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September 24, 2019

ULNRC-06528

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

10 CFR 50.54(f)

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
PATH FORWARD FOR RESOLUTION OF GL 2004-02**

In the letter identified as Reference 1 (in the list of references provided on page 3 of this letter), Union Electric Co. (dba Ameren Missouri) described the closure path being taken for resolution of Generic Letter (GL) 2004-02 (Reference 3) and Generic Issue GI-191 (formerly Generic Safety Issue GSI-191) for the Callaway Plant. Specifically, Ameren Missouri proposed to achieve resolution of GL 2004-02 and GI-191 by implementing Option 2b, "Full Risk-Informed Resolution Path," of SECY-12-0093 (Reference 4), utilizing the methodology developed by South Texas Project (STP). This resolution path is still being pursued by Ameren Missouri and is ongoing.

Per Reference 1, it was initially noted that the necessary application/correspondence for resolving GI-191 at Callaway Plant would be submitted by December 31, 2015. This was identified as a commitment (Commitment No. 50261) in Attachment 2 of the letter. In References 2 and 5, Ameren Missouri subsequently revised its submittal commitment. In Reference 2, it was clarified that the GI-191 closure correspondence to be submitted for Callaway would likely be in the form of a license amendment request (LAR) and proposed regulatory exemption (similar to STP's submittal). The current commitment described in Attachment 1 to Reference 5 states that the submittal will either be made by September 26, 2019, or one year after issuance of the NRC's Safety Evaluation (SE) for WCAP-17788, "Comprehensive Analysis and Test Programs for GSI-191 Closure," whichever is later.

Several activities have transpired subsequent to the Reference 5 letter, including actions by the NRC staff regarding closure of GI-191 (Reference 6) and issuance of a Technical Evaluation Letter (Reference 7), in lieu of a Safety Evaluation that identified unresolved issues concerning WCAP-17788. In 2018, a Technical Specification (TS) traveler developed by the Technical Specifications Task Force (TSTF), i.e., TSTF-567, Revision 1, "Add Containment Sump TS to Address GSI-191

Issues," was approved by the NRC and made available to licensees (Reference 8) for proposing appropriate Technical Specification changes in connection with their GL 2004-02 responses. Recently, a pre-submittal meeting was conducted with the NRC in which representatives from and for Ameren Missouri provided a presentation/summary of the combined LAR and exemption request to be submitted as the final response to GL 2004-02 for Callaway. Insights from that meeting are now being factored into the intended submittal. In light of these activities, additional time is needed to finalize the complete submittal.

Based on the above, it is proposed that the date for submitting the GL 2004-02 closure correspondence for Callaway Plant be extended to June 11, 2020. The revised submittal commitment is documented in the attachment (Attachment 1) to this letter.

For any questions concerning the contents of this letter, please contact Roger Wink, Regulatory Affairs Manager, at 573-310-7025.

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

Sincerely,



Stephanie Banker  
Vice President - Engineering

Executed on: 9/24/19

Attachment 1: Revised Commitment

### References

1. Ameren Missouri letter ULNRC-05989, "Path Forward for Resolution of GSI-191," dated May 16, 2013 (Accession No. ML13136A290).
2. Ameren Missouri Letter ULNRC-06100, "Path Forward for Resolution of GSI-191," dated March 31, 2014 (Accession No. ML14090A355).
3. Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors," dated September 13, 2004 (Accession No. ML042360586).
4. NRC Policy Issue SECY-12-0093, "Closure Options for Generic Safety Issue - 191, 'Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance,'" dated July 9, 2012 (Accession No. ML121310648).
5. Ameren Missouri Letter ULNRC-06417, "Path Forward for Resolution of GSI-191," dated March 6, 2018 (Accession No. ML14090A355).
6. NRC Memorandum from R. V. Furstenau to H. K. Nieh, "Closure of Generic Issue GI-191, 'Assessment of Debris Accumulation on PWR Sump Performance,'" dated July 23, 2019 (Accession No. ML19203A299).
7. NRC Memorandum from V. G. Cusumano to M. Gavrilas, "Technical Evaluation Report of In-Vessel Debris Effects," dated June 13, 2019 (Accession No. ML19178A252).  
NRC letter from V. Cusumano to Technical Specifications Task Force, "Final Safety Evaluations of Technical Specifications Task Force Traveler TSTF-567, Revision 1, 'Add Containment Sump TS to address GSI-191 Issues' (EPID: L-2017-PMP-0005)," dated July 3, 2018 (Accession No. ML18109A071)

cc: Mr. Scott A. Morris  
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Mr. Jay Silberg (Pillsbury Winthrop Shaw Pittman LLP)

