



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064**

February 28, 2001

EA-00-208

Garry L. Randolph, Senior Vice  
President and Chief Nuclear Officer  
Union Electric Company  
P.O. Box 620  
Fulton, Missouri 65251

**SUBJECT: APPEAL OF FINAL SIGNIFICANCE DETERMINATION FOR THREE WHITE FINDINGS, DENIAL OF VIOLATION, AND REVIEW OF BACKFIT ISSUES (NRC INSPECTION REPORT 50-483/00-17, CALLAWAY PLANT)**

Dear Mr. Randolph:

The purpose of this letter is to acknowledge your letters of February 7 and February 15, 2001. As a result of your concerns, the NRC will review your:

- Appeal of the NRC staff's final significance determination of the three White findings of Inspection 50-483/2000-17,
- Denial of the violation of 10 CFR 20.1101(b) identified in Inspection Report 50-483/2000-17,
- Assertion that NRC has imposed a regulatory staff position that is new or different from a previously applicable staff position, and
- Assertion that the as low as is reasonably achievable (ALARA) portion of the Occupational Radiation Safety Significance Determination Process creates a new regulatory burden, is not objective, scrutable, and risk-based, and should be suspended.

Your concerns will be reviewed in accordance with NRC Manual Chapter 0609, Attachment 3, NUREG/BR-0195, and NRC Management Directive 8.4 and you will be notified of the results when we have completed our reviews. If we have not accurately characterized your views or if you have questions regarding the NRC processes, please contact me at (817) 860-8180 or Gail M. Good, Chief, Plant Support Branch, at (817) 860-8215.

Sincerely,

**/RA/ Dale A. Powers for**  
Arthur T. Howell III, Director  
Division of Reactor Safety

Union Electric Company

-2-

Docket: 50-483  
License: NPF-30

cc:  
Professional Nuclear Consulting, Inc.  
19041 Raines Drive  
Derwood, Maryland 20855

John O'Neill, Esq.  
Shaw, Pittman, Potts & Trowbridge  
2300 N. Street, N.W.  
Washington, D.C. 20037

Mark A. Reidmeyer, Regional  
Regulatory Affairs Supervisor  
Quality Assurance  
Union Electric Company  
P.O. Box 620  
Fulton, Missouri 65251

Manager - Electric Department  
Missouri Public Service Commission  
301 W. High  
P.O. Box 360  
Jefferson City, Missouri 65102

Ronald A. Kucera, Director  
of Intergovernmental Cooperation  
P.O. Box 176  
Jefferson City, Missouri 65102

Otto L. Maynard, President and  
Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
P.O. Box 411  
Burlington, Kansas 66839

Dan I. Bolef, President  
Kay Drey, Representative  
Board of Directors Coalition  
for the Environment  
6267 Delmar Boulevard  
University City, Missouri 63130

Lee Fritz, Presiding Commissioner  
Callaway County Courthouse  
10 East Fifth Street  
Fulton, Missouri 65251

Union Electric Company

-3-

Alan C. Passwater, Manager  
Licensing and Fuels  
AmerenUE  
One Ameren Plaza  
1901 Chouteau Avenue  
P.O. Box 66149  
St. Louis, Missouri 63166-6149

J. V. Laux, Manager  
Quality Assurance  
Union Electric Company  
P.O. Box 620  
Fulton, Missouri 65251

Jerry Uhlmann, Director  
State Emergency Management Agency  
P.O. Box 116  
Jefferson City, Missouri 65101

Electronic distribution from ADAMS by RIV:  
 Regional Administrator (**EWM**)  
 DRP Director (**KEB**)  
 DRS Director (**ATH**)  
 Senior Resident Inspector (**VGG**)  
 Branch Chief, DRP/B (**WDJ**)  
 Senior Project Engineer, DRP/B (**RAK1**)  
 Chief, DRP/TSS (**PHH**)  
 RITS Coordinator (**NBH**)  
 Scott Morris (**SAM1**)  
 NRR Event Tracking System (**IPAS**)  
 CWY Site Secretary (**DVY**)  
 G. F. Sanborn, D:ACES (**GFS**)  
 K. D. Smith, RC (**KDS1**)  
 R. W. Borchardt, OE (**RWB1**)  
 OE:EA File (**RidsOeMailCenter**)

DOCUMENT: S:\DRS\PB\CALLAWAY ACKNOWLEDGMENT LETTER.WPD

RIV:DRS/PSB	C:PSB	C:DRP/B	D:ACES	RC	D:DRS
LTRicketson:nh	GMGood	WDJohnson	GFSanborn	KCSmith	ATHowell III
<b>/RA/</b>	LTRicketson for	RKopriva for	<b>/RA/</b>	<b>/RA/</b>	DPowers for
02/28/01	02/28/01	02/28/01	02/28/01	02/28/01	02/28/01

OFFICIAL RECORD COPY

T=Telephone

E=E-mail

F=Fax