

**AmerenUE**  
Callaway Plant

**Ronald D. Affolter**  
Vice President - Nuclear

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March 18, 2002

U.S. Nuclear Regulatory Commission  
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Rockville, MD 20852

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  
Rockville, MD 20852

Gentlemen:

ULNRC-04622

**DOCKET NUMBER 50-486**  
**UNION ELECTRIC COMPANY**  
**CALLAWAY PLANT**  
**REQUEST FOR EXTENSION OF TIME**  
**TO SUBMIT AN ANSWER OR REQUEST A HEARING**

- 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) 20-Day Response to NRC Order for Interim Safeguards and Security Compensatory Measures, ULNRC-04621 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 licenses 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.

Section IV of the NRC's February 25, 2002, Order Modifying Licensee ("Order") states that, in accordance with 10 CFR 2.202, a Licensee must submit an answer to the Order and may request an extension of time in which to submit an answer or to request a hearing on the Order within 20 days of the date of the Order. In addition, the Order states "where good cause is shown, consideration will be given to extending the time to request a hearing."

*See 1/1 No Safeguards*



Union Electric Company's response to the Order is provided in Reference 2. For the following reasons, UE hereby requests an extension of time to supplement the answer to the Order submitted March 18, 2002 and to request a hearing.

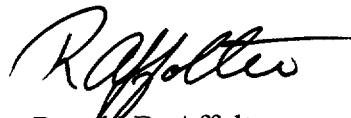
In one instance, because of the extensive analyses required as detailed in the attachment to this letter, we are unable to complete the necessary evaluations within 20 days to determine what actions are appropriate and what an appropriate schedule for implementation would be. Because we will be unable to ascertain within 20 days what actions would be appropriate to comply with Interim Compensatory Measure B.2.a(2), we are also unable at this time to determine whether it is necessary to request a hearing with respect to that measure.

Accordingly, UE respectfully requests that the time within which to respond to Interim Compensatory Measure B.2.a(2), be extended for supplementing UE's response to the item to 20 days after completing the necessary evaluations to determine what actions are appropriate and what an appropriate schedule for implementation would be. We estimate that that evaluation will be completed on or before May 31, 2002. UE also requests that the time to request a hearing on the Order with respect to Interim Compensatory Measure B.2.a(2) be extended to 20 days after UE completes the necessary evaluations and responds to the Commission pursuant to the Order with respect to these measures.

We appreciate your written concurrence to this request for extension as soon as practical.

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 stylized flourish at the end.

Ronald D. Affolter  
Vice President, Nuclear

DS/mlo

Attachment 1: Extension Request for Interim Compensatory Measures Requiring Significant Analysis

U.S. Nuclear Regulatory Commission

March 18, 2002

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

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 18<sup>th</sup> day  
of March, 2002.



Cathy J. Crisp

Notary Public  
Notary Seal

State of Missouri  
Commissioned for Callaway County  
My commission expires Jan. 29, 2006

**EXTENSION REQUEST FOR INTERIM COMPENSATORY  
MEASURE REQUIRING SIGNIFICANT ANALYSES: ITEM B.2.A(2)**

The analyses required to meet Order Conditions B.1, B.2, and C.1 could not be completed within the required order response period for Interim Compensatory Measure B.2.a(2). The following steps and schedule for responding to this section are:

1. UE is obtaining TM5-1300, "Tri-Services Manual, Structures to Resist the Effects of Accidental Explosions" and the BLAST/FX program.
2. UE will analyze the required vehicle bomb impacts using TM5-1300, "Tri-Services Manual, Structures to Resist the Effects of Accidental Explosions", BLAST/FX computer program, Air Force publication AFR 88-22, Structures to Resist the Effects of Accidental Explosions, FACEDAP computer program, or acceptable substitute analysis methodologies for structures and personnel. UE expects to complete this analysis by May 31, 2002.
3. UE will determine the necessary mitigating steps if the analysis identifies vulnerabilities. This determination is expected to be completed by May 31, 2002.
4. Within 20 days after completion of the determination of mitigating measures, UE will provide the responses directed by Order Conditions B.1, B.2, and C.1.