



July 12, 2012

ULNRC-05883

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
FACILITY OPERATING LICENSE NPF-30  
REQUEST TO CORRECT TYPOGRAPHICAL ERROR IDENTIFIED IN  
TECHNICAL SPECIFICATION 3.1.9 REQUIRED ACTION A.3**

The purpose of this letter is to request action for correction of a typographical error identified in Technical Specification (TS) 3.1.9, "RCS Boron Limitations < 500°F," of the Callaway Technical Specifications. The error is that the "≥" symbol is incorrectly displayed as "Š" in front of the value for the reactor coolant system (RCS) cold leg temperature limit specified in Required Action A.3. As explained below, the error occurred in connection with the issuance of Amendment 202 to the Callaway Operating License

TS 3.1.9 was added to the Technical Specifications via License Amendment 174 which was issued and implemented in 2006. As intended, the "≥" symbol was present in Required Action A.3 at that time. No subsequent TS changes were made such that they would have directly affected TS 3.1.9 until the processing and issuance of Amendment 202. In that regard, it was recently determined that the "≥" symbol was inadvertently changed from a symbol character to a text character with the issuance of Amendment 202 in July 2011. Amendment 202 extensively revised the Technical Specifications by relocating specific surveillance frequencies to a licensee controlled program such that a significant amount of text was inserted into and removed from many TS sections. Due to the text changes, the amendment required issuing additional revised TS pages due to re-pagination.

In the software used for the Callaway Technical Specifications, Character Tags are used to change the look of text and to ensure that the documents are formatted consistently. For TS pages that are incorporated into the amendment because of re-pagination, the existing revision bar Character Tags are removed and a new revision bar is added to the footer to show that the change to the page is due to page re-numbering. It appears that during Amendment 202, the symbol Character Tag for Required Action A.3 was inadvertently removed with the removal of the revision Character Tags on this page.

July 12, 2012

Page 2


Due to the volume of pages required to be issued for Amendment 202, this error was not identified in the review that was conducted prior to transmitting the clean typed pages to the NRC for issuance of the amendment.

In order to correct the problem of the missing " $\geq$ " in Required Action A.3, Ameren Missouri is hereby providing (in the enclosure to this letter) a corrected, clean copy of page 3.1-22 (with Amendment No. 202 indicated on the page) for use in re-issuance of the corrected page. This will enable the NRC to re-issue a corrected TS page 3.1-22 for License Amendment 202, reflecting the corrected symbol in front of the value for the RCS cold leg temperature specified in Required Action A.3.

It should be noted that a review of the Amendment 202 issued pages and of the current Technical Specifications did not identify any additional issues with symbol Character Tags in the TS documents.

This letter contains no new commitments. Please contact Tom Elwood, Supervising Engineer, Regulatory Affairs and Licensing at 314-225-1905 for any questions you may have regarding this submittal.

Sincerely,

  
Scott A. Maglio  
Regulatory Affairs Manager

Enclosure

cc: Mr. Elmo E. Collins  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Mr. Andrew Hon  
Senior Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop O-8G14  
Washington, DC 20555-2738

**Index and send hardcopy to QA File A160.0761**

**Hardcopy:**

Certrec Corporation

4150 International Plaza Suite 820

Fort Worth, TX 76109

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

**Electronic distribution for the following can be made via Responses and Reports ULNRC Distribution:**

A. C. Heflin

F. M. Diya

C. O. Reasoner III

L. H. Graessle

S. M. Maglio

T. B. Elwood

R. Holmes-Bobo

NSRB Secretary

Mr. Bill Muilenburg (WCNOC)

Mr. Tim Hope (Luminant Power)

Mr. Ron Barnes (APS)

Mr. Tom Baldwin (PG&E)

Mr. Mike Murray (STPNOC)

Ms. Linda Conklin (SCE)

Mr. John O'Neill (Pillsbury Winthrop Shaw Pittman LLP)

### 3.1 REACTIVITY CONTROL SYSTEMS

#### 3.1.9 RCS Boron Limitations < 500°F

LCO 3.1.9 The boron concentration of the Reactor Coolant System (RCS) shall be greater than the all rods out (ARO) critical boron concentration.

APPLICABILITY: MODE 2 with  $k_{eff} < 1.0$  with any RCS cold leg temperature < 500°F and with Rod Control System capable of rod withdrawal,  
MODE 3 with any RCS cold leg temperature < 500°F and with Rod Control System capable of rod withdrawal,  
MODES 4 and 5 with Rod Control System capable of rod withdrawal.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RCS boron concentration not within limit.	A.1 Initiate boration to restore RCS boron concentration to within limit.	Immediately
	OR	
	A.2 Initiate action to place the Rod Control System in a condition incapable of rod withdrawal.	Immediately
	OR	
	A.3 ----- NOTE ----- Not applicable in MODES 4 and 5. -----	
	Initiate action to increase all RCS cold leg temperatures to $\geq 500^\circ\text{F}$ .	Immediately