

UNION ELECTRIC COMPANY

1901 GRATIOT STREET
ST. LOUIS, MISSOURI

July 31, 1984

DONALD F. SCHNELL
VICE PRESIDENT

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- 892

DOCKET NUMBER 50-183
CALLAWAY PLANT, UNIT 1
APPLICATION FOR PARTIAL EXEMPTION FROM APPENDIX J

The purpose of this letter is to request a partial exemption, pursuant to the provisions of 10CFR50.12, from the testing requirements of 10CFR50, Appendix J.

The exemption requested would allow reduced pressure leakage testing of containment air locks following periods when the air locks are open and containment integrity is not required by the Technical Specifications.

The reduced pressure test uses a testable seals feature which verifies that the seal leakage is less than $0.005L_a$ as determined by precision flow measurements when measured for at least 30 seconds at a constant pressure of greater than or equal to 10 psig. The air locks will be tested at P_a (as defined in Technical Specification 3.6.1.2) at least once every 6 months and prior to establishing containment integrity when maintenance has been performed on an air lock that could affect the lock's sealing capability.

The current requirement contained in 10CFR50, Appendix J, III.D.2.(b)(ii) poses a significant burden. Air locks will usually be opened during outages to facilitate equipment and personnel transport into and out of containment. Prior to entry into Mode 4, the air lock leakage tests are required to be performed. Installing strongbacks, performing the tests and removing strongbacks requires at least six hours during which access through the air locks is prohibited. The proposed changes would provide for reduced pressure tests, if the test at P_a had been performed within 6 months and air lock sealing maintenance had not been performed. This will allow better scheduling of the normal air lock leakage test during periods when the need for access to containment is minimal.

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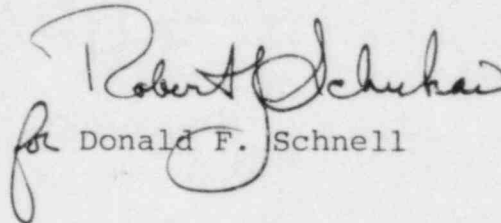
Mr. Harold R. Denton
July 31, 1984
Page 2

This exemption will not pose any undue risk to the health and safety of the public. Testing of the air locks at reduced pressure by the use of the testable seals feature in conjunction with tests at P_a every 6 months and following seal maintenance provides adequate assurance of proper seal performance. The air locks are designed to maintain containment integrity with a pressure applied from inside containment. Testing of the overall air lock at P_a from within the air lock does present some possibility of damage or degradation to the containment side air lock door and seal.

The Standard Technical Specifications for Westinghouse PWR's (NUREG-0452, Revision 4) generically recognize this as an area for possible exemption to Appendix J. The Callaway Technical Specifications do not require an amendment to be consistent with this exemption request.

This request for exemption is for the duration of the license for Callaway Plant, Unit 1. If any questions arise during your review of this request, please contact us.

Very truly yours,

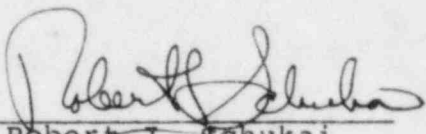

for Donald F. Schnell

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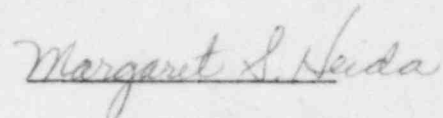
cc: J. Holonich

STATE OF MISSOURI)
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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 *31st* day of *July*, 198*4*



MARGARET S. HEIDA
NOTARY PUBLIC—STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXPIRES JANUARY 2, 1986

cc: Gerald Charnoff, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M. Street, N.W.
Washington, D.C. 20036

Nicholas A. Petrick
Executive Director
SNUPPS
5 Choke Cherry Road
Rockville, Maryland 20850

John H. Neisler
Callaway Resident Office
U.S. Nuclear Regulatory Commission
RR#1
Steedman, Missouri 65077

William Forney
Division of Projects and
Resident Programs, Chief, Section 1A
U.S. Nuclear Regulatory Commission
Region III
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ULNRC- 892

DOCKET NUMBER 50-483
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This exemption will not pose any undue risk to the health and safety of the public. Testing of the air locks at reduced pressure by the use of the testable seals feature in conjunction with tests at P_a every 6 months and following seal maintenance provides adequate assurance of proper seal performance. The air locks are designed to maintain containment integrity with a pressure applied from inside containment. Testing of the overall air lock at P_a from within the air lock does present some possibility of damage or degradation to the containment side air lock door and seal.

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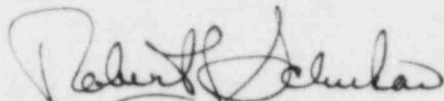

for Donald F. Schrell

DS/sz

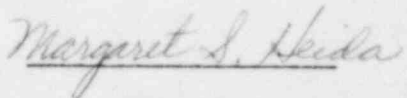
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