

Attachment 1 to ULNRC-06488

Response to Request for Additional Information

(2 pages)

Request for Additional Information:

On December 20, 2018, the NRC staff transmitted the following Request for Information (RAI) to Ameren Missouri in regards to its License Amendment Request (LAR) for Emergency Action Level (EAL) changes, which had been submitted per letter ULNRC-06433, dated September 4, 2018:

Note: In the RAI below, the section or initiating condition category are listed with the Callaway nomenclature first and if any change from NEI guidance listed in brackets.

Callaway RAI-1 CA6.1 and SA9.1 [CA6 and SA9]

Page 2 of Attachment 1, "Evaluation of Proposed Emergency Action Levels," proposes the following wording for CA6.1 and SA9.1, as Note 12 states:

This EAL is applicable when a Table C-6, Hazardous Events, causes a LOSS OF SAFETY FUNCTION on a SAFETY SYSTEM required for the current operating MODE, then this emergency classification is not warranted.

However, Attachment 3, "Emergency Action Level Technical Bases Document," provides the following wording for CA6.1 and SA9.1 Note 12:

This EAL is applicable when a Table C-6, Hazardous Events, causes a LOSS OF SAFETY FUNCTION on a SAFETY SYSTEM required for the current operating MODE.

The wording of Note 12, in either of the above versions, includes "LOSS OF SAFETY FUNCTION" as a defined term. This definition appears to require an assessment that determines whether or not a safety function assumed in the accident analysis cannot be performed. This is neither consistent with the NEI 99-01, Revision 6 or the EPFAQ 2016-02 versions of CA6.1 and SA9.1.

- a. Concerning Note 12, as provided on page 2 of Attachment 1, please explain how the proposed wording would not cause confusion when it appears to state that the EAL is applicable AND that an emergency classification is not warranted.
- b. Concerning Note 12, as provided in Attachment 3, the addition of LOSS OF SAFETY FUNCTION criteria is not consistent with the proposed EALs CA6.1 and SA9.1 threshold values. Please explain how a timely and accurate assessment of CA6.1 and SA9.1 can be performed with a note, as stated above, that is not consistent with the EAL threshold values and requires either a safety function determination or some other form of an operability determination. Note: This RAI response should explanation and provide, in much greater detail, justification for a deviation that is not consistent with the definition of an Alert emergency classification.

Response to Request for Additional Information:

- a. Note 12 for EALs CA6.1 and SA9.1 in the "Evaluation of Proposed Emergency Action Levels" that was originally provided in Attachment 1 to Ameren Missouri's September 4, 2018 LAR contained a typographical error that made it inconsistent with the marked-up affected pages and clean text copy of the Emergency Action Level Technical Bases Document that was originally provided in Attachments 2 and 3, respectively, to the same LAR. The documents have been revised to be consistent with one another. A copy of the revised "Evaluation of Proposed Emergency Action Levels" is now included in Attachment 2 to this letter. Marked-up and clean text copies of the affected pages in the revised Emergency Action Level Technical Bases Document are now provided in Attachments 3 and 4 to this letter, respectively.
- b. In order to avoid uncertainty regarding the assessment of EALs CA6.1 and SA9.1, the marked-up affected pages and clean text copy of the Emergency Action Level Technical Bases Document that were originally provided in Attachments 2 and 3, respectively, to the previously submitted LAR have been revised to remove the definition of the proposed term LOSS OF SAFETY FUNCTION and make the wording of proposed Notes 11 and 12 for EALs CA6.1 and SA9.1 conform to EPFAQ 2016-002. Marked-up and clean text copies of the affected pages in the revised document are now provided as Attachments 3 and 4, respectively, to this letter. The "Evaluation of Proposed Emergency Action Levels" that was originally provided as Attachment 1 to the LAR has also been revised to reflect these changes, and is now provided as Attachment 2 to this letter. An information-only copy of the revised Emergency Action Level Classification Matrix has also been provided as Attachment 5 to this letter.