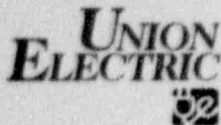


Callaway Plant
Post Office Box 620
Fulton, Missouri 65251
573-676-8245
573-676-4056 Fax



May 15, 1997

Garry L. Randolph
Vice President and
Chief Nuclear Officer

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

ULNRC-3578

DOCKET NUMBER 50-483
CALLAWAY PLANT
TECHNICAL SPECIFICATION CONVERSION APPLICATION

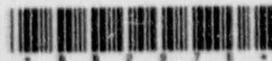
- REF: 1) ULNRC-3298 dated November 29, 1995
2) ULNRC-3533 dated February 11, 1997
3) NUREG-1431, "Standard Technical Specifications
Westinghouse Plants," Revision 1, April 1995

Pursuant to 10CFR50.90, Union Electric Company (UE) hereby requests an amendment to the Callaway Plant Facility Operating License (NPF-30) by incorporating changes to the Callaway Technical Specifications (TS) and by adding a license condition to address Surveillance Requirements not previously performed by existing requirements or tests. This request provides the information discussed in References 1 and 2 for a full conversion of the Callaway Plant Technical Specifications from the current Technical Specifications (CTS) to a set of Improved Technical Specifications (ITS) based upon the improved Standard Technical Specifications (ISTS) [Reference 3].

Attachment 1 to this letter is an affidavit and Attachment 2 is a general description and assessment of the proposed full conversion including the proposed license condition. Attachment 3 contains a list of the changes within the submittal which are not directly related to the conversion process and a list of other pending or projected License Amendment Requests (LARs) which could potentially impact the review of this conversion application. Attachments 4 through 18 provide the specific changes and the justifications that support the acceptability of the changes and the evaluations that support the conclusion that these changes do not involve a significant hazard consideration. Attachment 19 provides the Improved Technical Specifications (the ISTS with the proposed changes incorporated) for Callaway. Attachment 20 is the Improved Technical Specification Bases.

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Union Electric developed this conversion application in concert with three other utilities: TU Electric, Wolf Creek Nuclear Operation Corporation (WCNOC), and Pacific Gas & Electric Company (PG&E). Two enclosures (Enclosures 3B and 6B) in Attachments 4 through 18 to this submittal contain conversion comparison tables. These comparison tables reflect how the proposed changes are treated by each of the four utilities. The tables are provided to assist the NRC in performing reviews of the individual submittals of each of these utilities. Only the information related to Callaway Plant on these tables is considered to be part of this license amendment request. The information related to the other utilities is provided for information only.

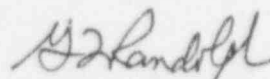
TU Electric, WCNOC and PG&E are submitting parallel license amendment requests for their respective plants (CPSES Units 1 and 2, Wolf Creek Generating Station and Diablo Canyon Units 1 and 2). Because of the similarities in the attached license amendment request and the submittals of these other three licensees, it is requested that, to the extent possible, the NRC review these four submittals together in order to minimize the required NRC resources, reduce licensee costs and reduce overall review time. Don Woodlan of TU Electric is the chairman of the Joint Licensing Subcommittee (JLS), which consists of members from each of the four utilities. The JLS coordinated the development of the four full conversion applications. Mr. Woodlan (817-897-6887) is the lead utility contact to resolve matters which relate to the NRC's review of these four packages. Mr. David Shafer (314-554-3104) is the primary contact at Union Electric to resolve matters related to Callaway specific issues in this amendment request.

In accordance with 10CFR50.91(b), UE is providing the State of Missouri with a copy of this proposed amendment.

Because implementation of the Improved Technical Specifications involves significant training and revisions to implementing procedures, UE will interface with the NRC during the review process to establish an appropriate implementation date or period.

Should you have any questions, please contact Mr. David Shafer.

Very truly yours,



G. L. Randolph

DS/hh

ULNRC-3578

- Attachments:
1. Affidavit
 2. General Description and Assessment
 3. Lists of additional changes, related LARs, Acronyms and Abbreviations
 4. CTS Section 1.0 / ITS Section 1.0
 5. CTS Section 2.0 / ITS Section 2.0
 6. CTS Section 3/4.0 / ITS Section 3.0
 7. CTS Section 3/4.1 / ITS Section 3.1
 8. CTS Section 3/4.2 / ITS Section 3.2
 9. CTS Section 3/4.3 / ITS Section 3.3
 10. CTS Section 3/4.4 / ITS Section 3.4
 11. CTS Section 3/4.5 / ITS Section 3.5
 12. CTS Section 3/4.6 / ITS Section 3.6
 13. CTS Section 3/4.7 / ITS Section 3.7
 14. CTS Section 3/4.8 / ITS Section 3.8
 15. CTS Section 3/4.9 / ITS Section 3.9
 16. CTS Section 3/4.10/ ITS Section 3.10 (Not Applicable)
 17. CTS Section 5.0 / ITS Section 4.0
 18. CTS Section 6.0 / ITS Section 5.0
 19. ITS Specifications with proposed changes incorporated
 20. ITS Bases with proposed changes incorporated

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

Garry L. Randolph, of lawful age, being first duly sworn upon oath says that he Vice President and Chief Nuclear Officer 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 *Garry L. Randolph*
Garry L. Randolph
Vice President and
Chief Nuclear Officer

SUBSCRIBED and sworn to before me this 15th day
of May, 1997.

Patricia A. Reynolds



PATRICIA L. REYNOLDS
NOTARY PUBLIC—STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXPIRES DEC. 22, 2000

bcc: J. Brandt/A160.761
/QA Record (CA-758)

E210.01

J. V. Laux

G. L. Randolph

R. J. Irwin

P. M. Barrett

J. D. Blosser

A. C. Passwater

D. E. Shafer

W. E. Kahl

S. Wideman (WCNOC)

A. J. DiPerna, (Bechtel)

H. D. Bono

NSRB (Patty Reynolds)