

Donald F. Schnell
Senior Vice President
Nuclear

March 11, 1993

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

Gentlemen:

ULNRC-2776

CALLAWAY PLANT
DOCKET NUMBER 50-483
UNION ELECTRIC RESPONSE TO GENERIC LETTER 90-06
References: 1) ULNRC-2343 dated December 18, 1990
2) L. R. Wharton letter to D. F. Schnell
dated January 21, 1993

This letter provides clarification to Item 2 of Generic Letter 90-06, Resolution of Generic Issue 70, "Power-Operated Relief Valve and Block Valve Reliability," and Generic Issue 94, "Additional Low-Temperature Overpressure Protection for Light-Water Reactors." Item 2 of Enclosure A of GL 90-06 requested licensees to stroke test the PORVs during Mode 3 or Mode 4 and in all cases prior to establishing conditions where the PORVs are used for low-temperature overpressure protection.

Union Electric's response to GL 90-06 (Reference 1) indicated that the PORVs are tested at a Cold Shutdown frequency in accordance with the Inservice Test Program and Technical Specifications. This statement implies that the PORVs are tested every time the plant is placed in Mode 5 for greater than 72 hours. The NRC Staff questioned whether this response met the testing requirements as delineated in the generic letter (see Reference 2).

Our response to GL 90-06, Item 2 should be amended as follows. At Callaway, the PORVs are full stroke tested in Mode 4 prior to entering Mode 3 (ascending) every time the plant is placed in Mode 5 for greater than 72 hours, not to exceed quarterly

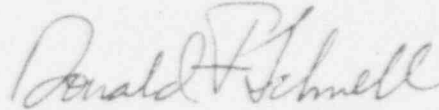
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testing requirements. The testing is performed in Mode 4, ascending to avoid testing following shutdown when decay heat load is greatest. In addition, with the cold shutdown frequency, the surveillance is current for up to 18 months. Therefore, there is no need to test the PORVs to demonstrate operability prior to their use when shutting down the plant.

We regret any confusion our previous response may have caused. If you have any questions concerning this letter, please contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Donald F. Schnell". The signature is fluid and cursive, with the first name "Donald" and last name "Schnell" clearly distinguishable.

Donald F. Schnell

WEK/plh

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 11th day
of March, 1994 36

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1995
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