



February 8, 2022

ULNRC-06710

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
10 CFR 50.90

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
RENEWED FACILITY OPERATING LICENSE NPF-30
LICENSE AMENDMENT REQUEST FOR PROPOSED REVISION
TO RADIOLOGICAL EMERGENCY RESPONSE PLAN REGARDING
RESPONSE AND NOTIFICATION GOALS**

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit," Ameren Missouri (Union Electric Company) herewith requests NRC approval of proposed changes to the Radiological Emergency Response Plan (RERP) for the Callaway Plant, as contained in proposed Revision 54 to the plan. The changes proposed per Revision 54 of the RERP are being submitted for approval prior to implementation, pursuant to 10 CFR 50.54(q)(4).

The proposed RERP changes would:

- Remove the 15-minute and 30-minute "Normal Hours" response and activation goals, leaving the 75-minute and 90-minute "Off-Normal Hours" activation goals as the station standard to cover all hours.
- Extend the State and counties "follow-up" notification goal from 30 minutes to 60 minutes and allow for even further increases when conditions are stable, with the agreement of the State of Missouri and local counties.

These changes are considered to constitute a reduction in effectiveness of the RERP.

Enclosures 1 through 3 provide a description of the proposed changes, a marked-up copy of affected pages of the RERP, and a revised copy (clean copy) of affected pages (as proposed) of the RERP, respectively.

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92, "Issuance of Amendment." In addition, pursuant to 10 CFR 51.22, "Criterion for Categorical Exclusion; Identification of Licensing and Regulatory Actions Eligible for Categorical Exclusion or Otherwise not Requiring Environmental Review," Section (b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

The Callaway Onsite Review Committee has reviewed and approved the proposed changes and has approved the submittal of this amendment application. Ameren Missouri requests approval of the requested license amendment prior to February 15, 2023. Ameren Missouri further requests that the license amendment be made effective upon NRC issuance, to be implemented within 90 days from the date of issuance.

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.

This submittal does not contain new commitments. For any questions concerning this letter, please contact Tim Wiltman at 573-590-2225 or Gerry Rauch at 314-225-1727.

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

Sincerely,



Steve J. Meyer
Manager, Regulatory Affairs

Executed on: 2/8/2022

Enclosures: 1) Description of the Proposed Changes
2) Marked-up Copy of Affected Pages of the RERP
3) Proposed Revised Copy of Affected Pages of the RERP

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. M. Chawla
Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop 08B1A
Washington, DC 20555-0001

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

.....

Index and send hardcopy to QA File A160.0761

Hardcopy:

Certrec Corporation

6500 West Freeway, Suite 400

Fort Worth, TX 76116

(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 Responses and Reports ULNRC Distribution:

F. M. Diya

B. L. Cox

F. J. Bianco

S. P. Banker

B. L. Jungmann

M. A. McLachlan

K. A. Mills

S. J. Meyer

R. C. Wink

G. P. Rauch

T. B. Elwood

T. R. Wiltman

NSRB Secretary

Mr. Jason Davenport, REP Manager (SEMA)

STARS Regulatory Affairs

Mr. Jay Silberg (Pillsbury Winthrop Shaw Pittman LLP)

Ms. Katie Jo Wheeler (DNR)