



Donald F. Schnell
Senior Vice President
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March 12, 1993

U.S. Nuclear Regulatory Commission
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Gentlemen:

ULNRC-2778

**CALLAWAY PLANT
DOCKET NUMBER 50-483**

CALLAWAY PUMP AND VALVE INSERVICE TESTING PROGRAM

- References: 1) J. N. Hannon letter to D. F. Schnell
dated April 7, 1992
2) ULNRC-2548 dated January 23, 1992

This letter transmits Revision 13 of the Callaway Pump and Valve Inservice Testing (IST) Program. Attachment 1 is a brief description of the changes, and Attachment 2 contains a copy of revised pages which should be inserted into the existing program. NRC staff approval of this submittal is requested so that these changes may be implemented for Refuel 6 which is scheduled to begin in September, 1993.

Changes to the Callaway IST Program are subject to the fee provisions of 10CFR170. Therefore, Union Electric will accept charges incurred as a result of the NRC review. If you have any questions concerning this submittal, please contact me.

Very truly yours,

Donald F. Schnell

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Attachments

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PDR ADOCK 05000483
PDR

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STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Senior Vice President-Nuclear and an officer of 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 Donald F. Schnell
Donald F. Schnell
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this 12th day
of March, 1993.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
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**CHANGES TO THE CALLAWAY
INSERVICE TESTING PROGRAM**

- ITEM 1:** Revise Relief Request #EP-2 to remove the use of alternative testing in the form of acoustic monitoring techniques.

**BASIS FOR CHANGE/JUSTIFICATION FOR NO ADVERSE
IMPACT**

Revision 12 of the Callaway Pump and Valve Program allowed either disassembly or acoustic monitoring to verify full stroke capability of the Accumulator Discharge check valves. Upon further review, it was discovered that there was no acceptable method to provide flow through the Accumulator Discharge Check Valves (EP8956A,B,C,D) for the purpose of acoustic monitoring. Therefore, the ability of these valves to open will continue to be verified by disassembly. There is no change being implemented here - just a continuation of former plant testing - therefore no unreviewed safety question exists.

- ITEM 2:** Revise Alternative to Check Valve Full Flow Testing Justification #V07 by removing reference to EP8956A,B,C,D from the list of valves which are tested by acoustic monitoring.

**BASIS FOR CHANGE/JUSTIFICATION FOR NO ADVERSE
IMPACT**

This is an update to support the change made to Item 1 above. The same basis for change/justification for no adverse impact applies.

- ITEM 3:** Add Justification #V08 for the extension of the disassembly interval of the Accumulator Discharge Check Valves.

**BASIS FOR CHANGE/JUSTIFICATION FOR NO ADVERSE
IMPACT**

Justification #V08 provides the basis for extending the disassembly interval of the Accumulator Discharge Check Valves. This justification is written based on the provisions of Generic Letter 89-04. The only change being requested here is in regards to the frequency at which the subject valves must

be disassembled and inspected. This proposed testing extension does not pose an unreviewed safety question.

- ITEM 4: Revise Relief Request #P07 to allow the use of digital vibration meters.

BASIS FOR CHANGE/JUSTIFICATION FOR NO ADVERSE IMPACT

Callaway is buying new digital vibration meters that can be used for ASME XI testing. Relief Request #P07 allows the use of analog vibration meters that do not meet the three times the reference value criteria. These digital vibration meters are autoscaling and therefore the three times the reference value criteria is not applicable. Digital vibration meters are exempted from the three times the reference value range criteria in the Operations and Maintenance of Nuclear Power Plants Section 6 (O&M, Section 6). The accuracy of the meters will meet the five percent required by ASME XI. This relief request does not introduce an unreviewed safety question as the accuracy and readability of these new vibration meters will be equal to or better than the current analog vibration meters.

- ITEM 5: Add testing requirements for the normal and alternate charging check valves (BB-8378A,B and BB8379A,B) to the Pump and Valve Program, and add new Relief Request #BB-12, which requests testing the normal and alternate charging check valves in the closed direction on a refueling frequency as opposed to the normal requirement to test on a quarterly frequency.

BASIS FOR CHANGE/JUSTIFICATION FOR NO ADVERSE IMPACT

Adding these check valves to the IST Program is a conservative change as it adds more testing. The request to test on a refuel frequency is justified because leak testing these valves at normal power operation creates the possibility of causing a LOCA if one of these valves fails. This change does not introduce an unreviewed safety question as it is a conservative change - adds more testing.