

May 16, 2001

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

ULNRC-04476

Gentlemen:



DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT
RESPONSE TO NRC REGULATORY ISSUE SUMMARY 2001-08

References: 1. NRC Regulatory Issue Summary 2001-08,
"Operating Reactor Licensing Action Estimates," dated
April 2, 2001

2. Letter from A. Marion, NEI, to M. T. Lesar, NRC, dated
February 8, 2001

Reference 1 requested that all power reactor licensees provide, on a voluntary basis, estimates of the number of new licensing action requests they plan to submit in upcoming fiscal years. Specifically, licensees were requested to provide a simple numerical estimate of the licensing actions expected to be submitted during the remainder of the NRC Fiscal Year (FY) 2001 and in FY 2002 (i.e., submitted by September 30, 2002). Reference 1 also requested that licensees identify by brief title those submittals expected to generate complex reviews, particularly any power uprate requests, license renewal applications, license transfer applications, or dry cask storage applications.

Reference 1 defines licensing actions as requests for license amendment, license renewal or transfer, exemptions, relief from inspection and surveillance requirements, review of topical reports submitted on a plant-specific basis, or other licensee requests requiring NRC review and approval before they can be implemented by the licensee.

AmerenUE (Union Electric Company) is a participant in an industry consortium of five plants as a result of a mutual agreement known as Strategic Teaming and Resource Sharing (STARS). The STARS group consists of the five plants operated by Wolf Creek Nuclear Operating Corporation, TXU Electric, AmerenUE, Pacific Gas and

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Electric, and STP Nuclear Operating Company. AmerenUE currently plans to submit three (3) new plant-specific licensing action requests during the remainder of the NRC FY 2001 and in FY 2002. Through the STARS cooperative effort, AmerenUE is participating in fifteen (15) licensing action requests expected to be submitted during this time frame. The number of common STARS group submittals may vary between STARS plants due to some plants already having approval of the licensing action request that the other STARS members are requesting.

AmerenUE currently has no plans to submit any power uprate requests, license renewal applications, license transfer applications, or dry cask storage applications through the end of NRC FY 2002.

In Reference 1, the NRC states that licensees would "assist the NRC by estimating the potential safety and operational benefits, costs/man-rem averted, or any other economic savings that would be realized by their licensing action requests." That request is based on the proposed voluntary information collection initiative (65 FR 76669, December 7, 2000). The STARS group endorses the comments provided in Reference 2 that the NRC initiative to have licensees estimate benefits and costs is unnecessary and should be withdrawn or modified.

There are no regulatory commitments made in this transmittal. If you have any questions concerning this response, please contact us.

Very truly yours,

David Hofer
for J. D. Blosser
Manager - Regulatory Affairs

cc: M. H. Fletcher
Professional Nuclear Consulting, Inc.
19041 Raines Drive
Derwood, MD 20855-2432

Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, TX 76011-8064

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

Mr. Jack Donohew (2) - **OPEN BY ADDRESSEE ONLY**
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
1 White Flint, North, Mail Stop OWFN 7E1
11555 Rockville Pike
Rockville, MD 20852-2738

Manager, Electric Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Nuclear Energy Institute
1776 I Street N.W.
Suite 400
Washington, DC 20006-3708