February 9, 2000

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

SUBJECT: CLOSEOUT OF GENERIC LETTER 99-02, "LABORATORY TESTING OF NUCLEAR-GRADE ACTIVATED CHARCOAL," FOR CALLAWAY PLANT, UNIT 1 (TAC NO. MA5773)

Dear Mr. Randolph:

On June 3, 1999, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," to all holders of operating licenses for nuclear power reactors, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel.

The purpose of the GL was to:

- (1) Alert addressees that the NRC has determined that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with the current licensing basis as it relates to the dose limits of General Design Criterion (GDC) 19 of Appendix A to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR) and Subpart A of 10 CFR Part 100.
- (2) Request that all addressees determine whether their Technical Specifications (TS) reference ASTM D3803-1989 for charcoal filter laboratory testing. Addressees whose TS do not reference ASTM D3803-1989 should either amend their TS to reference ASTM D3803-1989 or propose an alternative test protocol and provide the information discussed in the requested actions.
- (3) Alert addressees to the staff's intent to exercise enforcement discretion under certain conditions.
- (4) Request that all addressees send the NRC written responses to this generic letter relating to implementation of the requested actions.

In GL 99-02, the NRC staff established four groups of plants. In your response of August 2, 1999, to the GL, you stated that Callaway Plant, Unit 1 (Callaway) was in compliance with its TS, and the charcoal in the control room emergency ventilation (filtration and pressurization) and emergency exhaust systems is tested in accordance with ASTM D3803-1989. This is shown in Section 5.5.11, "Ventilation Filter Testing Program

(VFTP)," of the TS and Section 9.4 of the Callaway Final Safety Analysis Report. This letter indicates that your plant is in Group 1 of the GL in that the plant is in compliance with technical specifications that require charcoal testing in accordance with ASTM D3803-1989.

The staff has reviewed your response and has concluded that all requested information has been provided for Callaway and the information is consistent with the requirements in the TS on testing ventilation system charcoal in accordance with the ASTM standard; therefore, we consider GL 99-02 and TAC No. MA5773 to be closed for Callaway. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at 301-415-1307 or through the internet at jnd@nrc.gov.

Sincerely,

/**RA/**

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

cc: See next page

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Callaway Plant, Unit 1

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

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