

Union Electric

August 27, 1998

One Ameren Plaza
1901 Chouteau Avenue
PO Box 66149
St. Louis, MO 63166-6149
314.621.3222

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555-0001

ULNRC-03889
TAC NO. M98803

Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION ON THE
PROPOSED CONVERSION TO THE IMPROVED
TECHNICAL SPECIFICATIONS SECTIONS 1.0, 2.0, AND 3.0**

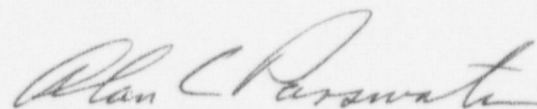
- References:
1. ULNRC-03578 dated May 15, 1997
 2. Letter dated July 7, 1998 from K. M. Thomas, NRC, to G. L. Randolph
 3. Letter dated July 9, 1998 from K. M. Thomas, NRC, to G. L. Randolph

Union Electric Company requested an amendment to the Callaway Facility Operating License (NPF-30) by incorporating changes to the Technical Specifications (TS) as provided in Reference 1. The NRC staff requested additional information regarding Section 1.0, "Use and Application," Section 2.0, "Safety Limits (SLs)," and Section 3.0, "Limiting Condition for Operation (LCO) Applicability and Surveillance Requirement (SR) Applicability," of the proposed TS changes in References 2 and 3. The requested information, other than the response to Comment Number 1.1-4, is provided in the Attachments to this letter as are any additional changes needed for Section 1.0, Section 2.0, and Section 3.0 as identified by Union Electric Company. The response to Comment Number 1.1-4 will be provided separately after the August 17, 1998 NRC letter to NEI on TSTF-111 has been fully evaluated.

This letter and its Attachments are not a supplement to Reference 1 and have not been reviewed by the Onsite Review Committee or Nuclear Safety Review Board. A supplement to Reference 1 will be provided at a later date.

If you have any questions concerning this response, please contact us.

Sincerely,



Alan C. Passwater
Manager, Corporate Nuclear Services

000043
9807100284 980827
PDR ADOCK 05000483
PDR

GGY/plr



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

Alan C. Passwater, of lawful age, being first duly sworn upon oath says that he is Manager, Corporate Nuclear Services for 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 *Alan C. Passwater*
 Alan C. Passwater
 Manager, Corporate Nuclear Services

SUBSCRIBED and sworn to before me this 27th day of August, 1998.

Patricia L. Reynolds



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

cc: M. H. Fletcher w/a
Professional Nuclear Consulting, Inc.
19041 Raines Drive
Derwood, MD 20855-2432

Regional Administrator w/a
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, TX 76011-8064

Senior Resident Inspector w/a
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Steedman, MO 65077

Kristine M. Thomas (2) w/a
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
1 White Flint, North, Mail Stop 13E16
11555 Rockville Pike
Rockville, MD 20852-2738

Manager, Electric Department -
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Ron Kucera -
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Denny Buschbaum w/a
TU Electric
P.O. Box 1002
Glen Rose, TX 76043

Pat Nugent w/a
Pacific Gas & Electric
Regulatory Services
P.O. Box 56
Avila Beach, CA 93424

JLS CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS

CTS 1.0 - DEFINITIONS

ITS 1.0 - USE AND APPLICATION

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND LICENSEE INITIATED
ADDITIONAL CHANGES

INDEX OF ADDITIONAL INFORMATION

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
1.1-1	DC, CP, WC, CA	YES
1.1-2	DC, CP, WC, CA	YES
1.1-3	CP, WC, CA	YES
1.1-4	DC, CP, WC, CA	YES
1.1-5	DC, CP, WC, CA	YES
1.1-6	DC, CP, WC, CA	YES
1.1-7	DC, CP, WC, CA	YES
1.1-8	CP, WC, CA	YES
1.1-9	DC, CP, WC, CA	YES
1.4-1	DC, CP, WC, CA	YES
DC ALL-002 (1.0 changes only)	DC	NA
DC ALL-005 (3.3 Bases changes only for TR 1.0-006)	DC	NA
TR 1.0-006	DC, CP, WC, CA	YES

JOINT LICENSING SUBCOMMITTEE METHODOLOGY FOR PROVIDING ADDITIONAL INFORMATION

The following methodology is followed for submitting additional information:

1. Each licensee is submitting a separate response for each section.
2. If an RAI does not apply to a licensee (i.e., does not actually impact the information that defines the technical specification change for that licensee), "NA" has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
3. If a licensee initiated change does not apply, "N.A." has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
4. The common portions of the "Additional Information Cover Sheets" are identical, except for brackets, where applicable (using the same methodology used in enclosures 3A, 3B, 4, 6A and 6B of the conversion submittals). The list of attached pages will vary to match the licensee specific conversion submittals. A licensee's FLOG response may not address all applicable plants if there is insufficient similarity in the plant specific responses to justify their inclusion in each submittal. In those cases, the response will be prefaced with a heading such as "PLANT SPECIFIC DISCUSSION."
5. Changes are indicated using the redline/strikeout tool of WordPerfect or by using a hand markup that indicates insertions and deletions. If the area being revised is not clear, the affected portion of the page is circled. The markup techniques vary as necessary, based on the specifics of the area being changed and the complexity of the changes, to provide the clearest possible indication of the changes.
6. A marginal note (the Additional Information Number from the index) is added in the right margin of each page being changed, adjacent to the area being changed, to identify the source of each change.
7. Some changes are not applicable to one licensee but still require changes to the Tables provided in Enclosures 3A, 3B, 4, 6A, and 6B of the original license amendment request to reflect the changes being made by one or more of the other licensees. These changes are not included in the additional information for the licensee to which the change does not apply, as the changes are only for consistency, do not technically affect the request for that licensee, and are being provided in the additional information being provided by the licensees for which the change is applicable. The complete set of changes for the license amendment request will be provided in a licensing amendment request supplement to be provided later.

JOINT LICENSING SUBCOMMITTEE METHODOLOGY FOR
PROVIDING ADDITIONAL INFORMATION

(continued)

8. The item numbers are formatted as follows: [Source] [ITS Section]-[nnn]

Source = Q - NRC Question	CA - AmerenUE	DC - PG&E
WC - WCNOG	CP - TU Electric	TR - Traveler

ITS Section = The ITS section associated with the item (e.g., 3.3). If all sections are potentially impacted by a broad change or set of changes, "ALL" is used for the section number.

nnn = a three digit sequential number or ED (ED indicates editorial correction with no impact on meaning)