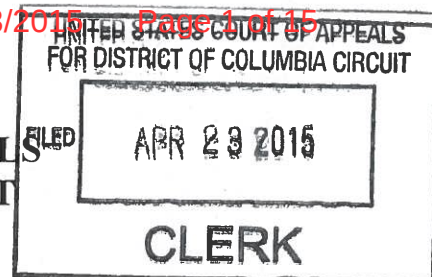


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UNITED STATES COURT OF APPEALS
DISTRICT OF COLUMBIA CIRCUIT



MISSOURI COALITION FOR THE
ENVIRONMENT, INC.,

Petitioner,

v.

UNITED STATES NUCLEAR
REGULATORY COMMISSION, and the
UNITED STATES OF AMERICA,

Respondents.

Case No. 15-1114

ORIGINAL

PETITION FOR REVIEW

Pursuant to 42 U.S.C. § 2239, 28 U.S.C. § 2344, 5 U.S.C. § 702, Fed. R. App. P. 15(a), and D.C. Cir. Rule 15(a), and through undersigned counsel, Missouri Coalition for the Environment, Inc. ("Petitioner") hereby petitions this Court for review of the following decisions of the U.S. Nuclear Regulatory Commission ("NRC" or "Commission"):

- NRC Commission Memorandum and Order CLI-15-11 (Apr. 23, 2015) ("Memorandum and Order CLI-15-11") (Attachment 1);
- License Renewal for Callaway Plant, Unit 1, 80 Fed. Reg. 13,636 (Mar. 16, 2015) ("License Renewal Decision") (Attachment 2); and

- NRC Commission Memorandum and Order CLI-15-04 (Feb. 26, 2015) (“Memorandum and Order CLI-15-04”) (Attachment 3).

Petitioner contends that the License Renewal Decision, Memorandum and Order CLI-15-04, and Memorandum and Order 15-11 violate the Atomic Energy Act (“AEA”), the National Environmental Policy Act (“NEPA”), and the Administrative Procedure Act (“APA”) by relying on the NRC Continued Storage of Spent Nuclear Fuel Final Rule, 70 Fed. Reg. 56,238 (Sept. 19, 2014) (“Continued Storage Rule”) and the supporting Generic Environmental Impact Statement for Continued Storage of Spent Nuclear Fuel, 70 Fed. Reg. 56,263 (Sept. 19, 2014) (“GEIS”). Petitioner has appealed the Continued Storage Rule and the supporting GEIS to this Court on the grounds that they violate the AEA, NEPA and the AEA. *See State of New York v. NRC*, Nos. 14-1210, 14-1212, 14-1216, and 14-1217 (Consolidated).¹

Accordingly, Petitioner asks this Court to review, reverse, and vacate the License Renewal Decision and Memorandum and Order. Petitioner also asks this Court to grant any other remedies that may be appropriate.

This filing is timely because it is made within the 60-day period established by the Hobbs Act as 28 U.S.C. § 2344 for bringing a petition for judicial review.

Venue is appropriate in the D.C. Circuit pursuant to 28 U.S.C. § 2343.

¹ Petitioner has moved the Court to hold this Petition for Review in abeyance pending the Court’s ruling in *New York v. NRC*.

Respectfully submitted,



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Counsel for Petitioner

April 23, 2015

ATTACHMENT 1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

COMMISSIONERS:

Stephen G. Burns, Chairman
Kristine L. Svinicki
William C. Ostendorff
Jeff Baran

In the Matter of

UNION ELECTRIC COMPANY

(Callaway Nuclear Power Plant, Unit 1)

Docket No. 50-483-LR

CLI-15-11

MEMORANDUM AND ORDER

Missouri Coalition for the Environment (MCE) moves to reopen the record of this proceeding. MCE seeks a hearing on its claim that the final supplemental environmental impact statement prepared in connection with this license renewal application violates the National Environmental Policy Act by failing to consider environmental impacts associated with the continued storage of spent nuclear fuel.¹ For the reasons discussed below, MCE's request is denied.

I. BACKGROUND

MCE sought to intervene early on in this license renewal proceeding. In its initial petition, MCE proffered three contentions that ultimately were rejected by the Atomic Safety and

¹ *Missouri [Coalition] for the Environment's Hearing Request and Petition to Intervene in License Renewal Proceeding for Callaway Nuclear Power Plant* (Dec. 8, 2014) (Petition); *Missouri [Coalition] for the Environment's Motion to Reopen the Record of License Renewal Proceeding for Callaway Unit 1 Nuclear Power Plant* (Dec. 8, 2014) (Motion to Reopen).

