

UNION ELECTRIC COMPANY

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DONALD F. SCHNELL  
VICE PRESIDENT

March 23, 1984

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

UINRC-773

Dear Mr. Denton:

DOCKET NO. 50-483  
CALLAWAY PLANT, UNIT 1  
REQUEST FOR ISSUANCE OF OPERATING LICENSE

Union Electric Company wishes to advise you that the design, construction and preoperational testing of Callaway Plant, Unit 1 are essentially complete and that the unit may be ready for fuel load as early as April 23, 1984. Our readiness for operation is premised on the following:

A. Conformance of the plant to the FSAR, design documents and regulatory commitments

Except as noted herein, in my judgment, Callaway Plant conforms to the facility description in the FSAR and other information filed on our docket.

B. Staff Operational Readiness

The Union Electric Nuclear Function, which I head, is the corporate entity responsible for the design, construction, startup and operation of Callaway Plant. The function is currently staffed with 670 permanent employees (exclusive of the security force). The entire organization is dedicated full time to the operation and technical support of the plant. Over 580 Nuclear Function personnel are currently employed at the Callaway Plant site.

Twenty-eight members of our operating staff (including management and training personnel) have been licensed by NRC as Senior Reactor Operators; fourteen are NRC-licensed Reactor Operators. The operations staff has demonstrated their competence and reliability through participation in activities leading to plant startup. They have assisted in preoperational test activities at Callaway and assumed overall responsibility

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for plant testing in December, 1983 during the hot functional test program. Each shift operating crew will meet the experience requirements presented to the NRC Commissioners by the Utility Group on February 24, 1984. Qualified advisors will be utilized to assure on-shift "hot participation experience" as defined by the Utility Group. I am convinced that we have prepared our personnel to handle the responsibility of operating Callaway Plant.

C. Hearing Reviews

The Atomic Safety and Licensing Board presiding over the Callaway operating license proceeding issued favorable decisions in December, 1982, and October, 1983 on construction quality assurance and off-site emergency preparedness issues, respectively. While the second of those decisions authorized you to issue the license when other Staff findings were ready, the Atomic Safety and Licensing Appeal Board completed its review of those decisions and affirmed them in September and December, 1983. By memorandum dated March 16, 1984, the Commission elected not to review the Appeal Board decisions. Consequently, the entire NRC hearing process on the Callaway license application is concluded.

D. Remaining Work Activities and Open Items

During the final weeks prior to fuel load, our efforts will be concentrated on completion of construction activities, final preoperational testing and closeout of licensing issues and inspection findings as follows:

1. NRR licensing issues: All outstanding and confirmatory issues have been addressed and await final NRC staff action. It is expected that all of these items will be closed or resolved in SER Supplement 3.
2. Open NRC Region III Inspection Findings: We expect to address all open items and items of noncompliance which are restraints to fuel load in order to permit final assessment and response by Region III personnel.
3. Significant Deficiencies and Potential 50.55(e) items: All items identified as known or potential

50.55(e) problems will be reviewed to assure that any unresolved problems are not exacerbated by fuel load and low-power test activities.

