

October 21, 1998

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



Gentlemen:

ULNRC-03905  
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  
SECTION 3.7**

- References:
- 1) ULNRC-03578 dated May 15, 1997
  - 2) Letter dated June 17, 1998, from  
K. M. Thomas, NRC to G. L. Randolph
  - 3) Letter dated June 16, 1998, from  
K. M. Thomas, NRC to G. L. Randolph

Union Electric 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 3.7, "Plant Systems" 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 Sections 3.7 and 3.9 as identified by Union Electric Company.

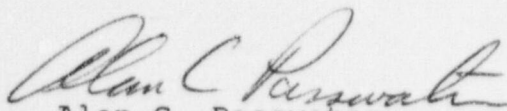
This letter and its Attachments are not a supplement to Reference 1 and have not been reviewed by the Onsite Review Committee or Nuclear Safety Review Board. A supplement to Reference 1 will be provided at a later date.

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PDR ADOCK 05000483  
P PDR

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A001

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

Sincerely,

A handwritten signature in cursive script that reads "Alan C. Passwater".

Alan C. Passwater  
Manager, Corporate Nuclear Services

DJW/hdh  
Attachments



cc: M. H. Fletcher  
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## INDEX OF ADDITIONAL INFORMATION

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.G-1	DC, CP, WC, CA	YES
3.7.1-1	DC, CP, WC, CA	YES
3.7.1-2	CP	NA
3.7.1-3	DC	NA
3.7.1-4	DC, CP, WC, CA	YES
3.7.1-5	DC, CP, WC, CA	YES
3.7.1-6	WC	NA
3.7.1-7	DC, CP, WC, CA	YES
3.7.1-8	WC, CA	YES
3.7.1-9	DC	NA
3.7.1-10	DC	NA
3.7.2-1	CP, WC, CA	YES
3.7.2-2	WC, CA	YES
3.7.2-3	DC, CP, WC, CA	YES
3.7.2-4	CP	NA
3.7.3-1	DC	NA
3.7.3-2	CP	NA
3.7.3-3	DC, CP, WC, CA	YES
3.7.3-4	WC, CA	YES
3.7.3-5	DC	NA
3.7.3-6	CP	NA
3.7.4-1	DC, CP	NA
3.7.4-2	DC	NA
3.7.4-3	DC	NA
3.7.4-4	WC, CA	YES
3.7.4-5	CP, WC, CA	YES
3.7.4-6	CP, CA	YES
3.7.4-7	CP, WC, CA	YES
3.7.4-8	CP	NA
3.7.4-9	CP	NA
3.7.5-1	CP	NA

## INDEX OF ADDITIONAL INFORMATION

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.5-2	WC, CA	YES
3.7.5-3	CA	YES
3.7.5-4	WC, CA	YES
3.7.5-5	CP	NA
3.7.5-6	CP, WC, CA	YES
3.7.5-7	CP, WC, CA	YES
3.7.5-8	DC, CP	NA
3.7.5-9	DC, CP, WC, CA	YES
3.7.5-10	DC, CP	NA
3.7.5-11	DC	NA
3.7.5-12	DC	NA
3.7.6-1	WC	NA
3.7.6-2	CP, WC, CA	YES
3.7.6-3	CP	NA
3.7.6-4	WC, CA	YES
3.7.6-5	CP	NA
3.7.6-6	CA	YES
3.7.6-7	DC	NA
3.7.7-1	WC, CA	YES
3.7.7-2	DC, CP, WC, CA	YES
3.7.7-3	WC, CA	YES
3.7.7-4	CP	NA
3.7.7-5	DC	NA
3.7.7-6	DC	NA
3.7.8-1	CP	NA
3.7.8-2	CP	NA
3.7.8-3	CP	NA
3.7.8-4	CP	NA
3.7.8-5	CP	NA
3.7.8-6	DC	NA
3.7.8-7	DC	NA

ADDITIONAL INFORMATION NUMBER	APPLICABILITY	ENCLOSED
3.7.8-8	DC	NA
3.7.8-9	DC	NA
3.7.8-10	DC	NA
3.7.8-11	WC, CA	YES
3.7.8-12	WC, CA	YES
3.7.8-13	WC	NA
3.7.8-14	WC, CA	YES
3.7.8-15	WC, CA	YES
3.7.8-16	CA	YES
3.7.8-17	CA	YES
3.7.9-1	DC	NA
3.7.9-2	DC	NA
3.7.9-3	CP	NA
3.7.9-4	CP	NA
3.7.9-5	WC	NA
3.7.9-6	CA	YES
3.7.9-7	CA	YES
3.7.9-8	CA	YES
3.7.10-1	DC	NA
3.7.10-2	DC	NA
3.7.10-3	DC	NA
3.7.10-4	DC, WC, CA	YES
3.7.10-5	DC	NA
3.7.10-6	DC	NA
3.7.10-7	DC, WC, CA	YES
3.7.10-8	DC, WC, CA	YES
3.7.10-9	DC, CP, WC, CA	YES
3.7.10-10	DC	NA
3.7.10-11	CP	NA
3.7.10-12	DC	NA
3.7.10-13	CA	YES

