

UNION ELECTRIC COMPANY

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ST. LOUIS, MISSOURI

DONALD F. SCHNELL
VICE PRESIDENT

December 2, 1983

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

Dear Mr. Denton:

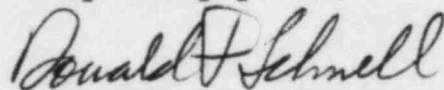
ULNRC- 693

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
SER CONFIRMATORY ISSUE 28 (III.D.1.1)

Callaway SER Confirmatory Issue 28 (III.D.1.1) concerns the "Integrity of Systems Outside Containment Likely to Contain Radioactive Material". Attached please find a description of the program developed to address this issue.

If there are questions related to this, please contact us.

Very truly yours,



Donald F. Schnell

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CALLAWAY PLANT - UNIT 1

PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT

This defines Union Electric's program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems considered include the recirculation portion of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, and RHR System. The program is as follows:

1. Preventive maintenance and periodic visual inspection requirements:

PROGRAM: One aspect of the P.M. program is the periodic replacement of valve packings, pump seals, and flange gaskets based on service life. This service life is based on both maintenance history and visual inspections.

Maintenance supervisory personnel perform periodic walkdowns of accessible systems. One objective of these walkdowns is to identify and correct leakage both from recirculation systems and other secondary systems.

Operations, via their normal duties and responsibilities, also walk-down and visually inspect accessible systems. Identification and correction of leakage is one of the criteria specified for these walkdowns.

2. Integrated leak test requirements for each system at refueling cycle intervals or less:

PROGRAM: Callaway is committed to ASME Section XI, 1980, for commercial operation. Section XI requires VT-2 examinations on Class 2 systems during each inspection period. For Callaway, this amounts to a VT-2 visual examination for leakage on all recirculation systems every 3 to 4 years.

In addition, Operations performs leakage testing on all recirculation systems with systems at operating pressure. This is accomplished per written procedure on a refueling frequency.

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 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 *2nd* day of *December*, 1983.

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

cc: Glenn L. Koester
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