

consequence acceptance criteria listed in the Standard Review Plan will continue to be met.

Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Use of Revised Methods in Re-Analysis of SGTR With Overfill

Use of revised methods in the re-analysis for the SGTR with overfill accident does not affect the manner in which safety limits or limiting safety system settings are determined nor will there be any adverse effect on those plant systems necessary to assure the accomplishment of protection functions. There is no significant impact on the overpower limit, departure from nucleate boiling ratio limits, heat flux hot channel factor (F_O), nuclear enthalpy rise hot channel factor ($F_{\Delta H}$), loss-of-coolant accident peak cladding temperature (LOCA PCT), peak local power density, or any other margin of safety. The radiological dose consequence acceptance criteria listed in the Standard Review Plan will continue to be met. The re-analysis of the SGTR with overfill confirms that both the thermal-hydraulic and radiological consequences are within the regulatory requirements and does not result in a significant reduction in a margin of safety.

Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

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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NRC Section Chief: Stephen Dembek.

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

Date of application request: June 27, 2003.

Description of amendment request: The amendment would revise the Technical Specifications (TSs) to (1) extend the allowed outage time (AOT) or required action completion time (CT) for an inoperable diesel generator (DG) by adding the phrase "OR 108 hours once per cycle for each DG" to the completion time for Required Action B.4 in TS 3.8.1, "AC Sources—Operating," and (2) delete the second CT given in certain required actions in TS 3.6.6, "Containment Spray and Cooling Systems"; TS 3.7.5, "Auxiliary Feedwater (AFW) System"; TS 3.8.1; and TS 3.8.9, "Distribution System—Operating," of the TSs. The second part would also delete Example 1.3-3, delete

text referring to this example, and re-number the remaining examples in TS 1.3, "Completion Times."

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.

DG AOT/CT Extension

The proposed change to extend the DG AOT/CT from 72 hours to 108 hours for planned, on-line maintenance does not affect the design of the DGs, the operational characteristics or function of the DGs, the interfaces between the DGs and other plant systems, or the reliability of the DGs. The DGs mitigate the consequences of previously evaluated accidents including loss-of-offsite power, but as such are not themselves initiators of any previously evaluated accidents. DG allowed outage time is thus not associated with any initiating condition for accidents previously evaluated. The consequences of an accident are independent of the time the DGs are out of service as long as adequate DG availability is assured. The proposed changes will not result in a significant decrease in DG availability, so assumptions regarding DG availability are not impacted. Since the DGs will continue to be capable of performing their accident mitigation function as assumed in the accident analysis, the consequences of accidents previously analyzed are unchanged with respect to the proposed changes.

In addition, to fully evaluate the effect of the proposed DG completion time extension, probabilistic risk assessment methods and a deterministic analysis were utilized. The results of the analyses show no significant increase in core damage frequency or large early release frequency.

Elimination of Second Completion Times

Similar to the above change, the changes to eliminate the "second" Completion Times from the affected Technical Specifications [(i.e., the specific TS sections being changed)] do not affect the design, operational characteristics, or intended functions of the equipment addressed by those Technical Specifications. With no direct effects on that equipment (or any other plant equipment or features), allowed equipment outage times are not associated with any initiating condition for any accident previously evaluated, and therefore would not affect the probability of such accidents. Further, eliminating these Completion Times is not expected to have an adverse effect on the availability of the applicable systems or components because equipment availability performance criteria required for conformance to the Maintenance Rule impose an equivalent or acceptable level of control and management of equipment availability regardless of such Completion Times. As noted above, the consequences of

evaluated accidents are independent of mitigating equipment allowed outage times as long as adequate availability of the equipment is ensured. Since elimination of the second Completion Times has no significant impact on equipment availability (in light of continued, required conformance to the Maintenance Rule), the consequences of accidents previously evaluated are unchanged.

Therefore, the proposed changes do 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.

None of the proposed changes, i.e., neither the DG AOT extension nor the elimination of [the] second Completion Times, involve a change in the design, configuration, or operational characteristics of the plant. No physical alteration of the plant is involved, as no new or different type of equipment is to be installed. The changes do not alter any assumptions made in the safety analyses, and no alteration in the procedures which ensure that the plant remains within analyzed limits is being proposed. As such, no new failure modes or mechanisms that could cause a new or different kind of accident from any previously evaluated are being introduced.

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

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

The proposed DG AOT extension and elimination of second Completion Times do not alter the manner in which safety limits or limiting safety system settings are determined. The safety analysis acceptance criteria are not impacted by [these] change[s], and the proposed changes will not permit plant operation in a configuration [that is] outside the design basis.

Further, with regard to plant risk, the risk assessment performed for the DG AOT extension determined that the quantifiable increase in plant risk is acceptably small. Likewise, for the elimination of [the] second Completion Times, it may be assumed that this change also involves little or no increase in risk on the basis that required, continued compliance with the Maintenance Rule provides adequate controls for maintaining equipment availability regardless of the second Completion Times [proposed to be eliminated].

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

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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