

April 29, 2005

Ms. Annette Vietti-Cook
Secretary
Office of the Security of the Commission
U.S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudication Staff
Washington, DC 20555

Dear Ms. Vietti-Cook:

ULNRC-05147



**DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT
RESPONSE TO THE APRIL 11, 2005, NRC LETTER
REGARDING IMPLEMENTATION OF THE NOVEMBER 5, 2004,
ORDER IMPOSING REQUIREMENTS FOR THE PROTECTION
OF CERTAIN SAFEGUARDS INFORMATION (EA-04-190)
Reference: ULNRC-05095 dated November 19, 2004**

Section IV of the November 5, 2004, Order Imposing Requirements for the Protection of Certain Safeguards Information (EA-04-190) ("Order") states that, in accordance with 10 CFR §2.202, the recipient of the Order must submit an answer to the Order, and may request a hearing on the Order, within 20 days of the date of the Order. Attachment 2 to the Order, *Modified Handling Requirements for the Protections of Certain Safeguards Information (SGI-M)*, which is incorporated by reference into the Order, contains detailed requirements which recipients of the Order must meet.

By letter dated November 19, 2004 (referenced letter), AmerenUE requested an extension of time in which to submit an answer to or request a hearing with respect to one or more provisions of Attachment 2 to the Order. The implications of the Order to licensees who have a program for controlling Safeguards Information that meets all current regulatory requirements was not clear, and time was requested to receive clarification from the NRC Staff to ensure that Commission's intent of the Order and how it is to be implemented was understood.

Specifically, clarification was sought that licensees with an existing Safeguards Information program could use that program to satisfy the Order (i.e., a separate SGI-M program is not required); and how licensees with an existing Safeguards Information program are to interface with an entity using an SGI-M program.

ULNRC-05147
Response to the April 11, 2005 NRC Letter
April 29, 2005
Page 2

During the period from Order issuance until clarity was received on the issues raised, AmerenUE committed to control all material designated SGI-M under its Safeguards Information program. AmerenUE also requested that the Commission exercise enforcement discretion during this period.

AmerenUE will continue to use its existing Safeguards Information program to process and control Safeguards Information. At such time as AmerenUE anticipates the need to transmit Safeguards Information to an individual or an entity who only has a SGI-M program, suitable modifications will be made to our Safeguards Information program consistent with the April 11, 2005, letter. As a result, AmerenUE is in full compliance with the November 5, 2004, Order and the April 11, 2005, letter.

In accordance with 10 CFR § 2.202(b), this response is provided under oath.

Very truly yours,



Michael S. Evans
Manager, Business Operations

DES/jdg

Attachment: List of Commitments

ULNRC-05147

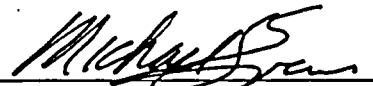
April 29, 2005

STATE OF MISSOURI)
)
CALLAWAY COUNTY)

SS

Michael S. Evans of lawful age, being first duly sworn upon oath says that he is Manager – Business Operations 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



Michael S. Evans
Manager, Business Operations

SUBSCRIBED and sworn to before me this 29th day
of April, 2005.

TERRA E. GUITAR Notary Public-Notary Seal State of Missouri, Callaway County My Commission Expires May 13, 2006

Terra E. Guittar

ULNRC-05147
Response to the April 11, 2005 NRC Letter
April 29, 2005
Page 3

cc: Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Assistant General Counsel for Materials Litigation and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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Jefferson City, MO 65102-0360

LIST OF COMMITMENTS

The following table identifies those actions committed to by AmerenUE in this document. Any other statements in this document are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to:

COMMITMENT	Due Date/Event
AmerenUE will continue to use its existing Safeguards Information program to process and control Safeguards Information. When the need to transmit Safeguards Information to an individual or an entity who only has a SGI-M program, suitable modifications will be made to our Safeguards Information program consistent with NRC Order EA-04-190 and letter dated April 11, 2005.	Before transmitting Safeguards Information to an individual or an entity who only has a SGI-M program.