

November 29, 1995

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Gentlemen:

ULNRC-03298

**DOCKET NUMBER 50-483**  
**CALLAWAY PLANT**  
**CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS**

This letter provides our commitment to convert to the improved Standard Technical Specifications (STS), using the process discussed at the meeting on November 14, 1995 between members of the NRC Staff and representatives of TU Electric, Pacific Gas and Electric Company, Wolf Creek Nuclear Operating Corporation, and Union Electric Company (hereafter the "Group"). The NRC Staff has stressed the importance of converting to the improved STS. The Staff has also stressed the value of licensees working together to increase standardization and to reduce NRC resources needed to act on licensing matters. In response to these recommendations and in recognition of the benefits that result, Union Electric has chosen to work jointly with the Group in the conversion of the Callaway Technical Specifications (TS).

The Group will jointly develop a full conversion submittal based on NUREG-1431, Revision 1. Submittals for all four utilities will address generic features of the plants' TS in an identical fashion, will include applicability matrices to identify differences in the TS submittals, and will be docketed at approximately the same time (target date of December 1996). The Group anticipates a 4 to 6 month review by the NRC, with the resultant review cost savings for each utility as discussed at the meeting.

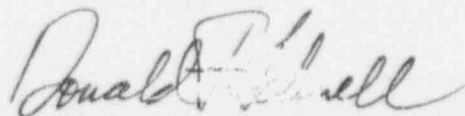
Our commitment to proceed with conversion to the improved STS is based on the following understandings reached in our November 14 meeting:

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1. Each plant will maintain its licensing basis, as established by its existing TS, in the conversion process. With appropriate justification, a utility may optimize its TS based on another Group member's existing TS. Our goal is to maximize commonality.
2. Plant-specific license amendment requests (LARs) will continue to receive timely consideration during the conversion process, including the NRC review cycle. The Group will screen and limit these to the extent possible, but the NRC recognizes that LARs in support of reloads and those representing either safety issues or significant cost savings will continue to be given prompt consideration. Where possible, LARs submitted during the next 18 months will be jointly developed and submitted by the Group to conserve NRC review resources.
3. The effective date for new shutdown or fuel cycle frequency surveillance requirements, imposed as a result of the conversion, will be the first refueling outage occurring after the implementation of the individual plant's TS conversion amendment.
4. A single point of contact will be established within the Projects and OTSB offices at NRR. Likewise the Group's single point of contact is Mr. Donald R. Woodlan of TU Electric.
5. Given our commitment to conversion, enforcement discretion will not be denied or delayed on the basis that conversion of the Callaway TS has not been completed. Each request for such discretion will continue to be judged on its own merit.

If you have any questions on the above, please contact the undersigned.

Very truly yours,

  
Donald F. Schnell

GGY/sld

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