



1901 Gratiot Street, St. Louis

April 16, 1987

Donald F. Schnell

Vice President

U.S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Washington, D.C. 20555

Gentlemen:

ULNRC-1493

DOCKET NUMBER 50-483

CALLAWAY PLANT

REVISION TO TECHNICAL SPECIFICATION TABLE 3.3-5

Reference: 1. ULNRC-1207 dated 11/15/85

Union Electric Company (UE) herewith transmits an application for amendment to Facility Operating License No. NPF-30 for Callaway Plant. This license amendment request proposes to revise Technical Specification Table 3.3-5 to increase the ESF response times for Items 2.a. (Containment Pressure-High-1, Safety Injection), 3.a. (Pressurizer Pressure-Low, Safety Injection) and 4.a. (Steam Line Pressure-Low, Safety Injection). These changes are detailed in Attachment 1.

On April 13, UE received a letter from Westinghouse Electric Corporation (SCP 87-155 dated 4/8/87) which informed us of a potential issue concerning the time required to change charging pump suction from the Volume Control Tank (VCT) to the Refueling Water Storage Tank (RWST) following a postulated steam line break event. Westinghouse advised that the issue had been evaluated for Callaway and that there was negligible impact on the Main Steam Line Break analysis results. UE reviewed the information and determined on April 15, 1987 that the issue was applicable to Callaway Plant. It was determined that the situation which has existed at Callaway is reportable within 30 days under 10CFR50.73(a)(2)(B) as an operation or condition prohibited by the plant's Technical Specifications. The reason for non-compliance was a misinterpretation of the surveillance requirements in Technical Specification Table 3.3-5. Although all equipment had been determined to be operational as required, the timing of equipment operation to meet response time requirements was misinterpreted. Notification of the situation was made to the NRC Resident Inspector and the NRC Licensing Project Manager on April 15, 1987.

Callaway has been in Mode 5 since April 3, 1987 for a maintenance outage. Callaway is scheduled to return to power in early May and will enter Mode 3 on May 6, 1987, at which time the requested change is required to be approved. Therefore, pursuant to 10CFR50.91(a)(5), UE hereby requests NRC emergency

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authorization and approval of this proposed amendment to Facility Operating License No. NPF-30.

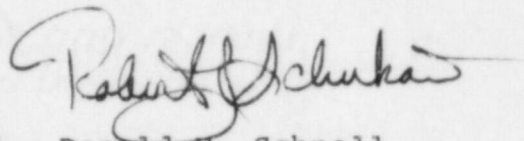
Further, the requested emergency authorization is appropriate because this amendment request involves no significant hazards consideration (Attachment 3). In addition, the present situation could not be avoided. As indicated above, UE promptly notified the NRC of this situation and has pursued an expeditious resolution of this matter. The results of the Safety Evaluation (Attachment 2) show that there is sufficient margin available in the analysis of record (Reference 1), such that conclusions reached therein remain valid.

The Callaway Plant On-Site Review Committee and Nuclear Safety Review Board have reviewed and approved this amendment request.

In accordance with 10CFR50.91(b), UE will promptly provide the State of Missouri with a copy of this proposed amendment to ensure their awareness of this request.

Enclosed is a check for the \$150.00 application fee as required by 10CFR170.21

Very truly yours,

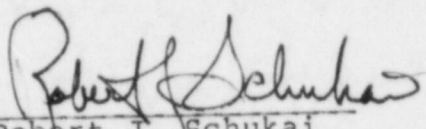

for Donald F. Schnell

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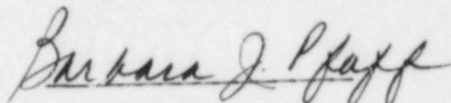
Attachments: 1 - Proposed Technical Specification Change
2 - Safety Evaluation
3 - Significant Hazard Evaluation
4 - Application Fee

STATE OF MISSOURI)
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CITY OF ST. LOUIS)

Robert J. Schukai, of lawful age, being first duly sworn upon oath says that he is General Manager-Engineering (Nuclear) 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 
Robert J. Schukai
General Manager-Engineering
Nuclear

SUBSCRIBED and sworn to before me this 16th day of April, 1987.


BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1989
ST. LOUIS COUNTY

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