- 2 -

Licensing Board.² Subsequently, our 2010 Waste Confidence Decision and Temporary Storage Rule were vacated by the court of appeals and remanded to the agency.³ In response, MCE, together with several other petitioners, filed requests to suspend final licensing decisions in this and other proceedings pending completion of our action on the remanded Waste Confidence proceeding.⁴ We suspended final licensing decisions until we addressed the court's remand and instructed the boards in the affected proceedings to hold the contentions in abeyance pending our further order.⁵ Thereafter, concurrent with our approval last year of the final Continued Storage Rule and companion Generic Environmental Impact Statement (GEIS), we lifted the suspension on final licensing decisions and directed that the proposed contention in this matter (among others) be dismissed.⁶ We observed that, "[a]s part of the analysis

² See LBP-12-15, 76 NRC 14 (2012). MCE did not appeal this decision.

³ See *New York v. NRC*, 681 F.3d 471 (D.C. Cir. 2012).

⁴ *Petition to Suspend Final Licensing Decisions in All Pending Reactor Licensing Proceedings Pending Completion of Remanded Waste Confidence Proceedings* (June 18, 2012). MCE also filed a fourth contention asserting that the applicant's environmental report improperly failed to address the environmental impacts associated with spent fuel pool leaks and fires, and the lack of a permanent spent fuel disposal facility. *Intervenor's Motion for Leave to File a New Contention Concerning Temporary Storage and Ultimate Disposal of Nuclear Waste at Callaway Nuclear Power Plant* (July 9, 2012).

⁵ *Calvert Cliffs 3 Nuclear Project, LLC and UniStar Nuclear Operating Services, LLC* (Calvert Cliffs Nuclear Power Plant, Unit 3), CLI-12-16, 76 NRC 63 (2012). At that time, we observed, "[t]o the extent the NRC takes action with respect to waste confidence on a case-by-case basis, litigants can challenge such site-specific agency actions in our adjudicatory process." *Id.* at 67 (but citing *Potomac Electric Power Co.* (Douglas Point Nuclear Generating Station, Units 1 and 2), ALAB-218, 8 AEC 79, 85 (1975) ("[L]icensing boards should not accept in individual license proceedings contentions which are (or are about to become) the subject of general rulemaking by the Commission.")).

⁶ See NUREG-2157, Vols. 1 & 2, *Generic Environmental Impact Statement for Continued Storage of Spent Nuclear Fuel* (Sept. 2014) (ADAMS accession nos. ML14196A105 and ML14196A107) (Continued Storage GEIS); Final Rule, Continued Storage of Spent Nuclear Fuel, 79 Fed. Reg. 56,238 (Sept. 19, 2014) (Continued Storage Rule); *Calvert Cliffs 3 Nuclear Project, LLC, and UniStar Nuclear Operating Services, LLC* (Calvert Cliffs Nuclear Power Plant, Unit 3), CLI-14-8, 80 NRC 71, 77-79 (2014). The Staff issued the renewed license on March 6, 2015. See Ghosh, Anita, Counsel for NRC Staff, letter to the Parties, "In the Matter of Union (continued . . .)

underpinning the GEIS . . . we concluded that the impacts of continued storage will not vary significantly across sites; the impacts of continued storage at reactor sites, or at away-from-reactor sites, can be analyzed generically.”⁷ For this reason, these generic determinations were appropriately excluded from litigation in individual proceedings.⁸

MCE now has filed a fresh intervention petition in which it argues that the recently released final supplemental environmental impact statement for license renewal of the Callaway plant is inherently flawed because it relies on the NRC’s generic analysis, in the Continued Storage Rule and GEIS, of the environmental impacts of the continued storage of spent fuel.⁹ The NRC Staff and the applicant, Union Electric Company, doing business as Ameren Missouri, oppose the hearing request.¹⁰

II. DISCUSSION

MCE seeks to lodge with us a “placeholder” contention.¹¹ MCE does not seek to litigate the substance of its contention now and candidly acknowledges that our rules of practice do not allow litigants to challenge our regulations within the context of individual license proceedings,

Electric Co. (Callaway Nuclear Power Plant, Unit 1), Docket No. 50-483-LR, Notification of Commission Authorization to Issue Renewed License” (Mar. 6, 2015).