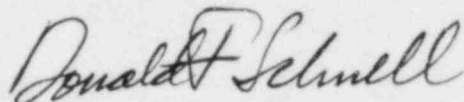
4. The Master Tracking System (MTS) in use at Callaway identifies and tracks completion of outstanding work documents, hardware and documentation deficiencies, inspection issues and other findings requiring resolution prior to operation. MTS entries are reviewed and classified so as to identify restraints to plant operational modes. All outstanding MTS items classified as potential restraints to fuel load will be closed out or dispositioned prior to fuel load. Exceptions will be specifically justified, reviewed with the Resident Inspectors, and, if appropriate, reviewed by the Callaway Nuclear Safety Review Board (NSRB), our off-site review committee. Similarly, MTS items classified as restraints to operational Modes 5 through 1 will be closed out or dispositioned before entering the restrained mode.
5. Design features and programs as well as construction items having safety significance which may not be complete by fuel load include the following:
  - a. Installation of modified under-voltage trip attachments for the reactor trip bypass breakers and completion of the qualification program for reactor trip breaker shunt coils (Ref: ULNRC-763, 3/12/84);
  - b. Completion of all portions of the IEEE-323/NUREG-0588 environmental qualification programs (Ref: SLNRC 84-0009, 1/27/84 and SLNRC 84-0034, 2/23/84);
  - c. Completion of all portions of the IEEE-344 seismic qualification programs (Ref: SLNRC 84-0040, 3/16/84);
  - d. Operational readiness of the Reactor Vessel Level Indicating System (Ref: SLNRC 83-0019, 4/15/83);
  - e. Completion of all phases of the Emergency Response Facilities Information Systems (Ref: SLNRC 83-0019, 4/15/83);

Mr. Harold R. Denton  
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- f. Operational readiness of the Post-Accident Sampling System (Ref: SLNRC 84-0015, 2/1/84);
  - g. Fire Protection Audit Open Items (SLNRC 84-0037, 2/24/84).
6. The preoperational test program for the Callaway Plant is essentially complete. Testing deficiencies are tracked by MTS. At this writing, the only preoperational test deferred until after fuel load is the CRDM Cooling Test (CS-03GN02). A portion of another test which involves acceptance of the halon system for the north cable penetration room (CS-04KC02) will not be completed prior to fuel load. Certain other testing deficiencies, such as a valve that leaked during hot functional testing, will require retest after fuel load when plant conditions permit.
7. SNUPPS Licensing Submittals: A number of documents have been submitted to your office by SNUPPS Staff which must be formally incorporated into the Callaway Docket. Attachment I lists these submittals which are hereby incorporated into the Callaway application.

To the best of my knowledge, the foregoing paragraphs address all remaining activities which bear on your issuance of the Callaway Plant Operating License. In summary, following our completion or disposition of the remaining activities noted, I believe that Callaway Plant and our Nuclear Function organization will be ready to commence fuel load. We respectfully request issuance of the operating license so that this activity may proceed as planned.

Very truly yours,



Donald F. Schnell

DFS/bjp  
Attachment

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 *23rd* day of *March*, 1984.

*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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ATTACHMENT I to ULNRC-773

The following lists all transmittals from SNUPPS to Mr. Harold R. Denton which are to be incorporated into the Callaway Plant Unit 1 operating license application:

SNUPPS  
LETTER NUMBER  
SLNRC

DATE

SUBJECT

79-14	10/02/79	SNUPPS FSAR
80-34	07/29/80	Masonry Walls
81-02	01/20/81	Transcript of FSAR Review Meeting
81-13	02/27/81	Review of FSAR Chapter 8
81-16	03/20/81	Electrical Instrumentation and Control Drawings
81-34	05/26/81	NRC Request for Additional Information-Preservice Inspection Program Plan
81-35	05/27/81	Emergency Procedures and Training for Station Blackout Events
81-38	06/01/81	Emergency Response Facilities
81-39	06/03/81	Auxiliary Feedwater System
81-41	06/04/81	Electrical, Instrumentation and Control Drawings
81-42	06/04/81	Letter Retransmittal (SLNRC 81-38)
81-44	06/08/81	Reliability Analysis of the SNUPPS Auxiliary Feedwater System
81-47	06/19/81	Emergency Response Facilities
81-48	06/22/81	Control of Heavy Loads
81-49	06/22/81	Description of ESF Status Panel
81-51	06/26/81	Human Factor Evaluation of the SNUPPS Control Room
81-54	07/01/81	ICSB Meeting
81-62	08/10/81	Seismic Analysis
81-63	08/10/81	Description of ESF Status Panel

