Union Electric
Callaway Plant

PO Box 620
Fulton, MO 65251

February 5, 2001

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

ULNRC-4365

Gentlemen:

EMERGENCY PREPAREDNESS
RADIOLOGICAL EMERGENCY RESPONSE PLAN
CALLAWAY PLANT, DOCKET NUMBER 50-483
UNION ELECTRIC CO.

Ref: 1) RERP Revision 023
2) RERP Change Notice 00-006

Enclosed is one copy of Change Notice 00-008 to Revision 023 of the Callaway Plant Radiological Emergency Response Plan (RERP), Attachment 1.

During Change Notice 00-006 an editorial error occurred in placing footnote symbols in EAL 1C item 2 and EAL1D item 2. The error was corrected by use of separate symbols for the two footnotes associated with these EALS. For consistency, the new footnote was added to EAL 1B item 2. Copies of the affected page of the original and revised EALs are attached for ease of understanding.

This Change Notice does not decrease the effectiveness of emergency preparedness for the Callaway Plant. The RERP continues to meet the standards of 10CFR50.47(b) and the requirements of 10CFR50.54(q).

Sincerely,

John D. Blosser
Manager, Operations Support

JDB/alr
Enclosure

A045

cc: Mr. Ellis W. Merschoff (2 copies w/a)
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Mr. Vince Gaddy (1 copy w/a)
Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Steedman, MO 65077

Mr. Jack N. Donohew (2 copies w/a)
Licensing Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop 7E1
Washington, DC 20555-2738

Manager, Electric Department (1 copy w/o)
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Mr. Paul Elkman (1 copy w/a)
Senior Emergency Preparedness Analyst
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Mr. Thomas A. Baxter (1 copy w/o)
Shaw, Pittman, Potts & Trowbridge
2300 N. Street N.W.
Washington, DC 20037

Mr. Jerry B. Uhlmann (1 copy w/o)
Director
Missouri State Emergency Management Agency
PO Box 116
Jefferson City, MO 65102

Superintendent, Licensing (1 copy w/o)
Wolf Creek Nuclear Operating Corporation
PO Box 411
Burlington, KS 66839

