

July 15, 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 ON THE PROPOSED
CONVERSION TO THE IMPROVED STANDARD TECHNICAL
SPECIFICATIONS FOR CALLAWAY PLANT, UNIT 1 (TAC NO. M98803)

Dear Mr. Randolph:

The Nuclear Regulatory Commission staff is reviewing Union Electric Company's proposed license amendment to convert the current technical specifications for Callaway Plant, Unit 1 to the Improved Standard Technical Specifications. Union Electric Company provided their proposed license amendment request by letter dated May 15, 1997.

The staff has reviewed selected portions of the application. Based on its review, the staff has determined that additional information is needed in Section 5.0, Administrative Controls, as discussed in the enclosure. Since you worked with three other utilities in preparing your submittal, the enclosure contains the request for additional information (RAI) questions for all four utilities. However, you need only reply to the RAI questions associated with Callaway Plant, Unit 1 as identified in the table within the enclosure.

To assist the staff in maintaining its review schedule, please respond to the questions pertaining to Callaway Plant, Unit 1 within 30 days of the date of this letter. If you have any questions regarding the RAI, please contact me at (301) 415-1362. If all four utilities would like to have a common discussion, a single meeting, or phone call, it can be coordinated by contacting the NRR Lead Project Manager, Timothy J. Polich at (301) 415-1038.

Sincerely,
Original Signed By
Kristine M. Thomas, 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

Document Name: CALITS.RAI

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Mr. Garry L. Randolph

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July 15, 1998

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**FOUR LOOP GROUP (FLOG) IMPROVED TS REVIEW COMMENTS
SECTION 5.0 - ADMINISTRATIVE CONTROLS**

5.1-1 CTS 6.1.1, ITS 5.1.1, Change 01-01-A and Difference 5.1-2 (Callaway)

Comment: Difference 5.1-2 states that the STS is revised to "maintain CTS." However, given that Change 01-01-A Insert 1 includes new language into the CTS it is unclear how the CTS is being maintained. This addition of new language into the CTS and deviation from the STS is not justified. Provide justification.

FLOG Response:

5.2-1 STS 5.2.2 b and Difference 5.2-2

Comment: TSTF-121 has been withdrawn for modification, combination and resubmission. Use current ITS.

FLOG Response:

5.3-1 ITS 5.3.1 (Wolf Creek, Callaway and Diablo Canyon)

Comment: Part 55 of Title 10 of the Code of Federal Regulations was revised in March 1987 to establish upgraded requirements for licensed reactor operators. NRC Regulatory Guide (RG) 1.8, Revision 2, April 1987, describes methods acceptable to the staff for complying with the revised rule. The Statements of Consideration for the Part 55 rule change state that, "Those facility licensees that have made a commitment that is less than that required by the new rules must conform to the new rules automatically." The staff is concerned some facilities continue to have technical specifications that reference older industry standards that may not fully meet the revised requirements of 10 CFR Part 55.

The staff previously considered that the standards applied through the industry's accreditation process were equivalent to the guidance contained in RG 1.8, Revision 2. However, the staff has recently found that current INPO guidance in this area is very general; only advising licensees to follow regulatory requirements. In RG 1.8, Revision 2, the NRC staff endorses, with conditions, certain parts of industry standard ANSI/ANS-3.1-1981 as an acceptable approach for complying with the qualification and training requirements of 10 CFR Parts 50 and 55. This endorsement applies to the positions identified as shift supervisor, senior operator, licensed operator, shift technical advisor, and radiation protection manager. For positions other than those identified, the RG finds acceptable the approach provided in ANSI N18.1-1971.

For Callaway, the ITS proposes to adopt the CTS which adopts ANSI/ANS 3.1-1978 for the unit staff (besides SROs, ROs and STAs) and RG 1.8, September 1975 for the radiation protection manager. For Wolf Creek, the ITS proposes to adopt the CTS which adopts ANSI/ANS 3.1-1978 for the unit staff (besides SROs and ROs) and RG 1.8, September 1975 for the radiation

protection manager. For Diablo Canyon, the ITS proposed to adopt the CTS which adopts ANSI/ANS 3.1-1978 for the unit staff (besides the radiation protection manager) though it does make a reference to ROs and SROs having to meet the minimum qualifications of Part 55.

Please describe how your commitment to an ANSI standard other than that endorsed by NRC RG 1.8, Revision 2 currently meets the requirements of 10 CFR Part 55, as discussed in the Statements of Consideration for the rule change and would meet those requirements with the ITS as proposed.

FLOG Response:

5.5-1 Change 2-17 LS1 (Callaway, Diablo Canyon)

Comment: WOG-85 has not yet become a TSTF. Use current ITS.

FLOG Response:

5.5-2 Difference 5.5-14

Comment: WOG-85 has not yet become a TSTF. Use current ITS.

