July 14, 1997

Mr. Garry L. Randolph
Vice President and Chief Nuclear Office
Union Electric Company
P. O. Box 620
Fulton, Missouri 65251

50-483

Dear Mr. Randolph:

I would like to thank you for accepting our request that the Committee to Review Generic Requirements (CRGR) visit with the management and staff of the Callaway plant on July 23, 1997. You should note that this visit is not an inspection; rather, it is an informal exchange of views on the role that backfit management plays in the regulatory process.

We would propose that our one day visit include meetings with plant management and an operating crew, and some time for follow-up remarks. Our intent in speaking to members of an operating crew (perhaps a crew is going through a training session) is to obtain their views on the impact of generic communications on their performance of their licensed duties.

Enclosure 1 provides a preliminary agenda. Enclosure 2 provides a list of potential discussion questions relating to the evaluation and implementation of new generic requirements. The questions in Enclosure 2 are simply illustrative of subjects that are of interest to the CRGR, and do not constitute a request to you for a written reply. Let me know if you would like to add some items to this preliminary agenda. Enclosure 3 provides a summary of recent CRGR activities in reviewing new generic requirements. Enclosure 4 provides a list of attendees. Enclosure 5 contains the CRGR Charter, Revision 6.

Please refer any questions to me at (301) 415-7472, or Dr. Raji Tripathi of the CRGR staff at (301) 415-7584.

Sincerely,
Original Signed by:
Denwood F. Ross
Dr. Denwood F. Ross, Jr., Chairman
Committee to Review Generic Requirements

Enclosures: As stated

cc/w enclosures:
Alan C. Passwater, Manager
Licensing and Fuels, Union Electric Company
Mark Reidmeyer, Union Electric Company
Samuel Collins, NRC
Ellis Merschoff, NRC

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NAME	RTripathi		DFRoss	
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PRELIMINARY AGENDA

CRGR Visit to Callaway Plant
July 23, 1997

[NOTE: ORDER OF EVENTS AND TIME ALLOCATIONS MAY CHANGE]

WEDNESDAY - July 23, 1997

8:00 a.m. - 8:15 a.m.	Arrival at Callaway Plant Site & Badging Process
8:15 a.m. - 10:45 a.m.	Discussions with Union Electric Management General review of the backfit process and the role of CRGR; discussion of recent backfits (either generic or plant-specific) and their impact on the plant.
10:45 p.m. - 11:45 p.m.	Discussion with Operators
Lunch Break	
12:45 p.m. - 2:45 p.m.	Plant Tour
2:45 p.m. - 4:45 p.m.	Discussions with Union Electric Company Management (cont.)
4:45 p.m. - until	Wrap-up

ENCLOSURE 1

QUESTIONS FOR POSSIBLE DISCUSSION
CRGR VISIT TO CALLAWAY PLANT
July 23, 1997

1. Evaluation of Recently Issued Generic Requirements

   a. Have you had any difficulty in understanding documents (e.g., bulletins or generic letters) that transmit new or changed generic requirements/positions?

      - Has NRC applied the new requirements/positions appropriately in accordance with your understanding of them?

      - Cite examples of any specific difficulties.

   b. Generally, do you agree with the need for the new requirements/ positions that have been transmitted over the past two years or so? Has implementation of the new requirements/positions improved safety (significantly, some, not at all) at your plant? Has any adversely affected safety in any instance in your judgment? Which have not improved safety or have not been technically justified?

   c. Did you feedback comments to NRC on any difficulties encountered?

      - In your view, are there appropriate mechanisms for such feedback?

      - Would you have any reluctance to use such mechanisms?

   d. What has been your experiences with and what are your comments on the following:

      - Generic Letter (and Supplement) on thermo-lag fire barriers.

      - Supplements 1-6 to Generic Letter 89-10 regarding motor-operated valves.

      - Supplement 4 to Generic Letter 88-20 regarding individual plant examinations for external events (IPEEE).

      - Generic Letter 91-07 regarding reactor coolant pump seal failures and the potential impact on station blackout.

      - Information Notice 93-17 regarding design to accommodate LOCA/delayed LOOP.

ENCLOSURE 2

- Generic Letter 92-01, Revision, Supplement 1, concerning reactor pressure vessel integrity.

- Bulletin 96-02 on movement of heavy loads.

