

UNION ELECTRIC COMPANY

1901 GRATIOT STREET
ST. LOUIS, MISSOURI

March 23, 1984

DONALD F. SCHNELL
VICE PRESIDENT

MAILING ADDRESS:
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ST. LOUIS, MISSOURI 63166

Mr. Harold R. Denton
Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ULNRC- 774

Dear Mr. Denton:

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
ADDITIONAL BASIS FOR FORTY-YEAR OPERATING LICENSE

Reference: ULNRC-697 dated 12/2/83 Signed by D. F. Schnell

This letter provides additional information concerning our request, referenced above, for a forty-year operating term commencing with the issuance of the operating license for Callaway Unit 1. This additional information responds to a request from the Callaway NRC Project Manager.

Union Electric finds that significant adverse environmental impact is not anticipated as a result of increasing the operating life of Callaway Plant to 40 years. The following points provide additional justification to support this position:

- (a) The Callaway Plant is located in a rural area where the population growth over the forty-year lifetime is expected to be small.
- (b) Having Callaway Plant available for a forty-year term would maintain system capacity, promote fuel diversification, and defer capital costs and environmental impacts of replacement capacity.
- (c) Environmental considerations associated with a forty-year operating term do not change significantly. Impacts on the aquatic ecosystem from water use and chemical, thermal, radioactive and other waste discharges derived from continued plant operation, would remain small. Likewise the impact on the terrestrial ecosystem from continued cooling tower operation, radioactive discharge, and land use would also remain very small.
- (d) A forty-year operating term would extend the socioeconomic benefits from operation of the Plant. The creation of direct and indirect jobs and sustained

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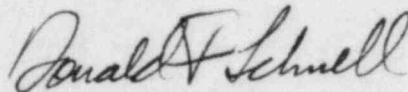
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tax benefits would continue to outweigh the small adverse impacts from land use and the continued demand for community services. Accident risks, human health effects and impacts from the balance of the fuel cycle will continue to be low.

The magnitude of the plant impact is not expected to vary significantly over an extended forty-year lifetime. The Callaway Plant was designed for a forty-year life and its operation over this period of time is not expected to compromise any safety limits or design parameters.

Very truly yours,


Donald F. Schnell

DJW/msc

STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell
Donald F. Schnell
Vice President
Nuclear

SUBSCRIBED and sworn to before me this 23rd day of March, 1984

Barbara J. Pfeiffer
BARBARA J. PFEIFFER
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1985
ST. LOUIS COUNTY

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Mr. Harold R. Denton, Director
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U.S. Nuclear Regulatory Commission
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