

SAFEGUARDS INFORMATION

October 28, 2004

Mr. Garry L. Randolph
Senior Vice President and Chief Nuclear Officer
c/o Mr. J. Mark Dunbar
Ameren Union Electric Company
Callaway Plant, Unit 1
Post Office Box 620
Fulton, MD 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 - ADMINISTRATIVE CHANGE TO FACILITY
OPERATING LICENSE IN CONJUNCTION WITH THE COMMISSION ORDER
EA-03-086 REGARDING REVISED DESIGN BASIS THREAT (DBT); AND
REVISIONS TO PHYSICAL SECURITY PLAN, TRAINING AND
QUALIFICATION PLAN, AND SAFEGUARDS CONTINGENCY PLAN
(TAC NO. MC2899)

Dear Mr. Randolph:

By letter dated April 26, 2004, Ameren Union Electric Company submitted a supplemental response in accordance with Order EA-03-086, the Order requiring compliance with the revised design basis threat, dated April 29, 2003, (DBT Order) for the Callaway Plant, Unit 1. Section III.A of the DBT Order required licensees to revise physical security plans (PSPs), training and qualification plans (T&Q Plans), and safeguards contingency plans (SCPs) to provide protection against the revised DBT set forth in Attachment 2 to the DBT Order. These revised plans, along with an implementation schedule, were required to be submitted to the Nuclear Regulatory Commission (NRC or the Commission) for review and approval no later than April 29, 2004.

The NRC staff's review of the Callaway Plant, Unit 1 PSP, SCP, and T&Q Plan submitted in your letter dated April 26, 2004, as supplemented on July 9, July 27, August 6, September 3, September 28, October 21, and October 22, 2004, has focused on ensuring the necessary programmatic elements are contained in these plans in order to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety.

NOTICE: Enclosure 2 and contains Safeguards Information. Upon separation from Enclosure 2, this letter and Enclosure 1 are DECONTROLLED.

SAFEGUARDS INFORMATION

The NRC staff has determined that, subject to subsequent inspection and evaluation, these plans contain the necessary programmatic elements that, when effectively implemented, will provide the required high assurance that Callaway Plant, Unit 1 will be protected against the revised DBT. The NRC staff, therefore, approves the PSP, SCP, and T&Q Plan for Callaway Plant, Unit 1. However, ultimately the effectiveness of these plans will be judged on your ability to meet regulatory requirements through facility implementing procedures and site practices. As such your facility implementing procedures and practices will continue to be subject to future NRC review and inspection, including NRC-conducted force-on-force exercises.

In addition, the NRC staff noted that your PSP included alternatives to certain requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 73.55. In each case, the NRC staff found that the alternative measures provide an equivalent level of protection to that of the associated requirement and meet the high assurance objective of 10 CFR 73.55(a). The NRC staff, therefore, approves the alternatives shown in the table below. The NRC staff's evaluation is discussed further in the enclosed Safety Evaluation (SE).

Approved Alternatives to the Requirements of 10 CFR Part 73

SE Section	PSP Section	Alternative to 10 CFR	Description
3.6.2	6.2	73.55(c)(3)	Isolation Zones
3.9.4.3	9.4.3	73.55(d)(4)	Protected Area (PA) vehicle search requirements
3.9.4.4	9.4.4	73.55(d)(1)	PA personnel search requirements
3.9.5.2	9.5	73.55(d)(4)	PA access control requirements
3.10.1	10.1	73.55(c)(5)	PA illumination requirements
3.13.1	14.1	73.55(c)(1) 73.55(d)(7)(i)(B)	Temporary reclassification of Vital Areas to PA status (devitalization)

Finally, consistent with the DBT Order, conforming administrative changes to Facility Operating Licenses (FOLs) are required to ensure implementation of DBT Order requirements. Therefore, an administrative license change to FOL No. NPF-30 is being made to incorporate the reference to the revised PSP, SCP, and T&Q Plan required by the DBT Order. This change complies with the standards and requirements of the Atomic Energy Act of 1954, as amended, and the Commission's rules and regulations set forth in 10 CFR Chapter I.

