Donald F. Schnell July 10, 1992 U.S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Stop P1-137 Washington, D.C. 20555 ULNRC-2662 NRC TAC No. 68524 Gentlemen: CALLAWAY PLANT DOCKET NUMBER 50-483 CALLAWAY STATION BLACKOUT SUBMITTAL References: 1) ULNRC-1973 dated 4/12/89 2) ULNRC-2182 dated 3/29/90 3) ULNRC-2416 dated 5/31/91 4) J. Hannon letter to D. F. Schnell dated 6/9/92

A telecon was held on June 25, 1992 between Union Electric and NRC to discuss the NRC Station Blackout Safety Evaluation Report for Callaway Plant (Reference 4). This SER concluded that the Callaway Plant was in conformance with the SBO rule contingent upon the satisfactory resolution of five recommended actions. These recommended actions and the acceptable resolution thereof, were the topic of the telecon and are discussed in the attachment to this letter.

Union Electric will complete all SBO related procedure revisions within 90 days of the date that NRC provides final approval of the Callaway SBO Program. If you have any questions concerning this information, please contact us.

Very truly yours,

Donald F. Schnell

WEK/dls

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## CALLAWAY STATION BLACKOUT SUBMITTAL

Recommended Action (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.

Union Electric response: The Emergency Operating Procedure for Loss of All AC Power (ECA 0.0) will be revised to eliminate the option of shedding the ESF status panels for an SBO. As discussed in Reference 3, non-vital inverters will be shed to assure the capability to operate the supply breaker to XNBO2.

Recommended Action (2): Revise heat-up calculations for the control room and instrumentation and control (I&C) cabinet rooms.

Union Electric Response: Union Electric has revised the heat-up calculation for the control room and instrumentation and control cabinet rooms by increasing the start temperature of the cable spreading rooms from 78°F to 82°F.

In addition, the following is provided for information:

- a) The heat-up calculation utilizes outside wall temperatures from Table 7, Chapter 26 of the ASHRAE handbook.
- b) The control room proper is actually two separate rooms which are divided by the control consoles. These rooms, the control room and the equipment cabinet area, constitute the entire control room proper and the heat loads from both areas must be added to attain the total heat load for the control room proper. The heat loads for these areas were transmitted to NRC by Reference 19 (of the Technical Evaluation Report).
- c) The heat load due to people was determined from Table 18 of the 1985 ASHRAE Fundamentals Handbook. This table shows a value of 325 Btu/hr sensible heat (latent heat is discounted in the heat-up calc.). This appears to be consistent with NRC Notice 92-32 which recommends a total heat load (latent and sensible heat) of 640 Btu/hr be considered in room calculations.
- d) An administrative procedure will be instituted to maintain rooms adjacent to the control room at temperatures lower than the values assumed in the heat-up calculation at the start of the SBO.

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Recommended Action (3): Provide an administrative procedure to maintain the inverter room temperature at or below the initial room temperature used in the heat-up calculations.

Union Electric Response: The inverter room temperatures are monitored via indicating switches which alarm in the control room. The plant operator responds to this alarm by:

- 1) ensuring that the Class 1E A/C unit is operating properly;
- 2) ensuring that the heater is off and that an adequate ESW supply is available to the A/C unit, and;
- 3) checking the equipment in the room for overheating.

Recommended Action (4): Confirm that the plant complies with the QA requirements of RG 1.155, Appendix A.

Union Electric Response: The Callaway Supplemental Quality Assurance Program is being revised to include a new section addressing non-safety related equipment required to cope with a station blackout. This program is in compliance with RG 1.155, Appendix A.

Recommended Action (5): Confirm that the Emergency Diesel Generator Reliability program is consistent with RG 1.155, Section 1.2.

Union Electric Response: Union Electric currently maintains a procedure for Emergency Diesel Reliability which is in compliance with the requirements of RG 1.155, Section 1.2.

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