

April 22, 2004

LICENSEE: Union Electric Company
Wolf Creek Nuclear Operating Corporation

FACILITIES: Callaway Plant, Unit 1
Wolf Creek Generating Station

SUBJECT: SUMMARY OF CLOSED MEETING WITH UNION ELECTRIC COMPANY AND
WOLF CREEK NUCLEAR OPERATING CORPORATION ON APRIL 15, 2004,
TO DISCUSS PROPRIETARY INFORMATION (TAC NOS. MC2286 AND
MC2287)

A meeting was held on Thursday, April 15, 2004, between the Nuclear Regulatory Commission (NRC) staff and representatives of Union Electric Company, the licensee for the Callaway Plant, Unit 1 and Wolf Creek Nuclear Operating Corporation, the licensee for Wolf Creek Generating Station. The meeting was held at the request of NRC to present the draft preliminary staff position paper on the staff's preliminary review of the Framatome Topical Report (TR), "Callaway Plant, Unit 1 and Wolf Creek Generating Station Defense-in-Depth and Diversity Assessment." The TR was submitted by the licensees of both Callaway Plant, Unit 1 and Wolf Creek Generating Station in letters dated March 4 and 3, 2004, respectively. The licensees requested that the staff review the methodology for meeting diversity and defense-in-depth (DDD) requirements for digital instrumentation that is described in the TR for approval of the methodology to be used in future amendment requests on the replacement of instrumentation and control systems (I&CS) at Callaway Plant, Unit 1 and Wolf Creek Generating Station. In order to meet the implementation schedule for replacement of the I&CS at Callaway, the licensees also requested that the NRC staff completed its review to approve the methodology by December 1, 2004.

In the letters submitting the TR, the licensees also submitted affidavits requesting that information designated proprietary in the TR be withheld from public disclosure pursuant to Section 2.390 of Title 10 of the *Code of Federal Regulations* (10 CFR). In the letter dated April 14, 2004, the NRC staff stated that it had reviewed the TR in accordance with the requirements of 10 CFR 2.390 and had determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Enclosure 1 is the list of attendees. The handouts from the licensees and the staff are proprietary because they are based on the proprietary information in the TR. The handouts were (1) the staff's draft preliminary position paper on the results of its preliminary review of the TR methodology against the DDD requirements for digital instrumentation and (2) the licensees' responses to the points made in the paper. A copy of the position paper was sent to the licensees prior to the meeting to expedite the licensees' understanding of any problems identified by the staff and their responses, if any, to the points made by the staff.

The points made by the staff in its draft preliminary position paper and the responses to these points were discussed in the meeting.

To meet the requested schedule, the staff recommended that the licensees consider that the staff review one of alternatives to the TR as the DDD methodology for the replacement of I&CS at the plants. The alternatives were presented in the meeting by the licensees to address points made by the NRC staff in its paper. The NRC staff made the point that the alternative would be the Framatome TELEPERM XS System that is described in TR EMF-2110(NP), Revision 1, "TELEPERM XS: A Digital Reactor Protection System," which has been approved by the staff in letter dated May 5, 2000, and the review could be completed by December 1, 2004. Although the methodology in the TR is based on this system, the TR methodology departs more from current designs to meet DDD requirements which would require more time to review than the alternatives. In the discussion, the staff stated that the licensees could also request that the staff review the TR, but the schedule for this review would have to be longer than the December 1, 2004, requested date.

The licensees said that they would consider these options and get back to the staff by letter with their decision. The NRC staff requested that, if the licensees should decide that they want the staff to continue its review of the TR, the letters stating such should submit proprietary and non-proprietary versions of the meeting handouts. If the staff is not going to complete its evaluation of the TR, the two handouts are not needed.

The meeting ended. The staff made no decisions about the licensee's application in the meeting.

/RA/

Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-482 and 50-483

Enclosure: List of Meeting Attendees

cc w/encl: See next page

April 22, 2004

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/RA/
Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure: List of Meeting Attendees

cc w/encl: See next page

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* See previous concurrence

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LIST OF MEETING ATTENDEES

DISCUSSION OF PROPRIETARY INFORMATION

FRAMATOME TOPICAL REPORT, "CALLAWAY PLANT, UNIT 1 AND WOLF CREEK
GENERATING STATION DEFENSE-IN-DEPTH AND DIVERSITY ASSESSMENT"

APRIL 15, 2004

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PDIV-2	= Project Directorate IV-Section 2
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Framatome	= Framatome ANP
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ENCLOSURE