

July 15, 1992

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U.S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Station P1-137 Washington, DC 20555

Gentlemen:

ULNRC-2663

CALLAWAY PLANT
DOCKET NUMBER 50-483
SUPPLEMENT TO 10 CFR 50.59 ANNUAL REPORT
Ref: 1. ULNRC-2646, dated June 12, 1992
2. ULNRC-2532, dated December 12, 1991

Reference 1 transmitted a report (the "annual 50.59 report") which summarized written safety evaluations of changes approved and implemented for Callaway Plant for the annual period ending March 31, 1992.

Reference 2 transmitted revisions to the Callaway Plant Core Operating Limits Report (COLR) affecting the end of cycle life (EOL) moderator temperature coefficient (MTC) limit and the 300-ppm MTC surveillance limit. It was confirmed that the results presented in the FSAR remain valid. Union Electric committed in Reference 2 to drument this in the next annual FSAR update and annual 50.59 report. The attached summary of the 10 CFR 50.59 safety evaluation for the COLR revisions of Reference 2 was not included among the safety evaluations summarized in Reference 1.

Under 10 CFR 50.59 Union Electric need report only those safety evaluations associated with a change to the plant or procedures described in the FSAR, a test or experiment not described in the FSAR, or a change in the Technical Specifications. The COLR revisions in Reference 2 were not associated with such a change, test, or experiment, and, since the COLR is no longer a part of the Technical Specifications, the COLR revisions were not a change in the Technical Specifications. Hence, the safety evaluation for the COLR revisions in Reference 2 did not meet the requirements of 10 CFR 50.59 for

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U.S. Nuclear Regulatory Commission Page 2 inclusion in the annual 50.59 report submitted by Reference 1. But, in accordance with Union Electric's explicit commitment in Reference 2, the safety evaluation of these COLR revisions should have been included in the annual 50.59 report and is herewith attached as a supplement to that report. If you have any questions on this matter, please contact us. Very truly yours, Donald F. Schnell GAC/kea