



April 15, 2014

ULNRC-06114

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

10 CFR 2.101
10 CFR 2.109(b)
10 CFR 50.4
10 CFR 50.30
10 CFR 51.53(c)
10 CFR 54

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
SUPPLEMENT TO THE CALLAWAY LRA – NFPA 805 GAP ANALYSIS
AND LRA AMENDMENT 33**

- References:
- 1) ULNRC-05830 dated December 15, 2011
 - 2) NRC Letter, "Callaway Plant, Unit 1- Issuance of Amendment Regarding Transition to a Risk-Informed, Performance-Based Fire Protection Program in accordance with 10 CFR 50.48(c) (TAC No. ME7046)," dated January 13, 2014
 - 3) ULNRC-06080, dated February 14, 2014
 - 4) NRC Letter, "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)," date April 11, 2014
 - 5) ULNRC-06112, dated April 7, 2014
 - 6) NRC Letter, "Safety Evaluation Report with Open Items Related to the License Renewal of Callaway Plant, Unit 1 (TAC No. ME7708)," dated April 23, 2013

By the Reference 1 letter, Union Electric Company (Ameren Missouri) submitted a license renewal application (LRA) for Callaway Plant Unit 1(Callaway). In Reference 2, the NRC issued Amendment 206 to Facility Operating License (OL) No. NPF-30. The amendment approved the transition of the

Callaway fire protection program to a risk-informed, performance-based program based on National Fire Protection Association (NFPA) 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition" (NFPA 805), in accordance with 10 CFR 50.48(c).

Reference 3 transmitted LRA Amendment 31, which included LRA changes which incorporated scope changes made as a result of the issuance of OL Amendment 206. Subsequent feedback from the staff (refer to Reference 4) indicated that a sufficient description had not been provided to show the link between the pre- and post-NFPA 805 license renewal application. Enclosure 1 to this transmittal provides a gap analysis which compares NFPA 805 and License Renewal scope differences by identifying:

- 1) Structures, systems, and components (SSC) required by the NFPA 805 program which are not currently within the scope of License Renewal; and
- 2) SSCs within the scope of License Renewal for fire protection, but which are not required by the NFPA 805 program.

The gap analysis provides information to address the issues raised in Reference 4, with the exception of the item related to severe accident mitigation analysis (SAMA), which was addressed by Reference 5, Enclosure 1, Comment 14. The gap analysis does not address areas outside the scope of License Renewal, which are a part of the transition to NFPA 805, such as personnel requirements, administrative controls, analysis methodology, or procedure requirements.

Enclosure 2 to this transmittal provides LRA Amendment 33, which contains additional scope changes that were identified in the development of the gap analysis. Portions of the compressed air system are included in the scope of license renewal to provide a backup supply of nitrogen to replenish accumulators for the auxiliary feedwater control valves and the main steam atmospheric relief valves.

The information provided is intended to assist the staff in closing Open Item 2.3.3.20-1 identified in Reference 6, regarding the transition to NFPA 805.

There are no commitments included in this transmittal.

If you have any questions with regard to this transmittal, please contact me at (573) 489-9435 or Mr. Roger Wink at (314) 225-1561.

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

Sincerely,

Executed on: April 15, 2014



Sarah Kovaleski
Director, Engineering Design

ULNRC-06114
April 15, 2014
Page 3

DS/nls

Enclosure: 1) NFPA 805 Gap Analysis
2) Amendment 33, LRA Changes

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