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

ULNRC- 2563

**CALLAWAY PLANT  
DOCKET NUMBER 50-483  
REVISION TO TECHNICAL SPECIFICATION 3/4.7.8  
SNUBBER VISUAL INSPECTION INTERVALS AND ACCEPTANCE CRITERIA**

- Ref: 1. ULNRC-2452, 8/1/91, "Callaway Plant/Docket Number 50-483/Revision to Technical Specification 3/4.7.8 /Snubber Visual Inspection Intervals and Corrective Actions"  
2. Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," December 11, 1990

Union Electric Company herewith revises its previously submitted application for amendment to Facility Operating License Number NPF-30 for the Callaway Plant (Reference 1). Specifically, Union Electric Company revises its original request to revise Technical Specification 3/4.7.8 and associated Bases to change the snubber visual inspection intervals and acceptance criteria in accordance with Generic Letter ("GL") 90-09 (Reference 2).

The "Visual Inspection Acceptance Criteria" as stated in GL 90-09 specify two conditions which must be satisfied in order to reclassify snubbers as acceptable which are initially classified as unacceptable as a result of visual inspections. Generic Letter 90-09 specified these conditions using the logical connector "and," i.e., both conditions must be satisfied in order to reclassify an unacceptable snubber. Reference 1 (See Insert B of Attachment 2 of Reference 1) specified these conditions using the logical connector "or," i.e., either condition may be satisfied to reclassify an

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unacceptable snubber. Following recent conversations with the NRC project manager for the Callaway Plant, it has been determined that "and" is the more appropriate connector. Note that the current Technical Specifications of the Callaway Plant use the logical connector "or." The word "system" has also been added to clarify the second to last sentence of the section addressing visual inspection acceptance criteria.

The pertinent text as herewith revised (Attachment 1) is consistent with the guidance of GL 90-09. The conclusions of Reference 1 that the subject amendment application does not involve any unreviewed safety question as defined in 10CFR50.59 nor a significant hazard consideration as determined per 10CFR50.92 remain valid.

If you have any questions on this matter, please contact us.

Very truly yours,



Donald F. Schnell

GAC/dls

Attachment: 1. Revision to Technical Specification Changes



INSERT "B"

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; ~~or~~ (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.8f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to determine operability with an unacceptable snubber. If operability cannot be justified, the system shall be declared inoperable and the ACTION requirements shall be met.

and

system

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