

August 10, 2006

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Ladies and Gentlemen:

ULNRC-05323

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.**

**30-DAY RESPONSE TO CALLAWAY PLANT - NRC SPECIAL  
INSPECTION REPORT 05000483/2006011, dated July 14, 2006**



The CALLAWAY PLANT - NRC SPECIAL INSPECTION REPORT 5000483/2006011, dated July 14, 2006, was received on July 17, 2006. This report, its enclosure, and attachments were reviewed by Callaway Plant representatives and the following concern was identified within the report.

In the NRC Special Inspection Report, one green finding was listed regarding failure to correct Emergency Operating Procedure deficiencies associated with Final Safety Analysis Report requirements. This finding was described as NRC identified and self revealing. Callaway Plant disagrees with the characterization of this finding as NRC identified and self revealing.

On March 27, 2006, Callaway Plant personnel identified a procedure deficiency due to the amount of time required for Control Room crews to establish component cooling water to the residual heat removal heat exchangers as demonstrated in License Operator simulator training. A Safety Analysis Engineer researched the issue and a corrective action document was initiated regarding the deficiency in the existing procedure. A root cause analysis team of Callaway Plant personnel was formed to investigate the issue, its extent of condition, and any generic related issues.

An NRC Special Inspection Team was formed after the procedure discrepancy was identified and after the root cause analysis team was formed. The Callaway root cause analysis team informed the NRC Special Inspection Team members of the root cause team progress and the NRC Special Inspection Team contributed in discussions regarding the issue during the inspection period. While we recognize the NRC Special Inspection Team members' interactions and discussions with our root cause analysis team, we do not believe that this qualifies the procedure discrepancy to be categorized as NRC identified, on the basis of this input alone.

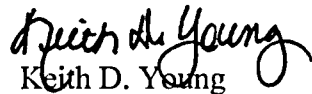
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We do not support a conclusion that our root cause analysis team would not have correctly identified the causes, contributors, and corrective actions for the procedure discrepancy issue without the NRC Inspection Team's involvement.

Callaway Plant believes this finding in the CALLAWAY PLANT - NRC SPECIAL INSPECTION REPORT 5000483/2006011 should be categorized as licensee identified, rather than NRC identified or self revealing, and hereby requests the inspection findings and results be re-evaluated in consideration of this correction.

This letter does not contain any commitments. If you have questions regarding this response, please contact K. A. Mills at 573-676-4317.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith D. Young", written in a cursive style.

Keith D. Young  
Manager, Regulatory Affairs

KDY/DWG/slk

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A160.0761

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*(Certrec receives ALL attachments  
as long as they are non-safeguards  
and publicly disclosed).*

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