

February 27, 2001

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555-0001

Gentleman:

ULNRC-04398



**DOCKET NO. 50-483**  
**UNION ELECTRIC COMPANY**  
**CALLAWAY PLANT**  
**RADIOLOGICAL EMERGENCY RESPONSE PLAN**  
**RESPONSE TIME GOAL EXTENSION**

Reference: ULNRC-4275 dated July 18, 2000

The referenced letter proposed changes to the Callaway Plant Radiological Emergency Response Plan (RERP). The changes revise the existing response time goals for the Emergency Response Organization (EO) and the addition of activation times for the Technical Support Center (TSC) and the Emergency Operations Facility (EOF).

Attached are clarifications to the referenced submittal. Changes to the RERP will be made after approval of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan C. Passwater".

Alan C. Passwater  
Manager, Corporate Nuclear Services

DS/mlo  
Attachment

A 045

cc: M. H. Fletcher  
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STATE OF MISSOURI )  
                          )           S S  
CITY OF ST. LOUIS )

Alan C. Passwater, of lawful age, being first duly sworn upon oath says that he is Manager, Corporate Nuclear Services for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Alan C. Passwater  
                          Alan C. Passwater  
                          Manager, Corporate Nuclear Services

SUBSCRIBED and sworn to before me this 27th day  
of February, 2001.

Melissa L. Orr

MELISSA L. ORR  
Notary Public - Notary Seal  
STATE OF MISSOURI  
City of St. Louis  
My Commission Expires: June 23, 2003

**Callaway Plant RERP Change Submittal**  
**Response Time Goal Extension**

Information per your review, and our discussion, in reference to the Callaway Plant RERP change submittal, the following changes will be made to the RERP, upon approval of the submittal.

1. Where response time goals are stated in the RERP, response time will be defined as the time that expires from emergency declaration to the responder arriving and signing in to the Emergency Response Facility (ERF). This is not a change to our present processes.
2. Where normal working hours are stated in the RERP, normal working hours will be defined as current standard core hours per Company and Plant policies and procedures. The current core hours are 7:00 a.m. to 3:30 p.m. Monday through Friday, and the off hours are the remaining hours in the week. This is not a change to our present processes.
3. Where ERF activation is stated in the RERP, activation will be defined as when the ERF (TSC or EOF) is ready to accept their respective functions from the Control Room. These functions are Classifications, Notifications, Dose Assessment, and Protective Action Recommendations. The Emergency Coordinator (EC) in the Control Room decides when to transfer emergency functions to the ERFs. The functions can be transferred individually or all together. The ERFs become operational when all the functions, including that of EC, are transferred from the Control Room. This is not a change to our present processes.
4. There are 7 Rapid Responders that are necessary to activate the Emergency Response Facilities, which will be better explained when activation is defined as per #3 above. This is not a change to our present processes.
5. Where Desired Number is stated in the RERP (Table 5-2), Desired Number will be defined as the complete ERO staffing for the event (all positions filled with the number of individuals we consider optimum) so as not to be confused with minimum staffing. Minimum staffing is defined as the Rapid Responders (the contingent that can effectively relieve the Control Room of emergency response functions) in Section 5.2. This is not a change to our present processes.
6. All coordinators listed in RERP Table 5-2 are trained to perform the tasks specified in the table for their staff. Although Callaway feels this is evident, effort will be made to clarify these duties. This is not a change to our present processes.
7. RERP section 5.1.5, Rad/Chem Technician, Chemistry, section 5.1.6, Rad/Chem Technician, Health Physics Operations Support, section 5.1.7, Rad/Chem Technician, Health Physics Technical Support, will be expanded to address additional qualifications that are shared among the groups. This explanation will include that Rad/Chem Technicians, Chemistry and Rad/Chem Technicians, Health Physics Technical Support

can do Health Physics Operations tasks, but the reverse is not true. This is not a change to our present processes.

8. The following Inspection Reports evaluate the ability of control room crews to perform, for periods of up to two hours, the emergency functions of evaluating plant conditions, identifying emergency action levels, classifying the emergency, making timely notifications to offsite agencies, evaluating radiation information and performing dose assessments, and recommending appropriate protective actions: IR 50-483/98-14, IR 50-483/98-23, and IR 50-483/2000-04, which were issued July 17 and October 28, 1998, and February 10, 2000, respectively. The resolution of the two Suggestion Occurrence Solutions (SOSs 98-3628 and 00-0107) for identified control room performance weaknesses were addressed and both were resolved.
9. Provide the estimated percentage increase in the pool of eligible rapid ERF responders (i.e., the current 30-45 minute responders). It is these responders which have a proposed increase in their response time goals. Provide the basis for the estimate.

At the present time we have 42 personnel filling our management Rapid Responder positions. The following management personnel live 45 minutes or greater from the Plant and are presently filling non-Rapid Responder positions in our Emergency Response Organization. These personnel would be considered for Rapid Responder positions if the time restrictions were increased as per our submittal.

- (10) Licensed Senior Reactor Operators
- (5) Senior Management- VP's, Managers, Superintendents
- (6) Supervising Engineers
- (21) Senior Engineers
- (5) Health Physics Management/ Dose Assessment qualified
- (6) Management Staff- EOF Communicator/ Offsite Liaison qualified.

This totals 53 individuals that could be added to our pool of management Rapid Responders. This also has a trickle down effect on the entire ERO. There are very capable personnel presently not in our ERO due to the fact that they cannot respond within the present time requirements.

In the non-management ranks, particularly Rad/Chem Support, there are presently 36 personnel that are available. The extended response time would add 19 additional individuals to the pool.

#### Summary:

At the present time, there are 78 (42 management and 36 non-management) personnel filling the rapid responders positions of RERP Table 5-2. With the proposed response time goals, an additional 72 (53 management and 19 non-management) personnel could be added for these positions. Therefore, the proposed response time goals will increase the pool for these positions by about 92 percent. There is no change to the pool of personnel for the later responders of RERP Table 5-2 (i.e., the 60-75 minute responders)

because the proposed response time goals does not extend the response time goals for these responders.

10. Both County Routes O and CC are two-lane roads that traverse the terrain of the Missouri River valley and its tributaries. These roads require maneuvering many curves and hills that requires reduced speed. Assistance from state or local police is not available and would not help drivers increase their speed when responding to an emergency at the plant.