



Callaway Plant

Security-Related Information – Withhold Under 10 CFR 2.390

March 9, 2018

ULNRC-06401

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

10 CFR 50.90  
10 CFR 2.390

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
LICENSE AMENDMENT REQUEST FOR ADDITION  
OF NEW TECHNICAL SPECIFICATION 3.7.20, "CLASS 1E  
ELECTRICAL EQUIPMENT AIR CONDITIONING (A/C) SYSTEM" (LDCN 16-0013)**

Reference:

1. NRC letter dated September 1, 2016, "Summary of August 25, 2016, Public Meeting with Wolf Creek Nuclear Operating Corporation and AmerenUE Regarding a Proposed Application for a New Technical Specification for the Class 1E Electrical Equipment Air Conditioning System (CAC Nos. MF8118 and MF8119)"
2. Wolf Creek Nuclear Operating Corporation letter ET 17-0010, "Docket No. 50-482: License Amendment Request for Addition of New Technical Specification 3.7.20, 'Class 1E Electrical Equipment Air Conditioning (A/C) System,'" dated June 28, 2017

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Ameren Missouri hereby requests an amendment to Renewed Facility Operating License No. NPF-30 for the Callaway Plant to incorporate a new Specification into the Callaway Technical Specifications (TSs). The proposed amendment would add TS 3.7.20, "Class 1E Electrical Equipment Air Conditioning (A/C) System," to the Callaway TSs.

Attachment 1 to this letter contains sensitive information.  
Withhold from public disclosure under 10 CFR 2.390(a)(4).  
Upon removal of Attachment, this letter is uncontrolled.

SENSITIVE INFORMATION – WITHHOLD UNDER 10 CFR 2.390(a)(4)

New TS 3.7.20 will include the Limiting Condition for Operation (LCO) statement, Applicability during which the LCO must be met, Actions (with Conditions, Required Actions, and Completion Times) to be applied when the LCO is not met, and Surveillance Requirements to demonstrate that the LCO is met for the Class 1E electrical equipment A/C trains at Callaway.

Under the current Technical Specifications (without TS 3.7.20), application of the TS definition of Operability requires that the associated electrical TS LCOs be declared not met upon the determination of a Class 1E electrical equipment A/C train being nonfunctional. This is overly restrictive and does not provide sufficient opportunity to restore the Class 1E electrical equipment A/C train to a functional status (due to the very short completion times and/or LCO 3.0.3 requirements involved when declaring the Class 1E electrical equipment inoperable), thereby resulting in the likelihood of an unnecessary plant shutdown. Introducing new TS 3.7.20 for the support system function performed by the Class 1E electrical equipment A/C trains would allow LCO 3.0.6 to be applied so that support system inoperability can be addressed via the Conditions and Required Actions of TS 3.7.20. To support implementation of proposed TS 3.7.20, a plant modification (described further in attachments to this letter) is planned that would enhance the capability of one Class 1E electrical equipment A/C train to provide adequate area cooling for both trains of Class 1E electrical equipment during normal and accident conditions with minimal actions required.

This license amendment request (LAR) for incorporating TS 3.7.20 into the Technical Specifications was the subject of a pre-application meeting conducted on August 25, 2016 between representatives from Wolf Creek Nuclear Operating Corporation (WCNOC), Ameren Missouri and the NRC. In that meeting, as summarized in Reference 1, it was noted that the same TS change would be proposed for the Wolf Creek and Callaway plants. A comparison of the LARs for these plants shows that this intent has been met, as the license amendment request for Wolf Creek has already been submitted per Reference 2.

It should be noted that this proposed amendment for Callaway also requires revision to part "e" of TS 5.5.11, "Ventilation Filter Testing Program (VFTP)," wherein the value specified for the wattage required to be dissipated by the heater in each control room pressurization train is proposed to be changed from  $15 \pm 2$  KW to  $5 \pm 1$  KW. This change is due to a modification to be made to the affected charcoal heaters to reduce the heat load on the Class 1E electrical equipment A/C trains. The change thus needs to be made in conjunction with the incorporation of TS 3.7.20.

Attachments 1 through 5 provide the Evaluation, Redacted Evaluation, markup of TSs, retyped TS pages, and proposed TS Bases changes, respectively, in support of this amendment request. Attachment 5 (TS Bases changes) is provided for information only. Final TS Bases changes will be implemented pursuant to TS 5.5.14, "Technical Specification (TS) Bases Control Program," at the time the amendment is implemented. It should be noted that Attachment 1 to this letter contains security-related information which could reasonably be expected to be useful to potential adversaries. Ameren Missouri therefore requests that Attachment 1 be withheld from public disclosure in accordance with 10 CFR 2.390. Attachment 2 is provided as a redacted version of Attachment 1.

Attachment 6 contains a list of regulatory commitments being made for completion of the two, above-noted plant modifications needed for implementation of the proposed amendment, i.e., the noted heater

modification for the control room pressurization filter trains, and a supplemental cooling/ventilation system to enable one Class 1E electrical equipment A/C train to cool the areas for both trains of Class 1E electrical equipment when operating under the provisions of the applicable Required Action(s) specified for proposed TS 3.7.20. These modifications are described in further detail in Attachment 1 and/or Attachment 2 and will be made under the provisions of 10 CFR 50.59 for those aspects not covered by this license amendment request.

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92, "Issuance of amendment." Further, pursuant to 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," Section (b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment.

This amendment application was reviewed by the Onsite Review Committee. In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," Section (b)(1), a copy of this amendment application, with Attachments 2 through 6, is being provided to the designated Missouri State official.

Ameren Missouri requests approval of this license amendment request prior to April, 2019. It is anticipated that the license amendment, as approved, will be effective upon issuance and will be implemented within 120 days from the date of issuance.

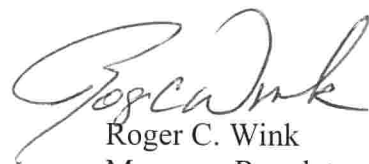
If you have any questions concerning this matter, please contact me at 573-310-7025 or Mr. Tom Elwood at 314-225-1905.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Executed on:

3/8/18



Roger C. Wink  
Manager, Regulatory Affairs

Attachments:

1. Evaluation
2. Evaluation (Redacted)
3. Proposed Technical Specification Changes (Mark-up)
4. Revised Technical Specification Pages
5. Proposed TS Bases Changes (for information only)
6. List of Regulatory Commitments

cc: Mr. Kriss M. Kennedy  
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