



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 6, 2000

Mr. Garry L. Randolph
Vice President and Chief Nuclear Officer
Union Electric Company
Post Office Box 620
Fulton, MO 65251

SUBJECT: SITE SPECIFIC WORKSHEETS FOR USE IN THE NRC'S REVISED REACTOR
OVERSIGHT PROCESS FOR CALLAWAY PLANT, UNIT 1

Dear Mr. Randolph:

The purpose of this letter is to provide you with one of the key implementation tools to be used by the Nuclear Regulatory Commission (NRC) in the revised reactor oversight process, which is currently expected to be implemented at Callaway Plant, Unit 1, in April 2000. Included in the enclosed Risk-Informed Inspection Notebook are the significance determination process (SDP) worksheets that the inspectors will be using to risk characterize inspection findings. The SDP is discussed in more detail below.

On January 8, 1999, the NRC staff described to the Commission its plans and recommendations to improve the reactor oversight process. These recommendations were contained in SECY-99-007, "Recommendation for Reactor Oversight Process Improvements," which is available to you through the internet on the NRC's Web Site at www.nrc.gov/NRC/COMMISSION/SECYS/index.html. The new process, developed with stakeholder involvement, is designed around a risk-informed framework, which is intended to focus both the NRC's and the licensee's attention and resources on those issues of more risk significance.

The performance assessment portion of the new process involves the use of both licensee submitted performance indicator (PI) data and inspection findings that have been appropriately categorized based on their risk significance. In order to properly categorize an inspection finding, the NRC staff has developed the SDP. This process was also described to the Commission in SECY 99-007A, "Recommendations for the Reactor Oversight Process Improvements (the follow-up paper to SECY-99-007 above)," dated March 22, 1999, also available on the above noted web site.

The SDP for power operations involves evaluating an inspection finding's impact on the plant's capability to: limit the frequency of initiating events; ensure the availability, reliability, and capability of mitigating systems; and to ensure the integrity of the fuel cladding, reactor coolant system, and containment barriers. The SDP involves the use of three tables. Table 1 is the estimated likelihood for initiating event occurrence during the degraded period. Table 2 describes how the significance is determined based on remaining mitigation system capabilities and Table 3 provides the bases for the failure probabilities associated with the remaining mitigation equipment and strategies.

NRC FILE CENTER COPY

DF01

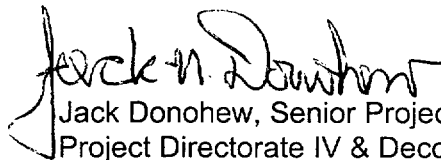
PDR AD0C1-

Gary L. Randolph

- 2 -

As a result of the recently concluded pilot plant review effort, the NRC has determined that site-specific risk data is needed in order to provide a repeatable determination of the significance of an issue. Therefore, the NRC has contracted with Brookhaven National Lab (BNL) to develop site-specific worksheets to be used in the SDP review. These worksheets were developed based on your individual plant examination (IPE) submittal that was requested by Generic Letter (GL) 88-20. The NRC plans to use this site-specific information in evaluating the significance of issues identified at your facility when the revised reactor oversight process is implemented industry-wide. It is recognized that the IPE utilized during this effort may not contain current information. Therefore, the NRC or its contractor will conduct a site visit in the near future to discuss with your staff any changes that may be appropriate. We are not requesting written comments on the enclosed Inspection Notebook. We will coordinate our efforts through your licensing or risk organizations as appropriate. If you have any questions, please contact me at (301)-415-1307, or through the internet at jnd@nrc.gov.

Sincerely,



Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure: Risk Informed Inspection Notebook
for Callaway Plant, Unit 1

cc w/encl: See next page

Callaway Plant, Unit 1

cc:

Professional Nuclear
Consulting, Inc.
19041 Raines Drive
Derwood, Maryland 20855

John O'Neill, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Mr. J. Schnock
Supervising Engineer
Quality Assurance Regulatory Support
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

U.S. Nuclear Regulatory Commission
Resident Inspector Office
8201 NRC Road
Steedman, Missouri 65077-1302

Mr. J. V. Laux, Manager
Quality Assurance
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

Manager - Electric Department
Missouri Public Service Commission
301 W. High
Post Office Box 360
Jefferson City, Missouri 65102

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavilion
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Mr. Ronald A. Kucera, Deputy Director
Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, Kansas 66839

Mr. Dan I. Bolef, President
Kay Drey, Representative
Board of Directors Coalition
for the Environment
6267 Delmar Boulevard
University City, Missouri 63130

Mr. Lee Fritz
Presiding Commissioner
Callaway County Court House
10 East Fifth Street
Fulton, Missouri 65151

Mr. Alan C. Passwater, Manager
Licensing and Fuels
Union Electric Company
Post Office Box 66149
St. Louis, Missouri 63166-6149

Mr. Steve Floyd
Nuclear Energy Institute
Suite 400
1776 I Street, N.W.
Washington, D.C. 20006

David Lochbaum, Esq.
Nuclear Safety Engineer
Union of Concerned Scientists
Suite 310
1616 P Street, N.W.
Washington, D.C. 20036-1495