⁷ *Calvert Cliffs*, CLI-14-8, 80 NRC at 78. We stated additionally that “the assumptions used in the analysis are sufficiently conservative to bound the impacts such that variances that may occur between sites are unlikely to result in environmental impact determinations greater than those presented in the [Continued Storage] GEIS.” *Id.* (citation omitted).

⁸ *Id.* at 79.

⁹ See NUREG-1437, Generic Environmental Impact Statement for License Renewal, Supp. 51 (Regarding Callaway Plant, Unit 1) (ML14289A140) (Oct. 2014), at 1-4 to 1-5, 6-3.

¹⁰ See *NRC Staff Answer to Missouri Coalition for the Environment’s Hearing Request and Petition to Intervene and Motion to Reopen the Record in the License Renewal Proceeding for Callaway Unit 1 Nuclear Power Plant* (Dec. 18, 2014); *Ameren’s Answer Opposing Missouri Coalition for the Environment’s Hearing Request and Motion to Reopen the Record* (Dec. 18, 2014).

¹¹ Petition at 2.

absent a request for a waiver.¹² MCE's stated reason for filing its petition and motion to reopen is to ensure that any court decision resulting from its federal court challenge to the Continued Storage Rule and GEIS will also be applied to the individual *Callaway* proceeding.¹³

MCE is correct that the proposed contention is not admissible under our rules of practice because it impermissibly challenges an agency regulation and is therefore outside the scope of this individual licensing proceeding.¹⁴ MCE provides seven bases for its contention, all of which challenge the generic findings in the GEIS.¹⁵ None of the contention's bases pertain specifically to the Callaway license renewal application. The contention therefore does not provide sufficient information to demonstrate a genuine dispute with the applicant on a material issue.¹⁶ For these reasons, we decline to admit the contention.¹⁷

In MCE's view, its "placeholder contention" is "the only procedural means" available for ensuring that any court decision resulting from the pending appeal of the Continued Storage

¹² See *id.* at 2 & 2-3 n.3. MCE does not seek a rule waiver. *Id.*

¹³ *Id.* at 2. MCE has challenged the Continued Storage Rule and Continued Storage GEIS in the U.S. Court of Appeals for the District of Columbia Circuit. *Beyond Nuclear v. NRC*, Docket No. 14-1216 (D.C. Cir. filed Oct. 29, 2014). As MCE notes in its hearing request, its petition for review has been consolidated with similar petitions before the D.C. Circuit and the case is now captioned *New York v. NRC*, Docket Nos. 14-1210, 14-1216, and 14-1217 (D.C. Cir. Oct. 31, 2014). MCE states that, should we decline to admit its contention, it will ask the court to consolidate its challenge here with its pending appeal. Petition at 2-3.

¹⁴ See, e.g., *Calvert Cliffs*, CLI-14-8, 80 NRC at 79; *Duke Energy Corp.* (Oconee Nuclear Station, Units 1, 2, and 3), CLI-99-11, 49 NRC 328, 345 (1999).

¹⁵ See Petition at 7-9.

¹⁶ 10 C.F.R. § 2.309(f)(1)(vi).

¹⁷ Because MCE has not submitted an admissible contention, it necessarily has not satisfied our reopening standards because it has not raised a significant environmental issue and has not demonstrated that a materially different result would be likely if the contention had been considered initially. 10 C.F.R. § 2.326(a)(2)-(3). Because MCE's contention is inadmissible, we need not address the timeliness of its filing, a matter of some debate among the litigants.

Rule and GEIS will be applied to the Callaway license renewal matter.¹⁸ However, MCE cannot litigate the Continued Storage Rule and GEIS here. We addressed the environmental impacts of continued storage generically, via the rulemaking process, in accordance with NEPA and general principles of administrative law.¹⁹ MCE had—and took advantage of—the opportunity to provide comments on the proposed rule and draft GEIS.²⁰ Now that the rule has been adopted, MCE has sought review of the rule and GEIS in the appropriate venue, the court of appeals. Absent a successful petition that the rule should be waived in accordance with 10 C.F.R. § 2.335, MCE’s challenges to the Continued Storage Rule and GEIS are appropriately brought before the court of appeals. Should the D.C. Circuit find any infirmities in the Continued Storage Rule or GEIS, we would take appropriate action consistent with the court’s direction. In the meantime, however, admission of a “placeholder” contention is not necessary to ensure that MCE’s challenges to the Continued Storage Rule and GEIS receive a full and fair airing.²¹

¹⁸ *Missouri [Coalition] for the Environment’s Reply to Oppositions to Hearing Request/Petition to Intervene and Motion to Reopen the Record of License Renewal Proceeding for Callaway Nuclear Power Plant*, 2 (Dec. 29, 2015).

