



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

APR 2 1981



Docket No. 50-483

Union Electric Company
ATTN: Mr. John K. Bryan
Vice President - Nuclear
Post Office Box 149
St. Louis, MO 63166

Gentlemen:

This refers to Noncompliance Item 483/80-22-01, which we brought to your attention in Inspection Report No. 50-483/80-22 forwarded by our letter dated September 29, 1980 and which you responded to by letter dated October 30, 1980. Further, in our letter dated November 28, 1980, we acknowledged your response to this item, which involves the Callaway ultimate heat sink (UHS) slope protection (riprap), and indicated it would be referred to our headquarters for further evaluation.

This evaluation has been completed, and our headquarters determined that the slope protection should have been classified as safety related and, therefore, been designed and constructed accordingly. This position, therefore, confirms the validity of the noncompliance item, and the basis for this position is as follows:

1. We concur with the licensee that failure of the riprap in itself would not result in the loss or availability of UHS pond water. However, in the event the riprap slope protection is disturbed during extreme environmental conditions of wave and wind action, the erosion and deposition of the slope material could effect the circulation and availability of water by restricting intake and discharge to the pond.
2. The riprap does provide a passive slope protection function. Any long-term deterioration of the riprap could be corrected by maintenance providing material and equipment are available. The licensee in the FSAR committed to in-service inspection of the slope protection. FSAR Section 9.2.5.4, UHS Testing and Inspection, refers to in-service inspections of UHS components i.e., fans, valves, tower fill, and piping but does not reference slope protection inspection and maintenance. This item should be included as an FSAR commitment.

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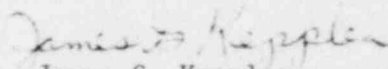
3. UHS pond slopes are designed as a Category I structures per 10 CFR 100, Appendix A, Section V(d)(2). Therefore, the protection of these slopes should be provided to preclude erosion caused by wind and wave action.

Therefore, pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within twenty-five days of the date of this letter a written statement or explanation in reply, including for each item of non-compliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your response to this letter will be placed in the NRC's Public Document Room.

Your cooperation with us is appreciated.

Sincerely,


James G. Keppler
Director

cc w/encl:
W. H. Weber, Manager
Nuclear Construction
E. L. Jordan, IE:HQ
E. J. Gallagher, IE:HQ
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