<u>SNUPPS LETTER NUMBER SLNRC</u>	<u>DATE</u>	<u>SUBJECT</u>
81-65	08/12/81	Human Factor Evaluation of the SNUPPS Control Room
81-66	08/31/81	Improved Load Following Package
81-67	08/14/81	ICSB Positions
81-68	08/14/81	ICSB Review
81-69	08/14/81	NRC Request for Additional Information - Materials Engineering
81-70	08/20/81	NSSS Setpoint Methodology
81-71	08/17/81	NRC Request for Additional Information-Materials Engineering
81-73	08/20/81	Meeting with Power Systems Branch
81-75	08/27/81	Seismic Analysis
81-76	08/31/81	CPB (Reactor Fuel) Review
81-82	09/01/81	ICSB Review
81-83	09/01/81	RSB Review
81-89	09/05/81	Pump and Valve Test Program
81-90	09/05/81	MEB Review
81-92	09/09/81	CPB Review
81-96	09/09/91	RSB Review
81-97	09/11/81	Event V Program
81-98	09/11/81	Turbine Missile Analysis
81-100	09/11/81	PSB Review
81-101	09/14/81	RSB Review
81-103	09/16/81	NRC Request for Information- Materials Engineering
81-105	09/17/81	RSB Review
81-107	09/18/81	Pump and Valve Test Program
81-108	09/18/81	SER Open Issues



<u>SNUPPS LETTER NUMBER SLNRC</u>	<u>DATE</u>	<u>SUBJECT</u>
81-109	09/22/81	PSB Review
81-111	09/22/81	ICSB Review
81-113	09/24/81	Revision Seven to SNUPPS FSAR
81-115	10/02/81	ICSB Review
81-117	10/02/81	PSB Review
81-120	10/30/81	CPB Review
81-123	11/16/81	ICSB Review
81-124	11/17/81	SER Outstanding Issue-Cable Tray Seismic Analysis
81-126	11/17/81	Natural Circulation Cooldown
81-127	12/11/81	Pump and Valve Test Program
82-01	01/07/82	SNUPPS ECCS Analysis
82-04	01/19/82	NUREG-0737, Item I.D.1
82-05	01/19/82	Shunt Coils for Reactor Trip Breakers
82-06	02/04/82	NRC Request for Information-Seismic Qualification of Equipment
82-08	02/09/82	Seismic Qualification of Equipment
82-09	02/12/82	Safe Shutdown with a Postulated Fire in the Control Room
82-10	02/23/82	Revision Eight to SNUPPS FSAR
82-16	03/16/82	NUREG-0737, Item I.D.1
82-19	04/02/82	Long Term Operability of Deep Draft Pumps
82-20	04/12/82	NUREG-0737, Item I.D.1
82-23	04/29/82	NUREG-0737, Item II.D.1
82-25	05/14/82	Long Term Operability of Deep Draft Pumps
82-28	05/25/82	Fillet Weld Requirements

<u>SNUPPS LETTER NUMBER SLNRC</u>	<u>DATE</u>	<u>SUBJECT</u>
82-30	07/01/82	NUREG-0737, Item II.D.1
82-33	08/04/82	Control of Heavy Loads
82-40	10/20/82	NUREG-0737, Item II.D.1
82-41	10/18/82	Seismic Analysis
82-46	11/03/82	Fire Protection Review
82-47	12/03/82	Regulatory Guide 1.121, Application for Withholding Proprietary Information from Public Disclosure
82-49	12/15/82	Revised Submittal of Snubber Technical Specification
82-50	12/22/82	SNUPPS QA Program for Design and Construction
82-59	12/22/82	Request for Information re: SRP Section 7.4, Remote Shutdown Capability
83-02	01/07/83	NUREG-0737, Item II.D.1
83-07	02/04/83	NUREG-0737, Item II.B.3
83-15	03/10/83	Environmental Qualification of Safety Related Equipment
83-22	04/26/83	Containment Recirculation Sump Testing
83-24	05/09/83	Power System Branch Review
83-25	05/09/83	Fillet Weld Requirements
83-27	05/13/83	Power System Branch Review
83-30	05/27/83	Environmental Qualification of Safety Related Equipment
83-35	06/30/83	SNUPPS Program Plan for the DCRDR
83-36	07/08/83	SNUPPS Technical Specifications
83-42	07/28/83	Environmental Qualification of Safety-Related Electrical Equipment
83-45	08/30/83	Alternate Pipe Break Criteria

