



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

April 11, 2014

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

**SUBJECT: CALLAWAY PLANT, UNIT 1 – STAFF ASSESSMENT OF THE SEISMIC
WALKDOWN REPORT SUPPORTING IMPLEMENTATION OF NEAR-TERM
TASK FORCE RECOMMENDATION 2.3 RELATED TO THE FUKUSHIMA
DAI-ICHI NUCLEAR POWER PLANT ACCIDENT (TAC NO. MF0103)**

Dear Mr. Diya:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information letter per Title 10 of the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter). The 50.54(f) letter was issued to power reactor licensees and holders of construction permits requesting addressees to provide further information to support the NRC staff's evaluation of regulatory actions to be taken in response to lessons learned from Japan's March 11, 2011, Great Tōhoku Earthquake and subsequent tsunami. The request addressed the methods and procedures for nuclear power plant licensees to conduct seismic and flooding hazard walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions through the corrective action program, and to verify the adequacy of the monitoring and maintenance procedures.

By letter dated November 27, 2012, as supplemented by letter dated January 14, 2014, Union Electric Company (dba Ameren Missouri) submitted its Seismic Walkdown Report as requested in Enclosure 3 of the 50.54(f) letter for the Callaway Plant, Unit 1. By letter dated November 26, 2013, Ameren Missouri provided a response to the NRC's request for additional information for the staff to complete its assessments.

The NRC staff reviewed the information provided and determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter, as documented in the enclosed staff assessment.

F. Diya

- 2 -

If you have any questions, please contact me at 301-415-2296 or via e-mail at fred.lyon@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "CF Lyon".

Carl F. Lyon, Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
Staff Assessment

cc w/encl: Distribution via Listserv

STAFF ASSESSMENT OF SEISMIC WALKDOWN REPORT
NEAR-TERM TASK FORCE RECOMMENDATION 2.3 RELATED TO
THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

1.0 INTRODUCTION

On March 12, 2012,¹ the U.S. Nuclear Regulatory Commission (NRC) issued a request for information per Title 10 of the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter) to all power reactor licensees and holders of construction permits in active or deferred status. The request was part of the implementation of lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 3, "Recommendation 2.3: Seismic,"² to the 50.54(f) letter requested licensees to conduct seismic walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions using the corrective action program (CAP), verify the adequacy of monitoring and maintenance procedures, and report the results to the NRC.

Enclosure 3 of the 50.54(f) letter requested licensees to provide the following:

- a. Information concerning the plant-specific hazard licensing bases and a description of the protection and mitigation features considered in the licensing basis evaluation.
- b. Information related to the implementation of the walkdown process.
- c. A list of plant-specific vulnerabilities identified by the IPEEE [Individual Plant Examination of External Events] program and a description of the actions taken to eliminate or reduce them...
- d. Results of the walkdown including key findings and identified degraded, nonconforming, or unanalyzed conditions...
- e. Any planned or newly installed protection and mitigation features.
- f. Results and any subsequent actions taken in response to the peer review.

In accordance with the 50.54(f) letter, Enclosure 3, Required Response Item 2, licensees were required to submit a response within 180 days of the NRC's endorsement of the seismic

¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340.

² ADAMS Accession No. ML12056A049.

walkdown process. By letter dated May 29, 2012,³ the Nuclear Energy Institute (NEI) staff submitted Electric Power Research Institute (EPRI) document 1025286, "Seismic Walkdown Guidance for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic," (walkdown guidance) to the NRC staff to consider for endorsement. By letter dated May 31, 2012,⁴ the NRC staff endorsed the walkdown guidance.

By letter dated November 27, 2012,⁵ Union Electric Company (dba Ameren Missouri, the licensee) provided a response to Enclosure 3 of the 50.54(f) letter Required Response Item 2, for Callaway Plant, Unit 1 (Callaway). In addition to the aforementioned letter, the licensee, by letter dated January 14, 2014,⁶ provided a supplement to the initial seismic walkdown report. The purpose of the latter submittal was to provide information on inaccessible components not completed during the initial walkdowns.