- Recently published for comments the proposed generic letter "Potential for Degradation of Emergency Core Cooling System and Containment Spray Systems Following a Loss-of-Coolant Accident Due to Construction Deficiencies and Foreign Material Inside the Containment."

- Recently issued generic letter titled "Degradation of Control Rod Drive Mechanisms and Other Vessel Head Penetrations" What is your experience? Is Callaway vulnerable?

- Recently published for comments the proposed Supplement 1 to Bulletin 96-01, "Control Rod Insertion Problems."

- Recently proposed generic letter titled "Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps."

- 50.54(f) Generic Letter on Design Basis Information.

- Maintenance Rule.

- Procurement and dedication of commercial grade items for safety applications.

2. What has been the impact of the new requirements/positions that have been transmitted over the past two years or so; specifically:

   a. What is your tally of the actual cost of implementing new NRC requirements? (For example, what has been the actual costs of implementing specific new requirements/positions; and what has been the total cost of all backfits over a specific period?)

      What is your view of the accuracy of NRC cost estimates?

   b. Have any new NRC requirements/positions delayed or otherwise adversely affected intended improvements identified and undertaken solely on your initiative? Were any of your initiatives considered to be of higher priority than new NRC requirements/positions? Were any of higher safety importance?

3. How is NRC's backfit control process working in your view, specifically:

   a. The CRGR review process for generic requirements?

b. NRC process for plant-specific backfits?

4. With regard to plant modifications/upgrades initiated by you (not resulting from new NRC generic requirements):

   a. What were the most important/effective actions you have taken to improve performance (e.g., significant capital improvement items in the plant; significant increases in operating budget/personnel/ training etc.)?

   b. Have new NRC generic requirements/positions helped or adversely impacted your ability to improve performance?

   c. Have NRC feedback documents (information notices, AEOD case studies, etc.) helped in a meaningful and specific way to improve plant performance?

5. NRC has placed an emphasis on the use of specific assessments to identify and characterize potential sources of increased risk. These include PRA studies such as NUREG-1150, individual plant examinations, specific containment reviews and severe accident studies. What comments would you offer on the benefits, costs, efficiency, impacts, knowledge, insights and values that are associated with these assessments?

6. Some of the comments received in the NRC's regulatory impact survey indicate that too many new requirements/positions are being issued (e.g., generic letters). Do you agree with this assessment? If so, are there far too many? Which new requirements/positions do you believe should have been withheld or postponed significantly?

7. Do you believe that any new positions or requested actions contained in generic letters and bulletins you have received from NRC ought to have been processed as new rules instead? Which ones? Please explain.

8. Do the generic issuances generally explain the safety problem being addressed so that you can understand the motive behind the issuance?

COMMITTEE TO REVIEW GENERIC REQUIREMENTS

Generic requirements and positions proposed by the NRC staff for one or more classes of reactors are reviewed by the Committee to Review Generic Requirements (CRGR). The Committee is made up of senior NRC managers who review such proposals and advise the Executive Director for Operations (EDO) as to whether or not the requirement or position should be issued.

The current membership of the CRGR is as follows:

Denwood F. Ross, Jr. (Chairman), Director
Office for Analysis and Evaluation of Operational Data

Frank J. Miraglia, Jr., Deputy Director
Office of Nuclear Reactor Regulation

Malcolm R. Knapp, Deputy Director
Office of Nuclear Material Safety and Safeguards

Joseph A. Murphy, Director
Division of Regulatory Applications
Office of Nuclear Regulatory Research

Dennis C. Dambly, Deputy Assistant General Counsel
for Materials, Anti-trust and Special Proceedings
Office of the General Counsel

James E. Dyer, Deputy Regional Administrator
Region IV

In making its evaluations of proposed requirements, the CRGR seeks assurance that a proposed requirement (1) is necessary for the public health and safety, (2) is needed for compliance with existing requirements or written licensee commitments, or (3) will provide a substantial improvement in public safety or security and to have a cost impact on the public, industry and government which is consistent with and justified by the improvement to be realized.

