



Callaway Plant

March 18, 2015

ULNRC-06196

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

10 CFR 50.71(e)(4)

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
CYCLE 20 COMMITMENT CHANGE SUMMARY REPORT**

Please find attached the Cycle 20 Commitment Change Summary Report required by NEI 99-04, "Guideline for Managing NRC Commitment Changes," for changes requiring NRC notification annually or at a frequency consistent with that required for FSAR updates per 10 CFR 50.71(e)(4). These commitment revisions were completed at Callaway Plant Unit 1 for the period between May 29, 2013 and November 22, 2014, and were not reported to NRC in a previous submittal. The Cycle 20 Commitment Change Summary Report provides a description of each change completed along with a brief justification for each revised commitment.

If you should have any questions concerning this report, please contact Scott Maglio at (573) 676-8719.

This letter does not contain new commitments.

Sincerely,

A handwritten signature in black ink that reads "Scott A. Maglio".

Scott A. Maglio
Manager, Regulatory Affairs

DRB/

Enclosure

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CYCLE 20 COMMITMENT CHANGE SUMMARY REPORT

In accordance with NEI 99-04, "Guidelines for Managing NRC Commitment Changes," as endorsed in Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," the following commitment changes are being reported. The changes were completed for Callaway Plant Unit 1 for the period from May 29, 2013 to November 22, 2014. A description of each change completed, along with a brief justification for each revised commitment, is provided.

Commitment 42210 (ref. ULNRC-02294, Generic Letter 90-03)

This commitment implements Generic Letter 90-03, "Relaxation of Staff Position in Generic Letter 83-28, Item 2.2 Part 2 'Vendor Interface for Safety-Related Components.'" The primary change in this commitment was to increase the periodicity of vendor re-contact from "with the maximum interval between contacts with a vendor not to exceed 24 months" to "with the customary interval between contacts with a vendor being 3 years, based on industry standard practice for vendor re-contact programs."

Justification for change:

The original position taken by the NRC in Part 2 of Item 2.2 of GL 83-28 includes the sentence: "The program shall include periodic communication with vendors..." With the above-described change to Callaway's commitment, the intent of maintaining communication with vendors continues to be met. This change is consistent with current industry standard practice for vendor re-contact programs.

A large number of commitments were either deleted, initiated or revised to support Callaway's License Amendment Request to adopt NFPA 805, "Performance-Based Standard for fire Protection of Light Water Reactor Generating Plants (2001 Edition)." Individual notifications (ULNRC-05871, ULNRC-05876, ULNRC-05952, ULNRC-06011, ULNRC-06030 and ULNRC-06060) were filed in support of these changes. However, several of these commitments were changed subsequent to the notifications/correspondence and are thus reported as follows:

Commitments 50196-50198 (ref. ULNRC-05781)

These three commitments revise training modules to add discussion addressing radiological release considerations during firefighting. The commitment text specified the course and module numbers to which this material would be added. The course numbering system subsequently changed, so the text of these commitments was adjusted accordingly.

Justification for change:

The content of the added material did not change from what was described in the commitment. The only change was in the course numbering system.

Commitments 50155 and 50166 (ref. ULNRC-05781)

These two commitments revised procedure APA-ZZ-00741, "Control of Combustible Materials," to include discussion related to the removal of waste, debris, scrap and combustible packing materials; and the removal of cribbing timbers; respectively. The commitment text specified the section and step numbers that would be revised to include this discussion. This procedure was extensively rewritten in support of the NFPA 805 project. Due to the rewrite, the changes made to support these commitments fit into other procedure sections than those which were originally identified. These commitments were revised to delete the section and step numbers identified in the text of these commitments.

Justification for change:

The original intent of these commitments is unchanged. The only change was to delete the procedural section and step numbers that would otherwise be revised.