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September 13, 1995

Donald F. Schnell
Senior Vice President
Nuclear

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

ULNRC-03267

CALLAWAY PLANT
DOCKET NUMBER 50-483
REVISION TO TECHNICAL SPECIFICATIONS
4.3.2.2, 4.7.1.2.1, AND THE BASES FOR
SPECIFICATION 3/4.7.1.2 FOR THE
AUXILIARY FEEDWATER SYSTEM
Reference: ULNRC-3113 dated December 9, 1994

The referenced letter submitted an amendment application proposing changes to Technical Specification 4.3.2.2, 4.7.1.2.1 and the Bases for Specification 3/4.7.1.2 for the Auxiliary Feedwater System. Among the changes is a decrease in frequency of Auxiliary Feedwater Pump surveillance testing from monthly to quarterly per NRC Generic Letter 93-05, Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation.

Based on a telephone conversation between NRC Staff reviewers and Union Electric personnel, attached is additional information on Auxiliary Feedwater System unavailability. This information supports the conclusion that the proposed Technical Specifications changes are consistent with Callaway Plant operating experience as discussed in the referenced letter. The conclusions of the previously submitted licensing evaluations performed pursuant to 10CFR50.59, 10CFR50.92, and 10CFR51.22(c)(9) are unaffected and remain valid.

If you have any questions on the attachment, please contact us.

Very truly yours

A handwritten signature in cursive script that reads "Donald F. Schnell".
Donald F. Schnell

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WBM/jdg

Attachment

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PDR ADDCK 05000483
P PDR

ADD 1

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

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Senior Vice President-Nuclear and an officer of 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 Donald F. Schnell
Donald F. Schnell
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this 13th day
of September, 1995.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC - STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
ST. LOUIS COUNTY.

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Callaway Plant
Auxiliary Feedwater System
Technical Specification Change
(TAC M91093)

Table 1 shows Cycle 7 Test and Maintenance (T&M) unavailability for each train of Auxiliary Feedwater. This includes only unavailabilities due to test and maintenance activities. Other causes of system unavailability are not included in Table 1. This data has been compiled to support Callaway Plant's implementation of the maintenance rule. Table 1 also includes a comparison of T&M unavailabilities between Cycle 7 and the data used in the Callaway IPE submitted to the NRC via ULNRC-2703, dated September 29, 1992. The data compiled for the Callaway Individual Plant Examination was from approximately 1987 to 1990. Train specific data from 1990 to the beginning of Cycle 7 (November 1993) has not been compiled.

Table 2 tabulates quarterly unavailabilities for each quarter since January 1992. This data is used as an INPO performance indicator. Note that train specific data is not compiled. The Callaway Plant Equipment Out of Service Log (EOSL) was used to determine the total hours required to be operable per quarter. The average (per train) unavailabilities were then calculated. The attached graph plots these average unavailabilities and shows that the total unavailabilities are consistently less than 2%. Table 2 also shows that the amount of unplanned unavailability is consistently extremely low. For the period of 1992 through 1994, the unplanned unavailability rate is approximately 0.07% per Auxiliary Feedwater train.

The Auxiliary Feedwater pumps are tested pursuant to Section XI of the ASME Boiler and Pressure Vessel Code per Technical Specification 4.0.5. The change to quarterly testing will not prevent more frequent testing if pump degradation is detected. The ASME Code requires doubling the testing frequency if testing indicates degradation.

TABLE 1

CALLAWAY NUCLEAR PLANT
AUXILIARY FEEDWATER AVAILABILITY INFORMATION

Test and Maintenance Unavailability (Info available for Cycle 7 only)		
Cycle 7 November 22, 1993 to March 24, 1995 (Breaker to Breaker)		
Total exposure hours = 487 Days X 24 Hours/Day = 11,688 hours.		
Unavailable Hours (Test and Maintenance Only)		
Turbine Driven Auxiliary Feedwater Pump		199.2 hours
Motor Driven Auxiliary Feedwater Pump A		88.6 hours
Motor Driven Auxiliary Feedwater Pump B		112.9 hours
Unavailability (Test and Maintenance Only)		
	Cycle 7	IPE Submittal
Turbine Driven Auxiliary Feedwater Pump	1.70 E-2	2.25 E-2
Motor Driven Auxiliary Feedwater Pump A	7.58 E-3	1.85 E-2
Motor Driven Auxiliary Feedwater Pump B	9.66 E-3	2.28 E-2

TABLE 2

TOTAL UNAVAILABILITY
(Train Specific Data not Compiled)

	Planned Hours	Unplanned Hours	Total Unavailable Hours	Total Hours Required to be Operable (per train)	Average Unavailability per Train
1st Quarter 1992	15	0	15	1924	2.60 E-3
2nd Quarter 1992	23.8	0	23.8	1150	6.90 E-3
3rd Quarter 1992	92.7	13.5	106.2	2208	1.60 E-2
4th Quarter 1992	36	0	36	2208	5.43 E-3
1st Quarter 1993	122.6	0	122.6	2136	1.91 E-2
2nd Quarter 1993	67.5	9.1	76.6	2184	1.17 E-2
3rd Quarter 1993	58.5	0	58.5	2208	8.83 E-3
4th Quarter 1993	67.7	0	67.7	1134	1.99 E-2
1st Quarter 1994	81	6	87	2136	1.36 E-2
2nd Quarter 1994	49.9	0	49.9	2184	7.62 E-3
3rd Quarter 1994	86.6	0	86.6	2208	1.31 E-2
4th Quarter 1994	35.4	18.6	54	2208	8.15 E-3
1st Quarter 1995	90.2	6.6	96.8	2013	1.60E-2

CALLAWAY
NUCLEAR PLANT

AUXILIARY FEEDWATER SYSTEM AVERAGE UNAVAILABILITY (PER TRAIN)

