



Callaway Plant

October 24, 2016

ULNRC-06307

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

10 CFR 50.71(e)(4)

Ladies and Gentlemen:

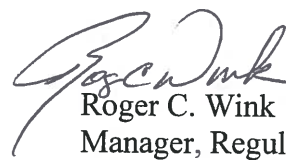
**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
CYCLE 21 COMMITMENT CHANGE SUMMARY REPORT**

Please find attached the Cycle 21 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 November 22, 2014 and May 10, 2016, and were not reported to NRC in a previous submittal. The Cycle 21 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 Mr. Tom Elwood, Supervising Engineer, Regulatory Affairs and Licensing at 314-225-1905.

This letter does not contain new commitments.

Sincerely,

 10/24/16  
Roger C. Wink 4381  
Manager, Regulatory Affairs

DRB/tlw

Enclosure

cc: Mr. Kriss M. Kennedy  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Mr. L. John Klos  
Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop O8H4  
Washington, DC 20555-0001

**Index and send hardcopy to QA File A160.0761**

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R. C. Wink  
T. B. Elwood  
Corporate Communications  
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Mr. Greg Voss, REP Manager (SEMA)  
STARS Regulatory Affairs  
Mr. Jay Silberg (Pillsbury Winthrop Shaw Pittman LLP)  
Ms. Leanne Tippet-Mosby (DNR)

## CYCLE 21 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 November 22, 2014 to May 10, 2016. A description of each change completed, along with a brief justification for each revised commitment, is provided.

### Commitment 42745

This commitment limited the time that an individual sealand container of radwaste could be stored outside (onsite) to less than one year. The time limit no longer applies, so this commitment was closed.

#### Justification:

Commitment 42745 was closed since the requirement imposed by this commitment is no longer in effect. Specifically, NRC Regulatory Issue Summary (RIS) 2011-09, "Available Resources Associated with Extended Storage of Low-Level Radioactive Waste [LLW]," endorses the staff position expressed in SECY-94-198, which was written to inform the Commission of changes needed due to closure of the Barnwell LLW disposal facility and the resultant necessity of many licensees to store LLW onsite for extended periods. SECY-94-198 removed specific onsite storage time limits.

### Commitment 41624

This commitment implements a portion of NRC Generic Letter (GL) 88-05, "Boric Acid Corrosion of Carbon Steel Reactor Pressure Boundary Components in PWR Plants," which requested licensees to establish procedures for locating small reactor coolant system (RCS) leaks. The primary change to this commitment was to reduce the required frequency of containment walkdowns from quarterly to "no less than once per fuel cycle during power operations."

#### Justification:

This commitment change was made primarily to reduce occupational radiation exposure to Callaway staff and align with industry practices. Callaway benchmarking of industry peers revealed Callaway to be an outlier in the number of containment entries made.

Operations personnel routinely monitor RCS identified and unidentified leak rates using procedure OSP-BB-00009, "RCS Inventory Balance." The use of procedure OSP-BB-00009

allows the detection of very small RCS leaks. Identification of new leakage results in efforts to determine the source of the leakage using procedure ODP-ZZ-00029, "RCS Leakage Action Level Guideline." Containment entries are performed as necessary following detection of RCS leakage above threshold values in order to identify the source of the leakage.

This revised commitment continues to implement GL 88-05, which did not specify walkdowns as a required method for locating small coolant leaks.

#### Commitment 41813

This commitment details how the Station Blackout (SBO) response guidelines of NUMARC 87-00, section 4.2.1 are met. Originally, several procedures were necessary to meet these guidelines, and each of these procedures was identified in the commitment text. The primary change made to the commitment was to acknowledge that, due to subsequent procedure changes, only one procedure, ECA-0.0, "Loss of All AC Power," is currently required to meet the SBO guidelines.

#### Justification for change:

Since 1989, emergency procedures have been strengthened and reorganized such that ECA-0.0 by itself meets the SBO response guidelines of NUMARC 87-00, section 4.2.1. The other procedures originally listed in the commitment are no longer relevant since their applicable guidance was subsumed under ECA-0.0. The original intent of ensuring that there is adequate procedural guidance for implementing the SBO response guidelines of NUMARC 87-00 (section 4.2.1) at Callaway is unchanged.