



UNION ELECTRIC COMPANY

1901 Gratiot Street, St. Louis

Donald F. Schnell
Vice President

January 29, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

ULNRC-1031

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1

REVISIONS TO TECHNICAL SPECIFICATION TABLE 4.3-1

Reference: Youngblood to Schnell letter dated 7-18-84,
Review of Design for Automatic Shunt
Trip for Scram Breakers - Callaway Plant, Unit 1

Union Electric Company is transmitting three (3) original and forty (40) conformed copies of an application for amendment to Facility Operating License No. NPF-30 for Callaway Plant, Unit 1.

This amendment application requests that the surveillance requirements given in Technical Specification Table 4.3-1 be revised in accordance with the Staff positions delineated in the referenced letter. These revisions are as follows:

1. Note 7 of Table 4.3-1 is being revised to indicate that the on-line Trip Actuating Device Operational Tests of the reactor trip breakers shall include independent verification of the Undervoltage and Shunt trips. Each train shall be tested at least every 62 days on a STAGGERED TEST BASIS. This is consistent with the reference letter and Item 4.5.1 of Generic Letter 83-28. Heretofore, this independent verification was performed at least once per 18 months.
2. Note 11 of Table 4.3-1 is being revised to add operability testing requirements for the Undervoltage and Shunt Trip Attachments on the bypass breakers. These requirements, including the test intervals, are per the Staff positions given in the reference letter.

The reference letter also required that a change be effected to ensure that all control room reactor trip switch contacts and wiring are tested prior to startup after each refueling outage. No changes are required in this area as this testing is presently covered by Technical Specification 4.3.1.1-1.

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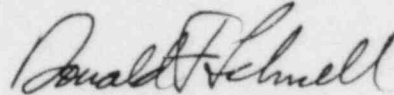
Mailing Address: P.O. Box 149, St. Louis, MO 63166

*Rec'd w/ check \$150.00
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The proposed changes would become effective for Union Electric implementation upon NRC approval. Enclosed is a check for the \$150.00 application fee as required by 10CFR170.21.

Very truly yours,



D. F. Schnell

GGY/lw

Enclosures: 1-Safety Evaluation
2-Significant Hazards Consideration
3-Proposed Technical Specification Changes

STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell
Donald F. Schnell
Vice President
Nuclear

SUBSCRIBED and sworn to before me this 29th day of January, 1985.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1985
ST. LOUIS COUNTY.

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SAFETY EVALUATION

This amendment request revises the Table Notations associated with Technical Specification Table 4.3-1 in order to comply with Staff requirements. Per these requirements Union Electric must submit proposed Technical Specification changes that address the following:

- a) Independent, on-line testing of the Undervoltage and Shunt Trip Attachments on the reactor trip breakers per Item 4.5.1 of Generic Letter 83-28.
- b) Periodic testing of the Undervoltage and Shunt Trip Attachments on the bypass breakers, with test intervals as defined by the Staff.

The addition of the above surveillance requirements results in greater confidence that the respective Undervoltage and Shunt Trip Attachments will perform as designed. Pursuant to the above information, this amendment request does not adversely affect or endanger the health of the general public and does not involve an unreviewed safety question.

SIGNIFICANT HAZARDS CONSIDERATION

This amendment request revises the Table Notations associated with Technical Specification Table 4.3-1 in order to comply with Staff requirements.

The Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (48FR14870). This amendment request is similar to the example of an action involving no significant hazards consideration which relates to a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications.

This amendment request does not involve a significant increase in the probability or consequences of an accident or other adverse condition over previous evaluations; nor create the possibility of a new or different kind of accident or condition over previous evaluations; nor involve a significant reduction in a margin of safety. Based on the foregoing, the requested amendment does not present a significant hazard.