

Union Electric

October 21, 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-03908
TAC NO. M98803

Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
FOLLOW-UP ITEMS RELATED TO THE
PROPOSED CONVERSION TO THE IMPROVED
TECHNICAL SPECIFICATIONS SECTIONS 3.1, 3.2, 3.4, 3.5, AND 5.0**

- References: 1) ULNRC-03578 dated May 15, 1997
2) ULNRC-03877 dated August 4, 1998
3) ULNRC-03900 dated September 24, 1998

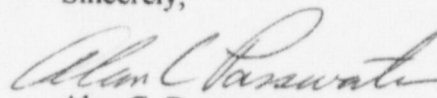
Union Electric Company requested an amendment to the Callaway Facility Operating License (NPF-30) by incorporating changes to the Technical Specifications (TS) as provided in Reference 1. The NRC staff requested additional information regarding Section 3.1, "Reactivity Control Systems," Section 3.2, "Power Distribution Systems," Section 3.5, "Emergency Core Cooling Systems," Section 3.9, "Refueling Operations," and 4.0, "Design Features," which was provided in Reference 2. In addition, the NRC staff requested additional information regarding Section 3.4, "Reactor Coolant System," and Section 5.0, "Administrative Controls," which was provided in Reference 3.

The Attachments to this letter provide (1) additional information or supporting documentation not provided in the original RAI responses, (2) answers to follow-up questions, and (3) additional changes identified by the licensee for ITS Sections 3.1, 3.2, 3.4, 3.5, and 5.0.

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

9810270353 981021
PDR ADOCK 05000483
P PDR

GGY/plr
Attachments

A001/1



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

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

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

Mr. Mel Gray (2)
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
TU Electric
P.O. Box 1002
Glen Rose, TX 76043

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

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

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

ITS	Item Number	Applicability	Enclosed
3.1	Q 3.1-19	CA, WC	YES
3.1	Q 3.1-20	CP, DC	NA
3.1	CA-3.1-005 (new)	CA	YES
3.2	Q 3.2-3	CA, CP, DC, WC	YES
3.4	Q 3.4.13-5	DC	NA
3.4	Q 3.4.13-6	CA	YES
3.5	Q 3.5.5-1	CP, DC	NA
3.5	CA-3.5-001	CP (new)	NA
3.5	CA-3.5-002	CA, CP, DC, WC	YES
3.5	CA-3.5-004 (new)	CA	YES
3.5	CP-3.5-003 (new)	CP	NA
3.5	DC-3.5-002	DC	NA
3.5	DC-3.5-006	DC	NA
5.0	NR-5.0-001 (new)	CA, CP, DC, WC	YES

ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q 3.1-19

APPLICABILITY: CA, WC

REQUEST: ITS 3.1.7 Rod Position Indication
CTS 3.1.3.2 Position Indication Systems - Operating (Wolf Creek & Callaway)
DOC 13-05-A & 13-09-LS-23 & 13-06-A
JFD 3.1-7 & 3.1-12

Comment: The ITS retains Conditions and associated Required Actions from the CTS addressing more than one inoperable digital rod position indicator (DRPI) per group, which is not addressed in the STS. However, not all associated CTS Required Actions have been retained in the ITS; the Required Actions to take manual control of the rods and to record reactor coolant temperature every hour have not been retained. These actions, in one case affect rod movement and in the other case provide an indication that the rod(s) position may have changed, and therefore have a bearing on SDM and therefore should not be deleted if the overall condition of more than DRPI per group is inoperable is retained. Either retain the CTS requirements completely, adopt the STS requirements, or provide a better justification for the ITS proposals. The STS wording of the note permitting separate condition entry should be retained with the STS Conditions and Required Actions.

FLOG RESPONSE (original): The wording of ITS Condition B, with its Required Actions B.1 and B.2, and the change to the Actions Note on separate Condition entry were made pursuant to traveler TSTF-234. TSTF-234 was created based on the Callaway and Wolf Creek CTS; however, Westinghouse and the Westinghouse Owners Group felt that Action Statements b.1.b) and b.1.c) were unnecessary compensatory actions. The justifications for deleting CTS 3.1.3.2 Action Statements b.1.b) and b.1.c) are discussed in Enclosure 4 under LS-23. In order to capture those justifications under Enclosure 3A, DOC 13-09-LS-23 is revised to add the following:

"The proposed change would delete the Actions to place control rods in manual and record RCS T_{avg} hourly if multiple DRPIs per group are inoperable. Multiple inoperable DRPIs, of themselves, have no impact on SDM in MODES 1 and 2 if the control rod positions are verified by alternate means (e.g., movable incore detectors). The requirement to place control rods in manual may not be appropriate in all situations and may be detrimental for load rejection transients unless operator action is assumed to simulate the rod control system in automatic. Accidents analyzed using the [Improved Thermal Design Procedure (ITDP)] assume that the control rods are in [automatic]. Automatic rod movement can accommodate a 10% load rejection. Placing rods in manual may impact the load rejection capability assumed when the P-9 setpoint was established at 50% RTP. The steam dump system can accommodate a 40% RTP load rejection and with the rod control system in automatic, a 50% RTP load rejection can be accommodated without a reactor trip. While manual operator action can be just as timely as automatic rod control, there is no need to have this limitation in the Technical Specifications. Corrective actions for excessive rod motion are covered under ITS 3.1.7 Condition C. The requirement to monitor and record T_{avg} hourly is unnecessary given the available indicators and alarms, e.g., $T_{avg} - T_{ref}$ deviation alarm, to alert operators to changing moderator conditions."

FLOG RESPONSE (revised): This is a modified response, which replaces the original response provided in Reference 2 of the cover letter, in order to respond to NRC reviewer comments.

The wording of ITS Condition B, with its Required Actions B.1 and B.2, and the change to the Actions Note on separate Condition entry were made pursuant to traveler TSTF-234. TSTF-234 was created based on the Callaway and Wolf Creek CTS; however, Westinghouse and the Westinghouse Owners Group felt that Action Statements b.1.b) and b.1.c) were unnecessary compensatory actions. The justifications for deleting CTS 3.1.3.2 Action Statements b.1.b) and b.1.c) were discussed in Enclosure 4 under LS-23. However, based on NRC staff review, ITS 3.1.7 Condition B will be revised to include Required Actions to place the control rods in manual and to monitor and record RCS T_{avg} hourly, as required by the current TS. The separate condition entry note does not need to include "per group" or "per bank" since the wording of the respective Conditions already provides those restrictions and including that wording in the note is redundant and potentially misleading to the operator. This is an editorial change.

ATTACHED PAGES:

Attachment 7, CTS 3/4.1 – ITS 3.1
Enclosure 2, page 3/4 1-17
Enclosure 3A, page 12
Enclosure 3B, page 8
Enclosure 4, pages 1, 50, and 51
Enclosure 5A, Traveler Status Sheet
Enclosure 5A, pages 3.1-17 and 3.1-18
Enclosure 5B, page B 3.1-48
Enclosure 6A, page 2
Enclosure 6B, page 1