

February 20, 2019

ULNRC-06488

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

10 CFR 50.47
10 CFR 50.54(q)
10 CFR 50 Appendix E, IV.B.2
10 CFR 50.90

Ladies and Gentlemen:

DOCKET NUMBERS 50-483 AND 72-1045
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
RENEWED FACILITY OPERATING LICENSE NPF-30
SUPPLEMENT AND RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION REGARDING LICENSE AMENDMENT REQUEST FOR
EMERGENCY ACTION LEVEL (EAL) CHANGES

- References:
- 1) ULNRC-06433, "License Amendment Request for Emergency Action Level (EAL) Changes," dated September 4, 2018 (ADAMS Accession No. ML18247A467)
 - 2) Correspondence from John Klos to Tom Elwood, "Formal release of RAI Ref: Callaway Plant EAL changes, L-2018-LLA-0239," dated December 20, 2018 (ADAMS Accession No. ML18355A488)
 - 3) NEI 99-01, "Development of Emergency Action Levels for Non-Passive Reactors," Revision 6, dated November 2012 (ADAMS Accession No. ML12326A805)
 - 4) EPFAQ 2016-002, "Clarification of Equipment Damage as a Result of a Hazardous Event" (ADAMS Accession No. ML17195A299)
 - 5) EPFAQ 2018-004, "EPFAQ 2018-04 Clarification of Hazardous Events and Safety Systems Concurrence Package for Public Comment Release," dated May 31, 2018 (ADAMS Accession No. ML18268A168)

Per Reference 1, Union Electric Company (Ameren Missouri) submitted a license amendment request for an emergency action level (EAL) scheme change for Callaway Plant (Callaway). Specifically, Ameren Missouri proposed changes to EALs CA6.1, "Cold Shutdown / Refueling System Malfunction

– Hazardous event affecting a SAFETY SYSTEM needed for the current operating MODE: Alert," and SA9.1, "System Malfunction – Hazardous event affecting a SAFETY SYSTEM needed for the current operating MODE: Alert" (including addition of a new definition for the term "Loss of Safety Function (LOSF)" and re-definition of the term "Visible Damage"), along with deletion of Initiating Condition (IC) HG1 and associated EAL HG1.1, "Hazard – HOSTILE ACTION resulting in loss of physical control of the facility: General Emergency," in connection with the Callaway Plant Radiological Emergency Response Plan (RERP).

Per Reference 2, the NRC staff transmitted a request for additional information (RAI) needed to facilitate the technical review being conducted by the Office of Nuclear Security and Incident Response/ Division of Preparedness and Response/Reactor Licensing Branch (NSIR/DPR/RLB).

Through discussion with the NRC staff during a telephone conference on December 18, 2018, Ameren Missouri proposed to revise its original LAR such that the verbiage that had been provided for the requested EAL changes regarding "Loss of Safety Function" would be replaced with verbiage that is consistent with Reference 3, as modified in accordance with the NRC staff guidance provided in Reference 4.

When the originally proposed verbiage was replaced in order to effect alignment with the noted NRC-recognized guidance, Ameren Missouri also considered additional NRC-recognized guidance, as provided in Reference 5, which is applicable to the proposed changes. Changes per the latter would add clarification text to the Bases for EALs CA6.1 and SA9.1 that is consistent with Reference 5, including examples of systems and components to which the clarification applies.

All of these changes require revision of the originally proposed changes, and consequently, this letter is hereby submitted as a supplement to the original LAR. This letter also serves to provide a response to the Reference 2 RAI, notwithstanding the applicability of the RAI questions/requests to the originally proposed changes.

All required information pertaining to the new changes and RAI response is provided in the attachments to this letter. Specifically, the response to the RAI is provided in Attachment 1 to this letter, and Attachments 2, 3, and 4, respectively, provide a revised evaluation of proposed EALs, revised mark-ups of proposed Callaway EAL Technical Bases Document affected pages, and revised clean copies of proposed Callaway EAL Technical Bases Document affected pages. A revised clean copy of the proposed Emergency Action Level Classification Matrix is also provided for information as Attachment 5. The supplemental material that is provided in Attachments 2, 3, 4, and 5 supersedes material that had been submitted per Reference 1.

This submittal does not contain new commitments. For any questions concerning this letter, please contact Mr. Tom Elwood at 314-225-1905.

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

Sincerely,

Executed on: February 20, 2019



Roger C. Wink
Manager, Regulatory Affairs

- Attachments:
- 1) Response to Request for Additional Information
 - 2) Evaluation of Proposed Emergency Action Levels
 - 3) Mark-ups of Callaway EAL Technical Bases Document affected pages
 - 4) Revised affected pages of EIP-ZZ-00101 Addendum 2, "Emergency Action Level Technical Bases Document," Proposed Revision 016 (Clean Copy)
 - 5) EAL Matrix from EIP-ZZ-00101 Addendum 1, "Emergency Action Level Classification Matrix," Proposed Revision 009 (Clean Copy – Information Only)

cc: Mr. Scott A. Morris
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Director
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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 O9E3
Washington, DC 20555-0001

Senior Emergency Preparedness Analyst
U.S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

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