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March 31, 2014

ULNRC-06100

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

10 CFR 50.54(f)

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
PATH FORWARD FOR RESOLUTION OF
GENERIC SAFETY ISSUE (GSI) -191**

- References:
- 1) Ameren Missouri letter ULNRC-05989, "Path Forward for Resolution of GSI-191," dated May 16, 2013 (Accession No. ML13136A290)
 - 2) Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors," dated September 13, 2004 (Accession No. ML042360586)
 - 3) NRC Policy Issue SECY-12-0093, "Closure Options for Generic Safety Issue – 191, 'Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance,'" dated July 9, 2012 (Accession No. ML121310648)

By letter dated May 16, 2013, (Reference 1) Union Electric (dba Ameren Missouri) identified the closure path for resolution of Generic Letter 2004-02 (Reference 2) and GSI-191 (as addressed by Reference 3) for the Callaway Plant.

In the May 16, 2013 letter, Ameren Missouri proposed resolution of GL 2004-02 by pursuing Option 2b, "Full Risk-Informed Resolution Path," of SECY-12-0093 (Reference 3), noting that the approach being taken for Callaway Plant would utilize the methodology developed by South Texas Project (STP), whose pilot submittal for GSI-191 closure is currently under review by the NRC staff. Like STP, a license amendment request and proposed regulatory exemption will be submitted to achieve resolution of GL 2004-02 for Callaway Plant.

In Attachment 2 of the May 16, 2013 letter, Ameren Missouri issued a commitment (Commitment No. 50261) to submit the requisite license amendment request and proposed regulatory exemption for resolving GL 2004-02 and GSI-191 at Callaway Plant. This letter is being submitted to revise that commitment. The revised commitment is documented in the attachment (Attachment 1) of this letter.

Revision of the submittal commitment is based on consideration that the success path for the risk-informed Option 2b approach is dependent on completion of the NRC staff's review and issuance of a Safety Evaluation (SE) for STP's pilot submittal. Currently, STP is resolving the NRC staff's comments and requests for additional information. The delay in a final submittal by STP has extended the NRC's review of the STP pilot submittal, which in turn will postpone the NRC's issuance of the STP SE beyond the Ameren Missouri projection for that milestone.

The revision of Ameren Missouri's submittal commitment is therefore an extension of the submittal date which will also allow sufficient time for performing the necessary analysis using the STP pilot-plant methodology guidance. Specifically, it is proposed that the date for submitting the GSI-191 closure correspondence for Callaway Plant be extended to September 1, 2017, or to one year after issuance of the NRC's SE for STP, whichever is later.

If you have any questions concerning the content of this letter, please contact Scott Maglio, Regulatory Affairs Manager, at 573-676-8719.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Executed on: 3-31-2014



David W. Neterer
Vice President, Engineering

DRB

Attachment 1: Revised Commitment

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Attachment 1
Revised Commitment

Current Commitment in ULNRC-05989

COMMITMENTS	Due Date/Event	Commitment Number
Ameren Missouri will submit the necessary request/correspondence (e.g., regulatory exemption request) for resolving GSI-191 at Callaway Plant pursuant to Option 2b (risk-informed approach).	December 31, 2015	50261

Proposed Change to Commitment 50261

COMMITMENTS	Due Date/Event	Commitment Number
Ameren Missouri will submit closure correspondence (e.g., License Amendment request and proposed regulatory exemption) for resolving GSI-191 at Callaway Plant pursuant to SECY-12-0093 Option 2b (risk-informed approach).	September 1, 2017 OR One year following issuance of the Safety Evaluation for the STP risk-informed GSI-191 resolution submittal, whichever is later.	50261, Rev. 1