



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 11, 2012

Mr. Adam C. Heflin
Senior Vice President and
Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 - REVIEW OF 60-DAY RESPONSE TO REQUEST FOR INFORMATION REGARDING RECOMMENDATION 9.3 OF THE NEAR-TERM TASK FORCE RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT (TAC NO. ME8682)

Dear Mr. Heflin:

By letter dated March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC or Commission) issued a Request for Information pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), paragraph 50.54(f) which included the Near Term Task Force (NTTF) Recommendation 9.3 for Emergency Preparedness (EP). Specifically, licensees were requested to assess their means to power communications equipment onsite and offsite during a prolonged Station Blackout (SBO) event and to perform a staffing study to determine the staff required to fill all necessary positions in response to a multi-unit event. If a licensee could not meet the requested 90-day response, then that licensee was required to provide a response within 60 days of the issuance of the letter describing an alternative course of action and estimated completion date.

By letter dated May 10, 2012, Union Electric Company, the licensee for Callaway Plant, Unit 1, submitted its 60-day response proposing an alternative course of action based upon the higher priority to complete the implementation of the revised EP Rule. As discussed in the enclosed NRC staff evaluation, the licensee's alternative approach outlined in its 60-day response letter is consistent with the guidance of industry document Nuclear Energy Institute (NEI) 12-01, "Guidance for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities,"¹ and the direction of the Commission.

In addition, the NRC staff concludes that the licensee provided an adequate basis for its proposed alternative to responding to the 50.54(f) Request for Information regarding communications and staffing for NTTF Recommendation 9.3. In its letter dated May 10, 2012, the licensee identified the regulatory commitments provided in the attachment to the enclosure to this letter.

¹ NRC staff determined NEI 12-01 to be an acceptable approach in a letter dated May 5, 2012 (ADAMS Accession No. ML12131A043).

A. Heflin

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If you have any questions, please contact me at 301-415-8480 or via e-mail at andrew.hon@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Hon', written in a cursive style.

Andrew Hon, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
Staff Evaluation

cc w/encl: Distribution via Listserv

NUCLEAR REGULATORY COMMISSION STAFF EVALUATION
INFORMATION REQUEST MADE UNDER 10 CFR 50.54(f)
REGARDING NEAR-TERM TASK FORCE RECOMMENDATION 9.3
UNION ELECTRIC COMPANY
CALLAWAY PLANT, UNIT 1
DOCKET NO. 50-483

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12073A348), the U.S. Nuclear Regulatory Commission (NRC or Commission) issued a Request for Information pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), paragraph 50.54(f) which included the Near-Term Task Force (NTTF) Recommendation 9.3 for Emergency Preparedness (EP). Specifically, licensees were requested to assess their means to power communications equipment onsite and offsite during a prolonged Station Blackout (SBO) event and to perform a staffing study to determine the staff required to fill all necessary positions in response to a multi-unit event. If a licensee could not meet the requested 90-day response, then that licensee was required to provide a response within 60 days of the issuance of the letter describing an alternative course of action and estimated completion date.

By letter dated May 3, 2012 (ADAMS Accession No. ML12125A410), the Nuclear Energy Institute (NEI) submitted NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0, May 2012. The NRC staff reviewed NEI 12-01 and found it to be an acceptable method for licensees to use when responding to the NRC's 10 CFR 50.54(f) Request for Information regarding communications and staffing for EP. This staff evaluation is focused specifically on the licensee's response to the 10 CFR 50.54(f) letters and not on the associated Orders.

By letter dated May 10, 2012 (ADAMS Accession No. ML12135A382), Union Electric Company, the licensee for Callaway Plant, Unit 1, submitted its 60-day response to the 10 CFR 50.54(f) Request for Information proposing an alternative course of action based upon the higher priority to complete the implementation of the revised EP Rule. The NRC staff reviewed the licensee's proposed alternative against the guidance contained in NEI 12-01. In addition, the NRC staff also considered the direction given by the Commission in the Staff Requirements Memorandum (SRM) to SECY 12-0025, "Proposed Orders and Requests for Information in Response to Lessons Learned from Japan's March 11, 2011, Great Tohoku Earthquake and Tsunami," dated March 9, 2012 (ADAMS Accession No. ML120690347). This SRM stated, in part, that

Completing implementation activities associated with the rule we have already promulgated has greater safety significance and also involves the coordinated actions of our partners in State and local governments. Substantial public credibility benefits accrue from continuing these activities as a priority.