¹⁹ *New York*, 681 F.3d at 483 (declining to grant the petitioners’ request that the NRC consider continued storage on a site-by-site basis); *see also NLRB v. Bell Aerospace Co. Div. of Textron, Inc.*, 416 U.S. 267, 294 (1974) (agency had discretion to choose between rulemaking and adjudication); *SEC v. Chenery Corp.*, 332 U.S. 194, 203 (1947) (“the choice made between proceeding by general rule or by individual, ad hoc litigation is one that lies primarily in the informed discretion of the administrative agency”).

²⁰ See Continued Storage GEIS at D-596.

²¹ *Cf. Entergy Nuclear Generation Co. and Entergy Nuclear Operations, Inc.* (Pilgrim Nuclear Power Station), CLI-12-6, 75 NRC 352, 372-76 (2012) (declining a suspension request filed by the intervenor to “protect its position” and eventually enable it to litigate challenges to a final supplemental EIS following resolution of a rulemaking petition).

- 6 -

III. CONCLUSION

For the foregoing reasons, we *deny* MCE's motion to reopen the record of this proceeding and admit a new contention.

IT IS SO ORDERED.

For the Commission

NRC SEAL

/RA/

Annette L. Vietti-Cook
Secretary of the Commission

Dated at Rockville, Maryland,
this 23rd day of April, 2015

ATTACHMENT 2

instruments, and databases to provide the reach to make the next intellectual leaps.

NSF currently provides support for facility construction from two accounts: the Major Research Equipment and Facility Construction (MREFC) account, and the Research and Related Activities (R&RA) account. The MREFC account, established in FY 1995, is a separate budget line item that provides an agency-wide mechanism, permitting directorates to undertake large facility projects that exceed 10% of the Directorate's annual budget; or roughly \$100M or greater. Smaller projects continue to be supported from the R&RA Account.

Facilities are defined as shared-use infrastructure, instrumentation and equipment that are accessible to a broad community of researchers and/or educators. Facilities may be centralized or may consist of distributed installations. They may incorporate large-scale networking or computational infrastructure, multi-user instruments or networks of such instruments, or other infrastructure, instrumentation and equipment having a major impact on a broad segment of a scientific or engineering discipline. Historically, awards have been made for such diverse projects as accelerators, telescopes, research vessels and aircraft, and geographically distributed but networked sensors and instrumentation.

The growth and diversification of large facility projects require that NSF remain attentive to the ever-changing issues and challenges inherent in their planning, construction, operation, management and oversight. Most importantly, dedicated, competent NSF and awardee staff are needed to manage and oversee these projects; giving the attention and oversight that good practice dictates and that proper accountability to taxpayers and Congress demands. To this end, there is also a need for consistent, documented requirements and procedures to be understood and used by NSF program managers and awardees for all such large projects.

Use of the Information: Facilities are an essential part of the science and engineering enterprise, and supporting them is one major responsibility of the National Science Foundation (NSF). NSF makes awards to external entities—primarily universities, consortia of universities or non-profit organizations—to undertake construction, management and operation of facilities. Such awards frequently take the form of cooperative agreements. NSF does not directly construct or operate the facilities it

supports. However, NSF retains responsibility for overseeing their development, management and successful performance. The Large Facilities Manual is intended to:

- Provide step-by-step guidance for NSF staff and awardees to carry out effective project planning, management and oversight of large facilities while considering the varying requirements of a diverse portfolio;
- Clearly state the policies, processes and procedures pertinent at each stage of a facility's life cycle from development through construction, operations, and termination; and
- Document and disseminate "best practices" identified over time so that NSF and awardees can carry out their responsibilities more effectively.