## Attachment 1

### Revised Commitment

#### Current Commitment per ULNRC-06417

COMMITMENTS	Due Date/Event	Commitment Number
Ameren Missouri will submit closure correspondence (e.g., License Amendment and regulatory exemption request) for resolving GSI-191 at Callaway Energy Center pursuant to SECY-12-0093 Option 2b (risk-informed approach).	September 26, 2019  OR  1 year following issuance of the Safety Evaluation for WCAP-17788, "Comprehensive Analysis and Test Programs for GSI-191 Closure"  Whichever is later.	50261, Rev. 2

#### Proposed Change to Commitment 50261

COMMITMENTS	Due Date/Event	Commitment Number
Ameren Missouri will submit closure correspondence (e.g., a combined license amendment and regulatory exemption request) for resolving GL 2004-02 at Callaway Energy Center pursuant to SECY-12-0093 Option 2b (risk-informed approach).	June 11, 2020	50261, Rev. 3

# COMMITMENT REVISION, INITIATION, DELETION REQUEST (CRIDR)

<b>ORIGINATOR</b>	
1. Check the appropriate request: <input checked="" type="checkbox"/> Revision <input type="checkbox"/> Initiation <input type="checkbox"/> Implementation / Completion	
2. Name (print) <u>J. P. Kovar</u>	3. Date <u>09/24/2019</u>
4. Commitment No. <u>50261</u> (RARL will enter this in case of initiation)	
5. Commitment Description: <input checked="" type="checkbox"/> See Attached, or <input type="checkbox"/> See CA2358	
6. Source document, section, and date <u>ULNRC-06528, Attachment 1, September 26, 2019</u>	
7. Reference documents, sections, and dates <u>ULNRC-06417, Attachment 1, March 6, 2018</u> (use attachments if necessary)	
8. Justification for revision, initiation, or deletion: (attach additional pages as required) <u>To address NRC staff actions to close GI-191 (formerly GSI-191), issue a Technical Evaluation Report that identified unresolved issues concerning WCAP-17788, and approve TSTF-567, Rev. 1, and the insights gained from the recent pre-submittal meeting, additional time will be needed to prepare the submittal.</u>	
<b>CRITERIA FOR A COMMITMENT</b>	
9. Place an 'x' by any of the following items that apply to the commitment text (initiation and revision only): a) <input checked="" type="checkbox"/> It is a written promise by Ameren Missouri - Callaway Plant to the NRC to perform an action by a given date. b) <input type="checkbox"/> It is a written promise by Ameren Missouri - Callaway Plant to another regulatory agency to perform an action by a given date. c) <input type="checkbox"/> It is a written promise by Ameren Missouri - Callaway Plant to another entity to perform an action by a given date.	
If none of the items can be marked, this text may not represent a commitment. In this case, contact RARL for further directions.	
10. Action Documents <u>CR 200910285-052</u>	11. Recommended Responsible Person(s) <u>J. P. Kovar</u>
12. Approving Manager <u><i>Stephen P. Bauer</i></u> <u>95541</u> <u>9/24/19</u>	
Forward CRIDR package to RARL	
13. Commitment coordinator    _____	14. Date Entered CTS    _____
<b>Instructions</b>	
1. -3.    Self explanatory	
4.        Enter the number of the commitment being revised or deleted.	
5.        Provide a description of the Commitment by either attaching a sheet to this form, or via the CA2358.	
6.        Enter the title of the source document, the section of the source document that contains the commitment text, and the date the document was issued. The source document is the document in which Ameren Missouri commits an action to outside organizations.	
7.        Enter the title of the source documents, the sections containing the reference text, and the date the documents were issued. Reference documents are any documents that contain redundant, similar, or supporting information with respect to the source text.	
8.        Enter the reason for revising, initiating, or deleting this commitment.	
9.        Select the applicable choice. If none apply, this may not be a commitment, but an obligation.	
10.       Enter document(s) which satisfy the commitment (if known).	
11.       Enter responsible person(s) (if known).	
12.       Signature of the Approving manager	
<b>Return CRIDR to RARL</b>	