The NRC staff reviewed the walkdown report and determined that additional supplemental information would assist the staff in completing its review. By letter dated November 1, 2013,⁷ the NRC staff requested additional information to gain a better understanding of the processes and procedures used by the licensee in conducting the walkdowns and walk-bys. By letter dated November 26, 2013,⁸ the licensee responded to the NRC staff's request for additional information (RAI).

The NRC staff evaluated the licensee's submittals to determine if the information provided in the walkdown report met the intent of the walkdown guidance and if the licensee responded appropriately to Enclosure 3 of the 50.54(f) letter.

2.0 REGULATORY EVALUATION

The systems, structures, and components (SSCs) important to safety in operating nuclear power plants are designed either in accordance with, or meet the intent of Appendix A to 10 CFR Part 50, General Design Criteria (GDC) 2: "Design Bases for Protection Against Natural Phenomena," and Appendix A to 10 CFR Part 100, "Reactor Site Criteria." GDC 2 states that SSCs important to safety at nuclear power plants shall be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunamis, and seiches without loss of capability to perform their safety functions.

For initial licensing, each licensee was required to develop and maintain design bases that, as defined by 10 CFR 50.2, identify the specific functions that an SSC of a facility must perform, and the specific values or ranges of values chosen for controlling parameters as reference bounds for the design.

GDC 2 states that the design bases for the SSCs shall reflect appropriate consideration of the most severe natural phenomena that have been historically reported for the site and

³ ADAMS Accession No. ML121640872.

⁴ ADAMS Accession No. ML12145A529.

⁵ ADAMS Accession No. ML123470150.

⁶ ADAMS Accession No. ML14015A021.

⁷ ADAMS Accession No. ML13304B418.

⁸ ADAMS Accession No. ML13331A572.

surrounding area with sufficient margin for the limited accuracy, quantity, and period of time in which the historical data have been accumulated.

The current licensing basis (CLB) is the set of NRC requirements applicable to a specific plant, including the licensee's docketed commitments for ensuring compliance with, and operation within, applicable NRC requirements and the plant-specific design basis, including all modifications and additions to such commitments over the life of the license.

3.0 TECHNICAL EVALUATION

3.1 Seismic Licensing Basis Information

The licensee provided information on the plant-specific licensing basis for the Seismic Category I SSCs for Callaway in Section 1 of the walkdown report. Consistent with the walkdown guidance, the NRC staff noted that the report includes a summary of the Safe Shutdown Earthquake (SSE) and a description of the codes, standards, and methods that were used in the design of the Seismic Category I SSCs for meeting the plant-specific seismic licensing basis requirements. The NRC staff reviewed Section 1 of the walkdown report, focusing on the summary of the SSE and the design codes used in the design.

Based on its review, the NRC staff concludes that the licensee has provided information on the plant-specific seismic licensing basis and a description of the protection and mitigation features considered in the licensing bases evaluation consistent with Section 8, Submittal Report, of the walkdown guidance.

3.2 Seismic Walkdown Methodology Implementation

Section 2, Personnel Qualifications; Section 3, Selection of SSCs; Section 4, Seismic Walkdowns and Area Walk-Bys; and Section 5, Seismic Licensing Basis Evaluations, of the walkdown guidance provide information to licensees regarding the implementation of an appropriate seismic walkdown methodology. By letter dated July 09, 2012,⁹ the licensee confirmed that it would utilize the walkdown guidance in the performance of the seismic walkdowns at Callaway.

The walkdown report dated November 27, 2012, and supplemented on January 14, 2014, did not identify deviations from the walkdown guidance.