Since its inception in November 1981 through June 10, 1996, the CRGR has held 288 meetings and taken up a total of 486 separate issues. Since May 1996 through June 1997, the CRGR has considered the following items:

- Proposed final Regulatory Guide 1.153 and Important-to-Safety Issue **RES**
- Expedited Bulletin on Chemical, Galvanic and Other Reactions in Spent Fuel Storage and Transportation Casks **NMSS**

ENCLOSURE 3

- 50.54(f) Letter on Design Basis Information **NRR**
- Urgent Generic Letter on Assurance of Equipment operability and Containment Integrity During design basis Accident Conditions **NRR**
- Expedited Generic Letter on Loss of Reactor Coolant Inventory and Associated potential for Loss of Emergency Mitigation Features While In a Shutdown Condition **NRR**
- Proposed Standard Review Plan,Chapter 7, "Instrumentation and Control," Update **NRR**
- Proposed SER on WCAP-144416-P (Credit for soluble boron issue) **NRR**
- Briefing on Source Term Options (Commission Paper) **NRR**
- Proposed Steam generator Integrity Rule **NRR**
- Briefing on risk-informed Regulatory Guides and associated Standard Review Plans
- Proposed general Regulatory Guide - risk-informed regulations guidance documents **RES and NRR**
- Proposed general SRP
- Briefing on Proposed Rule on Shutdown and Low-Power Operations and Spent Fuel Pools **NRR**
- Briefing by D. Muscara (RES) on ISI background concerns
- Review of Proposed Generic Letter on Effectiveness of Ultrasonic Testing Systems in ISI Programs **NRR**
- Review of Proposed Generic Letter on Steam Generator Tube Inspection techniques **NRR**
- Review of Proposed Generic Letter on Degradation of Steam Generator Internals **NRR**
- General Regulatory Guide (Excluding the Appendices) and SRP **NRR**
- Proposed Application-specific Regulatory Guides and SRPs - risk-informed regulations guidance documents **RES and NRR**
- RG and SRP Inservice Testing
- RG and SRP on Technical Specifications

- RG and SRP and Graded Q/A

- Urgent Generic Letter on Assurance of Sufficient NPSH for Emergency Core Cooling and Containment Heat Removal Pumps **NRR**

- Generic Letter on Modification of the NRC Staff's Recommendations for the Post-Accident Sampling System **NRR**

- Generic letter on Degradation of Control Rod Drive Mechanism and Other Vessel Head Penetrations

- Generic letter on Degradation of Control Rod Drive Mechanism and Other Vessel Head Penetrations **NRR**

- CRGR review and endorsement the proposed Revision 2 to Regulatory Guide (RG) 1.160, which endorses Revision 2 to NUMARC 93-01, "Industry Guideline For Monitoring The Effectiveness Of Maintenance At Nuclear Power Plants" (April 1996 version), and provides certain clarifications (CRGR Material Item No. 153) **NRR**

- CRGR review of the proposed generic letter "Potential for Degradation of Emergency Core Cooling System Recirculation due to Construction Deficiencies and Foreign Material in the Containment Following a Loss-of-Coolant Accident." (CRGR Material Item No. 154) **NRR**

- CRGR review of the revised general Regulatory Guide and Standard Review Plan for risk-informed regulation (CRGR Item No. 155) **NRR**

- CRGR review of the revised application-specific (Inservice Testing, Technical Specifications, and Graded Quality Assurance) Regulatory Guides and the accompanying Standard Review Plans for risk-informed regulation. **NRR**

- CRGR review of the revised proposed generic letter dealing with degradation of the emergency core cooling system and the containment spray system due to foreign material inside containment and construction deficiencies (An earlier version of this generic letter was reviewed by the CRGR on February 25, 1997 at the meeting No. 302). **NRR**

- CRGR review and endorsement of Supplement 1 to Bulletin 96-01, "Control Rod Insertion Problems." **NRR**

- CRGR briefing and review of the proposed rulemaking on shutdown and spent fuel pool operations **NRR**

- CRGR review of the revised SRP, Chapter 7, "Instrumentation and Controls," Update **NRR**

- Proposed generic letter on problems with medium-voltage circuit breakers — NRR
- Standard Review Plan, Chapter 7, "Instrumentation and Controls," Update — NRR
- Safety Evaluation Report on EPRI Topical report, "Guideline on Evaluation and Acceptance of Commercial Grade Digital Equipment for Nuclear Safety Applications," EPRI-TR-106439 — NRR
- Six Regulatory Guides for computer software in nuclear safety applications — RES

LIST OF ATTENDEES

Denwood F. Ross, Jr. (Chairman), Director
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Office of the General Counsel

James E. Dyer, Deputy Regional Administrator
Region IV

Raji Tripathi, Senior Program Manager
CRGR Staff
Office for Analysis and Evaluation of Operational Data

ENCLOSURE 4