

File Center



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 24, 1999

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

SUBJECT: CLOSEOUT OF ACTIONS REGARDING GENERIC LETTER 98-04 ISSUED
JULY 14, 1998 FOR CALLAWAY PLANT, UNIT 1 (TAC NO. MA4028)

Dear Mr. Randolph:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," to all holders of operating licenses or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs at operating nuclear power plant facilities.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility, including a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for (a) controlling the procurement of coatings and paints used at the facility, (b) the qualification testing of protective coatings, and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.
- (2) Information demonstrating compliance with item (i) or item (ii) below.
 - (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components (SSCs) during a postulated design basis loss-of-coolant accident (DB LOCA), the following information shall be provided to demonstrate compliance:

NOV 24 1999

PDR ADOCK

DF01

- (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
 - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
 - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling" and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable.

The following information shall be provided: If a commercial-grade dedication program is not being used at the facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 9, 1998 (ULNRC-03916) for Callaway Plant, Unit 1. In the letter, you stated that Callaway does not have licensing-basis requirements for tracking the amount of unqualified coatings inside containment (item i above); however, you do require the use of qualified safety-related coatings inside containment and you provided the information requested for item ii above.

The letter of November 9, 1998, provided the information requested by GL 98-04. Clarification was provided during a phone call that took place on July 6, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for Callaway Plant, Unit 1.

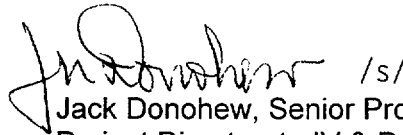
Mr. Garry L. Randolph

- 3 -

November 24, 1999

This closes out our efforts on TAC No. MA4028. We thank you for your prompt and complete response. If you have any questions regarding this matter, please contact me at 301-415-1307, or through the internet at jnd@nrc.gov.

Sincerely,



Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: See next page

DISTRIBUTION:

- File Center
- PUBLIC
- PDIV-2 Reading
- SRichards
- OGC
- ACRS
- WJohnson, RIV
- RPulsifer
- CLauron
- JDavis

To receive a copy of this document, indicate "C" in the box							
OFFICE	PDIV-2/RM	C	PDIV-2/LA	C	EMCB/SC		PDIV-2/SC
NAME	JDonohew:am		EPeyton		ESullivan		SDembek
DATE	11/23/99		11/19/99		11/23/99		11/24/99

DOCUMENT NAME: G:\PDIV-2\Callaway\MA4028-GL9804closeout.cw.wpd
OFFICIAL RECORD COPY

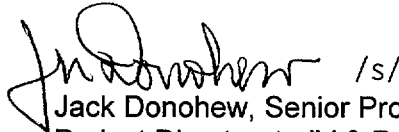
Mr. Garry L. Randolph

- 3 -

November 24, 1999

This closes out our efforts on TAC No. MA4028. We thank you for your prompt and complete response. If you have any questions regarding this matter, please contact me at 301-415-1307, or through the internet at jnd@nrc.gov.

Sincerely,

 /s/

Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: See next page

DISTRIBUTION:

File Center
PUBLIC
PDIV-2 Reading
SRichards
OGC
ACRS
WJohnson, RIV
RPulsifer
CLauron
JDavis

To receive a copy of this document, indicate "C" in the box							
OFFICE	PDIV-2/RM	C	PDIV-2/LA	C	EMCB/SC		PDIV-2/SC
NAME	JDonohew:am		EPeyton		ESullivan		SDembek
DATE	11/23/99		11/19/99		11/23/99		11/24/99

DOCUMENT NAME: G:\PDIV-2\Callaway\MA4028-GL9804closeout.cw.wpd

OFFICIAL RECORD COPY

Mr. Garry L. Randolph

- 3 -

November 24, 1999

This closes out our efforts on TAC No. MA4028. We thank you for your prompt and complete response. If you have any questions regarding this matter, please contact me at 301-415-1307, or through the internet at jnd@nrc.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jack Donohew".

Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: See next page

Callaway Plant, Unit 1

cc:

Professional Nuclear
Consulting, Inc.
19041 Raines Drive
Derwood, Maryland 20855

John O'Neill, 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 NRC 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
Post Office 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