



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 26, 2014

Mr. Fadi Diya
Senior Vice President and
Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 – RELAXATION OF THE SCHEDULE
REQUIREMENTS FOR ORDER EA-12-051, "ORDER MODIFYING LICENSES
WITH REGARD TO RELIABLE SPENT FUEL POOL INSTRUMENTATION"

Dear Mr. Diya:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A679), the U.S. Nuclear Regulatory Commission (NRC) ordered Union Electric Company (the licensee) to take certain actions at Callaway Plant, Unit 1, associated with the Fukushima Near-Term Task Force Recommendations. Order EA-12-051 directed that actions be taken by licensees to install reliable level monitoring systems in the spent fuel pool (SFP) which would operate during loss of site power until offsite resource availability is reasonably assured.

Section IV of the order states that licensees proposing to deviate from requirements contained in NRC Order EA-12-051 may request that the Director, Office of Nuclear Reactor Regulation, relax or rescind certain requirements. By letter dated April 17, 2014 (ADAMS Accession No. ML14112A217), as supplemented by letter dated May 8, 2014 (ADAMS Accession No. ML14129A394), the licensee informed the NRC of their request for an extension of one additional refueling cycle to complete Section 1.6 of Attachment 2 to the order, which states in part that onsite generators used as an alternate power source and replaceable batteries used for instrument channel power shall have sufficient capacity to maintain the level indication function until offsite resource availability is reasonably assured. The licensee will install the new SFP level monitoring system by the order compliance date with a battery supply that can last for about 72 hours if site power is lost. The licensee stated that the batteries are not easily replaceable, and the licensee's plan is to use the portable generators that will be utilized at Callaway in response to Order EA-12-049, "Order Modifying Licenses With Regard To Requirements For Mitigation Strategies For Beyond Design Basis External Events," to provide power to the system before the battery is depleted.

However, the licensee previously received a relaxation of the due date for Order EA-12-049 to the completion of the spring 2016 refueling outage (refer to the NRC letter dated December 11, 2013 (ADAMS Accession No. ML13319A668)). As Callaway's mitigation strategies will not be fully implemented until then, the capability to use a portable generator to power the SFP level monitoring system cannot be reasonably assured until that time. Therefore, the licensee requests an extension of one additional refueling cycle to complete Section 1.6 of Attachment 2 to the order.

F. Diya

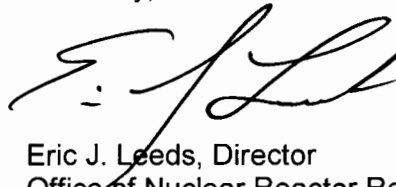
- 2 -

In light of the facts presented in the licensee's letters of April 17 and May 8, 2014, the NRC staff has determined that the licensee has presented good cause for a relaxation of the implementation date for Section 1.6 of Attachment 2 to the order. The ability to have a portable generator which survives the external event and can then be connected to provide power to plant equipment will not be reasonably assured until after the spring 2016 refueling outage. The SFP level monitoring system will remain in service on battery power for the first 72 hours of the event. The NRC staff also considered that, following the accident at Fukushima Dai-ichi, the NRC concluded that a sequence of events such as the Fukushima Dai-ichi accident is unlikely to occur in the United States based on the current regulatory requirements and existing plant capabilities. The NRC staff approves the relaxation of the order implementation date.

Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the requirements of Section 1.6 of Attachment 2 to Order EA-12-051 is relaxed until the completion of the spring 2016 refueling outage.

If you have any questions, please contact John Boska at 301-415-2901.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. J. Leeds', written in a cursive style.

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: Listserv

In light of the facts presented in the licensee's letters of April 17 and May 8, 2014, the NRC staff has determined that the licensee has presented good cause for a relaxation of the implementation date for Section 1.6 of Attachment 2 to the order. The ability to have a portable generator which survives the external event and can then be connected to provide power to plant equipment will not be reasonably assured until after the spring 2016 refueling outage. The SFP level monitoring system will remain in service on battery power for the first 72 hours of the event. The NRC staff also considered that, following the accident at Fukushima Dai-ichi, the NRC concluded that a sequence of events such as the Fukushima Dai-ichi accident is unlikely to occur in the United States based on the current regulatory requirements and existing plant capabilities. The NRC staff approves the relaxation of the order implementation date.

Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the requirements of Section 1.6 of Attachment 2 to Order EA-12-051 is relaxed until the completion of the spring 2016 refueling outage.

If you have any questions, please contact John Boska at 301-415-2901.

Sincerely,

/RA/

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: Listserv

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