

Union Electric

U. S. Nuclear Regulatory Commission
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Washington, D. C. 20555-0001

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

Gentlemen:

ULNRC-03927
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 3.3

- References:
1. ULNRC-03578 dated May 15, 1997
 2. Letter dated July 17, 1998 from K. M. Thomas, NRC, to G. L. Randolph
 3. NRC memorandum from S. D. Bloom to W. H. Bateman dated August 7, 1998
 4. Letter dated August 28, 1998 from J. N. Donohew, NRC, to G. L. Randolph
 5. NRC memorandum from J. N. Donohew to J. N. Hannon dated September 3, 1998
 6. Letter dated October 16, 1998 from J. N. Donohew, 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 3.3, "Instrumentation," of the proposed TS changes in Reference 2. The NRC's Request for Additional Information was modified during public meetings held from August 11 to August 14, 1998 (as noticed by Reference 3 and discussed in Reference 4) and from September 15 to September 18, 1998 (as noticed by Reference 5 and discussed in Reference 6). The requested information is provided in the Attachments to this letter as are any additional changes needed for Section 3.3 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,

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

Alan C. Passwater
Manager, Corporate Nuclear Services

9812070271 981125
PDR ADOCK 05000483
P PDR

GGY/plr
Attachments

a subsidiary of Ameren Corporation

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 25th day
of November, 1998.

Patricia A. 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

Mr. Mel Gray (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

INDEX OF ADDITIONAL INFORMATION

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
Q 3.3.Gen-1	DC, CP, WC & CA	YES
Q 1-A GEN	DC, CP, WC & CA	YES
Q 2-LS GEN	DC, CP, WC & CA	YES
Q 3-LS GEN	DC, CP, WC & CA	YES
Q 1-B GEN	DC, CP, WC & CA	YES
Q 1-01	DC, CP, WC & CA	YES
Q 1-02	DC, WC	NA
Q 1-03	DC, WC & CA	YES
Q 1-04	WC	NA
Q 1-05	DC, WC & CA	YES
Q 1-06	DC, CP, WC & CA	YES
Q 1-07	DC, CP, WC & CA	YES
Q 1-10	CA	YES
Q 1-11	CP, WC & CA	YES
Q 1-13	DC, CP, WC & CA	YES
Q 1-14	DC, CP, WC & CA	YES
Q 1-15	WC	NA
Q 1-16	DC, CP, WC & CA	YES
Q 1-18	DC, CP, WC & CA	YES
Q 1-23	DC, CP, WC & CA	YES
Q 1-25	DC, CP, WC & CA	YES
Q 1-30	CA	YES
Q 1-32	WC	NA
Q 1-35	DC	NA
Q 1-37	DC, CP, WC & CA	YES
Q 1-40	WC & CA	YES
Q 1-48	DC	NA
Q 1-49	DC	NA
Q 1-51	DC, CP, WC & CA	YES
Q 1-53	DC, CP, WC & CA	YES
Q 1-54	CA	YES
Q 1-56	DC	NA
Q 1-58	CP	NA
Q 2-02 (3.3)	WC & CA	YES
Q 2-03 (3.3)	CP	NA
Q 2-05 (3.3)	DC & CP	NA
Q 2-07 (3.3)	CP	NA
Q 2-08 (3.3)	DC	NA
Q 2-09	WC	NA
Q 2-11	CP & WC	NA

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<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
Q 2-12	CP, WC & CA	YES
Q 2-13	CP	NA
Q 2-15	DC, CP, WC & CA	YES
Q 2-16	CP, WC & CA	YES
Q 2-17	CP	NA
Q 2-18	WC & CA	YES
Q 2-19	DC, CP, WC & CA	YES
Q 2-20	CP	NA
Q 2-21	CP	NA
Q 2-25	CP & WC	NA
Q 2-26	CP, WC & CA	YES
Q 2-31	WC & CA	YES
Q 2-32	CP	NA
Q 2-34	WC & CA	YES
Q 2-35	DC	NA
Q 2-36	DC	NA
Q 2-37	WC	NA
Q 2-38	DC	NA
Q 2-40	DC, CP & WC	NA
Q 2-41	CA	YES
Q 2-45	WC & CA	YES
Q 2-47	CA	YES
Q 3-01	DC, CP, WC & CA	YES
Q 3-02	DC, CP, WC & CA	YES
Q 3-03	DC, WC & CA	YES
Q 3-05	DC, CP, WC & CA	YES
Q 3-08	DC	NA
Q 3-13	CP	NA
Q 3-15	DC	NA
Q 3-16	DC	NA
Q 3-17	CP	NA
Q 7-01	DC, CP, WC & CA	YES
Q 7-04	WC & CA	YES
Q 7-06	WC & CA	YES
Q 7-08	CP	NA
Q 7-08a	CP	NA
Q 7-09	DC, CP, WC & CA	YES
Q 7-10	DC & CP	NA
Q 7-11	WC & CA	YES
Q 7-12	WC & CA	YES
Q 7-13	WC & CA	YES

