

ENCLOSURE

Callaway Plant, Unit 1

Safety Evaluation for

Deletion of Cold Control Rod Drop Test

By letter, D. F. Schnell to H. R. Denton, dated July 26, 1984, the Union Electric Company requested an exemption from cold rod drop testing outlined in Regulatory Guide 1.68, Appendix A, 2.b. The basis for this request is that normal operation with the plant at power and the temperature less than 540°F is precluded by technical specifications. Therefore, rod drop testing at hot zero power is sufficient to fulfill the intent of this section, i.e., "to bound conditions under which scram might be required."

The requested exemption to Regulatory Guide 1.68, Appendix A, 2.b. is acceptable because it bounds conditions allowed under normal operations. In addition, it is consistent with technical specifications surveillance testing and exemptions accepted in other plant test programs.