



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

April 11, 2014

Mr. Fadi Diya
Senior Vice President and
Chief Nuclear Officer
Ameren Missouri Callaway
Energy Center
P.O. Box 620
Fulton, MO 65251

SUBJECT: REGARDING AMEREN MISSOURI LICENSE RENEWAL AMENDMENT 31,
NATIONAL FIRE PROTECTION ASSOCIATION 805 CHANGES TO THE
CALLAWAY PLANT, UNIT 1, LICENSE RENEWAL APPLICATION
(TAC NO. ME7708)

Dear Mr. Diya:

By letter dated December 15, 2011, Union Electric Company (Ameren Missouri) submitted a license renewal application (LRA) pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51 and 10 CFR Part 54, to renew operating license NPF-30 for the Callaway Plant, Unit 1 (Callaway), for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). This letter is to inform you of the staff's concerns regarding the sufficiency of information in your letter dated February 14, 2014, "Amendment 31 to the Callaway LRA," regarding proposed changes to the LRA as a result of the approved National Fire Protection Association (NFPA) 805 license amendment being applied to Callaway.

The staff noted in its letter dated February 26, 2014, that to complete all the necessary safety review activities (e.g., Advisory Committee on Reactor Safeguards (ACRS) Subcommittee meeting, final license renewal safety evaluation report (SER), ACRS Full Committee meeting) to support issuance of a renewed license for Callaway before the end of 2014, Ameren Missouri needs to have provided final responses to all unresolved technical issues to the staff no later than May 16, 2014. The staff also noted in this letter that the "timeliness and quality of your responses is essential to maintain the schedule, and any delay could result in additional revisions to the enclosed schedule with the potential of leaving milestone schedule dates to be determined." One of these unresolved technical issues is Open Item 2.3.3.20-1, "Scoping of Fire Protection systems, structures, and components (SSCs)," as documented in the staff's "Safety Evaluation Report With Open Items Related to the License Renewal of Callaway Plant, Unit 1," dated April 2013. This issue pertains to the impacts of NFPA 805 on the LRA, and is to be addressed by supplying a gap analysis to the staff that states any changes to the LRA and provides adequate justification for any proposed changes.

After performing an initial review of Amendment 31, the staff has some concerns related to the adequacy of docketed justification for several areas of this response.

The staff's initial review encountered several issues, some of which are described here:

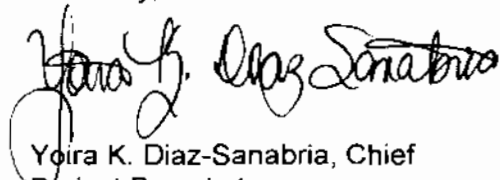
- The staff was not able to determine the rationale or specific bases for the changes (SSCs added or removed) to the particular fire protection components and features listed in Amendment 31's LRA gap analysis.

- The staff was not able to determine the details of, nor justification for, to the LRA as a result of transitioning from the existing to the NFPA 805-based fire protection program with regard to water-based and gaseous fire suppression systems.
- The amendment does not discuss whether an NFPA 805 "monitoring program" will be used to age manage any SSCs as a part of or in place of the Fire Protection Aging Management Program in the LRA.
- The amendment does not document the rationale or basis for removing an entire system from the scope of license renewal (the Radwaste Building HVAC system).
- The staff noted that, as part of the NRC review of the Callaway NFPA 805 license amendment, Ameren Missouri made several changes to the associated probabilistic risk analysis (PRA). The staff was not able to confirm whether Ameren Missouri considered or revised any PRA aspects associated with the original LRA submittal (e.g., for the severe accident mitigation analysis) as a result of these NFPA 805-associated PRA changes.

As discussed in a conference call on milestones and schedules for the Callaway license renewal review held on March 19, 2014, with Sarah Kovaleski of your staff, we understand that Ameren Missouri will revise or supplement Amendment 31 to provide more detailed explanations and justifications of the items in your gap analysis to the staff by April 15, 2014. It should be noted that any supporting documentation that you wish to provide for NRC review should also be made available to the staff by that time. It was agreed that providing this information as stated would afford the staff an opportunity to review it in order to make a determination as to whether the current published schedule of milestones can be retained.

If you have any questions, please contact Mr. John Daily, project manager for the Callaway LRA safety review, by telephone at 301-415-3873 or by e-mail at John.Daily@nrc.gov.

Sincerely,



Yoira K. Diaz-Sanabria, Chief
Project Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

- The staff was not able to determine the details of, nor justification for, to the LRA as a result of transitioning from the existing to the NFPA 805-based fire protection program with regard to water-based and gaseous fire suppression systems.
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If you have any questions, please contact Mr. John Daily, project manager for the Callaway LRA safety review, by telephone at 301-415-3873 or by e-mail at John.Daily@nrc.gov.

Sincerely,

/RA/

Yaira K. Diaz-Sanabria, Chief
Project Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-483

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