



Callaway Plant

February 27, 2018

ULNRC-06423

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

10 CFR 50.54(p)(2)

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
RENEWED FACILITY OPERATING LICENSE NPF-30
FOLLOW-UP CLARIFICATION FOR LETTER DATED DECEMBER 19, 2017**

By letter dated December 19, 2017, an update (Revision 1) of the Cyber Security Plan (CSP) for the Callaway Plant was transmitted to the NRC. Since the CSP is an extension of the Physical Security Plan (PSP), and since both plans are similar to the extent that the reporting/submittal of changes to either plan is subject to the provisions of 10 CFR 50.54(p) and License Condition 2.E of the Callaway Plant Operating License, the CSP revision was transmitted to the NRC by the Security Manager for the Callaway Plant.

In light of some potentially confusing aspects of the December 19, 2017 letter, as identified by the NRC Project Manager for the Callaway Plant, this follow-up letter is submitted to provide clarification regarding the purpose/intent of the December 19, 2017 submittal. Specifically, although Revision 1 of the CSP is considered satisfactorily transmitted by the December 19, 2017 submittal, this letter provides clarifications in regard to specific parts of the text contained in the cover letter and in the cover sheet that was included in the attachment to the letter, as follows:

- In the cover letter, it was requested that the NRC "review the attached documents for acceptance and approval by the commission." It should be clarified that the CSP changes were reviewed prior to submittal and determined to NOT constitute a reduction in effectiveness. Thus, the changes do not require approval by the NRC and were being submitted/reported to the NRC for information pursuant to 10 CFR 50.54(p)(2).
- It was further requested in the cover letter that the "agency give urgent attention to this submittal and approval request to assist us in meeting our end of year milestone completion commitment... for cyber security compliance." As noted above, the transmitted CSP changes were in fact being reported/provided as information pursuant to 10 CFR 50.54(p)(2). Submittal

of the changes on December 19, 2017 supported fulfillment of the noted commitment "for cyber security rule compliance," as NRC approval of the changes prior to implementation was not required.

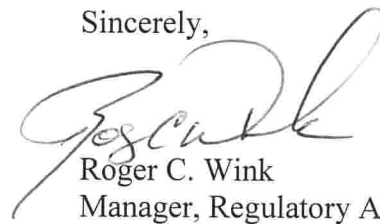
- The CSP changes provided with the December 19, 2017 letter were provided as an attachment containing a cover sheet titled, "Official Use Only – Security Related Information: Change to the Callaway Plant Security Plan." As noted above, due to the CSP being an extension of the PSP, a Security Plan Change cover sheet was used, though it should be clear that what was transmitted were CSP changes. The cover sheet contained two errors: (1) Within Table 1 of the cover sheet, in describing the "Change to plan," the change was identified as "Addition of new Cyber Security Plan," and (2) At the bottom of the sheet, the words "Official Use Only – Security Related Information: Change to the Wolf Creek Security Plan" were erroneously included. In regard to the first error, it should be clarified that the change being made was a revision to the CSP (and not the addition of a "new" CSP). In regard to the second error, it is clear that the change being made is to the Callaway Security Plan (i.e., CSP) and not to the plan for Wolf Creek.

Ameren Missouri regrets any confusion caused by the December 19, 2017 submittal. It should be noted that the December 19, 2017 letter was not transmitted in accordance with station procedures. The non-compliance has been addressed in Callaway Plant's Corrective Action Program.

This letter does not contain new commitments.

If there are any questions please contact Mr. Thomas Elwood, Regulatory Affairs and Licensing Supervisor, at 314-225-1905.

Sincerely,

 2/27/18
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