

January 19, 2000

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

Gentlemen:

ULNRC-04178



DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT
RESPONSE TIME TESTING ELIMINATION

Reference: ULNRC-04159 dated December 3, 1999

In the reference above, Union Electric Company submitted a request for NRC review and approval of our application of WCAP-14036-P-A, Revision 1, "Elimination of Periodic Protection Channel Response Time Tests," dated October 1998, for Callaway Plant. This review request was submitted pursuant to the Improved Technical Specification (ITS) Section 1.1 Definition for Engineered Safety Feature (ESF) Response Time, which requires NRC review and approval of any methodology used to allocate response times in lieu of measuring them.

On January 14, 2000, a telephone conference call was held between Union Electric and NRC staff to discuss how Callaway meets Current Technical Specification (CTS) 4.3.2.2, i.e., how the ESF Response Time is currently demonstrated. This was discussed in the second and third paragraphs of the referenced cover letter. Additional clarification was provided during the conference call and is documented herein.

At Callaway, ESF Response Times are currently demonstrated by a combination of response time testing and functional testing. Functional testing is relied upon for the SSPS master and slave relays. These relays are not response time tested per se, rather allocated response times of 40 msec and 100 msec for the master and slave relays, respectively, have been assigned. The currently allocated response times were based on several years of test data, with the longest response times ever witnessed at Callaway (20 msec and 50 msec) doubled for conservatism. Any significant degradation of the relay response time would be accompanied by an

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outright failure of the relay, which would be detected during periodic functional testing. Therefore, the response time of these relays is demonstrated during functional testing required by the Technical Specifications (e.g., Master Relay Tests, Slave Relay Tests), with acceptable performance of the functional test proving the acceptability of the response time.

The NRC staff asked that our discussions be documented and had no additional questions at this time.

If you have any further questions on this request, please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Alan C. Passwater".

Alan C. Passwater
Manager-Corporate Nuclear Services

GGY/mlo

STATE OF MISSOURI)
)
CITY OF ST. LOUIS) S S

Alan C. Passwater, of lawful age, being first duly sworn upon oath says that he is Manager, Corporate Nuclear Services 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 Alan C. Passwater
Alan C. Passwater
Manager, Corporate Nuclear Services

SUBSCRIBED and sworn to before me this 19th day
of January, 2000.

Melissa L. Orr

MELISSA L. ORR
Notary Public - Notary Seal
STATE OF MISSOURI
City of St. Louis
My Commission Expires: June 23, 2003

cc: M. H. Fletcher
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