



May 28, 1997

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

ULNRC-3588

Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT
REQUEST FOR JUSTIFICATION REGARDING ADEQUACY
OF TECHNICAL SPECIFICATION 3.8.1

- Reference:
- 1) NRC Letter dated May 8, 1997
 - 2) Amendment 100 to Facility Operating License NPF 30, for Callaway Plant dated July 6, 1995
 - 3) ULNRC-2824 dated July 16, 1993
 - 4) ULNRC-2042 dated July 21, 1989
 - 5) ULNRC-3578 dated May 15, 1997

In Reference 1 the NRC Project Manager for Callaway requested that Union Electric provide justification for not pursuing a Technical Specification (TS) amendment for the fuel oil volume currently specified in TS 3.8.1.1.b.2), or submit an amendment request to reflect a revised volume/level required in the diesel generator (DG) fuel oil day tanks. Reference 2 and 3 revised the same specification for the DG day tank volume to the currently required value of 510 gallons. This value is the amount of fuel oil required to allow a DG to operate at its continuous rating for one hour plus a 10% margin.

The diesel generators have a number of support and auxiliary systems which are necessary for operation. These include control, cooling, lubrication, air, and fuel oil systems. The standard TS and Callaway's TS Limiting Conditions for Operation (LCO) only specify a day tank volume, fuel oil storage tank volume, and a fuel oil transfer pump for each DG. There are numerous other components and parameters that are necessary, but not directly required by the LCO to maintain operability of the DGs. These must be considered, regardless of there being an explicit requirement, when determining the operable status of our DGs per Tech Spec 1.0.

ADD 1/0



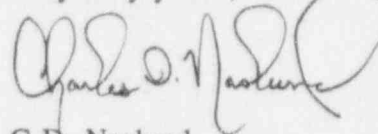
For the Callaway DGs, level in the day tank standpipes is maintained above 88" which ensures both the 510 gallon volume and the injection headers remain full. The level is maintained automatically for each DG by a fuel oil transfer pump taking suction from its associated underground storage tank. Maintaining the level in the standpipes is a functional requirement for the fuel oil transfer pump subsystem. If the fuel oil level is found to be below the control board or if the transfer subsystem is not capable of automatically maintaining the standpipe level, the associated DG would be declared inoperable and actions taken as required by TS. A plant annunciator alarm is provided for low standpipe level for each DG. An example of this was reported in Reference 4 (Callaway LER 89-001-01). In that case a surveillance test identified that a main control board switch failure had the effect of preventing the transfer pump from automatically supplying fuel to the day tank. The DG was declared inoperable and the switch was replaced prior to returning the DG to service.

The Callaway Technical Specifications are consistent with the STS. The parameters specified, plus other support and auxiliary systems monitored, provide assurance that the diesels will operate when required.

Union Electric submitted a TS conversion amendment request on May 15, 1997 (See Reference 5). In Attachment 14, Enclosure 5B, the bases discussion for SR 3.8.1.4 incorrectly states the volume in the day tank is at or above the level at which fuel oil is automatically added. We will revise that request during the upcoming NRC review period to correct this statement and to address the DG day tank level in a manner similar to that done for Wolf Creek Generating Station. Their request contains a monthly surveillance that verifies the transfer pumps start on a low level associated with the day tank standpipe. The actual level is stated in the improved bases.

If you have any further questions please contact us.

Very truly yours,



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