



UNION ELECTRIC COMPANY

1901 Gratiot Street, St. Louis

Donald F. Schnell
Vice President

July 10, 1985

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

ULNRC-1134

Dear Mr. Denton:

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
REFUELING INTERVAL TECHNICAL SPECIFICATION CHANGE REQUEST

Union Electric herewith transmits 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 application requests that the Callaway Technical Specifications, Appendix A to the Operating License, be revised to provide an extension of the initial 18-month surveillance interval on the following items:

1. Manual Initiations for Reactor Trip System and Engineered Safety Features Actuation System (ESFAS)
2. Portions of Diesel Generator Testing
3. ESFAS Actuations on Safety Injection and Loss-of-offsite Power
4. Containment Spray Actuation Testing
5. Phase A and B Containment Isolations
6. Class 1E Battery Service Test

A complete listing of affected specifications is provided in Enclosure 1.

The requested change would allow the surveillance interval for these surveillances to be extended beyond the 25% allowed by Technical Specification 4.0.2 until startup following Refuel 1 or June 1, 1986, whichever occurs first. Refuel 1 is the next scheduled shutdown and is currently scheduled to begin

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Mailing Address: P.O. Box 149, St. Louis, MO 63166

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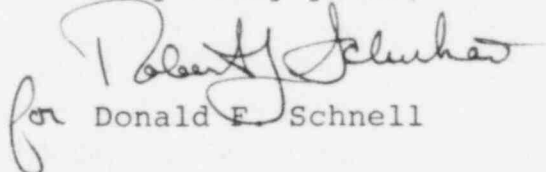
Mr. Harold R. Denton
Page 2
July 10, 1985
ULNRC-1134

April 1986. This request entails an approximate six-month extension in the most limiting case. Since Callaway Cycle 2 is designed to be an 18-month cycle, it is necessary that the provision of Specification 4.0.2 be reset to allow the necessary tolerances to perform subsequent surveillances.

It should be noted that without the requested extension, Union Electric would be forced into a Mode 5 outage in the fall for the purpose of surveillance testing. The equipment involved with the performance of these protective features is safety-related and highly reliable. The extension request would not have an impact on safe operation of the plant when compared to the transient associated with a shutdown for the sole purpose of performing these surveillances. These same surveillances would also have to be reperformed during Refuel 1 to establish the appropriate interval for cycle 2. Due to the need to provide adequate time for the planning of future outages, it is requested that this application be processed expeditiously.

The proposed changes would become effective for Union Electric implementation upon NRC approval. A check for the \$150.00 application fee as required by 10CFR170.21 was transmitted under separate cover on July 8, 1985. The check is #352470 dated 7/8/85 and drawn on Boatman's National Bank.

Very truly yours,

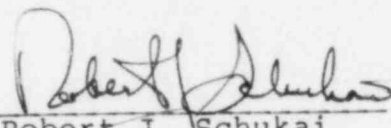

for Donald F. Schnell

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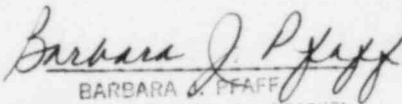
Enclosures: 1 - Specification List Requiring Extension
2 - Proposed Revisions to Specifications
3 - Safety Evaluation

STATE OF MISSOURI)
) S S
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 10th day of July, 1985.


BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1989
ST. LOUIS COUNTY

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This amendment request revises the surveillance interval associated with the Technical Specifications listed below by allowing the first 18-month interval to be extended to startup following Refuel 1 or June 1, 1986, whichever occurs first. This change is requested because these surveillances require performance with the plant in Modes 5 (COLD SHUTDOWN) or 6 (REFUELING). Due to the plant startup program and operational experience, no opportunity has been afforded to perform these surveillances. The next Mode 5/6 outage (Refuel 1) is currently scheduled to begin April 1986. This request would require an approximate six-month extension beyond the 18-month plus 25% interval Technical Specification requirement. This would allow the surveillances to coincide with the scheduled refueling outage and allow approximately two months to complete the surveillance testing. Without this request being granted, Union Electric Company would be facing a shutdown of Callaway Plant for the sole purpose of performing these surveillances. The equipment involved with the performance of these protective features is safety-related and highly reliable. The extension request would not have an impact on safe operation of the plant when compared to the transient associated with a shutdown for the purpose of performing these surveillances. Additionally, these surveillances would need to be repeated during Refuel 1 in order to establish the appropriate interval for cycle 2. This request would also allow the provisions of Specification 4.0.2 to be reset to allow the necessary tolerances to perform subsequent surveillances. Extensions are requested for the following individual specifications and the appropriate changes are shown in Enclosure 2.

<u>Tech Spec</u>	<u>Page</u>	<u>Item</u>
1. 4.3.1.1-17	3/4 3-10,12	Safety Injection Input from ESF
2. 4.3.2.1-1.a	3/4 3-33,37	Safety Injection-Manual Initiation
3. 4.3.2.1-2.a	3/4 3-33,37	Containment Spray-Manual Initiation
4. 4.3.2.1-3.b.1)	3/4 3-34,37	Phase B Isolation-Manual Initiation
5. 4.5.2.e.2)	3/4 5-5	ECCS Actuation on Safety Injection Signal
6. 4.6.2.1.c.2)	3/4 6-13	Containment Spray Actuation Test
7. 4.6.3.2.a	3/4 6-17	Phase A Isolation Test
8. 4.6.3.2.b	3/4 6-17	Phase B Isolation Test
9. 4.7.3.b.2	3/4 7-11	CCW Actuation on Safety Injection Signal
10. 4.7.4.b.2)	3/4 7-12	ESW Actuation on Safety Injection Signal
11. 4.8.1.1.2.f	3/4 8-4	Diesel Generator Testing
12. 4.8.2.1.d	3/4 8-10	Battery Service Test