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December 22, 1994

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Senior Vice President
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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

ULNRC-3118

DOCKET NUMBER 50-483
CALLAWAY PLANT
REVISION TO TECHNICAL SPECIFICATIONS 3/4.8.2.1,
3/4.8.2.2, 3/4.8.3.1 AND
3/4.8.3.2 ELECTRICAL POWER SYSTEMS
D.C. SOURCES AND ONSITE POWER DISTRIBUTION
Reference: ULNRC-3071 dated September 9, 1994

The referenced letter transmitted an application for amendment to Facility Operating License No. NPF-30 for Callaway Plant. The amendment request, in part, revised Specification 3.8.3.1 by relocating the requirement to maintain tie breakers between redundant busses open, to Tables 3.3-3 and 4.3-2. The change also included, in Table 3.3-3, Action 19, an 8-hour allowed outage time when a single tie breaker between busses NG01 and NG03 or NG02 and NG04 may be closed.

The requirement for maintaining the tie breakers open is being relocated to a more appropriate section and information is being added to indicate its direct impact on the plant. The closing of the tie breaker would cause the degraded voltage bistables setting to be incorrect. This would cause 4 of 4 channels of one safety load group to become inoperable, thus exceeding the minimum channels needed and placing the plant in Specification 3.0.3. However, in this case, implementation of Specification 3.0.3 is not appropriate in that one safety train is unaffected. Also, the load shedder and sequencer is integral with the degraded voltage function. The action statement for loss of one division of the load shedder/load sequencer is to declare the associated diesel generator

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and off-site power source inoperable and to take action per Specification 3.8.1.1 or Specification 3.8.1.2. For this condition, a 12 hour period is given to restore operable status or be in HOT STANDBY in the next 6 hours and in COLD SHUTDOWN in the next 30 hours. The 8 hours allowed in the revised Action Statement is clearly bounded by these conditions.

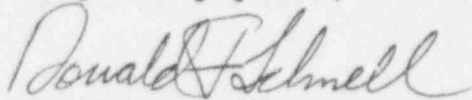
The option of closing the tie breaker to maintain the affected bus energized will enhance the safe operation of the plant in the event that the normal feed is lost or degraded. Powering equipment from the affected busses when a tie breaker is closed is preferable to a forced shutdown under the provisions of Specification 3.0.3. There is a low probability that voltage on the system would be low enough to affect the setpoint even with the tie breakers closed. The redundant train is fully operable and protected during this time period. There is a clear safety benefit to operating under this degraded condition for a short time rather than requiring a forced shutdown under the time constraints of Specification 3.0.3.

Closing of a tie breaker in a mode when the busses are required to be operable, for the purpose of performing normal preventative maintenance is not the intent of this change. Attachment 1 to this letter provides revised language to clarify this.

The basis and conclusions of the Safety Analysis, Significant Hazard Evaluation and Environmental Evaluation are not affected by the information provided herewith.

If there are any questions with regard to this information please contact us.

Very truly yours,


Donald F. Schnell

DES/plr

Attachment: Technical Specification Page 3/4 3-20a.

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 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 22nd day
of December, 1994.

Barbara J. Pfafe
BARBARA J. PFAFE
NOTARY PUBLIC — STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
ST. LOUIS COUNTY

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