

January 27, 2003

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

Ladies and Gentlemen:

ULNRC-04798

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
TWENTY-DAY ANSWER TO NRC ORDER FOR
COMPENSATORY MEASURES RELATED TO ACCESS AUTHORIZATION**

Reference: Letter dated January 7, 2003 from S. J. Collins to J. M. Dunbar,
Union Electric Company, (Order Modifying license dated
January 7, 2003)

This letter is in response to the NRC letter dated January 7, 2003, in which the U.S. Nuclear Regulatory Commission (NRC or Commission) issued an "Order" to Union Electric Company (AmerenUE) that modifies the current operating licenses for Callaway Plant, Unit 1. The Order was immediately effective and requires compliance with specific access authorization compensatory measures (CM) as stated in Attachment 2 to the Order.

The Order requires an answer within twenty (20) days. The enclosure to this letter is the 20-day answer for AmerenUE and a description of AmerenUE's schedule for implementation.

This response is submitted in accordance with 10 CFR 2.202. If you have any questions, please contact John Blosser at (573) 676-8190 or Dave Shafer at (314) 554-3104.

Very truly yours,



John D. Blosser
Manager, Regulatory Affairs

Enclosure
DS/mlo

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20-Day Answer to Order

The NRC order of January 7, 2003 included the following reporting requirements:

III

- B. 1. All Licensees shall, within **twenty (20) days** of the date of this Order, notify the Commission, (1) if they are unable to comply with any of the requirements described in Attachment 2, (2) if compliance with any of the requirements is unnecessary in their specific circumstances, or (3) if implementation of any of the requirements would cause the Licensee to be in violation of the provisions of any Commission regulation or the facility license. The notification shall provide the Licensees' justification for seeking relief from or variation of any specific requirement.
2. Any Licensee that considers that implementation of any of the requirements described in Attachment 2 to this Order would adversely impact safe operation of the facility must notify the Commission, within **twenty (2) days** of this Order, of the adverse safety impact, the basis for its determination that the requirement has an adverse safety impact, and either a proposal for achieving the same objectives specified in the Attachment 2 requirement in question, or a schedule for modifying the facility to address the adverse safety condition. If neither approach is appropriate, the Licensee must supplement its response to Condition B.1 of this order to identify the condition as a requirement with which it cannot comply, with attendant justifications as required in Condition B.1.
- C. 1. All Licensees shall, within **twenty (20) days** of the date of this Order, submit to the Commission, a schedule for achieving compliance with each requirement described in Attachment 2.
2. All Licensees shall report to the Commission, when they have achieved full compliance with the requirements described in Attachment 2.

AmerenUE Response and Answer:

AmerenUE will, to the extent permitted under existing Federal and state statutes and laws, and within AmerenUE's control, implement the access authorization compensatory measures per the NRC order dated January 7, 2003.

AmerenUE recognizes that industry guidance on the compensatory measures has not been finalized nor endorsed by the NRC. Ongoing interpretations of the compensatory measures and related laws may reveal conflicts. For example, existing laws may limit AmerenUE's full compliance with compensatory measure B.1.3c for licensees and contractors of Ameren until tools are available to all states for validation of this data.

AmerenUE Response and Answer (continued):

AmerenUE will immediately begin the implementation process for each compensatory measure from Attachment 2 of the Order and will implement each item as soon as practical. The following schedule is provided for completing the implementation of the access authorization compensatory measures:

Compensatory Measure Number	Description	Required Compliance Date	Implementation Date
B.	Unescorted Access Authorization Measures		
B.1.1	Alternative Method for Access	April 7, 2003	April 7, 2003
B.1.2	Access Categories	July 7, 2003	July 7, 2003
B.1.3	Verify True Identity ¹	July 7, 2003	July 7, 2003
B.1.4	Initial Unescorted Access	July 7, 2003	July 7, 2003
B.1.5	Updated Unescorted Access	July 7, 2003	July 7, 2003
B.1.6	Psychological Evaluation	July 7, 2003	July 7, 2003
B.1.7	Reinstated Access	July 7, 2003	July 7, 2003
C.	Access Authorization Program Measures		
C.1.1	Implement Common Vehicle (PADS)	July 7, 2003	July 7, 2003
C.1.2	Access Denial Data Entry	July 7, 2003	July 7, 2003
C.1.3	Personnel Follow-up at Other Plants	July 7, 2003	July 7, 2003
C.1.4	10 CFR 26 Violation Notification	July 7, 2003	July 7, 2003
C.1.5	Denied Access Actions	July 7, 2003	July 7, 2003
C.1.6	Conduct Reinvestigations	January 7, 2004	January 7, 2004
C.1.7	Screening of BI Screeners	July 7, 2003	July 7, 2003
C.1.8	Enhance Behavioral Observation	January 7, 2004	January 7, 2004
C.1.9	Access Audit Program	July 7, 2003	July 7, 2003
C.1.10	Management of Personnel Information	July 7, 2003	July 7, 2003

¹ Refer to the 2nd paragraph of AmerenUE Response and Answer.