

UNION ELECTRIC COMPANY

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ST. LOUIS, MISSOURI

August 1, 1984

DONALD F. SCHNELL
VICE PRESIDENT

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

ULNRC-889

Dear Mr. Denton:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
REVISION TO TECHNICAL SPECIFICATION TABLE 3.3-1

Union Electric Company herewith transmits three (3) original and forty (40) conformed copies of an application for Amendment to Facility Operating License No. NPF-25 for the Callaway Plant, Unit 1.

This change modifies Technical Specification Table 3.3-1 by revising one action statement (Action 4) and adding an additional action statement (Action 12) for the source range neutron flux monitors during shutdown conditions (Item 6.b). The source range monitors provide in part, protection for a boron dilution accident during Modes 2, 3, 4 and 5. These monitors initiate, upon doubling of neutron flux within 10 minutes, a switchover of the suction for the charging pumps from the Volume Control Tank (VCT) to the Refueling Water Storage Tank (RWST). The additional action statement specifies appropriate compensatory actions, when two channels are out of service, to maintain the plant in a safe condition. The revised action statement provides for a limited time, a block of both flux doubling channels in order to perform a reactor startup.

Based on our schedule for Callaway initial criticality of mid-to-late August and the fact that criticality is not achievable without this change, we are requesting an expedited review. This situation occurred through an oversight because the Callaway Plant is the first to receive an operating license with the Westinghouse Boron Dilution Mitigation System. During development of the Callaway Technical Specifications, greater consideration was given to assuring that the system fulfilled its intended safety function (i.e., boron dilution accident mitigation) than was given to possible operational limitations (i.e., limiting reactor startup). Recent surveillances of the system have identified that the technical specifications do not allow both channels to be blocked as designed to permit a planned reactor startup.

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Mr. Harold R. Denton

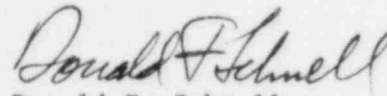
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August 1, 1984

The revised technical specification pages, Safety Evaluation, Significant Hazards Consideration, and Environmental Assessment are provided as Attachments 1, 2, 3 and 4 to this letter. Also enclosed is a check for \$150.00 as required by 10 CFR 170.21.

We are available to discuss this with you at any time.

Very truly yours,



Donald F. Schnell

WRR/drs
Attachments

cc: Distribution attached

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 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 the 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 1 day of Aug, 1984

Dee Pfeiffer
My Commission Expires Aug 31, 1986

cc ULNRC-889

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