

UNION ELECTRIC COMPANY

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ST. LOUIS, MISSOURI

DONALD F. SCHNELL
VICE PRESIDENT

July 26, 1984

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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- 884

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
REQUEST FOR EXEMPTION FROM COLD ROD DROP TESTING

Union Electric requests an exemption from cold rod drop testing as described in FSAR Section 14.2.12.3.27 and Section 14.2.12.3.4 of the Callaway Addendum.

Justification for this request is based upon the requirements for rod drop testing in Regulatory Guide 1.68 and the Callaway Technical Specifications.

Regulatory Guide 1.68 requires that control rod scram times be tested "at both hot zero power and cold temperature conditions, with flow and no-flow conditions in the reactor coolant system as required to bound conditions under which scram might be required." Callaway Technical Specifications require that for Mode 1 and Mode 2 with $K_{eff} \geq 1$, the lowest reactor coolant loop temperature shall be greater than or equal to 551°F, with the exception that during physics tests it shall be greater than or equal to 541°F. Therefore, under normal conditions, a scram would not be required at cold conditions.

A scram is also required for an uncontrolled rod bank withdrawal from a subcritical condition. As discussed in Section 15.4.1.2 of the FSAR, the most severe case for this accident is at hot zero power.

Therefore, rod drop testing at hot zero power is sufficient to bound conditions under which a scram might be required.

The other requirement for rod drop testing is found in the Callaway Technical Specifications. This requirement is that rod drop testing be performed at hot standby with full flow.

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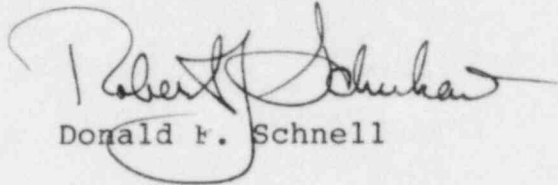
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Mr. Harold R. Denton
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Therefore, cold rod drop testing is not required to meet Callaway Technical Specifications.

Based on the above, Union Electric feels that the request for an exemption to cold rod drop testing is justified.

Very truly yours,

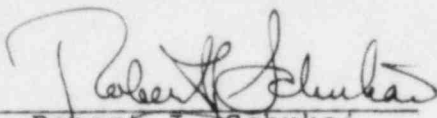
A handwritten signature in dark ink, appearing to read "Donald F. Schnell", is written over the typed name. The signature is fluid and cursive, with a large loop at the end.

Donald F. Schnell

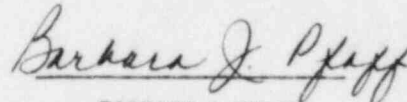
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STATE OF MISSOURI)
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CITY OF ST. LOUIS)

Robert J. Schukai, of lawful age, being first duly sworn upon oath says that he is General Manager-Engineering (Nuclear) for 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 
Robert J. Schukai
General Manager-Engineering
Nuclear

SUBSCRIBED and sworn to before me this 26th day of July, 1984.


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

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