

October 29, 2004

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

Ladies and Gentlemen:

ULNRC-05069



**DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
PROPOSED REVISION TO TECHNICAL SPECIFICATION 3.9.2
"UNBORATED WATER SOURCE ISOLATION VALVES"
TO REVISE AND RENAME SPECIFICATION 3.9.2
"DILUTION SOURCE ISOLATION VALVES" AND ASSOCIATED
REVISION TO TECHNICAL SPECIFICATION 3.3.9
"BORON DILUTION MITIGATION SYSTEM (BDMS)"**

Reference: ULNRC-04883, December 15, 2003

Pursuant to 10 CFR 50.90, AmerenUE, in the above referenced submittal letter requested an amendment to the Facility Operating License No. NPF-30 for Callaway Plant.

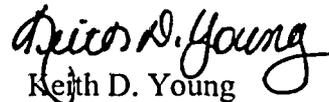
In summary, the amendment application proposed revision to Technical Specifications (TS) 3.9.2, "Unborated Water Source Isolation Valves," to remove the phrase "unborated water" throughout and replace it with the word "dilution", including renaming TS 3.9.2. In addition, the reference to specific Chemical and Volume Control system (CVCS) isolation valves BGV0178 and BGV0601 was deleted and replaced with the generic phrase "dilution source isolation valves" to ensure that all dilution sources and their associated isolation valves are covered by the Specification. The revised TS 3.9.2 would cover all inadvertent boron dilution events in Mode 6. In addition, TS 3.3.9 REQUIRED ACTIONS for CONDITIONS B and C were also revised to substitute the word "dilution" for "unborated water" and to eliminate reference to specific isolation valves. The revisions would make TS 3.3.9 consistent with TS 3.9.2. Several e-mails were transmitted and tele-conferences held between AmerenUE and NRC Staff to discuss the proposed license amendment request.

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After further consideration, AmerenUE has decided to withdraw the amendment request as originally proposed. Because the proposed changes address issues concerning potential boron dilution sources in MODE 6 (identified in the Callaway corrective action program), AmerenUE plans to re-submit the proposed amendment request. AmerenUE has decided to take a modified approach to the original proposed amendment request and is still in the process of developing the modified approach. Withdrawing the proposed license amendment request and re-submitting at a later date does not impact plant operation or safety. All concerns are being addressed under the corrective action program and plant administrative controls.

If you should have any questions on the above or attached, please contact Dave Shafer at (314) 554-3104 or Dwyla Walker at (314) 554-2126.

Sincerely,


Keith D. Young
Manager, Regulatory Affairs

DJW/jdg

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