This version of the Large Facilities Manual reflects recent changes in organization and formatting to improve readability and facilitate period revision. It also up-dates sections related to contingency and cost estimating requirements. The Manual does not replace existing formal procedures required for all NSF awards, which are described in the *Grant Proposal Guide* and *The Award and Administration Guide*. Instead, it draws upon and supplements them for the purpose of providing detailed guidance regarding NSF management and oversight of facilities projects. All facilities projects require merit and technical review, as well as approval of certain deliverables. The level of review and approval varies substantially from standard grants, as does the level of oversight needed to ensure appropriate and proper accountability for federal funds. The requirements, recommended procedures and best practices presented in the Manual apply to any facility significant enough to require close and substantial interaction with the Foundation and the National Science Board.

This Manual will be updated periodically to reflect changes in requirements, policies and/or procedures. Award Recipients are expected to monitor and adopt the requirements and best practices included in the Manual which are aimed at improving management and oversight of large facilities projects and at enabling the most efficient and cost-effective delivery of tools to the research and education communities.

The submission of proposals and subsequent project documentation to the Foundation related to the development, construction and operations of Large Facilities is part of the collection of information. This information is used to help NSF fulfill

this responsibility in supporting merit-based research and education projects in all the scientific and engineering disciplines. The Foundation also has a continuing commitment to provide oversight on facilities development and construction which must be balanced against monitoring its information collection so as to identify and address any excessive reporting burdens.

NSF has approximately twenty-two (22) Large Facilities in various stages of development, construction, operations and termination. One to two (1 to 2) new awards are made approximately every five (5) years based on science community infrastructure needs and availability of funding. Of the twenty-two large facilities, there are approximately eight (8) facilities annually that are either in development or construction. These stages require the highest level of reporting and management documentation per the Large Facilities Manual.

Burden to the Public: The Foundation estimates that an average of three (3) Full Time Equivalents (FTEs) are necessary for each facility project in development or construction (Total Project Cost of \$200–\$500M) to respond to NSF routine reporting and project management documentation requirements on an annual basis; or 6240 hours per year. The Foundation estimates an average of one (1) FTE for a facility in operations; or 2080 hours per year. Assuming an average of eight (8) facilities in construction and the balance in operations, this equates to roughly 80,000 public burden hours annually.

Suzanne H. Plimpton,
Reports Clearance Officer, National Science Foundation.

[FR Doc. 2015-05875 Filed 3-13-15; 8:45 am]

BILLING CODE 7555-01-P

NUCLEAR REGULATORY COMMISSION

[Docket No. 50-483; NRC-2012-0001]

License Renewal for Callaway Plant, Unit 1

AGENCY: Nuclear Regulatory Commission.

ACTION: License renewal and record of decision; issuance.

SUMMARY: The U.S. Nuclear Regulatory Commission (NRC) has issued renewed facility operating license No. NPF-30 to Union Electric Company (dba Ameren Missouri or the licensee), the operator of the Callaway Plant, Unit 1 (Callaway). Renewed facility operating license No.

NPF-30 authorizes operation of Callaway by the licensee at reactor core power levels not in excess of 3565 megawatts thermal, in accordance with the provisions of the Callaway renewed license and technical specifications. In addition, the NRC has prepared a record of decision (ROD) that supports the NRC's decision to renew facility operating license No. NPF-30.

DATES: The license renewal of facility operating license No. NPF-30 was effective on March 6, 2015.

ADDRESSES: Please refer to Docket ID NRC-2012-0001 when contacting the NRC about the availability of information regarding this document. You may obtain publicly-available information related to this document using any of the following methods:

- Federal Rulemaking Web site: Go to <http://www.regulations.gov> and search for Docket ID NRC-2012-0001. Address questions about NRC dockets to Carol Gallagher; telephone: 301-415-3463; email: Carol.Gallagher@nrc.gov. For technical questions, contact the individual listed in the **FOR FURTHER INFORMATION CONTACT** section of this document.

- NRC's Agencywide Documents Access and Management System (ADAMS): You may obtain publicly-available documents online in the ADAMS Public Documents collection at <http://www.nrc.gov/reading-rm/adams.html>. To begin the search, select "ADAMS Public Documents" and then select "Begin Web-based ADAMS Search." For problems with ADAMS, please contact the NRC's Public Document Room (PDR) reference staff at 1-800-397-4209, 301-415-4737, or by email to pdr.resource@nrc.gov. The ADAMS accession number for each document referenced in this document (if that document is available in ADAMS) is provided the first time that a document is referenced.

- NRC's PDR: You may examine and purchase copies of public documents at the NRC's PDR, Room O1-F21, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852.

FOR FURTHER INFORMATION CONTACT: John Daily, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, DC 20555; telephone: 301-415-3873; email: John.Daily@nrc.gov.

