



Callaway Plant

July 21, 2020

ULNRC-06592

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

10 CFR 50.90  
10 CFR 2.390(a)(4)

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
SUPPLEMENT TO LICENSE AMENDMENT REQUEST  
REGARDING DEFERRAL OF UPCOMING  
STEAM GENERATOR INSPECTION (LDCN 20-0013))**

Reference:

Ameren Missouri letter ULNRC-06586, "Request for One-Time License Amendment to Defer Upcoming Steam Generator Inspection (LDCN 20-0013)," dated June 26, 2020 (ADAMS Accession No. ML20178A669)

By letter dated June 26, 2020 (the above reference), Ameren Missouri (Union Electric) submitted a license amendment request (LAR) for approval to delay performance of the steam generator inspection required per part d.2 of Callaway Technical Specification 5.5.9, "Steam Generator (SG) Program." The inspection (i.e., eddy current testing of the steam generator tubes) is currently scheduled to be performed during Refuel Outage (RFO) 24 this coming October (2020), and per the requested license amendment, it would be deferred to RFO 25 which is scheduled for the spring of 2022. This deferral request was deemed necessary as a result of actions taken to mitigate the spread of the Coronavirus Disease 2019 (COVID-19) for which a national emergency was declared on March 13, 2020.

The Attachment to this letter contains sensitive information and should be withheld from public disclosure per 10 CFR 2.390.  
Upon removal of the Attachment, this letter is uncontrolled.

The June 26, 2020 LAR included an important, vendor-supplied document providing essential technical information in support of the LAR, i.e., an Operational Assessment (OA). Since the OA contained proprietary information (as identified by the vendor), a proprietary/non-redacted version of the document was provided as Attachment 2 of the LAR submittal, and a non-proprietary/redacted version was provided as Attachment 3 of the submittal. In support of the proprietary document, an affidavit was provided as Attachment 4 of the submittal, attesting to the need for withholding the proprietary information from public disclosure.

Subsequent to submittal of the June 26, 2020 LAR, it was identified that although the affidavit provided a basis for identifying the applicable information as proprietary and why the information should be withheld from public disclosure pursuant to 10 CFR 2.390, the proprietary version of the OA, as provided, did not include brackets adjacent to the text containing the proprietary information and did not include markings with the brackets, signifying the particular reason/basis for the proprietary information (i.e., why it should be withheld).

Based on the foregoing, this supplement to the June 26, 2020 LAR is being submitted in order to transmit a revised OA ("Callaway Unit 1 Steam Generator Operational Assessment to Support Deferral of Planned Inspections from 1R24 to 1R25"), which is provided as an attachment to this letter. The changes to the OA, i.e., to the proprietary/non-redacted version of the OA, consist of the addition of brackets around the proprietary information/text contained therein, as well as markings corresponding to the justification provided in the affidavit. No changes to the affidavit itself (or to the redacted version of the OA) are required.

The changes proposed in this supplement to Ameren Missouri's June 26, 2020 LAR are administrative in nature and have no impact on what was presented in the LAR in regard to the requested TS change. As such, these changes do not change the "No Significant Hazards Consideration" conclusions reached in the LAR, nor do they change the conclusion regarding no need for an environmental assessment based on the categorical exclusion provisions of 10 CFR 51.22.

It should be noted that this submittal does not contain new commitments.

In accordance with 10 CFR 50.91 "Notice for public comment; State consultation," Section (b)(1), a copy of this amendment application is being provided to the designated Missouri State official.

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

Sincerely,



Roger C. Wink  
Manager, Regulatory Affairs

**Attachment:**

**Callaway Unit 1 Steam Generator Operational Assessment to Support Deferral of Planned Inspections from 1R24 to 1R25, Revision 0 (Non-Redacted)**

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

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Mr. Mahesh Chawla  
Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop O8B1A  
Washington, DC 20555-0001

**Index and send hardcopy to QA File A160.0761**

**Hardcopy:**

Certrec Corporation

6100 Western Place, Suite 1050

Fort Worth, TX 76107

(Certrec receives ALL attachments as long as they are non-safeguards and may be publicly disclosed.)

**Electronic distribution for the following can be made via LER ULNRC Distribution:**

F. M. Diya

B. L. Cox

F. J. Bianco

S. P. Banker

K. A. Mills

J. J. Hutchison

R. C. Wink

T. B. Elwood

J. C. Claunch

NSRB Secretary

Performance Improvement Coordinator

Mr. Jay Silberg (Pillsbury Winthrop Shaw Pittman LLP)

Ms. Katie Jo Wheeler (DNR)

Missouri Public Service Commission