



October 29, 2012

ULNRC-05924

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

10 CFR 2.202

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
INITIAL STATUS REPORT IN RESPONSE TO MARCH 12, 2012
COMMISSION ORDER MODIFYING LICENSES WITH REGARD TO
REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-
DESIGN BASIS EXTERNAL EVENTS (ORDER NUMBER EA-12-049)**

- References:
1. Letter dated March 12, 2012 from E. J. Leeds and M. R. Johnson, USNRC, to Adam C. Heflin, Callaway Plant, Union Electric Company, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events"
 2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, August 29, 2012 (ADAMS Accession Number ML12229A174)
 3. Letter dated February 24, 2012, from A. R. Pietrangelo, Nuclear Energy Institute to USNRC, "Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX)" (ADAMS Accession No. ML12061A023)
 4. Nuclear Energy Institute document NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, August 2012 (ADAMS Accession No. ML12242A378)
 5. ULNRC-05842, Ameren Missouri Response to Commission Order to Modify Licenses with Regard to Requirements for Mitigation Strategies For Beyond-Design-Basis External Events, March 30, 2012

On March 12, 2012, the Nuclear Regulatory Commission issued an order (Reference 1) to Union Electric Company (dba Ameren Missouri) for Callaway Plant. Reference 1 was immediately effective

and directs Ameren Missouri to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event at Callaway Plant. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of final interim staff guidance from the NRC. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms Ameren Missouri has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event at Callaway Plant, in accordance with Attachment 2 of Reference 1.

Items to be reported per this status report are as follows:

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3). This equipment has been received on-site.
- A site walk-down was completed with personnel from Westinghouse Electric Company, LLC to determine the site's ability to meet the coping capabilities as defined in NEI 12-06 (Reference 4).

Planned activities for the next six months:

- Resources will be identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.
- Development and submittal of the overall integrated plan.
- Analyses to demonstrate compliance with strategies identified in Reference 4.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None

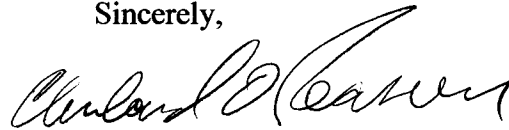
Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Callaway prior to startup from Refueling Outage 20 (currently scheduled for Fall 2014).

If you have any questions concerning the content of this letter, please contact Scott Maglio, Regulatory Affairs Manager, at 573-676-8719. This letter does not contain new commitments.

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

Sincerely,



Executed on: 10/29/12

Cleveland O. Reasoner
Vice President, Engineering

SJM/nls

cc: Mr. Elmo E. Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Mr. Eric J. Leeds
Director, Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O-13H16M
Washington, DC 20555-0001

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

Mr. Fred Lyon
Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O-8B1
Washington, DC 20555-2738

Jessica A. Kratchman
U. S. Nuclear Regulatory Commission
Mail Stop 9 D2
Washington, DC 20555-0001

Eric E. Bowman
U. S. Nuclear Regulatory Commission
Mail Stop 12 D20
Washington, DC 20555-0001

Index and send hardcopy to QA File A160.0761

Hardcopy:

Certrec Corporation
4150 International Plaza Suite 820
Fort Worth, TX 76109
(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 Other Situations ULNRC Distribution:

A. C. Heflin
F. M. Diya
C. O. Reasoner III
D. W. Neterer
L. H. Graessle
S. A. Maglio
R. Holmes-Bobo
NSRB Secretary
T. B. Elwood
Mr. Bill Muilenburg (WCNOC)
Mr. Tim Hope (Luminant Power)
Mr. Ron Barnes (APS)
Mr. Tom Baldwin (PG&E)
Mr. Mike Murray (STPNOC)
Ms. Linda Conklin (SCE)
Mr. John O'Neill (Pillsbury Winthrop Shaw Pittman LLP)
Missouri Public Service Commission