Enclosure

The NRC staff considers the existing EP framework and regulations provides reasonable assurance of adequate protection of public health and safety in the event of a radiological emergency. The revised EP rule that was promulgated on November 23, 2011, initiated a number of activities that will enhance EP programs, including conducting a staffing analysis and enhancing public notification systems. The implementation of the EP rule was given priority by the Commission and the NTTF recommendations should not displace ongoing work that has greater safety benefit, higher priority, or is necessary for continued safe operation of nuclear power plants. The NTTF Report concluded that continued operation and continued licensing activities do not pose an imminent risk to the public health and safety and are not inimical to the common defense and security.

The phased approach to responding to the 10 CFR 50.54(f) letters, combined with the definition of new response requirements associated with Fukushima NTTF Recommendation 4.2, as subsequently modified by the NRC staff and issued as NRC Order EA-12-049 (ADAMS Accession No. ML12054A736), will ensure that enhancements will be made to staffing and communications by licensees. It should be noted that the 10 CFR 50.54(f) letter and implementation of the Order includes completion of actions related to response assignments, staffing changes, issuance of new or revised procedures or guidelines, and training. Activities are ongoing by both the NRC and industry to initiate interim actions as a result of lessons learned from the events which will be provided in the 90-day response such as:

- Methods to access the site
- Notification of staff
- Interim actions taken to date

Given the above and that the licensee's approach was found to be consistent with the guidance of NEI 12-01 and the direction of the Commission, the NRC staff concludes that the licensee has provided an adequate basis for its proposed alternative responding to the 10 CFR 50.54(f) letters regarding communications and staffing for Recommendation 9.3.

In its letter dated May 10, 2012, the licensee identified the regulatory commitments provided in the attachment to this staff evaluation.

Attachment

LIST OF REGULATORY COMMITMENTS PROVIDED IN
UNION ELECTRIC COMPANY'S LETTER DATED MAY 10, 2012

The following table identifies those actions committed to by Union Electric Company, the licensee for Callaway Plant, Unit 1, in Attachment 1 of its letter dated May 10, 2012 response. There are no commitments associated with items listed in Attachment 1 of that response where there is no proposed change to the response as requested in the 50.54(f) letter dated March 12, 2012. In addition, any other statements in that response are provided for information purposes and are not considered commitments.

COMMITMENTS – Communications (Numbers in this column correspond to Attachment 1)	Due Date/Event	Commitment Number
1. Provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event meeting the conditions described the Discussion section (of the March 12, 2012 50.54(f) letter).	10/31/2012	50215
3. Provide an implementation schedule of the time needed to implement the results of the communications assessment.	10/31/2012	50216
COMMITMENTS - Staffing		
1. Provide onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment]	June 4, 2014*	50217
2. Sub-Action 2: Provide a schedule of the time to needed to implement changes associated with the Phase 2 of the onsite and augmented staffing assessment.	June 4, 2014*	50218
6. Identify changes that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.). Changes will be identified as follows: Those associated with the Phase 2 staffing assessment.	June 4, 2014*	50219

* This date corresponds to 4 months prior to the beginning of the second refueling outage, as used within the context of NRC Order EA-12-049, which is currently scheduled to begin in October, 2014.

A. Heflin

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If you have any questions, please contact me at 301-415-8480 or via e-mail at andrew.hon@nrc.gov.

Sincerely,

/RA/

Andrew Hon, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
Staff Evaluation

cc w/encl: Distribution via Listserv

DISTRIBUTION:

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CMurray, NSIR

JShea, NRR/JLD

JKratchman, NRR/JLD

ADAMS Accession No. ML12156A079

*via email

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA	NSIR/DPR/DDEPE/NRLB/BC
NAME	AHon	NKalyanam	JBurkhardt	KWilliams*
DATE	6/5/12	6/6/12	6/5/12	5/24/12
OFFICE	NRR/JLD/PMB/BC	NRR/DORL/LPL4/BC	NRR/DORL/LPL4/PM	
NAME	RPascarelli	MMarkley	AHon	
DATE	6/7/12	6/11/12	6/11/12	

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