



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

BCB/BCB

AUG 07 1992

Jocket No. 50-483

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

SUBJECT: UNION ELECTRIC COMPANY LETTER ULNRC-2679, DATED AUGUST 6, 1992 -
REQUEST FOR WAIVER OF COMPLIANCE REGARDING TECHNICAL SPECIFICATION
LIMITING CONDITION FOR OPERATION RELATED TO THE 'D' SAFETY
INJECTION ACCUMULATOR

Dear Mr. Schnell:

On August 6, 1992, you submitted the subject request for a temporary waiver of compliance (TWOC). A copy of your letter is enclosed. This request for a TWOC was prompted by your discovery on July 1, 1992, that the 'D' Safety Injection accumulator vent valve (EP-HV-8950F) was leaking at a rate of approximately one liter per second of nitrogen. In order to replace this valve, the accumulator would have to be depressurized rendering it inoperable per Technical Specification (T/S) 3.5.1, which requires accumulator pressure to be between 602 and 648 psig. The Action Statement for an inoperable accumulator requires that the accumulator be returned to an operable status within one hour or be in at least Hot Standby within the next six hours and reduce Reactor Coolant System (RCS) pressure to less than 1000 psig within the following six hours.

Your waiver request would extend the one hour allowed outage time to up to 24 hours to complete the valve replacement and necessary testing of the 'D' Safety Injection accumulator. I understand that you have developed and approved a procedure to provide actions for the licensed operators in the event accumulator level or pressure begins to decrease on one of the other three Safety Injection accumulators, and that if you exceed the allowed leakage on the 'D' accumulator discharge check valve, EP-8956D, you will comply with the appropriate T/S action statement.

Your request for a temporary waiver of compliance met the eligibility criteria in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement need be prepared.

I granted the requested relief on August 6, 1992, to begin at

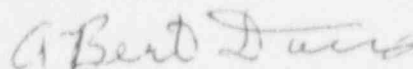
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0600 CDT August 7, 1992, and to expire at 0600 CDT August 8, 1992, based on the minimal increase in risk associated with extending the allowed inoperability time and the increase in safety by alleviating an unnecessary thermal cycle on the plant that would be experienced if the plant were to be shut down to effect valve repair. I understand that this waiver of compliance will be terminated prior to its expiration date if the accumulator is returned to an operable status in less than the 24 hours requested.

Sincerely,



A. Bert Davis
Regional Administrator

Enclosure: As Stated

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