

February 12, 2001

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

Gentlemen:

ULNRC-04372

DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT
IMPLEMENTATION DATE OF REVISED 10 CFR 50.59 AT CALLAWAY



The proximity of the promulgated 10 CFR 50.59 implementation date of March 13, 2001 to the start of Callaway Plant's eleventh refueling outage, currently scheduled to start on April 7, 2001, necessitates a Callaway implementation date extension. AmerenUE is planning extensive training after the refueling outage to ensure a smooth transition to the new rule guidance. Training and procedures will be completed to support effective rule implementation on July 31, 2001.

AmerenUE is involved in industry efforts to use uniform training and procedures to implement the revised rule. Initial training and procedure development is currently in process. AmerenUE intends to use the revised rule guidance exclusively after the implementation date for 50.59 reviews started after the Callaway implementation date. 50.59 reviews completed under the former rule can be implemented after the new rule guidance is in place. Until the aforementioned time, AmerenUE will continue to implement our existing 10 CFR 50.59 review processes.

The effective date for the revised 10 CFR 50.59, was established in a December 13, 2000, *Federal Register* notice (65 FR 77773), as March 13, 2001. As discussed in Regulatory Issue Summary (RIS) 2001-03, dated January 23, 2001, the NRC has stated that to permit an orderly transition to the revised rule, licensees may implement the rule later than this date. Although an exemption is not necessary, the RIS suggested that a licensee may want to communicate its implementation plan to the NRC.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Alan C. Passwater".

Alan C. Passwater
Manager, Corporate Nuclear Services

WPM/mlc

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