

September 15, 2000

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555-0001

Gentlemen:

ULNRC-04311

DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT
RESPONSE TIME TEST ADDITION FOR
AFW TRANSFER TO ESW

Reference: NRC Administration Letter 98-10, dated December 29, 1998

This letter documents a telephone conversation between the NRC Callaway Project Manager, Jack Donohew and AmerenUE personnel Tim Herrmann, Keith Mills and Dave Shafer on September 13, 2000. The Callaway Auxiliary Feedwater (AFW) System utilizes the condensate storage tank (CST) as the preferred source of water for its pumps. Since the CST is non-safety related, automatic circuitry provides for transfer of the AFW suction to the safety related Essential Service Water (ESW) System. This transfer circuitry and associated valves are functionally tested per the Callaway Technical Specifications.

Based on an internal review, AmerenUE has determined that this transfer feature should also be response time tested. Since the telephone conversation, we have verified the required response time for this function are satisfactorily being met through a combination of testing and review of current valve stroke testing records.

We have also determined that the Callaway Technical Specifications are not complete. The reference letter provides guidance in cases like this. AmerenUE will submit an amendment request in the near future to add the requirement to perform response time testing (SR 3.3.2.10) to Table 3.3.2-1, Function 6.h (Auxiliary Feedwater Pump Suction Transfer on Suction Pressure-Low). Additionally, FSAR Table 16.3-2 will be revised to require a response time of 60 seconds to Item 12 (Auxiliary Feedwater Pump Suction Pressure-Low, Transfer to Essential Service Water). Sixty seconds is consistent with the time assumed in the Callaway safety analysis.

If you have any questions, please contact us.

Sincerely,

Alan C. Passwater

for Alan C. Passwater
Manager, Corporate Nuclear Services

DS/jdg

a subsidiary of Ameren Corporation

A 001



cc: M. H. Fletcher
Professional Nuclear Consulting, Inc.
19041 Raines Drive
Derwood, MD 20855-2432

Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, TX 76011-8064

Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Steedman, MO 65077

Mr. Jack Donohew (2)- **OPEN BY ADDRESSEE ONLY**
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
1 White Flint, North, Mail Stop OWFN 4D3
11555 Rockville Pike
Rockville, MD 20852-2738

Manager, Electric Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Ron Kucera
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Denny Buschbaum
TU Electric
P.O. Box 1002
Glen Rose, TX 76043

Pat Nugent
Pacific Gas & Electric
Regulatory Services
P.O. Box 56
Avila Beach, CA 93424