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March 29, 1995

Donald F. Schnell
Senior Vice President
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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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ULNRC-03184

Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT
REVISIONS TO TECHNICAL SPECIFICATIONS BASED ON NRC
FINAL POLICY STATEMENT ON TECH SPEC IMPROVEMENTS
Reference: ULNRC-3023 dated May 20, 1994

Based on telephone conversations on January 31 and February 28, 1995 between NRC Staff reviewers and personnel representing Union Electric Company and Wolf Creek Nuclear Operating Corporation, attached are replacement pages for various portions of Attachments 1, 4, and 5 of the referenced amendment application. These replacement pages respond to concerns raised by the NRC Staff during the review of that amendment application. The conclusions of the previously submitted licensing evaluations performed pursuant to 10CFR50.59, 10CFR50.92, and 10CFR51.22(c)(9) are unaffected and remain valid for the attached changes.

If you have any questions on the attachments, please contact us.

Very truly yours,



Donald F. Schnell

GGY/jdg

- Attachments: 1 - Description of Changes to ULNRC-3023
2 - Replacement Page for Attachment 1 to ULNRC-3023
3 - Replacement Pages for Attachment 4 to ULNRC-3023
4 - Replacement Pages for Attachment 5 to ULNRC-3023

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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 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 29th day
of March, 1995.

Barbara J. Peaff
BARBARA J. PEAFF
NOTARY PUBLIC - STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
ST. LOUIS COUNTY

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ATTACHMENT ONE

DESCRIPTION OF CHANGES TO ULNRC-3023

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1. The LCO and Surveillance Requirements (SR) for the position indicators on the PORVs and PORV block valves will be relocated from the PAMS Technical Specification 3/4.3.3.6 to FSAR Chapter 16. There will be no Surveillance Requirements added to Technical Specification 3/4.4.4. This change is reflected in revisions to the following pages from ULNRC-3023:

Attachment 1, page 9 of 11

Attachment 4, page 3/4 4-10 and Insert 4B (void these changes; no new SRs to be added)

Attachment 5, Table 1 Note 5

Attachment 5, Technical Specification 3.3.3.6 Screening Form
2. New SRs 4.6.1.1.d and 4.6.1.1.e will be added to Technical Specification 3/4.6.1.1. These SRs will link the containment integrity LCO to the performance of leakage rate testing per 10CFR50, Appendix J and to the performance of a Containment Tendon Surveillance Program added as new Specification 6.8.5.c, discussed under Item 5 below. This change is reflected in revisions to the following pages from ULNRC-3023:

Attachment 4, page 1-2 (CONTAINMENT INTEGRITY definition revised to reference new SR 4.6.1.1.d and new Specification 6.8.5.c)

Attachment 4, page 3/4 6-1 and new Insert A (new SRs 4.6.1.1.d and 4.6.1.1.e added and SR 4.6.1.1.c revised to reference new SR 4.6.1.1.d)

Attachment 4, page 3/4 6-12 (SR 4.6.1.7.2 revised to reference new SR 4.6.1.1.d)

Attachment 5, Table 1 Notes 12 - 14

Attachment 5, Technical Specifications 3.6.1.2 and 3.6.1.6 Screening Forms
3. The rod drop time of 2.7 seconds and the conditions for its measurement will be retained in SR 4.1.3.1.3. This change is reflected in revisions to the following pages from ULNRC-3023 (note that no revisions are needed for the Attachment 5 Technical Specification 3.1.3.4 Screening Form):

DESCRIPTION OF CHANGES TO ULNRC-3023

Attachment 4, page 3/4 1-15 (Insert 2 revised to include the 2.7 second rod drop time)

Attachment 5, Table 1 Note 4 (revised to delete the reference to the rod drop time being listed only in FSAR Section 16.1.3.2)

4. The steam generator LCO and SRs in Technical Specification 3/4.4.5 will be retained as is, rather than be reformatted to the Section 6 criteria. This change is reflected in revisions to the following pages from ULNRC-3023:

Attachment 4, pages 3/4 4-11 through 3/4 4-17 (void these changes; the LCO and SRs are to remain as currently issued)

Attachment 5, Table 1 (revised to indicate "Retain") and Note 8 is deleted

Attachment 5, Table 2 (note added that 3.4.5 is to be retained)

Attachment 5, Technical Specification 3.4.5 Screening Form

5. Proposed Specification 6.8.5 has been revised to more fully describe the following programs: Explosive Gas and Storage Tank Radioactivity Monitoring Program; Reactor Coolant Pump Flywheel Inspection Program; and Containment Tendon Surveillance Program. References to the following programs (one line listings) have been deleted from 6.8.5: Turbine Overspeed Protection Reliability Program; Steam Generator Tube Surveillance Program (current Technical Specification 3/4.4.5 will remain as is); Snubber Inspection Program; Area Temperature Monitoring Program; and Primary Water Chemistry Program. These programs will be implemented in conjunction with the relocation of their associated 3/4 Technical Specifications to FSAR Chapter 16; however, consistent with the Standard Technical Specifications, they will not be described in Section 6. This change is reflected in revisions to the following pages from ULNRC-3023:

Attachment 4, Insert 9 (The three programs mentioned above have been more fully described, similar to the format contained in the Standard Technical Specifications. This Insert 9 supersedes the prior Insert 9.)

DESCRIPTION OF CHANGES TO ULNRC-3023

Attachment 5, Table 1 Notes 7, 9, 16, 17, and 20 are deleted (Note 6 is reworded to incorporate Note 20)

Attachment 5, Technical Specifications 3.3.3.10, 3.4.10, 3.6.1.6, 3.11.1.4, 3.11.2.5, and 3.11.2.6 Screening Forms are revised to refer to a program description in Section 6.8.5, rather than to a program statement.

Attachment 5, Technical Specifications 3.3.4, 3.4.5, 3.4.7, 3.7.8, and 3.7.12 Screening Forms are revised to delete the reference to a program statement being added to Section 6.8.5.

6. Changes to the draft FSAR Chapter 16 mark-ups, transmitted as Attachment 6 to ULNRC-3023, will be made accordingly. These changes are not attached since the only purpose of submitting them originally in ULNRC-3023 was to demonstrate where the relocated requirements would ultimately be contained.

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ATTACHMENT TWO

REPLACEMENT PAGE FOR ATTACHMENT 1 TO ULNRC-3023