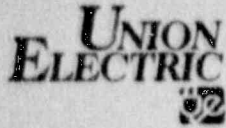


1901 Gratiot Street
Post Office Box 149
St. Louis, Missouri 63166
314-554-2650



December 28, 1989

Donald F. Schnell
Senior Vice President
Nuclear

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

ULNRC-2129

DOCKET NUMBER 50-483
CALLAWAY PLANT
REVISION TO TECHNICAL SPECIFICATION 3/4.1.3
MOVABLE CONTROL ASSEMBLIES

Reference: ULNRC-2055, dated August 2, 1989

The purpose of this letter is to provide additional information to support the NRC staff review of the proposed revisions to the Callaway Technical Specifications concerning Movable Control Assemblies. The proposed Technical Specification revision was transmitted to the NRC by the referenced letter.

The attachments to this letter provide additional justification for the proposed revisions to Technical Specification 3/4.1.3 and a clarified version of the proposed revisions incorporated into the existing Technical Specification.

If you have any additional questions concerning this matter, please contact me or D. E. Shafer of my staff.

Very truly yours,

for Donald F. Schnell

JMC/jal

Attachments

Handwritten: 1001
111

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, Licensing and Fuels (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 Alan C. Passwater
Alan C. Passwater
Manager, Licensing and Fuels
Nuclear

SUBSCRIBED and sworn to before me this 28th day
of December, 1989

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
ST. LOUIS COUNTY

cc: Gerald Charnoff, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Dr. J. O. Cermak
CFA, Inc.
4 professional Drive (Suite 110)
Gaithersburg, MD 20879

R. C. Knop
Chief, Reactor Project Branch 1
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Bruce Little
Callaway Resident Office
U.S. Nuclear Regulatory Commission
RR#1
Steedman, Missouri 65077

Tom Alexion (2)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
1 White Flint, North, Mail Stop 13E21
11555 Rockville Pike
Rockville, MD 20852

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

bcc: D. Shafer/A160.761

/QA Record (CA-758)

Nuclear Date

E210.01

DFS/Chrono

D. F. Schnell

J. E. Birk

J. V. Laux

M. A. Stiller

G. L. Randolph

R. J. Irwin

H. Wuertenbaecher

W. R. Campbell

A. C. Passwater

R. P. Wendling

D. E. Shafer

D. J. Walker

O. Maynard (WCNOC)

N. P. Goel (Bechtel)

T. P. Sharkey

NSRB (Sandra Auston)

Rod Control Action Statement Compliance Times

This correspondence supports efforts to extend the compliance time of Tech Spec 3.1.3.1b from six hours to 72 hours, if the rods are inoperable but trippable. Historically, the subject action statement has been entered on five different occasions, and the plant was subsequently shut down on three of those occasions.

Extending the compliance time would accomplish the following:

1. Allow sufficient time to evaluate the nature of the failure and to develop a systematic work plan.
2. Allow sufficient time to perform troubleshooting activities in a deliberate and systematic manner.
3. Avoid distractions to control room personnel. Under the existing action statement the control room must be making shut down preparations in parallel with supporting I&C troubleshooting of rod control system.
4. Some of the electronic failures will randomly occur during nights and weekends. The proposed tech spec change would allow time for the most experienced people available to travel to the plant, to plan and perform the work. The longer compliance time would also permit consultation with vendor personnel as necessary.
5. In the event of parts unavailability, the 72 hours would allow sufficient time to get part from another plant.
6. This would also reduce the potential for requiring the plant to cycle down and back up, due to electronic failures in Rod Control. This in turn would reduce exposure to safety system challenges during those evolutions.

In summary the proposed tech spec change would greatly improve the troubleshooting scenario. This would reduce the chances of unnecessary challenges to safety systems by reducing the chances of dropping a rod while troubleshooting. This would also reduce exposure to safeguard system challenges due to shutting down and starting up.

Technical Specification Inserts

Insert A

ACTION:

The ACTION to be taken is based on the cause of inoperability of control rods as follows: Any immovability of a control rod initially invokes ACTION Statement 3.1.3.1.a. Subsequently, ACTION Statement 3.1.3.1.a may be exited and ACTION Statement 3.1.3.1.d invoked if either the rod control urgent failure alarm is illuminated or an electrical problem is detected in the rod control system.

<u>CAUSE OF INOPERABILITY</u>	<u>ACTION</u>	
	<u>One Rod</u>	<u>More Than One Rod</u>
1. Immovable as a result of excessive friction or mechanical interference or known to be untrippable.	(a)	(a)
2. Misaligned by more than ± 12 steps (indicated position) from its group step counter demand height or from any other rod in its group.	(c)	(b)
3. Inoperable due to a rod control urgent failure alarm or other electrical problem in the rod control system, but trippable.	(d)	(d)

Insert B

For purposes of determining compliance with Specification 3.1.3.1, any immovability of a control rod initially invokes ACTION statement 3.1.3.1.a. Subsequently, ACTION statement 3.1.3.1.a may be exited and ACTION statement 3.1.3.1.d invoked if either the rod control urgent failure alarm is illuminated or an electrical problem is detected in the rod control system. The rod is considered trippable if the rod was demonstrated OPERABLE during the last performance of Surveillance Requirement 4.1.3.1.2 and met the rod drop time criteria of Specification 3.1.3.4 during the last performance of Surveillance Requirement 4.1.3.4.