Table 4-1
EMERGENCY ACTION LEVELS

Group 1 ABNORMAL RADIATION EVENTS
Offsite Events

UNUSUAL EVENT	ALERT	SITE EMERGENCY	GENERAL EMERGENCY
A. Any **Unplanned Release** of Radioactivity to the Environment That Exceeds **2 Times** the Radiological Effluent Control Limits in the ODCM, (APA-ZZ-01003) for ≥**60** minutes. MODES: At All Times	B. Any **Unplanned Release** of Radioactivity to the Environment That Exceeds **200 Times** the Radiological Effluent Control Limits in the ODCM, (APA-ZZ-01003) for ≥**15** minutes. MODES: At All Times	C. **EAB** Dose Resulting From an **Actual or Imminent** Release of Gaseous Radioactivity Exceeds **100 mrem TEDE** or **500 mrem CDE** Thyroid for the Actual or Projected Duration of the Release. MODES: At All Times	D. **EAB** Dose Resulting From an **Actual or Imminent** Release of Gaseous Radioactivity Exceeds **1000 mrem TEDE** or **5000 mrem CDE** Thyroid for the Actual or Projected Duration of the Release. MODES: At All Times
Indicators 1. All of the following: a. A **valid alarm** and reading on any of the following effluent monitors: HB-RE-18 GT-RE-21B GH-RE-10B b. The valid reading is 2 times the Hi Hi alarm setpoint value. c. The release cannot be terminated within 60 minutes of the alarm actuation. OR 2. Both of the following: a. **Confirmed** sample analysis indicates that a release exceeding 2 times the applicable values of the ODCM (APA-ZZ-01003), has occurred. b. The release **cannot** be terminated within 60 minutes.	**Indicators** 1. All of the following: a. A **valid alarm** and reading on any of the following effluent monitors: HB-RE-18 GT-RE-21B GH-RE-10B b. The valid reading is 200 times the Hi Hi alarm setpoint value. c. The release **cannot** be terminated within 15 minutes of the alarm actuation. OR @2. Both of the following: *CN 00-002* a. A **Valid reading** on any of the following monitors: AB-RE-0111 >27 mrem/hr AB-RE-0112 >27 mrem/hr AB-RE-0113 >27 mrem/hr AB-RE-0114 >27 mrem/hr FC-RE-0385 >150 mrem/hr b. The release **cannot** be terminated within 15 minutes. OR 3. Both of the following: a. **Confirmed** sample analysis indicates that a release exceeding 200 times the applicable values of the ODCM (APA-ZZ-01003), has occurred. b. The release **cannot** be terminated within 15 minutes. *CN 00-006 & 008* @Release values based on average meteorological data and a 1 hour release duration.	**Indicators** Any of the following: *CN 00-002* *1. A **valid reading** on the Unit Vent monitor, GT-RE-21B, > 2.42E+8 µCi/sec for 15 minutes or longer. *@2. Both of the following: a. A **Valid reading** on any of the following monitors: AB-RE-0111 >146 mrem/hr AB-RE-0112 >146 mrem/hr AB-RE-0113 >146 mrem/hr AB-RE-0114 >146 mrem/hr FC-RE-0385 >850 mrem/hr *CN 00-006 & 008* b. The reading has been, or is expected to be, exceeded for 15 minutes or longer. 3. A **valid dose projection** indicates **>100 mrem TEDE** or **>500 mrem CDE** thyroid dose at, or beyond, the **EXCLUSION AREA BOUNDARY** using in plant rad data or field monitoring team survey results. 4. Field survey results at, or beyond, the EAB corresponding to **>100 mrem/hr TEDE** for 1 hour (or expected to continue for 1 hour) or **>500 mrem/hr CDE** thyroid for 1 hour of inhalation. *Declare the event using this indicator only if actual dose projections per Indicator 3 cannot be performed within 15 minutes of the monitors exceeding the reading. *CN 00-006 & 008* @Release values based on average meteorological data and a 1 hour release duration.	**Indicators** Any of the following: *CN 00-002* *1. A **valid reading** on the Unit Vent monitor, GT-RE-21B, > 2.42E+9 µCi/sec for 15 minutes or longer. *@2. Both of the following: a. A **Valid reading** on any of the following monitors: AB-RE-0111 >1460 mrem/hr AB-RE-0112 >1460 mrem/hr AB-RE-0113 >1460 mrem/hr AB-RE-0114 >1460 mrem/hr FC-RE-0385 >8500 mrem/hr b. The reading has been, or is expected to be, exceeded for 15 minutes or longer. 3. A **valid dose projection** indicates **>1000 mrem TEDE** or **>5000 mrem CDE** thyroid dose at, or beyond, the **EXCLUSION AREA BOUNDARY** using in plant rad data or field monitoring team survey results. 4. Field survey results at, or beyond, the EAB corresponding to **>1,000 mrem/hr TEDE** for 1 hour (or expected to continue for 1 hour) or **>5,000 mrem/hr CDE** thyroid for 1 hour of inhalation. *Declare the event using this indicator only if actual dose projections per Indicator 3 cannot be performed within 15 minutes of the monitors exceeding the reading. *CN 00-006 & 008* @Release values based on average meteorological data and a 1 hour release duration.