SUPPLEMENTARY INFORMATION: Notice is hereby given that the NRC has issued renewed facility operating license No. NPF-30 to Union Electric Company, the operator of Callaway. Renewed facility operating license No. NPF-30 authorizes operation of Callaway by the licensee at reactor core power levels not

in excess of 3565 megawatts thermal, in accordance with the provisions of the Callaway renewed license and technical specifications. The NRC's ROD that supports the NRC's decision to renew facility operating license No. NPF-30 is available in ADAMS under Accession No. ML14302A238. As discussed in the ROD and the final supplemental environmental impact statement (FSEIS) for Callaway, Supplement 51 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Callaway Plant, Unit 1," dated October 2014 (ADAMS Accession No. ML14289A140), the NRC has considered a range of reasonable alternatives that included natural gas combined-cycle, supercritical pulverized coal, new nuclear, wind power, energy efficiency measures, and the no action alternative. The ROD and FSEIS document the NRC decision for the environmental review that the adverse environmental impacts of license renewal for Callaway are not so great that preserving the option of license renewal for energy planning decisionmakers would be unreasonable.

Callaway, Unit 1, is a pressurized water reactor located in Callaway County, Missouri. The application for the renewed license, "Callaway Plant, Unit 1, License Renewal Application," dated December 15, 2011, as supplemented by letters dated through June 20, 2014 (ADAMS Accession No. ML113530372), complied with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the NRC's regulations. As required by the Act and the NRC's regulations in chapter 1 of title 10 of the *Code of Federal Regulations*, the NRC has made appropriate findings, which are set forth in the license. A public notice of the proposed issuance of the renewed license and an opportunity for a hearing was published in the **Federal Register** on February 24, 2012 (77 FR 11173).

For further details with respect to this action, see: (1) Union Electric Company's (dba Ameren Missouri) license renewal application for Callaway Plant, Unit 1 dated December 15, 2011, as supplemented by letters dated through June 20, 2014; (2) the NRC's safety evaluation report published in August 2014 (ADAMS Accession No. ML14232A380); (3) the NRC's final environmental impact statement (NUREG-1437, Supplement 51), for Callaway, Unit 1, published in October 2014; and (4) the NRC's ROD.

Dated at Rockville, Maryland, this 6th day of March, 2015.

For the Nuclear Regulatory Commission.

Christopher G. Miller,

Director, Division of License Renewal, Office of Nuclear Reactor Regulation.

[FR Doc. 2015-05990 Filed 3-13-15; 8:45 am]

BILLING CODE 7590-01-P

NUCLEAR REGULATORY COMMISSION

Advisory Committee on Reactor Safeguards (ACRS); Meeting of the ACRS Subcommittee on Thermal Hydraulic Phenomena; Notice of Meeting

The ACRS Subcommittee on Thermal Hydraulic Phenomena will hold a meeting on March 20, 2015, Room T-2B1, 11545 Rockville Pike, Rockville, Maryland.

The meeting will be open to public attendance, with the exception of portions that may be closed to protect information that is proprietary pursuant to 5 U.S.C. 552(c)(4). The agenda for the subject meeting shall be as follows:

Friday, March 20, 2015—1:00 p.m. Until 5:00 p.m.

The Subcommittee will review Topical Report NEDE-33766P, "GEH Simplified Stability Solution" (GS3). The Subcommittee will hear presentations by and hold discussions with the NRC staff, General Electric-Hitachi, and other interested persons regarding this matter. The Subcommittee will gather information, analyze relevant issues and facts, and formulate proposed positions and actions, as appropriate, for deliberation by the Full Committee.

Members of the public desiring to provide oral statements and/or written comments should notify the Designated Federal Official (DFO), Zena Abdullahi (Telephone 301-415-8716 or Email: Zena.Abdullahi@nrc.gov) five days prior to the meeting, if possible, so that appropriate arrangements can be made. Thirty-five hard copies of each presentation or handout should be provided to the DFO thirty minutes before the meeting. In addition, one electronic copy of each presentation should be emailed to the DFO one day before the meeting. If an electronic copy cannot be provided within this timeframe, presenters should provide the DFO with a CD containing each presentation at least thirty minutes before the meeting. Electronic recordings will be permitted only during those portions of the meeting that are open to the public. Detailed procedures for the conduct of and participation in ACRS meetings were

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Respectfully submitted,


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