

FEB 03 1988

Docket No. 50-483

Union Electric Company
ATTN: Mr. Donald F. Schnell
Vice President - Nuclear
Post Office Box 149 - Mail Code 400
St. Louis, MO 63166

Gentlemen:

This refers to the Union Electric Company Callaway Station Unit 1 Request for Relief from the Technical Specification Limiting Condition for Operation stated in the Blosser to Davis letter of February 3, 1988.

We have thoroughly reviewed and evaluated the context of your request and have discussed the subject with NRC Headquarters management.

Based on our in-depth discussions and reviews, we have concluded that your justification for continued operation provided the necessary information to support the NRC's granting of this relief on a one-time basis. Based on the information provided relative to the concrete masonry unit (CMU) wall removal and the reasonable assurance that the safety of the plant would be maintained, your request for temporary relief from this Technical Specification Limiting Condition for Operation was granted.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

No reply to this letter is required; however, should you have questions on the basis of conclusions reached by the NRC, or if you need clarification on the decision, please let us know and we will be pleased to discuss them with you.

Sincerely,

Original signed by
A. Bert Davis

A. Bert Davis
Regional Administrator

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Attachment: Ltr 2/3/88
J. D. Blosser to A. B. Davis

See Attached Distribution

RIII
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Hinds/jp

RIII
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Forney

^{yes}
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Norelius
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[Signature]
Pappiello
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^{yes}
RIII
[Signature]
Davis
2/3/88

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FEB 03 1988

Distribution

cc w/attachment:

A. P. Neuhalfen, Manager Quality Assurance
Tom P. Sharkey, Supervisor, Compliance
DCD/DCB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Region IV
Resident Inspector, Wolf Creek
K. Drey
Chris R. Rogers, P.E.
Utility Division, Missouri
Public Service Commission
CFA, Inc.
H. S. Taylor, Quality Assurance Division
J. M. Taylor, Deputy Executive Director for Regional Operations
T. E. Murley, Director, NRR
Regional Administrators
RI, RII, RIV, RV
L. W. Zech, Chairman
J. K. Asselstine, Commissioner
F. M. Bernthal, Commissioner
T. M. Roberts, Commissioner
K. M. Carr, Commissioner
F. Maraglia, NRR Division Director
J. Lieberman, Office of Enforcement
M. R. Johnson, SALP Coordinator
RIII PRR
RIII SGA
State Liaison Officer, State of Missouri
INPO



Callaway Plant

⇒ J.M. HINDS (DRP)

February 3, 1988

Mr. A. Bert Davis
Regional Administrator
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

ULNRC-1715

Dear Mr. Davis:

DOCKET NO. 50-483
CALLAWAY PLANT
FACILITY OPERATING LICENSE NPF-30
REQUEST FOR ENFORCEMENT DISCRETION

This letter documents Union Electric's request for enforcement discretion in the matter of relief from Technical Specification 3.0.3, Plant Shutdown Action Requirements, due to the apparent inoperability of both trains of Essential Service Water (ESW). Union Electric's oral request for enforcement discretion was granted at 1607 CST on February 2, 1988. This letter explains our rationale for the request.

At 0930 CST on February 2, 1988, a member of the utility's ESW Safety Systems Functional Assessment (SSFA) group discovered that the concrete masonry unit (CMU) walls separating each train of the ESW pumps from their associated electrical panels were in excess of the design height of 6 ft. for these walls. The walls function as splash screens.

An immediate review of design documents by members of the SSFA revealed an architectural (Bechtel, Inc.) seismic design calculation that limited the CMU wall height to 6 ft. 3 in. Incident Report 88-22 was initiated at 1140 CST to document the design concern. Bechtel was immediately requested to review Callaway's design records in an attempt to gather additional information, if any, that could (1) explain why the ESW CMU walls were built to 8 ft. 9 in., or (2) justify the as-built condition in lieu of their previous seismic calculation. Also, installed support brackets on the CMU walls, similar to those used on II/I walls, were not shown on the plant drawings, adding to the confusion to the required design. In the meantime, efforts were begun to lower one CMU wall to 6 ft.

Upon receipt of information from Bechtel, that there were no design documents available to support the wall height above 6 ft. 3 in., the plant

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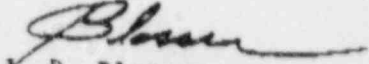
entered Technical Specification 3.03 at 1510 CST and our NRC senior resident inspector was informed of the condition. The ESW CMU wall height was greater than required for seismic qualifications and potentially jeopardized the operability of both trains of ESW pumps during a seismic event. This was considered a reportable condition per 10CFR50.72(a)(2)(v).

Union Electric's need for Callaway's electrical power was high due to reduced availability of other Union Electric plants and the extreme weather within our service area. Since efforts to lower one train's CMU wall were nearly complete, a verbal request for enforcement discretion was made in order to prevent a plant shutdown and the ensuing transient that would be imposed by Technical Specification 3.03.

Train "B" of ESW was returned to an operable condition, Technical Specification 3.03 was exited, and Technical Specification 3.7.4, Action Statement for the Remaining Train, was met at 1725 CST on February 2, 1988. Restoration of Train "A" is expected to be complete by 1700 CST today.

An Operating License Amendment is not required. A Licensee Event Report will be submitted pursuant to 10CFR50.73. If you have any questions regarding this condition, please contact me at 314/676-8190.

Very truly yours,


J. D. Blosser
Manager, Callaway Plant

TPS/JDB/cs

cc: Distribution attached