UNION ELECTRIC COMPANY
1901 GRATIOT STREET
ST. LOUIS, MISSOURI

DONALD F. SCHNELL
VICE PRESIDENT

May 21, 1984

MAILING ADDRESS:
P. O. BOX 149
ST. LOUIS, MISSOURI 63166

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

ULNRC-829

DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT, UNIT 1
IMPLEMENTATION OF GENERIC LETTER 83-28

References: 1. ULNRC-763 dated 3-12-84
2. ULNRC-687 dated 11-18-83

Recent discussions with the Staff have indicated the need to provide additional information with regard to the implementation schedule associated with the provisions of Generic Letter 83-28. The attachment provides the requested information. It is our understanding that this letter will provide the basis for an associated License Condition on this subject.

Very truly yours,

Robert F. Schnell
for Donald F. Schnell

GGY/lw

Attachments

B001
1/1

STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Robert J. Schukai, of lawful age, being first duly sworn upon oath says that he is General Manager-Engineering (Nuclear) 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 _____
Robert J. Schukai
General Manager-Engineering
Nuclear

SUBSCRIBED and sworn to before me this 21st day of May, 1984.

_____
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1985
ST. LOUIS COUNTY

cc: Glenn L. Koester
Vice President
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Regional Administrator
U.S. Nuclear Regulatory Commission
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799 Roosevelt Road
Glen Ellyn, IL 60137

1.1 Attached is a copy of Operations Department Procedure ODP-ZZ-00015, "Reactor Trip Review," as requested by the Staff. This program will be fully implemented by October 1, 1984.

1.2 This item is complete per the Staff.

2.1 Procedures to effect the development of the Callaway Q-List and ensure our interface with Westinghouse have been issued. These programs will be fully implemented by December 31, 1984.

2.2 Our interface with other vendors will follow the recommendations of the associated NUTAC report, "Vendor Equipment Technical Information Program," issued in March 1984. This program will be fully implemented by September 1985.

3.1/3.2 As discussed with the Staff, administrative procedures to ensure post-maintenance testing and incorporation of test guidance were in place prior to the development of the affected maintenance procedures. It is our position that, due to the vintage of Callaway, an additional review to provide this reassurance would be redundant to our normal procedure development process and is not justified. Technical Specification changes will be handled via the normal license amendment process. The implementation date for this item is the same as the date of this submittal.

4.1 Modified Undervoltage Trip Attachments for the bypass breakers will be installed by October 1, 1984.

4.2.1 Preventive Maintenance Procedure MPE-SB-QS001 covers the inspection, cleaning, and lubrication of reactor trip switchgear during each refueling outage.

This procedure covers the following salient points:

I. Switchgear

1. Inspect for discoloration, overheating, or weakened insulation.
2. Verify wiring connections, mounting brackets, and linkage.
3. Perform megger tests of buses.
4. Clean switchgear with vacuum and lint-free rags.
5. Clean buses and contacts with Stoddard's solvent (or Westinghouse #55812CA).

II. Breakers

1. Inspect for contact clearances.
2. Clean breakers with lint-free rags.
3. Clean contacts with Stoddard's solvent (or Westinghouse #55812CA).
4. Lubricate breakers per Instruction Manual with Dow Corning Molykote C-40. The interval between lubrications will not exceed 500 breaker operations as per the Instruction Manual.
5. Perform megger tests of breakers.
6. Perform mechanical test by manually tripping breakers.
7. Subsequent to the above, an electrical test of the breaker is performed to verify proper operation.

The Westinghouse Owner's Group compilation of maintenance information for the reactor trip switchgear is expected by July 1984. This information will be incorporated, as appropriate, in a fully implemented program by December 31, 1984.

4.2.2 The details of our trending program for reactor trip switchgear will be provided concurrent with its implementation date of December 31, 1984.

4.2.3/4.2.4 The results of the life cycle testing program and replacement interval information are expected by December 1984. These results will be incorporated into our preventive maintenance program prior to startup following the first refueling outage.

4.3 This item is complete per the Staff.

4.4 This item does not apply to Callaway.

4.5 This item is complete per the Staff.