The NRC staff reviewed the following sections of the walkdown methodology implementation provided in the walkdown report:

- Personnel Qualifications
- Development of the Seismic Walkdown Equipment Lists (SWELs)
- Implementation of the Walkdown Process
- Licensing Basis Evaluations and Results

⁹ ADAMS Accession No. ML123470150.

3.2.1 Personnel Qualifications

Section 2, Personnel Qualifications, of the walkdown guidance provides licensees with qualification information for personnel involved in the conduct of the seismic walkdowns and area walk-bys.

The NRC staff reviewed the information provided in Section 2, and Appendix H of the walkdown report, which includes information on the walkdown personnel and their qualifications. Specifically, the staff reviewed the summary of the background, experience, and level of involvement for the following personnel involved in the seismic walkdown activities: equipment selection personnel, seismic walkdown engineers (SWEs), licensing basis reviewers, IPEEE reviewers, peer review team, and operations staff.

The NRC staff noted that the walkdown report does not provide specific experience and qualifications for the operations staff involved in the walkdown activities. However, the licensee stated that plant operators were involved in the equipment selection process and signed the final SWEL. Since plant operators are qualified by the NRC and continuously train to maintain their license, plant operators have the appropriate operations knowledge and experience to support the seismic walkdown activities.

Based on the review of the licensee's submittals, the NRC staff concludes that those involved in the seismic walkdown activities have the appropriate seismic background, knowledge, and experience, as specified in Section 2 of the walkdown guidance.

3.2.2 Development of the SWELs

Section 3, Selection of SSCs, of the walkdown guidance provides information to licensees for selecting the SSCs that should be placed on the SWELs, so that they can be walked down by qualified personnel.

The NRC staff reviewed the overall process used by the licensee to develop the Callaway base list, SWEL 1 (sample list of designated safety functions equipment), and SWEL 2 (sample list of spent fuel pool (SFP)-related equipment). The overall equipment selection process followed the screening process shown in Figures 1-1 and 1-2 of the walkdown guidance. Based on Appendix G and the discussion in Sections 3.2 and 3.3 of the walkdown report, Callaway SWELs 1 and 2 meet the inclusion requirements of the walkdown guidance. Specifically, the following attributes were considered in the sample selection:

- A variety of systems, equipment and environments
- IPEEE equipment
- Major new or replacement equipment
- Risk considerations

Due to individual plant configurations and the walkdown guidance screening process followed to select the final SWEL equipment, it is possible that some classes of equipment will not be represented on the SWEL. The walkdown guidance recognizes this is due to the equipment not being present in the plant (e.g., some plants generate direct current power using inverters and, therefore, do not have motor generators) or the equipment being screened out during the screening process (the screening process is described in Section 3 of the walkdown guidance). The NRC staff noted that a detailed explanation was provided justifying cases where specific classes of equipment were not included as part of the SWEL, and concludes, therefore, that these exclusions are acceptable.

The NRC staff noted that no rapid drain-down items were included as part of the SWEL 2, as described in Section 3 of the guidance. In Section 3.3.2 of the walkdown report, the licensee stated there are no components that could, upon failure, result in rapid drain-down of the SFP water level to below 10 feet above the top of the fuel. After reviewing the information provided in this section, the staff concludes that the licensee provided adequate justification for not including a rapid drain-down list as part of the SWEL 2.

After reviewing SWELs 1 and 2, the NRC staff concludes that the sample of SSCs represents a diversity of component types and assures inclusion of components from critical systems and functions, thereby meeting the intent of the walkdown guidance. In addition, the NRC staff notes that the equipment selection personnel were appropriately supported by plant operations staff as described in the walkdown guidance.

3.2.3 Implementation of the Walkdown Process

Section 4, Seismic Walkdowns and Area Walk-Bys, of the walkdown guidance provides information to licensees regarding the conduct of the seismic walkdowns and area walk-bys for each site.