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<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
Q 8-01	DC, CP, WC & CA	YES
Q 8-04	DC, CP, WC & CA	YES
Q 8-05	WC & CA	YES
Q 8-07	CP	NA
Q 8-07f	DC, WC & CA	YES
Q 8-11	DC	NA
Q 12-05 (3.6)	DC	NA
Q 2-03 (2.0)	WC & CA	YES
Q 2-04 (2.0)	DC, WC & CA	YES
Q 2-05 (2.0)	DC	NA
Q 2-06 (2.0)	DC	NA
Q 2-07 (2.0)	DC	NA
Q 3.3c GEN	DC	NA
Q 3.3d GEN	DC, CP, & WC	NA
Q 3.3e	WC	NA
Q 3.3f	WC	NA
Q 3.3g	WC	NA
Q 3.3h	WC	NA
Q 3.3i	DC, CP, WC & CA	YES
Q 3.3j	DC, CP, WC & CA	YES
Q 3.3k	DC	NA
Q 3.3l	DC	NA
Q 3.3p	WC	NA
Q 3.3q	WC	NA
Q 3.3r	WC	NA
Q 3.3-02	DC, CP, WC & CA	YES
Q 3.3-03	DC & CA	YES
Q 3.3-04	CA	YES
Q 3.3-06	DC	NA
Q 3.3-10	DC & WC	NA
Q 3.3-17	WC & CA	YES
Q 3.3-19	WC & CA	YES
Q 3.3-20	DC, CP, WC & CA	YES
Q 3.3-21	WC & CA	YES
Q 3.3-22	DC, WC & CA	YES
Q 3.3-24	CP, WC & CA	YES
Q 3.3-26	WC	NA
Q 3.3-28	CA	YES
Q 3.3-29	DC	NA
Q 3.3-30	WC & CA	YES
Q 3.3-31	WC, DC, CP & CA	YES
Q 3.3-32	DC, WC & CA	YES
Q 3.3-34	DC, WC & CA	YES
Q 3.3-37	DC & CP	NA

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<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
Q 3.3-39	WC & CA	YES
Q 3.3-40	DC, CP, WC & CA	YES
Q 3.3-43	DC, CP, WC & CA	YES
Q 3.3-44	DC, CP, WC & CA	YES
Q 3.3-46	DC	NA
Q 3.3-48	WC	NA
Q 3.3-49	DC, CP, WC & CA	YES
Q 3.3-54	DC, CP, WC & CA	YES
Q 3.3-55	DC, CP, WC & CA	YES
Q 3.3-56	WC	NA
Q 3.3-63	DC, CP, WC & CA	YES
Q 3.3-65	CP	NA
Q 3.3-66	DC	NA
Q 3.3-68	DC	NA
Q 3.3-70	CP	NA
Q 3.3-71	DC	NA
Q 3.3-73	CP	NA
Q 3.3-74	CA	YES
Q 3.3-76	DC	NA
Q 3.3-77	DC	NA
Q 3.3-78	CP	NA
Q 3.3-79	DC, CP, WC & CA	YES
Q 3.3-80	WC & CA	YES
Q 3.3-82	DC	NA
Q 3.3-83	WC & CA	YES
Q 3.3-86	CP	NA
Q 3.3-88	CA	YES
Q 3.3-90	CA	YES
Q 3.3-91	CA	YES
Q 3.3-92	WC & CA	YES
Q 3.3-94	DC, CP, WC & CA	YES
Q 3.3-95	WC	NA
Q 3.3-96	DC, CP, WC & CA	YES
Q 3.3-97	DC, CP, WC & CA	YES
Q 3.3-98	CA	YES
Q 3.3-99	WC & CA	YES
Q 3.3-104	DC	NA
Q 3.3-107	DC, CP, WC & CA	YES
Q 3.3-117	DC, CP, WC & CA	YES
Q 3.3-119	CA	YES
Q 3.3-120	DC, CP, WC & CA	YES
Q 3.3-121	CA	YES
Q 3.3-122	DC, CP, WC & CA	YES
Q 3.3-123	DC	NA
Q 3.3-124	WC	NA
Q 3.3-125	DC, CP, WC & CA	YES
Q 3.3-127	DC	NA
Q 3.3-128	DC	NA
Q 3.3-129 ^a	DC	NA
Q 3.3-130	CP	NA

