



December 12, 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-3507

CALLAWAY PLANT
DOCKET NUMBER 50-483
PERIODIC VERIFICATION OF DESIGN-BASIS CAPABILITY
OF SAFETY-RELATED MOTOR-OPERATED VALVES

References: 1) NRC Generic Letter 96-05 dated
September 18, 1996
2) ULNRC-3487 dated November 6, 1996
3) NRC Letter from K. M. Thomas to
D. F. Schnell dated November 29, 1996

Generic Letter 96-05 requested licensees to establish a program, or ensure the effectiveness of the current program, to verify on a periodic basis that safety-related motor-operated valves (MOV) are capable of performing their safety functions within the current licensing bases of the facility. GL 96-05 also required submittal of a written summary description of the MOV periodic verification program.

Our response (Reference 2) indicated that all actions requested by GL 96-05 were closed. This conclusion was based on staff approval of the Callaway Plant GL 89-10 program, which includes a commitment to maintain a periodic verification program, and our involvement in industry activities. However, because of subsequent activities within the industry and NRC to address long-term MOV performance, the staff, in Reference 3, requested additional information concerning any actions we will be taking in response to GL 96-05.

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CITY OF ST. LOUIS)

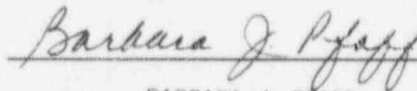
Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Senior Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power 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



Donald F. Schnell
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this twelfth day
of December, 1996.



BARBARA J. PFAFF
NOTARY PUBLIC—STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
ST. LOUIS COUNTY

As agreed in a December 2, 1996 telecon with the NRC, Union Electric will supplement the November 6, 1996 letter with more specific information regarding changes or the need for changes in our MOV periodic verification program brought about by industry and NRC activities over the last few years including but not limited to:

1. completion of the MOV performance prediction program by the Electric Power Research Institute and NRC issuance of a safety evaluation on the EPRI program;
2. preparation of a code case by the American Society of Mechanical Engineers on an MOV periodic verification program that could be used as an alternative to stroke-time testing; and
3. tests sponsored by the NRC on the aging of valve material samples.

We will submit this supplemental information by the GL 96-05 180-day response date of March 17, 1997. If the foregoing actions are not completely responsive to your request, or if you have any further questions concerning this letter, please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Donald F. Schnell".

Donald F. Schnell

WEK/

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