The NRC staff reviewed Section 4 of the walkdown report, which summarizes the results of the seismic walkdowns and area walk-bys, including an overview of the number of items walked down and the number of areas walked-by. The walkdown report states that teams consisting of two qualified SWEs conducted the seismic walkdowns and area walk-bys. SWEs were supported by members of Callaway Operations and Engineering personnel. These activities were conducted during the week of September 10, 2012. In addition, a subsequent set of walkdowns were performed between March and August 2013, as stated in the licensee's letter dated January 14, 2014. The purpose of the last activity was to complete a number of items that were inaccessible during the initial walkdowns.

The walkdown report also states that the SWEs discussed their observations and judgments with each other during the walkdowns. Additionally, the SWEs agreed on the results of their seismic walkdowns and area walk-bys before reporting the results of their review. Appendices A and B of the initial and supplemental walkdown report provide the completed seismic walkdown checklists (SWCs) and area walk-by checklists (AWCs), documenting the results for each item of equipment on SWEL 1 and 2 and each area containing SWEL equipment. The licensee used the checklists provided in Appendix C of the walkdown guidance report without modification.

The NRC staff reviewed the original checklists and noted that SWCs and AWCs were all signed on November 16 and 19, 2012, several months after the initial walkdowns were conducted. The staff reviewed the overall walkdown process described in the walkdown report and additional clarification provided as part of response to request for additional information (RAI) 1 (discussed below). The licensee stated that the checklists completed in the field as part of the walkdowns were modified in order to document how issues were evaluated and their resolutions. These modified checklists which were signed on November 16 and 19, 2012, were included as part of the walkdown report. The staff concludes that the process followed to update these checklists was acceptable since all the issues and their resolutions identified in the field were documented properly in the checklists.

As stated above, the licensee documented cases of potentially adverse seismic conditions (PASCs) in the checklists for further evaluation. Appendix C of the walkdown report list the PASCs identified during the seismic walkdowns and the area walk-bys. The table, provided as part of Appendix C, describes how the condition was addressed (e.g., placement in the CAP) and their resolution. Based on the initial review of the checklists, the NRC staff was unable to confirm that all the PASCs identified during the walkdowns were included in this table. As such, by letter dated November 1, 2013, the NRC staff issued two questions in an RAI in order to obtain clarification regarding the process followed by the licensee when evaluating conditions identified in the field during the walkdowns and walk-bys. Specifically, in RAI 1, the staff requested the licensee to provide further explanation regarding how a field observation was determined to be PASC, and to ensure that the basis for determination was addressed using normal plant processes and documented in the walkdown report. In response to RAI 1, the licensee provided a Figure 1-1 illustrating a flow chart of the seismic walkdowns evaluation process. The licensee confirmed that observations that could not be judged readily to be acceptable with respect to its CLB during the walkdown, were identified as PASCs on the SWC and AWC. These PASCs were further evaluated in the field and if the condition was determined to not meet the CLB or required additional evaluation conditions were denoted as an "N" (No) or "U" (Unknown) in the checklist. All items marked "N" and "U" in the field were entered into the licensing basis evaluation process as PASCs. The licensee referred to Appendix C of the walkdown report which includes a description of all these items. Furthermore, the licensee stated that licensing basis evaluation items not reconciled through the process to meet their CLB were entered into the CAP. The licensee also clarified that those PASCs that were later found to meet the plant's CLB were changed to "Y" (Yes) in the checklists provided in the final report. The licensee updated the table provided as part of Appendix C to include one additional PASC that was entered into the CAP as well as CAP initiation and planned completion dates for the other items. This table was referenced as Table 1-1 of the RAI response.

After evaluating the licensee's response and reviewing Appendix C and Table 1-1 of the RAI response, the NRC staff concludes that the licensee responded appropriately to RAI 1, PASCs were identified and documented properly and the summary tables included in Appendix C and updated as Table 1-1 of the RAI response are considered complete.