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<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
Q 3.3-131	CP	NA
Q 3.3-132	CP	NA
Q 3.3-135	DC, CP, WC & CA	YES
Q 3.3-144	DC	NA
CA-3.3-ED	CA	YES
CA-3.3-001	CA	YES
CA-3.3-002	CA	YES
CA-3.3-003	CA	YES
CA-3.3-005	CP, WC & CA	YES
CA-3.3-006	DC & CA	YES
CA-3.3-007	CA	YES
CA-3.3-009	CA	YES
CA-3.3-012	DC	NA
CA-3.3-014	CA, DC, WC	YES
CA-3.3-016	CA, CP, WC	YES
CA-3.3-017	CA	YES
CA-3.3-019	CA	YES
CA-3.3-021	WC & CA	YES
CA-3.3-022	CA	YES
CA-3.3-023	CA	YES
CP-3.3-ED	CP	NA
CP-3.3-001	DC & CP	NA
CP-3.3-002	CP	NA
CP-3.3-003	CP	NA
CP-3.3-004	CP	NA
CP-3.3-005	CP	NA
CP-3.3-006	CP	NA
CP-3.3-007	CP	NA
CP-3.3-008	CP	NA
CP-3.3-009	CP	NA
CP-3.3-010	CP	NA
DC-3.3-ED	DC	NA
DC-3.3-001	DC	NA
DC-3.3-002	DC	NA
DC-3.3-003	DC	NA
DC-3.3-004	DC	NA
DC-3.3-005	DC	NA
DC-ALL-001 (3.3 changes only)	DC	NA
DC-ALL-002 (3.3 changes only)	DC	NA
DC-ALL-003 (3.3 changes only)	DC	NA
DC-ALL-004 (3.3 changes only)	DC	NA
DC-ALL-005 (3.3 changes only)	DC	NA
TR-3.3-003	DC, CP, WC & CA	YES
TR-3.3-004	DC, CP, WC & CA	YES
TR-3.3-005	DC, CP, WC & CA	YES

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ADDITIONAL INFORMATION
NUMBER

APPLICABILITY

ENCLOSED

WC-3.3-ED	WC	NA
WC-3.3-004	WC	NA
WC-3.3-006	WC	NA
WC-3.3-007	CP, WC & CA	YES
WC-3.3-008	WC	NA
WC-3.3-009	WC	NA
WC-3.3-014	WC	NA
WC-3.3-015	WC	NA
WC-3.3-016	WC & CA	YES
WC-3.3-017	WC	NA
WC-3.3-018	WC	NA

ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q 3.3.Gen-1

APPLICABILITY: CA, CP, DC, WC

REQUEST: ITS 3.3.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 3.3 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 9, CTS 3/4.3 - ITS 3.3

Enclosure 5B, pages B 3.3-7, B 3.3-18, B 3.3-20, B 3.3-21, B 3.3-23, B 3.3-41, B 3.3-64, B 3.3-68, B 3.3-79, B 3.3-87, B 3.3-95, B 3.3-96, B 3.3-105, B 3.3-106, B 3.3-107, B 3.3-115, B 3.3-119, B 3.3-120, B 3.3-121, B 3.3-131, B 3.3-141, B 3.3-143, B 3.3-144, B 3.3-170, B 3.3-171, B 3.3-199, B 3.3-204, and B 3.3-222