AmerenUE
Callaway Plant

PO Box 620
Fulton, MO 65251

April 14, 2004

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

Ladies and Gentlemen: ULNRC-04969

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
SUPPORTING INFORMATION AND FOLLOW-UP REQUEST REGARDING LICENSE AMENDMENT REQUEST OL-1228 FOR REVISION TO TECHNICAL SPECIFICATIONS 3.8.1, "AC SOURCES – OPERATING," AND 3.8.4, "DC SOURCES – OPERATING"

Reference: 1) AmerenUE Letter ULNRC-04837, "License Amendment Request OL-1228 – Revision to Technical Specification Surveillance Requirements 3.8.1 and 3.8.4," from D. Shafer (AmerenUE) to USNRC, dated June 6, 2003

2) USNRC Letter, "Request for Additional Information re: Technical Specifications 3.8.1 and 3.8.4 for Callaway, Diablo Canyon, Palo Verde, and Wolf Creek Plants," from J. Donohew (USNRC) to G. Randolph, AmerenUE; G. Rueger, Pacific Gas and Electric; G. Overbeck, Arizona Public Service Company, and R. Muench, Wolf Creek Nuclear Operating Corporation; dated September 25, 2003.

3) AmerenUE Letter ULNRC-04909, "Response to Request for Additional Information Regarding License Amendment Request OL-1228 (Revision to Technical Specification Surveillance Requirements 3.8.1 and 3.8.4)," from K. Young (AmerenUE) to USNRC, dated December 19, 2003

Per Reference 1, Union Electric Company (AmerenUE) transmitted an application for amendment of Facility Operating License No. NPF-30 for the Callaway Plant. In that request AmerenUE proposed changes to Technical Specifications (TS) 3.8.1, "AC Sources – Operating," and TS 3.8.4, "DC Sources –

A001

Operating," to allow surveillance testing of the emergency diesel generators (DGs) during MODES in which it is currently prohibited and to incorporate changes based on Industry/Technical Specification Task Force (TSTF) Standard Technical Specification change TSTF-283, Revision 3.

AmerenUE's application for amendment, along with similar applications from Wolf Creek Nuclear Operating Corporation, Arizona Public Service Company, and Pacific Gas and Electric Company, is currently under review by the NRC staff. Per Reference 2, the NRC transmitted a request for additional information regarding the proposed TS Changes, to which AmerenUE responded via Reference 3.

Subsequently, on February 4, 2004, two additional questions related to DG testing in MODES 1 and 2 with the DG connected to the offsite power supply were provided by electronic mail from the NRC Project Manager. Responses to those questions were provided electronically on February 24, 2004, wherein it was identified that the information requested was previously provided by References 1 and 3. Through further discussions with the NRC Project Manager it was requested by the NRC Electrical Engineering Section that Ameren UE provide, in the Bases of the Callaway Technical Specifications, administrative controls for DG testing in MODES 1 and 2 with the DG connected to the offsite power supply.

Based on these discussions, AmerenUE is providing in the Enclosure additional changes to the TS Bases for Surveillance Requirement (SR) 3.8.1.14 (i.e., the 24-hour DG endurance run) to include the requested administrative controls. The enclosed additional TS Bases changes are provided (for information only) to assist the staff in its review of the proposed changes. (The enclosed marked-up TS Bases page reflects the NRC-requested changes as well as those originally indicated in Reference 1 for the affected page.) As noted in Reference 1, revision of the TS Bases will be implemented pursuant to the TS Bases Control Program, TS 5.5.14, upon implementation of the license amendment.

Specifically, the information to be added to the TS Bases will state:

> Administrative controls for performing this Surveillance in MODES 1 or 2 with the DG connected to an offsite circuit ensure or require that:
>
> a. Weather conditions are conducive for performing the Surveillance.
>
> b. The offsite power supply and switchyard conditions are conducive for performing the Surveillance, which includes ensuring that switchyard access is restricted and no elective maintenance within the switchyard is performed.
>
> c. No equipment or systems assumed to be available for supporting the performance of the Surveillance are removed from service.

