



February 21, 1996

Donald F. Schnell
Senior Vice President
Nuclear

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555-0001

Gentlemen:

ULNRC-03337

**CALLAWAY PLANT
DOCKET NUMBER 50-483**

RERP REVISION 18, ON-SHIFT DOSE ASSESSMENT

- References:
- 1) ULNRC-3079 dated September 29, 1994
 - 2) NRC letter signed by James R. Creed, Chief Safeguards and IR Section, NRC Region III, dated March 30, 1995.
 - 3) Teleconference Summary signed by Kristine M. Thomas, NRC Project Manager for Callaway, dated January 30, 1996.

On January 24, 1996, NRC Staff, including representatives from NRR and Region IV, held a teleconference with Union Electric (UE) to discuss the issue of on-shift, real-time dose assessment capability. Union Electric submitted a methodology (Reference 1) which determines protective actions based on plant conditions until the Technical Support Center is manned. Once the Technical Support Center is manned, real-time dose assessment is available. The methodology was approved by the NRC in Reference 2. Basing protective actions on plant conditions provides effective protective action assessment during the first hour of a postulated plant emergency and, in fact, is superior to on-shift, real-time dose assessment as a means to ensure protection of the health and safety of the public during the early stage of an accident. This is consistent with NUREG-1228, "Source Term Estimation During Incidents Response to Severe Nuclear Power Plant Accidents".

270026 In our view, the requirements of Appendix E 10CFR50 are satisfied without on-shift dose assessment. Section IV.B "Content of Emergency Plans, Assessment Actions" states "The means to be used for

ADD 1/0

determining the magnitude of and for continually assessing the impact of the release of radioactive materials shall be described". The Callaway Radiological Emergency Response Plan meets this requirement by describing plant conditions to define protective action recommendations to state officials.

I am concerned that your January 30th Teleconference Summary (reference 3) could lead one to believe that UE does not have a sound technical as well as practical basis for maintaining that the health and protection of the public is better served with the current provisions of our emergency plan. If we did not clearly communicate this to you during the January 24th teleconference, we would be happy to answer any additional questions.

Very truly yours,


Donald F. Schnell

DES/plr

cc: T. A. Baxter, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

M. H. Fletcher
Professional Nuclear Consulting, Inc.
19041 Raines Drive
Derwood, MD 20855-2432

L. Joe Callan
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, TX 76011-8064

Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Steedman, MO 65077

Kristine M. Thomas (2)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
1 White Flint, North, Mail Stop 13E16
11555 Rockville Pike
Rockville, MD 20852-2738

Manager, Electric Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102