ADDITIONAL INFORMATION NUMBER	APPLICABILITY	ENCLOSED
3.7.10-14	CP, WC, CA	YES
3.7.10-15	WC, CA	YES
3.7.10-16	WC, CA	YES
3.7.10-17	WC, CA	YES
3.7.10-18	DC, WC, CA	YES
3.7.10-19	CP, WC, CA	YES
3.7.11-1	CP	NA
3.7.12.1-1	DC	NA
3.7.12.1-2	DC	NA
3.7.12.1-3	DC	NA
3.7.12.1-4	DC	NA
3.7.12.1-5	DC	NA
3.7.12.1-6	DC	NA
3.7.13.1-1	DC	NA
3.7.13.1-2	DC	NA
3.7.13.1-3	DC	NA
3.7.13.1-4	DC	NA
3.7.13.1-5	DC	NA
3.7.13.1-6	DC	NA
3.7.13.1-7	DC	NA
3.7.13.1-8	DC	NA
3.7.13.2-1	WC, CA	YES
3.7.13.2-2	WC, CA	YES
3.7.13.2-3	WC, CA	YES
3.7.13.2-4	WC, CA	YES
3.7.13.2-5	CA	YES
3.7.13.2-7	WC, CA	YES
3.7.13.2-8	WC, CA	YES
3.7.13.2-9	WC, CA	YES
3.7.13.2-10	WC, CA	YES
3.7.15-1	DC, CP, WC, CA	YES



<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.15-2	WC, CA	YES
3.7.15-3	CP	NA
3.7.16-1	DC	NA
3.7.16-2	DC	NA
3.7.16-3	CP, WC, CA	YES
3.7.17.1-1	WC, CA	YES
3.7.17.1-2	CP, WC, CA	YES
3.7.17.1-3	WC, CA	YES
3.7.17.1-4	WC, CA	YES
3.7.17.1-5	WC, CA	YES
3.7.17.1-6	WC, CA	YES
3.7.17.1-7	CP	NA
3.7.17.2-1	DC	NA
3.7.17.2-2	DC	NA
3.7.17.2-3	DC	NA
3.7.17.2-4	DC	NA
3.7.17.2-5	DC	NA
3.7.17.3-1	DC	NA
3.7.17.3-2	DC	NA
3.7.17.3-3	DC	NA
3.7.17.3-4	DC	NA
3.7.17.3-5	DC	NA
3.7.17.3-6	DC	NA
3.7.18-1	CP	NA
3.7.19-1	CP	NA
3.7.19-2	CP	NA
3.7.19-3	CP	NA
3.7.19-4	CP	NA
3.7.19-5	CP	NA
3.7.20-1	CP	NA
3.7.20-2	CP	NA

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7 20-3	CP	NA
3.7.20-4	CP	NA
3.7.20-5	CP	NA
3.7.20-6	CP	NA
3.7 R DOCs	DC, CP, WC, CA	YES
TR 3.7-001	DC, CP, WC, CA	YES
TR 3.7-002	CP, WC, CA, DC	YES
TR 3.7-005	DC, CP, WC, CA	YES
CA 3.7-ED	CA	YES
CA 3.7-003	CA	YES
CA 3.7-004	CA	YES
CA 3.7-005	CA	YES
CA 3.7-008	CA	YES
CA 3.7-009	CA	YES
CP 3.7-ED	CP	NA
CP 3.7-004	CP	NA
CP 3.7-005	CP	NA
CP 3.7-008	CP	NA
CP 3.7-009	CP	NA
CP 3.7-012	CP	NA
CP 3.7-013	CP	NA
CP 3.7-014	CP	NA
CP 3.7-015	CP	NA
DC 3.7-ED	DC	NA
DC ALL-001 (3.7 changes only)	DC	NA
DC ALL-002 (3.7 changes only)	DC	NA
DC ALL-003 (3.7 changes only)	DC	NA

## INDEX OF ADDITIONAL INFORMATION

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
DC 3.7-008	DC	NA
DC 3.7-009	DC	NA
DC 3.7-010	DC	NA
WC 3.7-001	WC	NA
WC 3.7-002	WC	NA
WC 3.7-003	WC	NA
WC 3.7-004	WC	NA
WC 3.7-005	WC	NA
WC 3.7-006	WC	NA
WC 3.7-007	WC	NA
WC 3.7-008	WC	NA

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

## ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q 3.7.G-1

APPLICABILITY: DC, CP, WC, CA

REQUEST: ITS 3.7.X Bases

### General

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 3.7 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 is 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., SR3.6.6.A.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 mark-

The pages requiring changes because they are not consistent with the markup methodology are attached.

### ATTACHED PAGES:

Encl. 5B      B 3.7-1, B 3.7-2, B 3.7-4, B 3.7-8, B 3.7-10, B 3.7-17, B 3.7-18, B 3.7-21,  
B 3.7-23, B 3.7-25, B 3.7-27, B 3.7-29, B 3.7-30, B 3.7-33, B 3.7-40,  
B 3.7-44, B 3.7-47, B 3.7-52, B 3.7-57, B 3.7-60, B 3.7-61, B 3.7-62,  
B 3.7-73, B 3.7-77, B 3.7-82, B 3.7-89