G. L. Randolph

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Please replace the enclosed page to your FOL as indicated in Enclosure 1.

A copy of our SE with regard to your security plans (designated as Safeguards Information) is provided in Enclosure 2.

Sincerely,

/RA/

John A. Nakoski, Chief
Security Plan Review Team
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosures: 1. Administrative Change to FOL NPF-30
2. SE Regarding the Security Plans (**SAFEGUARDS INFORMATION**)

cc w/encl 1 only: See mailing list 1

cc w/encls 1 and 2: J. Mark Dunbar, Site Security Manager, Ameren Union Electric Company

G. L. Randolph

-3-

Please replace the enclosed page to your FOL as indicated in Enclosure 1.

A copy of our SE with regard to your security plans (designated as Safeguards Information) is provided in Enclosure 2.

Sincerely,

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John A. Nakoski, Chief
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cc w/encls 1 and 2: J. Mark Dunbar, Site Security Manager, Ameren Union Electric Company

DISTRIBUTION (w/o Enclosure 2):

PUBLIC	SPRT R/F	OGC	ACRS	EPeyton	JDonohew
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Accession No.:

OFFICE	SPRT/TL	SPRT/PM	SPRT/LA	SPRT/PL	OGC	NSIR/ SC	NRR/SC
NAME	JCreed	BBenney		JPeralta	SCole	SMorris	JNakoski
DATE	10/24/04	10/24/04	10/24/04	10/24/04	10/24/04	10/28/04	10/28/04

OFFICIAL RECORD COPY

Callaway Plant, Unit 1

cc: w/o encl.:

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AMEREN UNION ELECTRIC COMPANY

DOCKET NO. 50-483

CALLAWAY PLANT, UNIT 1

ADMINISTRATIVE LICENSE CHANGE TO FACILITY OPERATING LICENSE

License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. Consistent with Order EA-03-086, the Order requiring compliance with the revised design basis threat, (DBT Order) issued on April 29, 2003, conforming administrative changes to Facility Operating Licenses (FOLs) are required to ensure implementation of DBT Order requirements. Therefore, an administrative license change to FOL No. NPF-30 is being made to incorporate the reference to the revised Physical Security Plan, Safeguards Contingency Plan, and Training and Qualification Plan required by the DBT Order. These changes comply with the standards and requirements of the Atomic Energy Act (the Act) of 1954, as amended and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this administrative license change can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this administrative license change will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this administrative license change is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

Enclosure 1

2. Accordingly, the FOL is changed as indicated in the Attachment.
3. This administrative license change is effective as of its date of issuance and shall be implemented on or before October 29, 2004.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

John A. Nakoski, Chief
Security Plan Review Team
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to FOL No. NPF-30

Date of Issuance: October 28, 2004

CHANGES TO FACILITY OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Replace the following page of the Facility Operating License NPF-30 with the attached revised page as indicated. The revised page is identified by a revision date and contains marginal lines indicating the area of change.

Remove Page

- 8 -

Insert Page

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(13) LOCA Reanalysis (Section 15, SSER #3)

Prior to restart following the first refueling outage, UE shall submit for NRC review and approval a reanalysis for the worst large break LOCA using an approved ECCS evaluation model. At this time that model is the 1981 Westinghouse model. A modified version of the 1981 model which includes the BART computer code may be used.

(14) Generic Letter 83-28

UE shall submit responses to and implement the requirements of Generic Letter 83-28 on a schedule which is consistent with that given in its May 21, 1984 letter.

(15) Additional Conditions

The Additional Conditions contained in Appendix C, as revised through Amendment No. 133, are hereby incorporated into this license. UE shall operate the facility in accordance with the Additional Conditions.

- D. An Exemption from certain requirements of Appendix J to 10 CFR Part 50, are described in the October 9, 1984 staff letter. This exemption is authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, this exemption is hereby granted pursuant to 10 CFR 50.12. With the granting of this exemption the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.
- E. UE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 10 CFR 73.21 is entitled: "Callaway Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 20, 2004, as supplemented by the letter October 22, 2004.