In addition to the information provided above, the NRC staff notes that anchorage configurations were verified to be consistent with existing plant documentation for at least 50 percent of the SWEL items, in accordance with Section 4 of the walkdown guidance.

Sections 3.4.2 and 4.3 of the supplemental walkdown report confirms that additional walkdowns were conducted between March and August 2013 to perform internal inspections of selected electrical equipment cabinets that were not completely inspected or were not opened during the initial walkdowns. The NRC staff reviewed the seismic walkdown checklists provided in the supplemental report and confirmed that cabinets were opened to determine if any adverse conditions existed of internal equipment.

Based on the above, the NRC staff concludes that the licensee's implementation of the walkdown process meets the intent of the walkdown guidance.

3.2.4 Licensing Basis Evaluations and Results

Section 5, Seismic Licensing Basis Evaluations, of the walkdown guidance provides information to licensees regarding the conduct of licensing basis evaluations for items identified during the seismic walkdowns as degraded, nonconforming, or unanalyzed that might have potential seismic significance.

The NRC staff reviewed Section 5 of the Callaway Walkdown Report, which discusses the process for conducting the seismic licensing basis evaluations of the PASCs identified during the seismic walkdowns and area walk-bys. The licensee stated that it performed its licensing basis evaluations for all the identified PASCs. For those licensing basis evaluation items not reconciled through the process to meet their CLB were entered into the CAP. Appendix C of the walkdown report lists the key licensee findings, and provides a complete list of the potentially degraded, nonconforming, or unanalyzed conditions. The table provided in Appendix C and updated in Table 1-1 of the RAI response also describes the actions taken or planned to address these conditions, including the current status of each of the items the licensee entered into the CAP.

The NRC staff reviewed the licensing basis evaluations and CAP entries and the description of the actions taken or planned to address deficiencies. The staff concludes that the licensee appropriately identified potentially degraded, nonconforming, or unanalyzed conditions and entered them into the CAP, which meets the intent of the walkdown guidance.

3.2.5 Conclusion

Based on the above, the NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance for personnel qualifications, development of SWELs, implementation of the walkdown process, and seismic licensing basis evaluations.

3.3 Peer Review

Section 6, Peer Review, of the walkdown guidance provides licensees with information regarding the conduct of peer reviews for the activities performed during the seismic walkdowns. Page 6-1 of the walkdown guidance identifies the following activities to be conducted during the peer review process:

- Review the selection of the SSCs included on the SWELs

- Review a sample of the checklists prepared for the seismic walkdowns and area walk-bys
- Review the licensing basis evaluations
- Review the decisions for entering the potentially adverse conditions into the CAP
- Review the walkdown report
- Summarize the results of the peer review process in the walkdown report

The NRC staff reviewed the information provided in Section 6 and Appendix D of the Callaway Walkdown Report which describes the conduct of the peer review. In addition, the staff reviewed the response to RAI 2. In RAI 2, the staff requested the licensee to provide additional information on the overall peer review process that was followed as part of the walkdown activities. Specifically, the NRC staff requested the licensee to confirm that the activities identified in page 6-1 of the walkdown guidance were assessed and documented in the report. The NRC also requested the licensee to confirm that any individual involved in performing any given walkdown activity was not a peer reviewer for that same activity. In response to RAI 2, the licensee confirmed that all the activities identified on page 6-1 of the walkdown guidance were included as part of the peer review process and referred to the summary of the peer review activities provided in Section 6 of the walkdown report. In addition, the licensee stated that none of the peer review engineers were involved in the seismic walkdown inspection process in order to further demonstrate the independence of the peer review process.

The NRC staff reviewed the licensee's summary of each of these activities, which included the peer review team members' level of involvement, the peer review findings, and resolution of peer review comments. After reviewing the licensee's submittals, the NRC staff concludes that the licensee sufficiently documented the results of the peer review activities and how these reviews affected the work described in the walkdown report.

