

Union Electric

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September 24, 1998

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

Gentlemen:

ULNRC-03900
TAC NO. M98803

**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 3.4 AND 5.0**

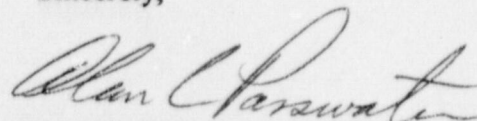
- References: 1. ULNRC-03578 dated May 15, 1997
2. Letter dated July 15, 1998 from K. M. Thomas, NRC, to
G. L. Randolph
3. Letter dated July 21, 1998 from K. M. Thomas, NRC, to
G. L. Randolph

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 3.4, "Reactor Coolant System," and 5.0, "Administrative Controls" of the proposed TS changes in References 2 and 3. The requested information is provided in the Attachments to this letter as are any additional changes needed for Section 3.4 and Section 5.0 as identified by Union Electric Company.

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

9810020255 980924
PDR ADOCK 05000483
P PDR

GGY/plr
Attachments

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 24th day
of September, 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
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JLS CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS

CTS 3.4 - REACTOR COOLANT SYSTEM

ITS 3.4 - REACTOR COOLANT SYSTEM

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>
3.4.Gen-1	CA, CP, DC, WC	YES
3.4.1-1	CA, CP, DC, WC	YES
3.4.1-2	CA, CP, DC, WC	YES
3.4.1-3	DC	NA
3.4.2-1	CA, CP, DC, WC	YES
3.4.3-1	CA, CP, DC, WC	YES
3.4.4-1	CA, CP, DC, WC	YES
3.4.5-1	CA, WC	YES
3.4.5-2	CA, WC	YES
3.4.5-3	CA, WC	YES
3.4.5-4	CP	NA
3.4.6-1	CA, CP, DC, WC	YES
3.4.6-2	DC	NA
3.4.7-1	WC	NA
3.4.7-2	WC	NA
3.4.7-3	CA	YES
3.4.8-1	CA, CP, DC, WC	YES
3.4.8-2	DC	NA
3.4.9-1	CA, CP, DC, WC	YES
3.4.9-2	CA	YES
3.4.9-3	CP, DC, WC	NA
3.4.9-4	DC	NA
3.4.10-1	CA, CP, DC, WC	YES
3.4.11-1	CA, CP, DC, WC	YES
3.4.11-2	CA, CP, DC, WC	YES
3.4.11-3	CA, CP, DC, WC	YES
3.4.11-4	CA, CP, DC, WC	YES
3.4.11-5	WC	NA
3.4.11-6	CA, CP, WC	YES
3.4.12-1	CA, CP, DC, WC	YES
3.4.12-2	CA, CP, DC, WC	YES
3.4.12-3	CA, CP, DC, WC	YES
3.4.12-4	CA, CP, WC	YES
3.4.12-5	CA, WC	YES
3.4.12-6	DC	NA
3.4.12-7	CP	NA
3.4.12-8	CP	NA
3.4.13-1	DC, WC	NA
3.4.13-2	CA, CP, DC, WC	YES
3.4.13-3	CA, CP, WC	YES
3.4.13-4	CP, DC	NA
3.4.13-5	DC	NA
3.4.13-6	CA	YES

INDEX OF ADDITIONAL INFORMATION
(cont.)

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.4.14-1	CA, CP, WC	YES
3.4.14-2	CP, DC, WC	NA
3.4.14-3	CA, CP, DC, WC	YES
3.4.14-4	CA, WC	YES
3.4.14-5	DC, WC	NA
3.4.15-1	CA, DC, WC	YES
3.4.15-2	CA, WC	YES
3.4.15-3	WC	NA
3.4.15-4	CP, DC	NA
3.4.15-5	DC	NA
3.4.16-1	CA, CP, DC, WC	YES
3.4.16-2	WC	NA
3.4.16-3	WC	NA
3.4.G-1	CP	NA
CA 3.4-002	CA	YES
CA 3.4-003	CA	YES
CA 3.4-004	CA, CP, DC, WC	YES
CP 3.4-004	CP	NA
DC 3.4-ED	DC	NA
DC ALL-001 (3.4 changes only)	DC	NA
DC ALL-002 (3.4 changes only)	DC	NA
DC ALL-005 (3.4 changes only)	DC	NA
DC 3.4-003	DC	NA
TR 3.4-004	CA, CP, DC, WC	YES
TR 3.4-005	CA, CP, DC, WC	YES
TR 3.4-006	CA, CP, DC, WC	YES
TR 3.4-009	CA, CP, DC, WC	YES
WC 3.4-001	WC, CP	NA
WC 3.4-002	CA, CP, DC, WC	YES
WC 3.4-004	WC	NA
WC 3.4-006	WC	NA
WC 3.4-007	WC, CA, DC	YES
WC 3.4-008	WC, CA	YES
WC 3.4-009	WC	NA
WC 3.4-0010	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, "NA" 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)

ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q 3.4.Gen-1

APPLICABILITY: CA, CP, DC, WC

REQUEST: ITS 3.4.x Bases

There have been a number of instances that the specific changes to the STS Bases are not properly identified with redline or strikeout marks.

Comment: Perform an audit of all STS Bases markups and identify instances where additions and/or deletions of Bases were not properly identified in the original submittal.

FLOG RESPONSE: The submitted ITS Bases markups for Section 3.4 have been compared to the STS Bases. Some differences that were identified were in accordance with the markup methodologies (e.g., deletion of brackets and reviewer's notes). Most of the differences were editorial in nature and would not have affected the review. Examples of editorial changes are:

- 1) Capitalizing a letter with only a "redline" but not striking out the lower case letter that it replaced.
- 2) Changing a verb from singular to plural by adding an "s" without redlining the "s".
- 3) Deleting instead of striking-out the A, B, C, etc., following a specification title (e.g., SR 3.6.6A.7).
- 4) Changing a bracketed reference (in the reference section) with only a "redline" for the new reference but failing to include the strike-out of the old reference.
- 5) In some instances the brackets were retained (and struck-out) but the unchanged text within the brackets was not redlined.
- 6) Not redlining a title of a bracketed section. The methodology calls for the section title to be redlined when an entire section was bracketed.
- 7) Additional text not contained in the STS Bases was added to the ITS Bases by the lead FLOG member during the development of the submittal. Once it was determined to not be applicable, the text was then struck-out and remains in the ITS Bases markup.

Differences of the above editorial nature will not be provided as attachments to this response. The pages requiring changes that are more than editorial and are not consistent with the markup methodology are attached.

ATTACHED PAGES:

Attachment 10, CTS 3/4.4 - ITS 3.4

Enclosure 5B, pages B 3.4-2, B 3.4-8, B 3.4-14, B 3.4-19, B 3.4-25, B 3.4-26, B 3.4-28, B 3.4-31, B 3.4-39, B 3.4-40, B 3.4-46, B 3.4-47, B 3.4-48, B 3.4-49, B 3.4-50, B 3.4-57, B 3.4-59, B 3.4-60, B 3.4-61, B 3.4-63, B 3.4-65, B 3.4-66, B 3.4-67, B 3.4-68, B 3.4-69, B 3.4-70, B 3.4-71, B 3.4-73, B 3.4-74, B 3.4-77, B 3.4-83, B 3.4-84, B 3.4-87, B 3.4-88, B 3.4-92, B 3.4-95, B 3.4-98, B 3.4-102, and B 3.4-106