September 20, 1984

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Docket No. 50-483

Union Electric Company ATTN: Mr. Donald F. Schnell Vice President - Nuclear Post Office Box 149 - Mail Code 400 St. Louis, MO 63166

Gentlemen:

This is in response to your letter of September 10, 1984 (ULNRC-821), in which Union Electric Company (UE) proposes a series of operating evolutions, prior to completing the low power test program, which will give Callaway shift crews additional hands-on experience in order to provide the NRC increased confidence in UE's ability to safely operate the plant. In general, we find your proposal acceptable.

UE has proposed that the plant be returned to Mode 4, and the residual heat removal system placed in service, then returned to Mode 3. This will be accomplished "where possible" by licensed shift personnel other than those directly involved in the initial plant heatup. We understand the caveat "where possible" was used to excuse personnel who were not available because of sickness or vacation and recognizes that some personnel will only observe certain operation(s). We further understand that this evolution will take place over several shifts enabling a majority of your shift personnel to have participated in a heatup operation.

In addition, we understand that following _tainment of Mode 2, those crews which have not experienced direct participation in the initial criticality evolution will be allowed to cycle the unit from approximately 0.5% power to hot standby and return the unit to Mode 2.

We recognize that the plant has already gone through several mode changes and associated heatups and cooldowns, and that the startup test program includes many reactivity changes which have already involved or which will involve many shift personnel.

In addition, we note the actions which you have taken to minimize unnecessary activities being conducted in the control room and to accomplish a greater degree of discipline in control room operations.

In addition to the above, since the plant first entered Mode 3, the NRC has assigned additional reactor inspectors to the Callaway plant to observe operations. They have been onsite during parts or all of each shift including the weekends and have observed that the plant operations are being conducted in a more deliberate and controlled manner.

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Based on the plant evolutions already made, the reactivity changes already incorporated in the startup test program, the improvement noted in your performance, and increased NRC inspection coverage, we find your proposal to be acceptable.

"Original Signed by J. G. Keppler"

James G. Keppler Regional Administrator

Enclosure: Ltr dtd 09/10/84

cc w/encl: W. H. Weber, Manager, Nuclear Construction S. E. Miltenberger, Plant Manager R. L. Powers, Assistant Manager Quality Assurance DMB/Document Control Desk (RIDS) Resident Inspector, RIII Region IV K. Drey Chris R. Rogers, P.E. Utility Division, Missouri Public Service Commission SNUPPS H. Denton, NRR D. Eisenhut, NRR R. DeYoung, IE

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