February 27, 1998

Mr. Garry L. Randolph
Vice President and Chief Nuclear Officer
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING MAIN STEAM SAFETY VALVE SETPOINT TOLERANCE CHANGE (TAC NO. M99419)

Dear Mr. Randolph:

By letter dated August 8, 1997, and supplemented by letters dated December 16, 1997, and January 20, 1998, Union Electric (UE) submitted an application for amendment to Facility Operating License No. NFP-30 for the Callaway Plant, Unit 1. Specifically, you requested to revise technical specification tables to revise sensor errors and reduce the setpoint tolerances for the main steam line safety valves.

The staff has reviewed your submittal and determined that further information is needed to complete our review. The requested information is included as an enclosure to this letter. Please provide your response to the staff's RAI within 30 days of the date of this letter in order to support the staff's review schedule. If you have any questions regarding the content of this RAI, please contact me at (301) 415-3456.

Sincerely,

Original Signed By
Barry C. Westreich, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure: Request for Additional Information

cc w/encl: See next page

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DOCUMENT NAME: CAL99419.RAI

OFC	PDIV-2/PM	PDIV-2/LA
NAME	BWestreich	EPeyton
DATE	2/27/98	2/27/98

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cc w/encl:
Professional Nuclear
Consulting, Inc.
19041 Raines Drive
Derwood, Maryland 20855

Gerald Charnoff, Esq.
Thomas A. Baxter, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Mr. H. D. Bono
Supervising Engineer
Quality Assurance Regulatory Support
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

U.S. Nuclear Regulatory Commission
Resident Inspector Office
8201 N. C Road
Steedman, Missouri 65077-1302

Mr. J. V. Laux, Manager
Quality Assurance
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

Manager - Electric Department
Missouri Public Service Commission
301 W. High
Post Office Box 360
Jefferson City, Missouri 65102

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavilion
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Mr. Ronald A. Kucera, Deputy Director
Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, Kansas 66839

Mr. Dan I. Bolef, President
Kay Drey, Representative
Board of Directors Coalition
for the Environment
6267 Delmar Boulevard
University City, Missouri 63130

Mr. Lee Fritz
Presiding Commissioner
Callaway County Court House
10 East Fifth Street
Fulton, Missouri 65151

Mr. Alan C. Passwater, Manager
Licensing and Fuels
Union Electric Company
Post Office Box 66149
St. Louis, Missouri 63166-6149

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

REQUEST FOR ADDITIONAL INFORMATION REGARDING MSSV TOLERANCE CHANGE

1. Discuss how the 1-second response time of pressurizer pressure-high trip is ensured and what licensing basis document this limit is controlled by.

2. Address the Westinghouse NSAL-94-001 and NRC IN 94-60 issues related to neutron flux high setpoint and its relation to the number of MSSVs inoperable.

3. With regard to safety valve accumulation, it is the staff's position that either this must be accounted for as has been done in the past (3% accumulation) or a justification based on test data presented for an alternative method. An alternative method was reviewed for another plant (see Palo Verde safety evaluation dated May 16, 1994) which accounts for a pressure increase resulting from appropriate delays in valve opening time. Please provide further justification of your proposed method with regard to valve accumulation.

4. Your position to not account for test instrument uncertainties of +2/-1% is inconsistent with approved methods by which instrument uncertainties are calculated or accounted for. Please account for this uncertainty or provide further justification for its exclusion.

5. In the FSAR, the initial assumptions are discussed with respect to RCS peak pressure. How are they applied for the MSS peak pressure analyses and how does this ensure conservative analyses with regard to the MSS?

6. What effect will crediting pressurizer pressure control have on the MSS peak pressure analyses?

7. The staff's RAI, dated December 9, 1997, asked the licensee to provide various data to allow the staff to understand certain details of the change requested by the licensee. The response to the RAI did not allow this understanding.

   The staff requests that the licensee provide:

   (a) Reference 4, the Westinghouse methodology;

   (b) A copy of the previous setpoint calculation;

   (c) A copy of the new setpoint calculation; and

   (d) An explanation of any differences between (b) and (c).