

UNION ELECTRIC COMPANY

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September 7, 1983

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VICE PRESIDENT

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Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Denton:

ULNRC-659

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
PROCEDURES GENERATION PACKAGE

Reference: ULNRC-627 dated May 11, 1983

The referenced letter transmitted the Procedures Generation Package for Callaway Plant, Unit 1. In phone calls between the NRC reviewer (Mr. Bill Middleton) and Union Electric on July 18 and 19, 1983 additional information was requested to complete the NRC review. This letter provides the additional information requested and should allow Mr. Middleton to prepare the input to close out Callaway SER (NUREG-0830) Open Issues 12, I.C.1 and I.C.8.

1. The technical content of the Callaway Plant Emergency Operating Procedures will be in accordance with the Westinghouse Emergency Response Guidelines. Any technical deviations from these guidelines will be identified and justified.
2. The testing associated with the Emergency Response Guideline Validation Program WCAP-10,204 was done at the Callaway site by Callaway and Wolf Creek (KGE) operators. The testing was done on the Callaway simulator using the Callaway EOPs. The objectives on page 10 of NUREG-0899 are covered in WCAP-10,204 and further enhanced as described below as a result of the program being conducted on the Callaway simulator using the Callaway specific procedures: (The paragraphs correspond to those of NUREG-0899, Section 3.3.5.1).
 - a. In addition to the discussion throughout WCAP-10,204, the EOPs are reviewed for technical accuracy in accordance with Callaway Administrative Procedure APA-ZZ-00101 (Preparation, Review, Approval and Control of Plant Procedures). Any parameters which cannot be verified or calculated at this time shall be identified on a deficiency page in accordance with Administrative Procedure APA-ZZ-00102

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(Emergency Operating Procedures Writer's Guide). These will be resolved prior to fuel load. The participation by Westinghouse in the development of the Callaway EOPs (in conjunction with the Verification program) provided an additional level of review.

- b. The EOPs are reviewed in accordance with APA-ZZ-00101 and compared to APA-ZZ-00102 (EOP Writer's Guide). The review in accordance with APA-ZZ-00101 is done by a Qualified Reviewer. In practice the Qualified Reviewer is an independent reviewer, meaning someone other than the person that drafted the EOP. APA-ZZ-00101 is being revised to clarify that the review by the Qualified Reviewer is independent. Deviations found during the review will be corrected.
 - c. The usability of the EOPs is discussed throughout WCAP-10,204.
 - d. Correlation between the procedures and control room/plant hardware is described in WCAP-10,204, Sections III.B, III.C, IV, and V. The review in accordance with APA-ZZ-00101 requires a determination of whether or not the procedure is technically correct. Comparison of the procedures to control board nameplate engraving lists is one method used to accomplish this.
 - e. The language and level of detail is included in the Procedures Writer's Guide (APA-ZZ-00102) Section 4.11 (Level of Detail). In addition the EOPs are reviewed in accordance with APA-ZZ-00101. This, in addition to the adequacy shown during the tests on the Callaway simulator, assures the level of detail is appropriate.
 - f. A high level of assurance that the procedures work, was accomplished through the test program completed at Callaway, by using the Callaway specific procedures, as described in WCAP-10,204.
3. Training on Emergency Operating Procedures will be accomplished in three training programs: Cold License Training Program, Crew Requalification Program and Control Board Certification Program (Phase III). The elements of these three programs with respect to EOP training are as follows:

A. Cold License Training Program:

- a. Introduction to Emergency Operating Procedures (2 hrs.). Introduction to philosophy, format and structure of EOPs.
- b. Content and technical bases of Emergency Operating Procedures (9 hrs.) - consists of detailed discussion of EOPs, including reading each procedure step-by-step and discussing the technical bases for major steps.
- c. Use of Emergency Operating Procedures - consists of a minimum of forty hours of simulator training during which the EOPs will be used to provide guidance for selected plant emergencies presented to the students.
- d. Pre-licensed Review Series (6 hrs.) - consists of discussion of content and technical bases of EOPs, including Critical Safety Functions.

B. Crew Regualification Program:

During each crew's regualification week, the following topics will be covered on a periodic basis:

- a. Review of technical bases and content of EOPs.
- b. Discussion of revisions to EOPs that occur.
- c. Use of EOPs during simulator periods.

C. Control Board Certification Program will include the following topics:

- a. Introduction to philosophy, format and structure of EOPs.
- b. Content and technical bases of EOPs.
- c. Use of EOPs during simulated plant emergencies.

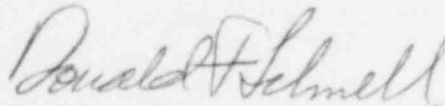
The meeting of training objectives associated with the emergency procedures is measured through the use of written examinations in classroom sessions and by evaluation of performance on the simulator. Input will be obtained from the simulator use of the EOPs to make appropriate revisions. These revisions will be processed in accordance with APA-ZZ-00101.

4. Entry conditions, automatic actions and immediate operator actions are being addressed in a revision to APA-ZZ-00102, Emergency Operating Procedures Writer's Guide. This revision is scheduled for approval by October 15, 1983.
5. One item discussed during the telephone call on July 18, which needs to be corrected, concerns the headings "ACTION/EXPECTED RESPONSE" and "RESPONSE NOT OBTAINED" on page 1 of E-0 and page 1 of ECA-1. These headings are included on all pages of the EOP pre-printed paper stock and therefore removal would require that the pages be stored and printed separately from the other text pages.

These particular pages contain written sections which address the "PURPOSE" and "SYMPTOMS". The sections cross the full width of the page with no dividing line down the center of the page. We do not believe this format is confusing to the user and removal of the headings is administratively not warranted.

If you have further questions concerning the Callaway Procedures Generation Package, please contact Mr. D. Shafer of my staff.

Very truly yours,



Donald F. Schnell

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STATE OF MISSOURI)
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CITY OF ST. LOUIS)

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

SUBSCRIBED and sworn to before me this 7th day of September, 1983.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1985
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