



February 8, 2019

ULNRC-06482

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

10 CFR 50.90

Ladies and Gentlemen:

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

References:

1. Ameren Missouri letter ULNRC-06401, "License Amendment Request for Addition of New Technical Specification 3.7.20, 'Class 1E Electrical Equipment Air Conditioning (A/C) System' (LDCN 16-0013)," dated March 9, 2018 (ADAM Accession Number ML18068A685)
2. NRC letter, "Callaway Plant, Unit No. 1 – Regulatory Audit Summary Regarding License Amendment Request to Incorporate a New Technical Specification 3.7.20 (EPID-L-2018-LLA-0062)," dated January 4, 2019. (ADAMS Accession Number ML18353B016)
3. NRC Request for Additional Information (received via e-mail, "Formal Release of RAIs, Ref: Callaway Plant Class 1E LAR, L-2018-LLA-0062" on January 9, 2019) (ADAMS Accession Number ML19010A010)
4. Ameren Missouri letter ULNRC-06477, "Supplement to License Amendment Request for Addition of New Technical Specification 3.7.20, 'Class 1E Electrical Equipment Air Conditioning (A/C) System' (LDCN 16-0013)," dated January 23, 2019 (ADAM Accession Number ML19024A470)

By letter dated March 9, 2018 (Reference 1) Union Electric Company (dba Ameren Missouri) submitted a License Amendment Request (LAR) for the Callaway Plant. Per the requested license amendment, the Callaway Technical Specifications would be revised to incorporate a new Technical Specification (TS), i.e., TS 3.7.20, for the Class 1E Electrical Equipment Air Conditioning (A/C) System at Callaway. In addition, TS 5.5.11, "Ventilation Filter Testing Program," would be revised to

change the value specified for the wattage required to be dissipated by the heater in each control room pressurization train from  $15 \pm 2$  kW to  $5 \pm 1$  kW.

The Class 1E Electrical Equipment A/C System provides area cooling within the Control Building for the Class 1E switchgear, as well as safety-related inverters, batteries and battery chargers. At present, the system is not specifically addressed in the Technical Specifications. Ameren Missouri's proposed LAR will incorporate appropriate TS requirements for this important support system, including a Condition and Required Action for when one Class 1E electrical equipment A/C train is declared inoperable.

The proposed Required Actions for the noted Condition would allow up to 30 days for restoring the inoperable Class 1E electrical equipment A/C train to Operable status, provided compensatory actions are taken, which consist mainly of monitoring room temperatures to ensure room temperatures remain within limits as supported by placing one train of the "supplemental cooling system" into service (to be described in the Bases for proposed TS 3.7.20 and in the FSAR). The supplemental cooling system augments the capability of one operable Class 1E electrical equipment A/C train to cool the rooms/areas of both trains of Class 1E electrical equipment. The system is being installed under a plant modification (MP 16-0024) that will be completed in the forthcoming refueling outage, i.e., in time for implementation of the requested license amendment.

The basis and details for proposed TS 3.7.20, as well as more detailed descriptions of the associated plant modifications (including the supplemental cooling system) and the underlying technical analyses, are provided in the Reference 1 LAR as well as in the recently submitted supplement to the LAR, (Reference 4).

To support the NRC staff's review of the LAR and its basis, an audit was conducted at the Callaway plant in September (2018). A summary of the audit was provided in an NRC letter issued on January 9, 2019 (Reference 2), and a summary of the audit questions/requests along with the final Ameren Missouri responses was included in the Reference 4 LAR supplement. As described in the Reference 2 and 4 letters, all of the items/issues identified from the audit were resolved except for one item/area for which it was determined that additional information is needed. That item/area mainly concerns the analysis of heat loads and use of the supplemental cooling system following an accident or hazard with a Class 1E electrical equipment A/C train inoperable at the onset of such an event. As anticipated, therefore, a request for additional information, in the form of several, individual questions/requests, was issued by the NRC on January 9, 2019, (Reference 3). Responses to the RAI questions/requests were requested to be submitted on or by February 8, 2019.

The response to the NRC's January 9, 2019 RAI is hereby provided via Attachment 1 to this letter. The attached response includes background information provided in the NRC's RAI, followed by responses to the individual questions/requests contained in the RAI.

If there are any questions regarding this LAR supplement, please contact Mr. Tom Elwood at 314-225-1905.

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

Sincerely,



Shannon L. Abel  
Director, Engineering Design and  
Projects

Executed on: 2/8/2019

Attachments to this letter:

1. RAI Questions and Responses

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