Based on the above, the NRC staff concludes that the licensee's results of the peer review and subsequent actions taken in response to the peer review meets the intent of Section 6 of the walkdown guidance.

3.4 IPEEE Information

Section 7, IPEEE Vulnerabilities, of the walkdown guidance provides information to licensees regarding the reporting of the evaluations conducted and actions taken in response to seismic vulnerabilities identified during the IPEEE program. Through the IPEEE program and Generic Letter (GL) 88-20, "Individual Plant Examination of External Events for Severe Accident Vulnerabilities," dated November 23, 1988,¹⁰ licensees previously had performed a systematic examination to identify any plant-specific vulnerabilities to severe accidents.

The licensee provided background information regarding its IPEEE program. The licensee stated that several issues were identified during the IPEEE walkdowns. A description of these conditions was provided in Table 7-1 of the walkdown report and notes where a plant

¹⁰ ADAMS Accession No. ML031150465.

modification was required to resolve. This table also includes the licensee's responses to those issues and their resolution.

Based on its review of Section 7 of the walkdown report, the NRC staff concludes that the licensee's identification of plant-specific vulnerabilities (including anomalies, outliers and other findings) identified by the IPEEE program, as well as actions taken to eliminate or reduce them, meets the intent of Section 7 of the walkdown guidance.

3.5 Planned Upgrades

The licensee did not identify any planned or newly installed protection and mitigation features in the walkdown report.

3.6 NRC Oversight

3.6.1 Independent Verification by Resident Inspectors

On July 6, 2012,¹¹ the NRC issued Temporary Instruction (TI) 2515/188, "Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns." In accordance with the TI, NRC inspectors independently verified that the Callaway licensee implemented the seismic walkdowns in accordance with the walkdown guidance. Additionally, the inspectors independently performed walkdowns of a sample of seismic protection features. The inspection report dated August 13, 2013,¹² documents the results of this inspection and states that no findings were identified.

4.0 CONCLUSION

The NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance. The staff concludes that the licensee, through the implementation of the walkdown guidance activities and, in accordance with plant processes and procedures, verified the plant configuration with the current seismic licensing basis; addressed degraded, nonconforming, or unanalyzed seismic conditions; and verified the adequacy of monitoring and maintenance programs for protective features. Furthermore, the staff notes that no immediate safety concerns were identified. The NRC staff concludes that the licensee responded appropriately to Enclosure 3 of the 50.54(f) letter.

¹¹ ADAMS Accession No. ML12156A052.

¹² ADAMS Accession No. ML13225A359.

F. Diya

- 2 -

If you have any questions, please contact me at 301-415-2296 or via e-mail at fred.lyon@nrc.gov.

Sincerely,

/RA/

Carl F. Lyon, Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
Staff Assessment

cc w/encl: Distribution via Listserv

DISTRIBUTION:

PUBLIC

LPL4-1 Reading

RidsAcrsAcnw_MailCTR Resource

RidsNroDsea Resource

RidsNrrDorLpl4-1 Resource

RidsNrrLAJBurkhardt Resource

RidsOpaMail Resource

RidsNrrPMCallaway Resource

RidsRgn4MailCenter Resource

LRegner, NRR

DJackson, NRO

RKaras, NRO

FVega, NRO

MJardaneh, NRO

NDiFrancesco, NRR

NChokshi, NRO

SFlanders, NRO

JNick, EDO RIV

ADAMS Accession No.: ML14083A411

*email 3/20/14

OFFICE	NRR/DORL/LPL4-1/PM	NRR/DORL/LPL4-1/LA	NRO/DSEA/RGS2/BC*	NRR/DORL/LPL4-1/BC	NRR/DORL/LPL4-1/PM
NAME	FLyon	JBurkhardt	DJackson	MMarkley	FLyon
DATE	4/8/14	4/8/14	3/20/14	4/11/14	4/11/14

OFFICIAL RECORD COPY