

AmerenUE
Callaway Plant

Ronald D. Affolter
Vice President - Nuclear

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March 18, 2002

(Safeguards Information)
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
1 White Flint North
11555 Rockville Pike
Rockville, MD 20852

(Safeguards Information)
U.S. Nuclear Regulatory Commission
ATTN: Mr. Samuel J. Collins, Director
Room 5 D2, Mail Stop O-5 E7
1 White Flint North
11555 Rockville Pike
Washington, DC 20852

Gentlemen:

ULNRC-04621



**DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT
20-DAY RESPONSE TO NRC ORDER
FOR INTERIM SAFEGUARDS AND
SECURITY COMPENSATORY MEASURES**

- Reference: 1) NRC Letter from Samuel J. Collins, Director Office of Nuclear Reactor Regulation to Garry L. Randolph, Senior Vice President-Generation and Chief Nuclear Officer, Callaway Plant dated February 25, 2002, enclosing Order Modifying Licenses (Effective Immediately)
- 2) Request for Extension of Time to Submit an Answer or Request a Hearing, ULNRC-04622 dated March 18, 2002

Via Reference 1, the U.S. Nuclear Regulatory Commission (NRC or Commission) issued an order to Union Electric Company (AmerenUE or UE) that modifies the current operating license for Callaway Plant. The order was immediately effective and requires compliance with specific interim safeguards and security compensatory measures as stated in an attachment to the Order.

The Order required a 20-day response. Attachment 1 to this letter is the 20-day response for Callaway Plant. Attachment 2 (contains Safeguards Information) is a description of the actions and commitments being taken by Callaway Plant to comply with the Order. Reference 2 is a UE request for an extension of time to submit an answer or request a hearing on a portion of the Order.

This response is hereby submitted to the commission in accordance with 10 CFR 50.4.

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The enclosed document (Attachment 2) contains Safeguards Information within the scope of 10 CFR 73.21. Removal of enclosures declassifies this document.

If you have any questions concerning this matter, please contact John Blosser at (573) 676-8190 or Dave Shafer at (314) 554-3104.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Affolter', with a horizontal line extending from the end of the signature.

Ronald D. Affolter
Vice President, Nuclear

DS/mlo

- Attachments: 1. 20 Day Response to Order
2. Description Of Actions To Comply With The Order (Safeguards Information)

cc: (Safeguards Information)
Ellis Merchoff, Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, TX 76011-8064

(Safeguards Information)
Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Steedman, MO 65077

STATE OF MISSOURI)
)
CALLAWAY COUNTY)

SS

Ronald D. Affolter, of lawful age, being first duly sworn upon oath says that he is Vice President-Nuclear, for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By

R. Affolter
Ronald D. Affolter
Vice President-Nuclear

SUBSCRIBED and sworn to before me this 18th day
of March, 2002.



Cathy J. Crisp
Notary Public
Notary Seal
State of Missouri
Commissioned for Callaway County
My commission expires Jan. 29, 2006

20 DAY RESPONSE TO ORDER

The NRC order of February 25, 2002, included the following reporting requirements:

- B.
 - 1. All Licensees shall, within **twenty (20) days** of the date of this Order, notify the Commission, (1) if they are unable to comply with any of the requirements described in Attachment 2, (2) if compliance with any of the requirements is unnecessary in their specific circumstances, or (3) if implementation of any of the requirements would cause the Licensee to be in violation of the provisions of any Commission regulation or the facility license. The notification shall provide the Licensees, justification for seeking relief from or variation of any specific requirement.
 - 2. Any Licensee that considers that implementation of any of the requirements described in Attachment 2 to this Order would adversely impact safe operation of the facility must notify the Commission, within twenty (20) days of this Order, of the adverse safety impact, the basis for its determination that the requirement has an adverse safety impact, and either a proposal for achieving the same objectives specified in the Attachment 2 requirement in question, or a schedule for modifying the facility to address the adverse safety condition. If neither approach is appropriate, the Licensee must supplement its response to Condition B1 of this Order to identify the condition as a requirement with which it cannot comply, with attendant justifications as required in Condition B1.
- C.
 - 1. All Licensees shall, within twenty (20) days of the date of this Order, submit to the Commission, a schedule for achieving compliance with each requirement described in Attachment 2.
 - 2. All Licensees shall report to the Commission, when they have achieved full compliance with the requirements described in Attachment 2.

Union Electric Company Response:

The Union Electric Company (UE) response below applies to all Interim Compensatory Measures (ICMs) in the Order except for ICM B.2.a(2), for which UE has requested an extension (see UE letter ULNRC 04622, March 18, 2002).

Item B1: UE is able to comply with and will implement the requirements in Attachment 2 of the Order. A description of UE's understanding of each requirement and the means by which UE intends to implement each requirement is provided in Attachment 2 to this letter. Implementation of these requirements will not cause UE to be in violation of the provisions of the applicable Commission regulations or the facility operating licenses.

- Item B2:** UE does not consider that the implementation of the requirements in Attachment 2 to the Order would adversely impact safe operation of Callaway Plant.
- Item C1:** The schedule for achieving compliance with the Order is included in Attachment 2 to this letter.
- Item C2:** UE will report to the Commission when full compliance with the requirements in Attachment 2 to the Order have been achieved.