<u>SNUPPS LETTER NUMBER SLNRC</u>	<u>DATE</u>	<u>SUBJECT</u>
83-47	08/31/83	ICSB Review: Proposed Technical Specification
83-50	09/07/83	SNUPPS Technical Specifications
83-54	10/27/83	Instrumentation and Control Systems Branch Review
83-55	10/27/83	Instrumentation and Control Systems Branch Review
83-61	11/23/83	Environmental Qualification of Equipment
83-62	11/28/83	SNUPPS Program Plan for the DCRDR
83-63	11/30/83	NUREG-0737, Item I.D.1
84-03	01/13/84	SPDS Safety Analysis
84-04	01/16/84	Containment Purge Valve Operability
84-05	01/18/84	NRC Request for Information re Preservice Inspection (PSI) Relief Request
84-08	01/27/84	Control of Heavy Loads
84-09	01/27/84	Environmental Qualification Justification for Interim Operations
84-10	01/31/84	Power System Branch Review
84-11	01/31/84	Power System Branch Review
84-13	02/01/84	Environmental Qualification of Safety-Related Electrical Equipment
84-14	02/01/84	Fire Protection Review
84-15	02/01/84	SNUPPS License Conditions
84-16	02/02/84	Safe Shutdown Following Loss of Instrument Bus
84-17	02/02/84	Steam Generator Tube Plugging Requirements
84-18	02/02/84	Revision 13 to SNUPPS FSAR
84-19	02/02/84	DCRDR Summary Report

<u>SNUPPS LETTER NUMBER SLNRC</u>	<u>DATE</u>	<u>SUBJECT</u>
84-21	02/02/84	Environmental Qualification of Equipment
84-22	02/02/84	Diesel Generator Rocker Arm Lube Oil Temperature
84-23	02/02/84	Seismic Qualification of Equipment
84-24	02/02/84	Power System Branch Review
84-25	02/07/84	Environmental Qualification of Safety-Related Electrical Equipment
84-26	02/07/84	NRC Request for Information re Preservice Inspection (PSI) Relief Request
84-27	02/08/84	NRC Request for Information re Preservice Inspection Programs
84-29	02/09/84	SNUPPS Technical Specifications
84-30	02/13/84	NRC Request for Information re PSI
84-32	02/14/84	Preservice Inspection Program for RCS Piping Welds
84-54	02/17/84	Reactor Cavity Shielding
84-34	02/23/84	E.Q. Justifications for Interim Operation
84-35	02/23/84	I&CS Branch Review
84-36	02/24/84	Preservice/Inspection Relief Request-Callaway Plant
84-37	02/24/84	Fire Protection Review
84-38	02/27/84	Slave Relay Testing Technical Specification Requirements
84-39	03/05/84	E.Q. Justifications for Interim Operation
84-40	03/06/84	Justifications for Interim Operation - Seismic Qualification
84-41	03/14/84	Fire Protection Review
84-42	03/14/84	Revision 14 to SNUPPS FSAR

SNUPPS  
LETTER NUMBER  
SLNRC

DATE

SUBJECT

84-43	03/15/84	Containment Isolation Dependability
84-44	03/16/84	S/G Tube Rupture Event
84-45	03/16/84	Equipment Qualification
84-46	03/20/84	SNUPPS Tech Specs
84-47	03/21/84	E.Q. of Mechanical Equipment
84-48	03/21/84	NRC Audit of SNUPPS Control Room Design Reviews, Week of 2/27/84