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February 5, 1997

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

Gentlemen:

ULNRC-03530

NRC ENFORCEMENT POLICY REVISION

Reference: NRC Enforcement Policy Revision,
NUREG-1600, published October 18, 1996.

The referenced NUREG set forth a revised Enforcement Policy applicable to licensee efforts to correct inconsistencies in licensing documents. One requirement of the notice was that, to qualify for enforcement discretion under the policy, programs for licensee reviews of the Final Safety Analysis Report (FSAR) must be described in writing and publicly available. The purpose of this letter is to document Union Electric's programs to review the FSAR.

A Task Team was formed in March, 1996 to identify and prioritize sections of the FSAR for a compliance review against plant hardware and procedures. The team completed its review in July, 1996 and identified actions and prioritized sections for further review. The additional reviews are scheduled to be completed prior to the end of 1998. The current plans are for a task team to be assigned to each of those sections to review FSAR information against plant procedures and plant design. The scope and depth of the program may be revised based on initial results.

Union Electric is also committed to respond to the Nuclear Energy Institute Initiative NEI 96-05. This programmatic review will include a sample review of FSAR information and will complement the Task Team effort described above. Additionally, Union Electric will perform two Safety System Functional Assessments by December 31, 1998. These assessments will cover the Auxiliary Building HVAC System (GL) and the combined CVCS/High Pressure Coolant Injection Systems (BG/EM). Part of the SSFA process includes a review of FSAR accuracy for those systems.

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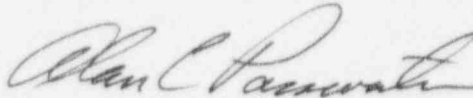
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Please contact me if you have any questions on this letter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Alan C. Passwater". The signature is fluid and cursive, with the first name "Alan" being more prominent.

Alan C. Passwater
Manager, Licensing and Fuels

ACP/plr

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

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

Ron Kucera
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Don Woodlan
TU Electric
1601 Bryan Street
Dallas, TX 75201-3411

Pat Nugent
Pacific Gas & Electric
Regulatory Services
P.O. Box 56
Avila Beach, CA 93424