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**UNION  
ELECTRIC**

January 8, 1993

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ULNRC-2745

Gentlemen:

DOCKET NUMBER 50-483

CALLAWAY PLANT

INDIVIDUAL PLANT EXAMINATION

Reference: ULNRC-2703 dated September 29, 1992

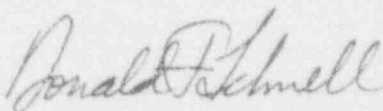
The referenced letter transmitted the Callaway Individual Plant Examination (IPE) report. The purpose of this letter is to clarify a statement made in that report.

Section 2.4.4 of the IPE report states that "...for each reference used in the IPE, Union Electric reviewed the current revision of each record against the revision documented in the IPE calculation packages to determine if the subsequent revisions would change the modeling or results of the IPE." Union Electric did not perform a review of all packages at the time of the submittal but did review the latest record revisions for each package at the time it was prepared. The intent of the statement was to describe the process of maintaining the Callaway PRA as a living document. As part of our periodic update process, it is our intention to perform a Level 1 IPE reference review after Refuel 6, scheduled for this fall. The objective of this review will be to identify any plant changes, made after our performance of the IPE, which will require changes in the Level 1 PRA models. This reference review, along with reviews of design change packages, will be the basis for our first update of the Callaway Level 1 PRA. The PRA update should be completed by the middle of 1994.

Attached are changes to pages 2-13, 2-14 and an updated List of Effective Pages for the IPE report. Should you have any questions on this matter, please contact us.

Very truly yours,

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LIST OF EFFECTIVE PAGES

<u>TABLE OF CONTENTS</u>	Rev.	<u>Tables</u>	Rev.
i		2.5-6	
ii		2.5-7	
iii		2.5-8	
iv		2.5-9	
v		2.5-10	
vi		2.5-11	
vii		2.5-12	
viii		2.5-13	
List of Acronyms(ix-xii)		2.5-14	
		2.5-15	
 <u>CHAPTER 1.0</u>		 <u>CHAPTER 3.0</u>	
<u>Text</u>		<u>SECTION 3.1.1</u>	
1-1		<u>Text</u>	
1-2		3.1-1	
1-3		3.1-2	
1-4		3.1-3	
1-5		3.1-4	
1-6		3.1-5	
1-7		3.1-6	
1-8		3.1-7	
<u>Figures</u>		3.1-8	
1.2-1		3.1-9	
1.4-1		3.1-10	
1.4-2		3.1-11	
1.4-3		3.1-12	
 <u>CHAPTER 2.0</u>		3.1-13	
<u>Text</u>		3.1-14	
2-1		3.1-15	
2-2		3.1-16	
2-3		3.1-17	
2-4		3.1-18	
2-5		3.1-19	
2-6		3.1-20	
2-7		3.1-21	
2-8		<u>Tables</u>	
2-9		3.1.1-1 (1)	
2-10		3.1.1-1 (2)	
2-11		3.1.1-1 (3)	
2-12		3.1.1-1 (4)	
2-13	1/93	3.1.1-2 (1)	
2-14	1/93	3.1.1-2 (2)	
2-15		3.1.1-2 (3)	
<u>Tables</u>		3.1.1-2 (4)	
2.5-1		3.1.1-2 (5)	
2.5-2		3.1.1-2 (6)	
2.5-3		3.1.1-2 (7)	
2.5-4		3.1.1-2 (8)	
2.5-5			

#### 2.4.2 PRAs of Other Plants Reviewed by Union Electric

During performance of the Callaway IPE, Union Electric referred to other plant PRAs for information on methodologies used and to compare Callaway results to results from other, similar studies. The PRAs referred to are listed below:

1. Surry (NUREG-1150 and NSAC-152)
2. Sequoyah (NUREG-1150 and NSAC-152)
3. Seabrook (Seabrook Station PSA)
4. Zion (NUREG-1150 and NSAC-152)
5. Turkey Point (IPE submittal)
6. Oconee (NSAC-60)

The reports on the Surry, Sequoyah and Zion PRAs were referred to from time-to-time, throughout the Callaway study, for insights on methods and intermediate and final results. In addition, the list of initiating events for Callaway was compared to initiators used in the Surry, Sequoyah and Seabrook studies. The Turkey Point IPE submittal was reviewed primarily for guidance during preparation of this submittal. Regarding the Oconee PRA, Union Electric employed the methodology used therein to determine large pipe break flooding frequencies.

#### 2.4.3 Plant Documentation Used

Almost all categories of the controlled documentation available for Callaway were used to complete the IPE program. This documentation included the FSAR, Technical Specifications, plant procedures, piping and instrumentation diagrams, piping isometric drawings, one-line and elementary wiring diagrams, electrical schematics, mechanical and electrical system descriptions, LERs, IRs, maintenance work orders, operator logs, and various calculations.

#### 2.4.4 Process Used to Confirm that the IPE Represents the As-Built, As-Operated Plant

Section 2.1.2, item 3 of NUREG-1335 states that "The intent of such a confirmation ... (is) to account for the impact of previous plant modifications or modifications conducted within the IPE framework."

As stated in ULNRC-2099 dated 10-31-89 (60-day response to GL 88-20 Supplement 1), our extensive design control, configuration control, and document control programs ensure that drawings and procedures used in the IPE reflect the current design and operating philosophy of the plant. For future updates of the

Level I PRA models, the Union Electric IPE team will maintain cognizance of changes made to pertinent references used in the IPE in order to reflect these changes, as required, in the Level I PRA models and results.

#### 2.4.5 IPE Walkdowns

The walkdowns conducted as part of the IPE program are described briefly hereinafter.

Two walkdowns were conducted in support of the front-end portion of the IPE. The team for both walkdowns was comprised of Messrs. Connelly and Davidson (both of Union Electric) and Mr. Quilici (of NUS). Most of the rooms containing safety-related plant equipment were visited during these walkdowns. Photographs were taken and information was obtained and recorded with respect to room cooling, room access, component labeling, emergency lighting, and component layout within the rooms. Information obtained during these walkdowns was used primarily to supplement plant documentation used for fault tree modeling and for identification of potential recovery actions.

Two walkdowns were conducted in support of the containment performance portion of the IPE.

The first was conducted by Ms. Anselm (of UE) and Mr. Vanover (of GKA). The purposes of this walkdown were to obtain information to support auxiliary building modeling (nodalization) in the Callaway MAAP model, to determine if there were any submerged break locations, and to obtain information on fire suppression sprays.

The second walkdown in this category was conducted by Mr. Carlson (of UE), Mr. Vanover (of GKA), and Mr. Fulford (of NUS). This walkdown was conducted in the containment building and addressed various MAAP modeling and containment performance issues.

Three walkdowns were conducted in support of the internal flooding analysis. These walkdowns were conducted by Ms. Walker and Mr. Stecko (of UE) and Mr. Jorgenson (of NUS). During these walkdowns, information was obtained as to equipment potentially impacted by internal flooding and the associated flooding sources.

#### 2.5 SYSTEM DEPENDENCIES

It was recognized early in the Callaway IPE program that dependent failures would be important contributors to core damage. Therefore, a principal focus of the Callaway program was to thoroughly address system dependencies and dependent failures.