



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20565

August 11, 1992

Docket No. 50-483

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

Dear Mr. Schnell:

SUBJECT: REQUEST FOR TEMPORARY WAIVER OF COMPLIANCE - TECHNICAL
SPECIFICATION TABLE 4.3-1, REACTOR TRIP SYSTEM INSTRUMENTATION
SURVEILLANCE REQUIREMENTS (TAC NO. M84230)

This confirms the granting of a Temporary Waiver of Compliance for the Callaway Plant, Unit 1, from the provisions of Technical Specification (TS) Surveillance 4.3.1.1, Table 4.3-1, Reactor Trip System Instrumentation Surveillance Requirements, as it pertains to performing the Trip Actuating Device Operational Test of the manual reactor trip function. This waiver was initially provided verbally by me on the evening of August 7, 1992, at approximately 17:35 EDT, with the concurrence of the NRC's Region III office. This verbal request and the subsequent granting of the waiver was requested by you due to the time constraints associated with the Callaway Plant TS which would have required placing the unit in at least Hot Standby within 7 hours of the manual reactor trip function being declared inoperable. The decision to grant the waiver was based on the assessment that a high confidence exists that the manual trip function will perform if called upon and that even if the function is unavailable, plant safety is ensured by the redundancy of the reactor trip system and the availability of other safety systems.

NRR performed an evaluation based upon the information you provided verbally and your subsequent written request and supporting documentation and determined that it adequately supported your request for a temporary waiver of compliance. This temporary waiver of compliance shall be valid until NRR has completed its review of your proposed TS amendment in accordance with the emergency provisions of 10 CFR 50.91(a)(5) and 10 CFR 50.92(c).

Table 3.3-1 of TS 3.3.1 specifies that the minimum number of operable channels of the manual reactor trip function is two and the surveillance requirements of Table 4.3-1 of TS 4.3.1 require a trip actuating device operational test (TADOT) be performed for each channel at least once per 18 months. Note 16 to Table 4.3-1 states that a TADOT shall independently verify the operability of the undervoltage and shunt trip circuits for the manual reactor trip function and the bypass breaker trip circuit.

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You stated that the undervoltage portion of the manual trip function was adequately tested through Refueling Outage #2 in the fall of 1987 and that the shunt trip test specified by the pre-operational test procedure has subsequently been determined to be inadequate. Further, you determined that prior to Refueling Outage #3, the requirement for testing the under-voltage and shunt portion of the handswitch were deleted for unknown reasons. However, since the manual trip function has been demonstrated to trip the reactor during refueling outages at least once every 18 months since initial startup, this has verified that the manual reactor trip switches and circuitry provide a reactor trip through at least one path and most likely both the undervoltage and shunt trip attachments.

It is the understanding of the NRC staff that verification of the OPERABILITY of the manual reactor trip circuitry shall be performed prior to startup after the first shutdown to Mode 3 after August 7, 1992.

Sincerely,

original signed by

John A. Zwolinski, Assistant Director
for Region III Reactors
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

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Callaway Plant
Unit No. 1

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