Attachment 1

Table 4-1
EMERGENCY ACTION LEVELS

As is currently

Group 1 ABNORMAL RADIATION EVENTS
Offsite Events

UNUSUAL EVENT	ALERT	SITE EMERGENCY	GENERAL EMERGENCY
A. Any **Unplanned Release** of Radioactivity to the Environment That Exceeds **2 Times** the Radiological Effluent Control Limits in the ODCM, (APA-ZZ-01003) for ≥60 minutes. MODES: At All Times	B. Any **Unplanned Release** of Radioactivity to the Environment That Exceeds **200 Times** the Radiological Effluent Control Limits in the ODCM, (APA-ZZ-01003) for ≥15 minutes. MODES: At All Times	C. **EAB** Dose Resulting From an **Actual or Imminent** Release of Gaseous Radioactivity Exceeds **100 mrem TEDE** or **500 mrem CDE** Thyroid for the Actual or Projected Duration of the Release. MODES: At All Times	D. **EAB** Dose Resulting From an **Actual or Imminent** Release of Gaseous Radioactivity Exceeds **1000 mrem TEDE** or **5000 mrem CDE** Thyroid for the Actual or Projected Duration of the Release. MODES: At All Times
Indicators 1. All of the following: a. **A valid alarm** and reading on any of the following effluent monitors: HB-RE-18 GT-RE-21B GH-RE-10B b. The valid reading is 2 times the Hi Hi alarm setpoint value. c. The release cannot be terminated within 60 minutes of the alarm actuation. OR 2. Both of the following: a. **Confirmed** sample analysis indicates that a release exceeding 2 times the applicable values of the ODCM (APA-ZZ-01003), has occurred. b. The release **cannot** be terminated within 60 minutes.	**Indicators** 1. All of the following: a. **A valid alarm** and reading on any of the following effluent monitors: HB-RE-18 GT-RE-21B GH-RE-10B b. The valid reading is 200 times the Hi Hi alarm setpoint value. c. The release **cannot** be terminated within 15 minutes of the alarm actuation. OR **2. Both of the following: *CN 00-002* a. **A Valid reading** on any of the following monitors: AB-RE-0111 >27 mrem/hr AB-RE-0112 >27 mrem/hr AB-RE-0113 >27 mrem/hr AB-RE-0114 >27 mrem/hr FC-RE-0385 >150 mrem/hr b. The release **cannot** be terminated within 15 minutes. OR 3. Both of the following: a. **Confirmed** sample analysis indicates that a release exceeding 200 times the applicable values of the ODCM (APA-ZZ-01003), has occurred. b. The release **cannot** be terminated within 15 minutes. *CN 00-006* **Release values based on average meteorological data and a 1 hour release duration.	**Indicators** Any of the following: *CN 00-002* *1. A **valid reading** on the Unit Vent monitor, GT-RE-21B, > 2.42E+8 µCi/sec for 15 minutes or longer. **2. Both of the following: a. **A Valid reading** on any of the following monitors: AB-RE-0111 >146 mrem/hr AB-RE-0112 >146 mrem/hr AB-RE-0113 >146 mrem/hr AB-RE-0114 >146 mrem/hr FC-RE-0385 >850 mrem/hr *CN 00-006* b. The reading has been, or is expected to be, exceeded for 15 minutes or longer. 3. **A valid dose projection** indicates **>100 mrem TEDE** or **>500 mrem CDE** thyroid dose at, or beyond, the **EXCLUSION AREA BOUNDARY** using in plant rad data or field monitoring team survey results. 4. Field survey results at, or beyond, the EAB corresponding to **>100 mrem/hr TEDE** for 1 hour (or expected to continue for 1 hour) or **>500 mrem/hr CDE** thyroid for 1 hour of inhalation. *Declare the event using this indicator only if actual dose projections per Indicator 3 cannot be performed within 15 minutes of the monitors exceeding the reading. *CN 00-006* **Release values based on average meteorological data and a 1 hour release duration.	**Indicators** Any of the following: *CN 00-002* *1. A **valid reading** on the Unit Vent monitor, GT-RE-21B, > 2.42E+9 µCi/sec for 15 minutes or longer. **2. Both of the following: a. **A Valid reading** on any of the following monitors: AB-RE-0111 >1460 mrem/hr AB-RE-0112 >1460 mrem/hr AB-RE-0113 >1460 mrem/hr AB-RE-0114 >1460 mrem/hr FC-RE-0385 >8500 mrem/hr b. The reading has been, or is expected to be, exceeded for 15 minutes or longer. 3. **A valid dose projection** indicates **>1000 mrem TEDE** or **>5000 mrem CDE** thyroid dose at, or beyond, the **EXCLUSION AREA BOUNDARY** using in plant rad data or field monitoring team survey results. 4. Field survey results at, or beyond, the EAB corresponding to **>1,000 mrem/hr TEDE** for 1 hour (or expected to continue for 1 hour) or **>5,000 mrem/hr CDE** thyroid for 1 hour of inhalation. * Declare the event using this indicator only if actual dose projections per Indicator 3 cannot be performed within 15 minutes of the monitors exceeding the reading. *CN 00-006* **Release values based on average meteorological data and a 1 hour release duration.