

**UNION
ELECTRIC**



February 9, 1996

Donald F. Schnell
Senior Vice President
Nuclear

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Gentlemen:

ULNRC - 03330

**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**

- References: 1) ULNRC-3113 dated December 9, 1994
2) ULNRC-3267 dated September 13, 1995

Reference 1 submitted an amendment application proposing changes 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. 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. Reference 2 provided additional information regarding Auxiliary Feedwater System unavailability.

Based on telephone conversations between NRC Staff reviewers and Union Electric personnel, attached is additional information regarding the referenced amendment request. As a result of the discussions with NRC personnel, Union Electric has revised the proposed Technical Specifications markups to incorporate NRC staff comments. Attachment 1 provides the additional information requested by NRC and discussions of resulting changes. Attachment 2 provides revised Technical Specifications markups resulting from the NRC comments. Attachment 3 provides the revised retyped Technical Specifications pages. Attachments 2 and 3 supersede the corresponding Technical Specifications pages submitted in Reference 1. 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.

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
December 19, 1995
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If you have any questions concerning this
letter, please contact us.

Very truly yours,

A handwritten signature in cursive script that reads "Donald F. Schnell". The signature is written in dark ink and is positioned above the printed name.

Donald F. Schnell

WBM/sld

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

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 ninth day
of February, 1996.

Barbara J. Peaff
BARBARA J. PEAFF
NOTARY PUBLIC - STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
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Attachment 1

Additional Information Regarding
Proposed Auxiliary Feedwater
Technical Specification Changes

**ADDITIONAL INFORMATION REGARDING
PROPOSED AUXILIARY FEEDWATER
TECHNICAL SPECIFICATION CHANGES**

Reference: 1) ULNRC-3113, dated December 9, 1994

During telephone conversations between Union Electric and NRC Staff personnel, five areas were identified in which the NRC had comments/questions and requested additional information. Union Electric has evaluated the areas and provides the following to address NRC comments:

1. The proposed amendment request changes the frequency of performing valve position verifications per SRS 4.7.1.2.1.a.3 and 4.7.1.2.1.a.4 from at least once per 31 days on a staggered test basis to at least once per 31 days. Was this intentional?

Union Electric Response

Yes. Union Electric proposed to change the frequency for performing Surveillance Requirements (SR) 4.7.1.2.1.a.3 and 4.7.1.2.1.a.4 from once per 31 days on a STAGGERED TEST BASIS to once per 31 days via Reference 1. These SRs involve the periodic verification of auxiliary feedwater system valve positions. The changes are consistent with NUREG 1431, Rev. 1, Standard Technical Specifications - Westinghouse Plants (STS) and are in accordance with NRC Generic Letter 93-05, Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation. The changes will not change the actual frequency of the valve position verifications which will still be performed at least once per 31 days. The changes will not change the method of verification, the acceptance criteria, nor the level of control on plant components. The changes will simply allow all AFW valve verifications to be performed at the same time. These changes do not alter the conclusions of the licensing evaluations submitted in Reference 1.

2. NUREG 1431, Rev. 1, Standard Technical Specifications - Westinghouse Plants, contains an additional requirement that steam turbine-driven auxiliary feedwater pump testing be performed within 24 hours of reaching appropriate testing conditions. Union Electric's amendment request should address this.

Union Electric Response

Union Electric will incorporate the comment and herewith provides revised markups (and rewrites) of Technical Specifications 4.3.2.2 and 4.7.1.2.1 which add the 24 hour requirement for performing the steam turbine-driven auxiliary feedwater pump surveillances after attaining the appropriate testing conditions (900 psig in all steam generators). These markups supersede the markups provided in Reference 1.

These additions are in accordance with NUREG 1431, Rev. 1, for the auxiliary feedwater system. These changes provide a time restriction for performing the testing at which time the steam turbine-driven pump would be declared inoperable if not satisfactorily completed. These proposed changes are more restrictive than the current specifications and do not alter the conclusions of the previous licensing evaluations submitted in Reference 1.

3. Callaway's Technical Specifications do not require Auxiliary Feedwater System operability in Mode 4 when the Steam Generators are used to remove decay heat. The STS includes this requirement. Union Electric should address this.

This issue is beyond the scope of the referenced amendment request. The amendment request proposes to incorporate the recommendations of NRC Generic Letter 93-05 which does not address Mode 4 applicability. This issue will be resolved through Union Electric's program to adopt the Standard Technical Specifications.

4. The referenced amendment request proposes the removal of the "at shutdown" requirement for testing the steam turbine-driven auxiliary feedwater pump. The STS does not include such a requirement for the motor-driven auxiliary feedwater pumps either. Does Union Electric intend to pursue a similar change for the motor-driven pumps?

No. Union Electric does not believe that the change is necessary at this time. The removal of the "at shutdown" wording for the motor-driven pumps would not provide significant benefit since the testing is normally performed at shutdown (specifically, Mode 4 or lower). Any change in the wording will be pursued with Union Electric's program to adopt the Standard Technical Specifications.

5. The Bases for Specification 3/4.7.1.2 are inconsistent with regard to its discussion of auxiliary feedwater pump testing. Specifically, a statement is provided concerning testing the motor-driven pumps on fixed recirculation flow, however, no similar statement is provided which discusses steam turbine-driven testing. In addition, the Bases are not clear about whether any auxiliary feedwater pump is capable of removing decay heat and reducing RCS temperature to ≤ 350 °F.

Union Electric will incorporate the comments and herewith provides revised markups of the Bases for TS 3/4.7.1.2. The revised markups supersede the markups provided in Reference 1. The additional changes provide amplifying information regarding the auxiliary feedwater system. The changes are supported by Callaway Final Safety Analysis Report Chapter 10.4.9 and do not impact the conclusions of the licensing evaluations submitted in Reference 1.

Attachment 2

Marked-up Technical Specification Pages

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