



Donald F. Schnell
Senior Vice President
Nuclear

February 19, 1992

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

ULNRC- 2563

**CALLAWAY PLANT
DOCKET NUMBER 50-483
REVISION TO TECHNICAL SPECIFICATION 3/4.7.8
SNUBBER VISUAL INSPECTION INTERVALS AND ACCEPTANCE CRITERIA**

- Ref: 1. ULNRC-2452, 8/1/91, "Callaway Plant/Docket Number 50-483/Revision to Technical Specification 3/4.7.8 /Snubber Visual Inspection Intervals and Corrective Actions"
2. Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," December 11, 1990

Union Electric Company herewith revises its previously submitted application for amendment to Facility Operating License Number NPF-30 for the Callaway Plant (Reference 1). Specifically, Union Electric Company revises its original request to revise Technical Specification 3/4.7.8 and associated Bases to change the snubber visual inspection intervals and acceptance criteria in accordance with Generic Letter ("GL") 90-09 (Reference 2).

The "Visual Inspection Acceptance Criteria" as stated in GL 90-09 specify two conditions which must be satisfied in order to reclassify snubbers as acceptable which are initially classified as unacceptable as a result of visual inspections. Generic Letter 90-09 specified these conditions using the logical connector "and," i.e., both conditions must be satisfied in order to reclassify an unacceptable snubber. Reference 1 (See Insert B of Attachment 2 of Reference 1) specified these conditions using the logical connector "or," i.e., either condition may be satisfied to reclassify an

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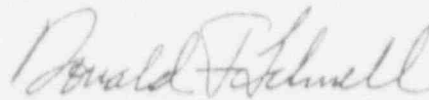
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unacceptable snubber. Following recent conversations with the NRC project manager for the Callaway Plant, it has been determined that "and" is the more appropriate connector. Note that the current Technical Specifications of the Callaway Plant use the logical connector "or." The word "system" has also been added to clarify the second to last sentence of the section addressing visual inspection acceptance criteria.

The pertinent text as herewith revised (Attachment 1) is consistent with the guidance of GL 90-09. The conclusions of Reference 1 that the subject amendment application does not involve any unreviewed safety question as defined in 10CFR50.59 nor a significant hazard consideration as determined per 10CFR50.92 remain valid.

If you have any questions on this matter, please contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Donald F. Schnell". The signature is fluid and cursive, with the first name "Donald" and last name "Schnell" clearly distinguishable.

Donald F. Schnell

GAC/dls

Attachment: 1. Revision to Technical Specification Changes

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 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 19th day
of February, 1992.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
ST. LOUIS COUNTY

INSERT "B"

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; ~~or~~ (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.8f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to determine operability with an unacceptable snubber. If operability cannot be justified, the system shall be declared inoperable and the ACTION requirements shall be met.

and

system

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