

November 29, 2000

Mr. Garry L. Randolph  
Vice President and Chief Nuclear Officer  
Union Electric Company  
Post Office Box 620  
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 RE: COMPLETION OF LICENSING ACTION FOR  
GENERIC LETTER 98-02, "LOSS OF REACTOR COOLANT INVENTORY AND  
ASSOCIATED POTENTIAL FOR LOSS OF EMERGENCY MITIGATION  
FUNCTION WHILE IN A SHUTDOWN CONDITION" (TAC NO. MA4776)

Dear Mr. Randolph:

On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02 to all holders of operating licenses for pressurized water reactors (PWR), except those who have permanently ceased operations, and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event, which occurred at Wolf Creek, that had the potential to draindown the reactor coolant system (RCS) to the refueling water storage tank (RWST) and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2) if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes which will prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

In response to GL 98-02, you provided a letter dated November 19, 1998, for Callaway Plant, Unit 1 (Callaway). The submittal indicated that Callaway was vulnerable to the type of incident which occurred at Wolf Creek and further indicated that the plant evaluation concerning the subject vulnerability (information item (2) of GL 98-02), was being kept in a retrievable licensee system that the NRC can verify on an as-needed or sample basis, in accordance with the GL.

By letter dated April 21, 2000, the Region IV NRC staff issued NRC Inspection Report (IR) No. 50-483/00-02, which contained details of the NRC staff's on-site verification of activities which you undertook in response to GL 98-02 for Callaway. The inspector verified that the design and administrative controls established in response to the event were adequate to preclude common mode failures similar to those discussed in the GL; however, although considered adequate, the inspector did note deficiencies with your staff's initial response to the GL. As stated in the IR, the file onsite did not contain the supporting documentation in your

response of November 19, 1998. Also, the initial response had not requested an evaluation for draining the reactor coolant system and common cause susceptibility with the RHR and ECCS in hot shutdown. Your self-assessment team also identified deficiencies in the quality assurance features evaluation, noting that, during the last refueling outage, several issues occurred that continued to challenge the conservative preplanned outage schedule. The inspector reviewed the final documentation compiled by your self-assessment team and concluded that it was thorough and had captured the deficiencies identified in your response to the GL. All issues were entered into the corrective actions program and have been completed (ADAMS Accession No. ML003767733).

The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided, and (2) that your onsite activities adequately addressed the concerns of the GL; therefore, we consider GL 98-02 and TAC No. MA4776 to be closed for Callaway. If you have any questions, please contact me at 301-415-1307, or through the internet at [jnd@nrc.gov](mailto:jnd@nrc.gov).

Sincerely,

*/RA/*

Jack Donohew, Senior Project Manager, Section 2  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: See next page

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Sincerely,  
*/RA/*

Jack Donohew, Senior Project Manager, Section 2  
 Project Directorate IV & Decommissioning  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

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ADAMS Accession No. ML003772423

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Callaway Plant, Unit 1

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