

June 9, 1992

Docket No.: LJ-483

Mr. Donald F. Schnell
Senior Vice President - Nuclear
Union Electric Company
Post Office Box 149
St. Louis, Missouri 63166

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Dear Mr. Schnell:

SUBJECT: CALLAWAY NUCLEAR PLANT - SAFETY EVALUATION OF THE RESPONSE TO THE STATION BLACKOUT RULE, 10 CFR 50.63 (TAC NO. M68524)

By letters dated April 12, 1989, March 29, 1990, May 17, 1991, and May 31, 1991, the Union Electric Company (the licensee) submitted responses to the Station Blackout (SBO) Rule pursuant to 10 CFR Part 50.63 for the Callaway Nuclear Plant. Additional information was provided during teleconferences between the licensee and the NRC staff on May 9, 1991, and June 21, 1991. This information was reviewed by the NRC staff and its contractor, Science Applications International Corporation (SAIC). The results of our review are documented in the enclosed Safety Evaluation (SE), which includes the SAIC Technical Evaluation Report (TER) as an attachment.

Based on our review of these submittals, the staff finds that, contingent on the satisfactory resolution of the recommendations presented in this SE, the design of the Callaway Plant conforms with the SBO rule. The recommended actions include the following:

- (1) Verify that vital information will not be lost due to shedding of the Engineered Safeguards Features (ESF) status panels or inverters from the station batteries;
- (2) Revise heat-up calculations for the control room and instrumentation and control (I&C) cabinet rooms;
- (3) Provide an administrative procedure to maintain the inverter room temperature at or below the initial room temperature used in the heat-up calculations;
- (4) Confirm that the plant complies with the QA requirements of RG 1.155, Appendix A; and
- (5) Confirm that the Emergency Diesel Generator Reliability program is consistent with RG 1.155, Section 1.2.

You are requested to submit your response to these recommendations or suitable alternatives within 30 days of receipt of this letter and the enclosed Safety Evaluation. In your response you should provide a schedule for the implementation of the action required to meet the SBO rule, in accordance with 10 CFR 50.63(c)(4).

The following areas are subject to follow-up inspection by the NRC to verify that the implementation of any modifications and the supporting

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documentation is adequate to meet the SBO rule. The staff is developing guidance for this inspection activity to verify the following:

- a) Hardware modifications and procedural changes;
- b) SBO procedures in accordance with RG 1.155, Position 3.4, and NUMARC 87-00, Section 4;
- c) Operator staffing and training to follow the identified actions in the SBO procedures;
- d) EDG reliability program conformance with RG 1.155 guidance;
- e) Equipment and components required to cope with a SBO are incorporated in a QA program that meets the guidance of RG 1.155, Appendix A; and
- f) Actions taken pertaining to the specific recommendations noted in the SE.

The guidance provided in Technical Specifications (TS) for a SBO states that the TS should be consistent with the Interim Commission Policy Statement on Technical Specifications. The staff has taken the position that TSs are required for SBO response equipment. However, the question of how specifications for the SBO equipment will be applied is currently being considered generically by the NRC in the context of the Technical Specification Improvement Program and remains an open item at this time. In the interim, the staff expects plant procedures to reflect the appropriate testing and surveillance requirements to ensure the operability of the necessary SBO equipment. If the staff later determines that TSs regarding the SBO equipment is warranted, the licensee will be notified of the implementation requirements.

If you have any questions concerning the enclosed SE or the TER, please contact L. Raynard Wharton at (301) 504-1396.

The reporting requirements contained in this letter affect fewer than ten respondents; therefore, Office of Management and Budget clearance is not required under Public Law 96-511.

Sincerely,

Original signed by Richard L. Emch, Jr. for:
John Hannon, Director
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:

Safety Evaluation w/attached

TER SAIC-91/6684

cc: See next page

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PD3-3:PM

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Mr. D. F. Schnell
Union Electric Company

Callaway Plant
Unit No. 1

cc:

Cermak Fletcher Associates
18225 Flower Hill Way #A
Gaithersburg, Maryland 20879-5334

Gerald Charnoff, Esq.
Thomas A. Baxter, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Mr. T. P. Sharkey
Supervising Engineer,
Site Licensing
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
RR#1
Steedman, Missouri 65077

Mr. Alan C. Passwater, Manager
Licensing and Fuels
Union Electric Company
Post Office Box 149
St. Louis, Missouri 63166

Manager - Electric Department
Missouri Public Service Commission
301 W. High
Post Office Box 360
Jefferson City, Missouri 65102

Regional Administrator
U.S. NRC, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Mr. Ronald A. Kucera, Deputy Director
Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Mr. Bart D. Withers
President and Chief
Executive Officer
Wolf Creek Nuclear Operating
Corporation
P.O. Box 411
Burlington, Kansas 66839

Mr. Dan I. Bolef, President
Kay Drey, Representative
Board of Directors Coalition
for the Environment
6267 Delmar Boulevard
University City, Missouri 65130