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April 17, 2014

ULNRC-06113

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

Order No. EA-12-051

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
FACILITY OPERATING LICENSE NPF-30  
REQUEST FOR RELAXATION FROM NRC ORDER EA-12-051,  
"ORDER MODIFYING LICENSES WITH REGARD TO RELIABLE  
SPENT FUEL POOL INSTRUMENTATION"**

- References: 1. Letter dated March 12, 2012 from E. J. Leeds and M. R. Johnson, USNRC, to Adam C. Heflin, Callaway Plant, Union Electric Company, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (ADAMS Accession No. ML12056A044)
2. ULNRC-05960, "Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Reliable Spent Fuel Pool Instrumentation," dated February 28, 2013 (ADAMS Accession No. ML130630581)
3. Letter dated December 11, 2013 from E. J. Leeds, USNRC, to Adam C. Heflin, Union Electric Company, "Callaway Plant Unit 1 - Relaxation of the Scheduler Requirements for Order EA-12-049, 'Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events'" (ADAMS Accession No. ML13319A668)

This letter transmits a request for relaxation of the requirements contained in Order EA-12-051 which was immediately issued by the U. S. Nuclear Regulatory Commission (NRC) to Union Electric Company (dba Ameren Missouri) on March 12, 2012 for Callaway Plant. The Order (issued per Reference 1) was immediately effective and directs Ameren Missouri to have a reliable means of remotely monitoring wide-range spent fuel pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event.

As described in the Overall Integrated Plan for Callaway Plant (Reference 2), spent fuel pool instrumentation (SFPI) channels will be powered by independent batteries following a loss of ac power until alternate sources of power can be provided by FLEX strategies. By Reference 3, Callaway obtained schedule relaxation for NRC Order EA-12-049 regarding FLEX strategies. With this relaxation, Callaway's FLEX strategies will not be fully implemented until Spring of 2016. Due to the interdependence of the FLEX and SFPI Orders, full and effective implementation of Order EA-12-051 (regarding SFPI) cannot be completed without FLEX strategies in place.

The currently identified date for installation of reliable spent fuel pool level instrumentation is completion of the fall 2014 refueling outage. An extension of one additional refueling cycle is requested, which would move the implementation date to completion of the spring 2016 refueling outage. This would allow sufficient time for installation and testing of SFPI as well as completion of FLEX requirements which support coping of an event that could affect SFP level. This relaxation would also align the completion dates for NRC Orders EA-12-049 and EA-12-051.

Section IV of NRC Order EA-12-051 (Reference 1) states that licensees proposing to deviate from requirements contained in NRC Order EA-12-051 may request that the Director, Office of Nuclear Reactor Regulation, relax those requirements. Therefore, in accordance with Section IV of NRC Order EA-12-051, Ameren Missouri is requesting that the Director, Office of Nuclear Reactor Regulation, relax the requirement for completion of full implementation as prescribed in Section IV.A.2 of NRC Order EA-12-051 and as described in the attachment to this letter.

Ameren Missouri considers that, upon approval by the NRC, the revised full implementation dates regarding NRC Order EA-12-051 proposed in the attachment will constitute a condition of the NRC Order EA-12-051 for Callaway Plant. Therefore, there are no new regulatory commitments contained in this letter.

Should 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: 4-17-2014



David W. Neterer  
Vice President, Engineering

Enclosure

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## **REQUEST FOR RELAXATION OF NRC ORDER EA-12-051 REQUIREMENT IV.A.2 FOR CALLAWAY PLANT**

### **Relaxation Request**

Pursuant to the procedure specified in Section IV of Nuclear Regulatory Commission (NRC) Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation " (Reference 1), Callaway Plant, hereby submits a request for relaxation from the Order requirements for completion of full implementation no later than two (2) refueling cycles after submittal of the Overall Integrated Plan, as required in Condition C.1.a of the Order, or December 31, 2016, whichever comes first.

### **Order Requirement from Which Relaxation is Requested**

NRC Order EA-12-051, Section IV.A.2 requires completion of full implementation of the Order requirements no later than two (2) refueling cycles after submittal of the Overall Integrated Plan, as required by Condition C.1.a, or December 31, 2016, whichever comes first. In accordance with the requirements of the Order, Ameren Missouri submitted the Overall Integrated Plan for Callaway Plant (Reference 2) on February 28, 2013. The Overall Integrated Plan milestone schedule identified the completion date for full implementation of NRC Order EA-12-051 as completion of the fall 2014 refueling outage for Callaway Plant.

NRC Order EA-12-051 requires a reliable means of remotely monitoring wide-range spent fuel pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. As described in the Overall Integrated Plan for Callaway Plant (Reference 2), spent fuel pool instrumentation (SFPI) channels will be powered by independent batteries following a loss of ac power until alternate sources of power can be provided by FLEX strategies. By Reference 3, Callaway obtained schedule relaxation for NRC Order EA-12-049 regarding FLEX strategies. With this relaxation, Callaway's FLEX strategies will not be fully implemented until Spring of 2016. Due to the interdependence of the FLEX and SFPI Orders, full and effective implementation of Order EA-12-051 (regarding SFPI) cannot be completed without FLEX strategies in place.

### **Justification for Relaxation Request**

The spent fuel pool instrumentation system (SFPIS) provides the capability to reliably monitor the spent fuel pool water level under adverse environmental conditions. This monitoring is essential to understanding the water level in the spent fuel pool and the corresponding prioritization of actions that plant staff can take to mitigate water inventory loss.

Based the interdependence between the FLEX and SFPIS Orders, full implementation of NRC Order EA-12-051 would not be completed by the Order requirement date. The current required implementation date is completion of the fall 2014 refueling outage. An extension of one additional refueling cycle is requested, which would move the implementation date to completion of the spring 2016 refueling outage, which is still within the maximum allowed timeframe of December 2016. The extension would allow time to complete and test the SFPIS, and would align the completion dates for both NRC Orders EA-12-049 and EA-12-051.

## **Conclusion**

Compliance with NRC Order EA-12-051 schedule requirement for full completion of implementation of mitigation strategies would require Callaway Plant to establish a SFPIS but due to the interdependence of FLEX, Callaway would be unable to provide mitigating actions in response to SFP level indications. Relaxation would allow sufficient time for completion and testing of the SFPIS, as well as allowing alignment of the implementation dates of both EA-12-049 and EA-12-051 Orders. Therefore, in accordance with the provisions of Section IV of the Order, Ameren Missouri requests relaxation of the requirement described in Section IV.A.2.

## **References**

1. NRC Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ADAMS Accession No. ML12056A044)
2. ULNRC-05960, "Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Reliable Spent Fuel Pool Instrumentation," dated February 28, 2013 (ADAMS Accession No. ML130630581)
3. Letter dated December 11, 2013 from E. J. Leeds, USNRC, to Adam C. Heflin, Union Electric Company, "Callaway Plant Unit 1 - Relaxation of the Scheduler Requirements for Order EA-12-049, 'Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events'" (ADAMS Accession No. ML13319A668)