does it affect the TS changes proposed in accordance with TSTF-577.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

Ameren Missouri requests adoption of TSTF-577, "Revised Frequencies for Steam Generator Tube Inspections," which is an approved change to the Standard Technical Specifications (STS), into the Callaway Plant, Unit 1, Technical Specifications. The Technical Specifications related to steam generator (SG) tube inspections and reporting, i.e., Technical Specification (TS) 5.5.9 and TS 5.6.10, are revised based on operating history.

In addition, the proposed TS changes include a change for removing a note from TS 5.5.9 that was incorporated by a previous license amendment to allow extension of the SG inspection interval on a one-time basis, which is now expired. This administrative/editorial change has no impact on the TS changes proposed in accordance with TSTF-577.

Ameren Missouri has evaluated if 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 amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change revises the inspection frequencies for SG tube inspections (as specified in Callaway TS 5.5.9) and associated reporting requirements (as specified in Callaway TS 5.6.10). The SG inspections are conducted as part of the SG Program to ensure and demonstrate that performance criteria for tube structural integrity and accident leakage integrity are met. These performance criteria are consistent with the plant design and licensing basis. With the proposed changes to the inspection frequencies, the SG Program must still demonstrate that the performance criteria are met. As a result, the probability of any accident previously evaluated is not significantly increased and the consequences of any accident previously evaluated are not significantly increased.

The additional change for removing a one-time TS provision that was approved via a previous license amendment and which is now expired is an administrative/editorial change that has no impact on the plant's current licensing basis and no effect on the changes proposed in accordance with TSTF-577.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No

The proposed change revises the inspection frequencies for SG tube inspections and associated reporting requirements. The proposed change does not alter the design function or operation of the SGs or the ability of an SG to perform the design function. The SG tubes continue to be required to meet the SG Program performance criteria. The proposed change does not create the possibility of a new or different kind of accident due to credible new failure mechanisms, malfunctions, or accident initiators that are not considered in the design and licensing bases.

The additional change for removing a one-time TS provision that was approved via a previous license amendment and which is now expired is an administrative/editorial change that has no impact on the plant's current licensing basis and no effect on the changes proposed in accordance with TSTF-577.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No

The proposed change revises the inspection frequencies for SG tube inspections and associated reporting requirements. The proposed change does not change any of the controlling values of parameters used to avoid exceeding regulatory or licensing limits. The proposed change does not affect a design basis or safety limit, or any controlling value for a parameter established in the UFSAR or the license.

The additional change for removing a one-time TS provision that was approved via a previous license amendment and which is now expired is an administrative/editorial change that has no impact on the plant's current licensing basis and no effect on the changes proposed in accordance with TSTF-577.

Therefore, the proposed 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.

3.2 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment 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 amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a 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 amendment 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 amendment.