



UNION ELECTRIC COMPANY

1901 Gratiot Street, St. Louis

December 28, 1984

Donald F. Schnell
Vice President

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

Dear Mr. Denton:

ULNRC- 1006

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
REVISION TO LICENSE CONDITION 2.C.(3).(a)

Reference: SLNRC 84-0135 dated December 21, 1984

Union Electric Company is transmitting three (3) original and forty (40) conformed copies of an application for amendment to Facility Operating License No. NPF-30 for Callaway Plant, Unit 1.

This amendment application requests that License Condition 2.C.(3).(a) be revised to incorporate a November 30, 1985 deadline for the environmental qualification of all safety-related electrical equipment. All outstanding Justifications for Interim Operation (JIO's) will remain valid through November 30, 1985 or until closed out (if earlier), including those JIO's revised in the reference letter (ESE-43 and ESE-44 pertaining to the Incore Thermocouples, Connectors, Adaptors, and Reference Junction Box).

It is noted that 10CFR50.49(i) does not stipulate a qualification deadline for applicants for operating licenses that are to be granted on or after February 22, 1983 but prior to November 30, 1985. Supplement 3 to the Callaway Safety Evaluation Report (NUREG-0830) states in Section 3.11.5.(1) that all equipment within the scope of 10CFR50.49 must be "environmentally qualified in accordance with the schedule established by the rule." Since the rule does not appear to impose the March 31, 1985 deadline on the Callaway license, the revision of the qualification deadline does not involve an exemption to 10CFR50.49. In fact, consistent with this request, 10CFR50.49(g) (which is applicable to operating licenses issued prior to February 22, 1983) permits the Staff to extend the compliance deadline to November 30, 1985 where appropriate JIO's are provided.

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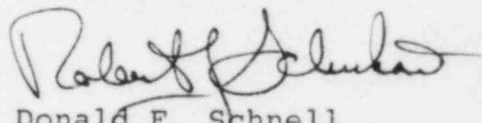
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Although the deadlines given in 10CFR50.49(g) are not expressly applicable to Callaway, it is our understanding that:

- (a) Explicit Commission approval is required for extensions past November 30, 1985.
- (b) Precedents have been set regarding recently issued operating licenses that included November 30, 1985 qualification deadlines. In particular, Facility Operating License NPF-23 for Byron Station, Unit 1, issued subsequent to NPF-25 (Callaway low-power license), has a November 30, 1985 environmental qualification deadline. It is noted that the outstanding Westinghouse qualification programs are generic to Callaway and Byron.

The proposed change would become effective for Union Electric implementation upon NRC approval. Enclosed is a check for the \$150.00 application fee as requested by 10CFR170.21.

Very truly yours,


for Donald F. Schnell

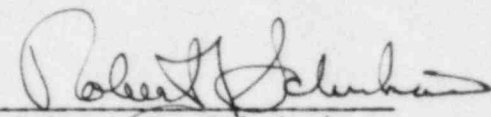
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Enclosures: A - Safety Evaluation
B - Significant Hazards Consideration
C - Proposed License Amendment

STATE OF MISSOURI)
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CITY OF ST. LOUIS)

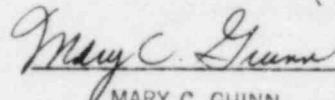
Robert J. Schukai, of lawful age, being first duly sworn upon oath says that he is General Manager-Engineering (Nuclear) for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and 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 28th day of December, 1984



MARY C. GUINN
NOTARY PUBLIC—STATE OF MISSOURI
ST. LOUIS CITY
MY COMMISSION EXPIRES JUNE 16, 1986

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SAFETY EVALUATION

This amendment request revises License Condition 2.C.(3).(a) of FOL NPF-30 to incorporate a November 30, 1985 deadline for the environmental qualification of all safety-related electrical equipment. 10CFR50.49(i), which is applicable to the Callaway Plant, does not appear to require the March 31, 1985 deadline currently in the license. Previously submitted Justifications for Interim Operation (JIO's) have addressed the requirements of 10CFR50.49(i) and will remain valid through November 30, 1985. The discussions in these JIO's ensure that the plant can be safely operated pending completion of equipment qualification. The issue at question is not one of compliance with a regulation, rather it is the date by which the compliance is achieved. It is noted that the Staff has concluded that Union Electric Company has demonstrated conformance with the qualification requirements of 10CFR50.49 (Supplement 3 to Callaway Safety Evaluation Report, NUREG-0830, Section 3.11.5).

Pursuant to the above information, this amendment request does not adversely affect or endanger the health of the general public and does not involve an unreviewed safety question.

SIGNIFICANT HAZARDS CONSIDERATION

This amendment request revises License Condition 2.C.(3).(a) of FOL NPF-30 to incorporate a November 30, 1985 deadline for the environmental qualification of all safety-related electrical equipment. The discussions in previously submitted JIO's ensure that the plant can be safely operated pending completion of equipment qualification.

The Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (48FR14870). This amendment request is similar to the example of an action involving no significant hazards consideration which relates to a change to make the license conform to regulations, where the license amendment results in very minor changes to facility operations clearly in keeping with the regulations.

This amendment request does not involve a significant increase in the probability or consequences of an accident or other adverse condition over previous evaluations; nor create the possibility of a new or different kind of accident or condition over previous evaluations; nor involve a significant reduction in a margin of safety. Based on the foregoing, the requested amendment does not present a significant hazard.

ENCLOSURE C

PROPOSED LICENSE AMENDMENT