50-483



## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001 May 8, 1997

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

SUBJECT: REQUEST FOR JUSTIFICATION REGARDING ADEQUACY OF TECHNICAL

SPECIFICATION 3.8.1 FOR UNION ELECTRIC COMPANY, CALLAWAY PLANT,

UNIT 1

Dear Mr. Randolph:

By letter dated January 19, 1996, the staff approved the enclosed technical specification amendment for the Wolf Creek Generating Station. The amendment replaced the fuel oil volume requirement in the emergency diesel generator day tanks in the Wolf Creek Technical Specifications with a fuel oil level requirement. The amendment was necessary since the diesel generator day tanks were not elevated to ensure the diesel generator injection headers remained filled by maintaining the minimum volume of 510 gallons of fuel oil in the day tanks required by the technical specifications. Therefore, by maintaining only 510 gallons of fuel oil in the day tanks, diesel generator operability could not be ensured.

It is my understanding that your staff evaluated this condition to determine its applicability to the Callaway Plant, and concluded that although the Callaway Plant diesel generator fuel oil system is of the same design as Wolf Creek, a technical specification amendment to ensure diesel generator operability was not warranted, since Union Electric established administrative controls to ensure fuel oil in the day tanks was maintained at a level to ensure the diesel generator injection headers remain filled.

It is the staff's position that if a licensee determines that a limiting condition for operation in the technical specifications is not adequate to ensure operability of the equipment controlled by the technical specifications, an amendment to the technical specifications is warranted. Therefore, within 15 days from receipt of this letter, either provide your justification, in writing, for not pursuing a technical specification amendment for diesel generator day tank fuel oil supply, or submit a technical

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9705200386 970508 PDR ADOCK 05000483 P PDR specification amendment to reflect the volume/level required in the day tanks to ensure diesel generator operability.

If you have any questions, please contact me at (301) 415-1362.

Sincerely,

Original Signed By

Kristine M. Thomas, Project Manager Project Directorate IV-2 Division of Reactor Projects - III/IV Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure: Wolf Creek Amendment

cc w/encl: See next page

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