In its license amendment application (Reference 1), AmerenUE proposed changes to the mode-restriction Notes associated with the applicable SRs under TS 3.8.1, as well as the applicable SRs under TS 3.8.4, i.e., SR 3.8.4.7 and SR 3.8.4.8. The proposed changes to the Notes provide the flexibility for a partial performance of the surveillance during plant operation to reestablish OPERABILITY following corrective maintenance. Although application of the proposed changes in the Notes to SR 3.8.4.7 and SR 3.8.4.8 (in addition to the SRs of TS 3.8.1) is consistent with NRC-approved TSTF-283, NRC reviewers of AmerenUE's amendment application expressed some concerns regarding the changes proposed for SR 3.8.4.7 and SR 3.8.4.8. As a result, in Reference 3, AmerenUE indicated that the changes to those SRs should be processed separately (from the TS 3.8.1 SRs) based on the potentially additional time to resolve the concerns both generically and for AmerenUE. After further consideration, AmerenUE has decided to withdraw the proposed changes to SR 3.8.4.7 and SR 3.8.4.8. AmerenUE will consider pursuing additional changes depending on the generic resolution of the concerns associated with the changes to those SRs.

It should be noted that the supplemental information and changes provided by this letter do not impact the conclusions of the No Significant Hazards Consideration provided in Reference 1. In addition, there are no commitments associated with this submittal.

Please contact me or Dave Shafer at (314) 554-3104 for any questions you may have regarding this application.

Very truly yours,

Keith D. Young
Manager, Regulatory Affairs

TBE/mlo
Enclosure

cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

Mr. Bruce S. Mallett
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

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

Mr. Jack N. Donohew (2 copies)
Licensing Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop 7E1
Washington, DC 20555-2738

Missouri Public Service Commission
Governor Office Building
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360

STATE OF MISSOURI)
) S S
COUNTY OF CALLAWAY)

Keith D. Young, of lawful age, being first duly sworn upon oath says that he is Manager, Regulatory Affairs, for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Keith D. Young
Keith D. Young
Manager, Regulatory Affairs

SUBSCRIBED and sworn to before me this 14th day of April, 2004.

Terra E. Cook

TERRA E. COOK
Notary Public - Notary Seal
STATE OF MISSOURI
Callaway County
My Commission Expires May 13, 2006

Enclosure

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.14

Regulatory Guide 1.108 (Ref. 9), paragraph 2.a.(3), requires demonstration once per 18 months that the DGs can start and run continuously at full load capability for an interval of not less than 24 hours. If the auto-connected design loads have increased above the continuous duty rating the load shall be increased to 110% of the continuous duty rating for $\geq$ 2 hours and the remainder of the time at a load equivalent to the continuous duty rating of the DG. The DG starts for this Surveillance can be performed either from standby or hot conditions. The provisions for prelubricating and warmup, discussed in SR 3.8.1.2, and for gradual loading, discussed in SR 3.8.1.3, are applicable to this SR.

In order to ensure that the DG is tested under load conditions that are as close to design conditions as possible, testing must be performed using a power factor of $\geq$ 0.8 and $\leq$ 0.9. This power factor is chosen to be representative of the actual design basis inductive loading that the DG would experience. The load band is provided to avoid routine overloading of the DG. Routine overloading may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY. The generator voltage and frequency is maintained within 4160 + 160 - 420 volts and 60 $\pm$ 1.2 Hz during this test.

INSERT 6

The 18 month Frequency is consistent with the recommendations of Regulatory Guide 1.108 (Ref. 9), paragraph 2.a.(3), takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This Surveillance is modified by ~~three~~ two Notes. Note 1 states that momentary transients due to changing bus loads do not invalidate this test. Similarly, momentary power factor transients above the power factor limit will not invalidate the test. The reason for Note 2 is that during operation with the reactor critical, performance of this Surveillance could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, unit safety systems. The reason for Note 2 is that operating the DG for greater than 2 hours in the overloaded condition need not be performed, provided the auto-connected loads remain below the 6201 KW continuous rating of the DG.

2

SR 3.8.1.15

This Surveillance demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal

(continued)

TS Bases Insert 6 (new)

Administrative controls for performing this Surveillance in MODES 1 or 2 with the DG connected to the offsite power supply ensure or require that:

a. Weather conditions are conducive for performing the Surveillance.

b. The offsite power supply and switchyard conditions are conducive for performing the Surveillance, which includes ensuring that switchyard access is restricted and no elective maintenance within the switchyard is performed.

c. No equipment or systems assumed to be available for supporting the performance of the Surveillance are removed from service.