

to extend, on a one-time basis, the allowable Completion Time for Required Actions associated with one offsite circuit inoperable, from 72 hours to 10 days.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

*Response:* No.

The proposal would change the Technical Specifications for AC Sources—Operating, to extend, on a one-time basis, the allowable Completion Times for Required Actions for one offsite circuit inoperable, from 72 hours to 10 days. The proposed change does not involve a significant increase in the probability of an accident previously evaluated because the probability increases are within the guidance provided in Regulatory Guide 1.177.

The consequence[s] of losing offsite power have been evaluated in the FSAR [Final Safety Analysis Report] and the Station Blackout evaluation. Increasing the completion time for one offsite power source from 72 hours to 10 days does not increase the consequences of a LOOP [loss of offsite power] event nor change the evaluation of LOOP events as stated in the FSAR or Station Blackout evaluation.

Therefore, this change does 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 change does not involve a physical alteration of the plant (no new or different type of equipment will be installed nor will there be changes in methods governing normal plant operation).

Allowing the completion time for ST [startup transformer] No. 10 to increase from 72 hours to 10 days is a one-time change that will allow continued operation of Unit 1 while replacing Startup Transformer Number 10. The accident analyses affected by this extension are the LOOP events that are discussed in the FSAR. The potential for the loss of other plant systems or equipment to mitigate the effects of an accident is not altered.

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

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

*Response:* No.

The proposed change does not involve a significant reduction in [a] margin of safety.

The proposed change allows, on a one-time basis, ST No. 10 to be out of service for 7

days more than is allowed by Technical Specifications. This increase in completion time for ST No. 10 results in a slight decrease in the margin of safety. Implementation of the compensatory measures described in Section 4.0 mitigates the increase in the core damage frequency and large early release frequency during this time, such that the potential impact of extending the completion time is small. Therefore, this one-time exemption will not involve a significant reduction in safety margin.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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*Union Electric Company, Docket No. 50-483, Callaway Plant, Unit 1, Callaway County, Missouri*

*Date of application request:* June 2, 2003.

*Description of amendment request:* The amendment would increase the value of the minimum fuel oil required in the storage tank for the emergency diesel generators in Technical Specification (TS) 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air." The licensee stated it has implemented the change in the field. This was done because the proposed new value is higher than the current value in the TSs.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

Overall protection system performance will remain within the bounds of the previously performed accident analyses since there are no hardware changes. The design of the emergency diesel engine fuel oil storage and transfer system and the function of the onsite standby power sources will be unaffected. The only physical change is to increase the [minimum] volume of fuel oil required to run the emergency diesel generators at their continuous rating for 6 days. This change has already been implemented in the field and is in the conservative direction. The fuel oil storage and transfer system will continue to function in a manner consistent with the plant design basis. All design, material, and construction standards that were applicable prior to this amendment request are maintained.

The probability and consequences of accidents previously evaluated in the FSAR [(Callaway Final Safety Analysis Report)] are not adversely affected because the change to the [minimum] volume of fuel oil required is conservative and is consistent with the safety analysis and licensing basis.

The proposed change will not affect the probability of any event initiators. There will be no degradation in the performance of, or an increase in the number of challenges imposed on, safety-related equipment assumed to function during an accident situation. There will be no change to normal plant operating parameters or accident mitigation performance.

The proposed change will not alter any assumptions or change any mitigation actions in the radiological consequence evaluations in the FSAR.

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

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

There are no hardware changes nor are there any changes in the method by which any safety-related plant system performs its safety function. This amendment will not affect the normal method of plant operation or change any operating parameters. The proposed change does not induce a new mechanism that would result in a different kind of accident from those previously analyzed. No performance requirements or response time limits will be affected.

No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result of this amendment. There will be no adverse effect or challenges imposed on any safety-related system as a result of this amendment.

This amendment does not alter the performance of the emergency diesel engine fuel oil storage and transfer system in [its] support of the onsite standby power sources.

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

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed change does not eliminate any surveillances or alter the frequency of surveillances required by the Technical Specifications. The minimum volume of fuel oil required for a 6[-]day supply as specified in the TS has already been increased in the conservative direction. The safety analysis limits assumed in the transient and accident analyses are unchanged. None of the acceptance criteria for any accident analysis are changed.

There will be no effect on the manner in which safety limits or limiting safety system settings are determined nor will there be any effect on those plant systems necessary to assure the accomplishment of protection functions. There will be no impact on any margin of safety. The radiological dose consequence acceptance criteria listed in the [NRC] Standard Review Plan will continue to be met.