does not entail any unproven or unusual design or technology. In this regard, a number of plants have previously changed from bolted or restrained racks to free standing racks, including Millstone 1 (amendment dated November 27, 1989) and San Onofre 2 and 3 (amendment dated May 1. 1990), and such changes have not been classified as involving a significant hazards consideration. Furthermore, CPSES is not located in an area subject to severe seismic events. A seismic event at CPSES would result in little movement of the free standing racks and would not cause the high density racks to collide with each other or the spent fuel pool walls. Therefore, use of the free standing high density racks would not create the possibility of a new or different kind of an accident.

3. Do the proposed changes involve a significant reduction in a margin of safety?

The proposed administrative changes to the Technical Specifications have no impact on any acceptance criteria, plant operations or the actual failure of any systems, components or structure; therefore these administrative changes have no impact on the margin of safety.

The NRC guidance [Nuclear Regulatory Commission, Letter to all Power Reactor Licensees, from B. K. Grimes, April 14, 1978, "OT Position for Review and Acceptance of Spent Fuel Storage and Handling Applications," as amended by the NRC Letter dated January 18, 1979] has established that an evaluation of margin of safety should address the following areas:

(1) Nuclear criticality considerations.

(2) Thermal-Hydraulic considerations.

(3) Mechanical, material and structural consideration.

The established acceptance criterion for criticality is that the neutron multiplication factor in the spent fuel pool storage racks shall be less than or equal to 0.95, including uncertainties, under all conditions. The k_{eff} for the high density racks for CPSES is always less than 0.95, including uncertainties at a 95/95 probability confidence level. Because the existing acceptance criterion is shown to be satisfied, the high density racks do not involve a significant reduction in the margin of safety with respect to criticality considerations.

The thermal-hydraulic evaluation demonstrates that the temperature margin of safety will be maintained. Re-evaluation of the spent fuel pool cooling system for the increased heat loads shows, with minor modifications, that the spent fuel cooling system will maintain the abnormal maximum temperature of the spent fuel pool water within the limits of the existing licensing basis (i.e., below 212 °F). Additionally, it shows that, with minor modifications, the normal maximum temperature will be within the existing design basis temperatures for the high density racks, liner, structure, and cooling system and will not have any significant impact on the spent fuel pool demineralizers. Thus, the existing licensing basis remains valid, and there is no significant reduction in the margin of safety for the thermal-hydraulic design or spent fuel cooling.

The main safety function of the spent fuel pool and the high density racks is to

maintain the spent fuel assemblies in a safe configuration through normal and abnormal operating conditions. The design basis floor responses of the Fuel Building were confirmed to be adequate and conservative and the floor loading will not exceed the capacity of the Fuel Building. The high density rack materials used are compatible with the spent fuel pool and the spent fuel assemblies. The structural considerations of the high density racks maintain margin of safety against tilting and deflection or movement, such that the high density racks do not impact each other or the pool walls, damage spent fuel assemblies, or cause criticality concerns. Thus, the margin of safety with respect to mechanical, material and structural considerations are not significantly reduced by the use of the high density racks.

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.

Local Public Document Room location: University of Texas at Arlington Library, Government Publications/Maps, 702 College, P.O. Box 19497, Arlington, Texas 76019.

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NRC Project Director: William D. Beckner.

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

Date of amendment request: December 9, 1994.

Description of amendment request: The proposed amendment would revise Technical Specification (TS) 4.3.2.2, 4.7.1.2.1, and the Bases for Specification 3/4.7.1.2. The changes would decrease the frequency of testing auxiliary feedwater pumps, provide consistent testing requirements for the steam turbine-driven auxiliary feedwater pump, and clarify performance parameters in the Bases.

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:

The proposed revision does not involve a significant hazards consideration because operation of Callaway Plant with this change would not:

(1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The Callaway Final Safety Analysis Report has been reviewed and been found to be unaffected by these proposed changes. The changes proposed by this Technical Specification amendment do not affect the performance parameters of the Auxiliary Feedwater System (AFWS). The changes proposed involve a decrease in the frequency of pump testing from once per 31 days to once per 92 days as recommended by NRC Generic Letter 93-05 and reflected in NUREG-1431 (T/S 4.7.1.2.1.a). This change will decrease the out-of-service time of the AFWS due to testing. This change will also decrease the number of component manipulations performed on the system and will therefore decrease the probability of a restoration error rendering the system incapable of performing its intended function.

The pumps will be required to meet the same acceptance criteria and will continue to be monitored as required by ASME Section XI. As stated earlier, the overall effect is a slight decrease in the CDF for Callaway These proposed changes will also eliminate an inconsistency among Specifications 4.7.1.2.1.b.2 and 4.3.2.2 and Specification 4.7.1.2.1.a.2 regarding an exception to Specification 4.0.4 for entry into Mode 3 for the TDAFP. The methodology and acceptance criteria of surveillance testing will not be changed. The ability of the AFWS to perform its intended function during accident conditions will continue to be demonstrated via surveillance testing. The proposed changes to the Technical Specifications do not affect any accident initiators for any accident evaluated in the Final Safety Analysis Report (FSAR). The Bases changes are corrections to errors which have no effect on any accident initiators nor equipment failure modes.

(2) Create the possibility of a new or different kind of accident from any previously evaluated.

The proposed Technical Specification changes do not modify any equipment nor create any potential accident initiators. The proposed change herein of potential interest is the exception to Specification 4.0.4 for entry into Mode 3 for TDAFP response time testing and auto-start testing. This allowance is already recognized via Specification 4.7.1.2.1.a.2 and NUREG–1431, Standard Technical Specifications-Westinghouse Plants.

(3) Involve a significant reduction in a margin of safety.

The Bases for Specification 3/4.7.1.2 are to be clarified to correctly state the design flow and pressure parameters for the AFWS. No plant design changes are involved in any of the proposed changes and the method and manner of plant operation remain the same. The specific surveillance test methodology and acceptance criteria remain unchanged.

As discussed above, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated or create the possibility of a new or different kind of accident from any previously evaluated. These changes do not result in a significant reduction in a margin of safety. Therefore, it has been determined that the proposed changes do not involve a significant hazards consideration.