FLOG Response:

5.5-3 ITS 5.5.4 b&g and Difference 5.5-1

Comment: Changes are based on a yet unnumbered traveler. Use current ITS.

FLOG Response:

5.5-4 ITS 5.5.4 e and Difference 5.5-13

Comment: WOG-72 has not yet become a TSTF. Use current ITS.

FLOG Response:

5.5-5 ITS 5.5.12 c, CTS 6.8.5 a.3 and Difference 5.5-7 (Callaway)

Comment: The CTS just refers to 10 CFR Part 20 Appendix B. More information is needed to determine which table governs the current requirements.

FLOG Response:

5.5-6 CTS 3.7.6 and Changes 10-15-LG and 10-17-A (Callaway)

Comment: Please provide a better explanation of the deletion of Pressurization System 2200 CFM +800, -200.

FLOG Response:

5.5-7 CTS 3.7.6 and Changes 10-15-LG and 10-17-A (Wolf Creek)

Comment: The CTS markup is inconsistent with the comments as nothing is lined out. Further, the deletions (at least as they are reflected in ITS 5.5.11) need a better explanation. Provide explanation.

FLOG Response:

5.5-8 CTS 3.7.6 (3.7.5.1 and 3.7.6.1 - DCPD and 3.7.7.1 and 3.7.8 -CPSES) and Change 10-08-A

Comment: It should be specifically noted as to which CTS requirements were carried over to the VFTP and which were deleted (as well as which section of what standard justified the duplication deletions). Provide explanation and justification.

FLOG Response:

5.5-9 CTS 3.9.13 (3.9.12 - DCPD) and Change 12-04-A (Wolf Creek, Callaway and Diablo Canyon)

Comment: It appears that some of the CTS requirements covered by this change were deleted rather than transferred to ITS 5.5.11 as stated. Justify the individual deletions.

FLOG Response:

5.5-10 ITS 5.5.11.b (Callaway and Wolf Creek)

Comment: The smooth copy of the ITS still has the [] around the plant specific bypass value

FLOG Response:

5.5-11 ITS 5.5.9 d, ITS 5.5.11 b, and 5.5.13 (Diablo Canyon)

Comment: The smooth copy of the ITS contains a number of administrative errors. Page 5.0-19 of the smooth copy of the ITS has two errors. First, the VFTP section title and the (continued) appear before ITS 5.5.11.b when they should appear at the top of Page 5.0-20. Second, in 5.5.11 b it should not be "10%at". To be consistent with the rest of the section, Page 5.0-15 should have SG Tube (continued) at the top of the page. Similarly, Page 5.0-23 should have a Diesel Fuel (continued) at the top of the page.

FLOG Response:

5.5-12 ITS 5.5.11 and CTS 4.7.6.c.2 (Wolf Creek)

Comment: The value of relative humidity is 70% in the ITS, 78% in the CTS markup, and 70% in the CTS. Is it correct to assume the CTS markup value is wrong?

FLOG Response:

5.5-13 Difference 5.5-9 (Diablo Canyon)

Comment: Unlike Comanche Peak, the ITS/CTS cross reference table does not include any reference to CTS 3/4.11. Therefore, the difference as written is not detailed enough. Either make the tie in the difference discussion or update the cross reference.

FLOG Response:

5.5-14 ITS 5.5.11.e and CTS 4.7.8.d.3 (Comanche Peak)

Comment: The value for the ESF filtration unit is 100 plus or minus 5 kW in the CTS and 100 plus 5 kW in the ITS. Provide correction or justify change.

FLOG Response:

5.6-1 ITS 5.6.5 a.7&8, Changes 03-14&15 M

Comment: It is true that the additions would make the COLR more restrictive however, the removal of the specific values from the TS is a less restrictive change that needs to be justified. Provide justification.

FLOG Response:

5.6-2 Difference 5.6-2 (Diablo Canyon)

Comment: TSTF-37 has not yet been approved by the NRC. Use current ITS.

FLOG Response:

5.7-1 ITS 5.7.2 and Difference 5.7-2

Comment: TSTF-167 has been rejected by the NRC. Use current ITS.

FLOG Response:

FLOG RAI APPLICABILITY TABLE FOR ITS SECTION 5.0

RAI Number	Callaway	Cornanche Peak	Diablo Canyon	Wolf Creek
5.1-1	X			
5.2-1	X	X	X	X
5.3-1	X		X	X
5.5-1	X		X	
5.5-2	X	X	X	X
5.5-3	X	X	X	X
5.5-4	X	X	X	X
5.5-5	X			
5.5-6	X			
5.5-7				X
5.5-8	X	X	X	X
5.5-9	X		X	X
5.5-10	X			X
5.5-11			X	
5.5-12				X
5.5-13			X	
5.5-14		X		
5.6-1	X	X	X	X
5.6-2			X	
5.7-1	X	X	X	X