



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

August 31, 2007

Charles D. Naslund, Senior Vice
President and Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

SUBJECT: MID-CYCLE PERFORMANCE REVIEW AND INSPECTION PLAN -
CALLAWAY PLANT

Dear Mr. Naslund:

On August 7, 2007, the NRC staff completed its performance review of Callaway Plant. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results for the period July 1, 2006 through June 30, 2007. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility.

This performance review and enclosed inspection plan do not include security information. A separate letter designated and marked as "Official use Only—Security Information" will include the security cornerstone review and resultant inspection plan.

Overall, Callaway Plant operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for the most recent quarter was within the Licensee Response column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight.

In our assessment letter dated March 2, 2007, we advised you of a substantive cross-cutting issue in the area of problem identification and resolution. There were 14 findings related to the corrective action program component of the problem identification and resolution area. Eleven of these findings had a common theme related to the failure of site personnel to thoroughly evaluate problems. Several of the findings were related to the quality of engineering work in evaluating problems and the interface between operations and engineering personnel. We understand that your evaluation of these findings identified actions to address corrective action programmatic deficiencies and plant behavior changes.

During this assessment period, the NRC staff identified 14 findings related to the corrective action program component of the problem identification and resolution area. Eleven of these findings also had a common theme related to site personnel failing to thoroughly evaluate problems. These findings occurred in the Mitigating Systems, Barrier Integrity, and Initiating Events cornerstones. Examples include a failure to implement identified corrective actions to determine the extent of condition of essential service water pipe wall thinning due to microbiologically induced corrosion, a failure to initiate an operability evaluation to address

residual heat removal relief line water hammer concerns, and allowing operation of the ultimate heat sink cooling tower in a mode contrary to the design basis. We understand your corrective actions to address corrective action programmatic changes are near completion; however, actions to address plant behavior changes are still being implemented. As a result, this substantive cross-cutting issue will remain open until we determine, through the implementation of the focused, baseline inspections, that corrective actions have been effective.

The enclosed inspection plan details the inspection, except those related to security, scheduled through December 31, 2008. In addition to the baseline inspection program, we plan to complete Temporary Instruction 2515/166, "Pressurized Water Reactor Containment Sump Blockage." The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

The NRC is currently evaluating the scope and frequency of all the baseline inspection procedures. If the results of the evaluation, or any other circumstances, cause us to change the inspection plan, we will contact you to discuss the change as soon as possible. Please contact Vincent Gaddy at 817-860-8141 with any questions you may have regarding this letter or the inspection plan.

Sincerely,



Vincent Gaddy, Chief
Reactor Projects Branch B
Division of Reactor Projects

Docket: 50-483
License: NPF-30

Enclosure:
Callaway Inspection/Activity Plan

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SUNSI Review Completed: VGG ADAMS: ☒ Yes ☐ No Initials: VGG
☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

R:\ REACTORS\EOC and Midcycle\Midcycle Assessment Letters\2007\CWY

RIV/C: DRP/B concurrence	D: DRS	D: DRP	C: DRP/B signature
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08/20/07 <i>8/23</i>	08/21/07	08/21/07	08/21/07

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*Previous Concurrence

Callaway
Inspection / Activity Plan
09/01/2007 - 12/31/2008

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	RP-ORS5 - OCCUPATIONAL RADIATION SAFETY- ALARA		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		10/01/2007	10/05/2007	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		10/01/2007	10/05/2007	Baseline Inspections
1	IP 71151	Performance Indicator Verification		10/01/2007	10/05/2007	Baseline Inspections
	EXAM - INITIAL EXAM		6			
1	X02355	CALLAWAY - INITIAL EXAM (10/07)		10/22/2007	10/26/2007	Not Applicable
1	X02355	CALLAWAY - INITIAL EXAM (10/07)		11/26/2007	12/01/2007	Not Applicable
	EB2-07B - HEAT SINK INSPECTION		1			
1	IP 7111107B	Heat Sink Performance		11/05/2007	11/09/2007	Baseline Inspections
	EB1TI166 - TI-166 CLOSEOUT		1			
1	IP 2515/166	Pressurized Water Reactor Containment Sump Blockage [NRC GENERIC LETTER 2004-02]		03/18/2008	03/20/2008	Safety Issues
	EB2-12T - TRIENNIAL MAINTENANCE RULE INSPECTION		1			
1	IP 7111112B	Maintenance Effectiveness		03/24/2008	03/28/2008	Baseline Inspections
	RP-ORS1 - OCCUPATIONAL RADIATION SAFETY - ALARA		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		04/14/2008	04/18/2008	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		04/14/2008	04/18/2008	Baseline Inspections
1	IP 71151-OR01	Occupational Exposure Control Effectiveness		04/14/2008	04/18/2008	Baseline Inspections
1	IP 71151-PR01	RETS/ODCM Radiological Effluent		04/14/2008	04/18/2008	Baseline Inspections
	EB2-52B - BIENNIAL PI&R INSPECTION		4			
1	IP 71152B	Identification and Resolution of Problems		04/21/2008	04/25/2008	Baseline Inspections
1	IP 71152B	Identification and Resolution of Problems		05/05/2008	05/09/2008	Baseline Inspections
	EP2 - EP PROGRAM		1			
1	IP 7111402	Alert and Notification System Testing		08/11/2008	08/15/2008	Baseline Inspections
1	IP 7111403	Emergency Response Organization Augmentation Testing		08/11/2008	08/15/2008	Baseline Inspections
1	IP 7111404	Emergency Action Level and Emergency Plan Changes		08/11/2008	08/15/2008	Baseline Inspections
1	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies		08/11/2008	08/15/2008	Baseline Inspections
1	IP 71151-EP01	Drill/Exercise Performance		08/11/2008	08/15/2008	Baseline Inspections
1	IP 71151-EP02	ERO Drill Participation		08/11/2008	08/15/2008	Baseline Inspections
1	IP 71151-EP03	Alert & Notification System		08/11/2008	08/15/2008	Baseline Inspections
	EB1-08 - INSERVICE INSPECTION ACTIVITIES		1			
1	IP 7111108P	Inservice Inspection Activities - PWR		11/03/2008	11/07/2008	Baseline Inspections
	RP-ORS2 - OCCUPATIONAL RADIATION SAFETY-ACCESS		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		10/20/2008	10/24/2008	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		10/20/2008	10/24/2008	Baseline Inspections

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.

Callaway
Inspection / Activity Plan
09/01/2007 - 12/31/2008

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates		Inspection Type
				Start	End	
	RP-ORS2 - OCCUPATIONAL RADIATION SAFETY-ACCESS		1			
1	IP 71151-OR01	Occupational Exposure Control Effectiveness		10/20/2008	10/24/2008	Baseline Inspections
1	IP 71151-PR01	RETS/ODCM Radiological Effluent		10/20/2008	10/24/2008	Baseline Inspections
	RP-ORS3 - OCCUPATIONAL RADIATION SAFETY - ALARA		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		10/27/2008	10/31/2008	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		10/27/2008	10/31/2008	Baseline Inspections
1	IP 71151-OR01	Occupational Exposure Control Effectiveness		10/27/2008	10/31/2008	Baseline Inspections
1	IP 71151-PR01	RETS/ODCM Radiological Effluent		10/27/2008	10/31/2008	Baseline Inspections

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