



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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August 30, 2005

Charles D. Naslund, Senior Vice  
President and Chief Nuclear Officer  
Union Electric Company  
P.O. Box 620  
Fulton, MO 65251

**SUBJECT: MIDCYCLE PERFORMANCE REVIEW AND INSPECTION PLAN -  
CALLAWAY PLANT**

Dear Mr. Naslund:

On August 2, 2005, the NRC staff completed its performance review of the Callaway Plant for the first half of the calendar year 2005 assessment cycle. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results over the previous 12 months. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility in order for you to inform us of any planned inspections that may conflict with your plant activities.

This performance review and enclosed inspection plan do not include physical protection information. A separate letter designated and marked as "Exempt from Public Disclosure in Accordance with 10 CFR 2.390" will include the physical protection review and resultant inspection plan.

Plant performance for the most recent quarter was within the Licensee Response Column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight (Green).

In our March 2, 2005, annual assessment letter we advised you of a substantive crosscutting issue in the area of Human Performance related to personnel errors. Our primary concern involved instances of failing to follow plant procedures that resulted in increased challenges to plant equipment from preventable transients and events. A corrective action plan was developed near the end of this assessment period to address the root causes for the adverse trends in human performance. On the basis of NRC's independent inspection activities, we found that Ameren UE (Union Electric) has taken steps to improve human performance and provide for greater supervisory and managerial oversight. This included revising the mission and charter of the Event Prevention Steering Committee to describe what is human performance excellence and identifying individuals within the organization to promote human performance initiatives.

However, there have been additional human performance deficiencies that are similar to those identified during the 2004 annual assessment. These Green findings involved Initiating Events and Mitigating Systems cornerstones, which had contributing causes related to personnel errors and the adequacy of procedures. Examples included a reactor trip signal and auxiliary feedwater actuation while in Hot Standby operations, failure to incorporate industry experience into work instructions which resulted in a reactor trip, and isolation of the fire suppression system during a surveillance test.

The NRC will continue to focus inspection activities within this area in order to assess the implementation effectiveness of your human performance corrective action plan. These focused inspections will assess whether human performance problems continue to result in increased challenges to plant equipment from preventable transients and events. A separate indicator will be the effectiveness of the corrective actions being taken to address the adverse trend in human performance and the impact of procedural adequacy on performance. The NRC's reviews will be accomplished as part of the baseline inspection program implementation, including selected reviews during the performance of baseline problem identification and resolution inspection activities.

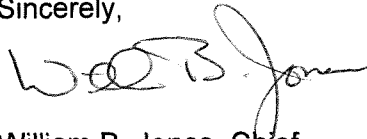
In our annual assessment letter dated March 2, 2005, we indicated our intent to review the results of a followup independent survey of the Callaway Plant nuclear safety culture and environment. This followup survey, which was completed in June 2005, was conducted as part of the actions taken in response to an independent survey in 2003. The followup survey concluded that overall plant safety culture had improved to the industry mean. Union Electric communicated the results of the latest survey to plant employees and provided specific organizational feedback to department heads to address any specific gaps. The survey results were also discussed with the NRC staff during a public meeting on July 20, 2005. As a result of the improvements noted, as well as the corrective actions taken to enhance the effectiveness of the employee concerns program and provide training to Callaway Plant staff, we plan no further focused baseline inspection activities within this area.

The enclosed inspection plan details the inspections, except those related to physical protection, scheduled through March 31, 2007. In addition to the baseline inspections, Inspection Procedure 50001, "Steam Generator Replacement," and Temporary Instructions (TI) Reactor Vessel Head Penetration (TI-150), and Pressurizer Nozzle Weld Safety Issue (TI-160), will be conducted as necessary. The inspection plan is provided to minimize the resource impact on your staff and to allow for the early resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last 9 months of the inspection plan are tentative and may be revised at the end-of-cycle review meeting.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If circumstances arise which cause us to change the inspection plan, we will contact you to discuss the change as soon as possible. Please contact me at (817) 860-8141 with any questions you may have regarding this letter or the inspection plan.

Sincerely,



William B. Jones, Chief  
Project Branch B  
Division of Reactor Projects

Docket: 50-483  
License: NPF-30

Enclosure:  
Callaway Plant Inspection/Activity Plan

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Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	<b>OB-INIT - INITIAL EXAM</b>		3			
1	X02286	CALLAWAY (05/05) - INITIAL EXAM		08/01/2005	08/05/2005	Not Applicable
1	X02286	CALLAWAY (05/05) - INITIAL EXAM		08/22/2005	08/26/2005	Not Applicable
	<b>S/G REP1 - STEAM GENERATOR REPLACEMENT</b>		7			
1	IP 50001	Steam Generator Replacement Inspection		07/03/2005	10/01/2005	Other Routine
1	IP 7111113	Maintenance Risk Assessments and Emergent Work Control		07/03/2005	10/01/2005	Baseline Inspections
1	IP 7111119	Post Maintenance Testing		07/03/2005	10/01/2005	Baseline Inspections
1	IP 7111120	Refueling and Other Outage Activities		07/03/2005	10/01/2005	Baseline Inspections
1	IP 7111122	Surveillance Testing		07/03/2005	10/01/2005	Baseline Inspections
1	IP 7111123	Temporary Plant Modifications		07/03/2005	10/01/2005	Baseline Inspections
	<b>EB17B - PERM PLANT MODS</b>		3			
1	IP 7111117B	Permanent Plant Modifications		08/22/2005	08/26/2005	Baseline Inspections
	<b>EB08P - ISI - INCL VHP VOL (TI 150) AS REQ</b>		2			
1	IP 7111108P	Inservice Inspection Activities - PWR		09/26/2005	09/30/2005	Baseline Inspections
1	IP 7111108P	Inservice Inspection Activities - PWR		10/17/2005	10/21/2005	Baseline Inspections
	<b>TI -160 - PRESSURIZER NOZZLE WELD INSPECTION</b>		4			
1	IP 2515/160	Pzr Pene Nozzles & Strm Space Piping Connections in U.S. PWRs [NRC Bulletin 2004-01]		09/20/2005	09/30/2005	Safety Issues
	<b>S/G REP2 - STEAM GENERATOR REPLACEMENT</b>		7			
1	IP 50001	Steam Generator Replacement Inspection		10/02/2005	12/31/2005	Other Routine
1	IP 7111113	Maintenance Risk Assessments and Emergent Work Control		10/02/2005	12/31/2005	Baseline Inspections
1	IP 7111119	Post Maintenance Testing		10/02/2005	12/31/2005	Baseline Inspections
1	IP 7111120	Refueling and Other Outage Activities		10/02/2005	12/31/2005	Baseline Inspections
1	IP 7111122	Surveillance Testing		10/02/2005	12/31/2005	Baseline Inspections
1	IP 7111123	Temporary Plant Modifications		10/02/2005	12/31/2005	Baseline Inspections
	<b>ACRSA - ACCESS CONTROL TO RAD SIGNIFICANT AREAS</b>		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		10/17/2005	10/21/2005	Baseline Inspections
1	IP 71151	Performance Indicator Verification		10/17/2005	10/21/2005	Baseline Inspections
	<b>ALARA3 - ALARA PLANNING AND CONTROLS</b>		1			
1	IP 7112102	ALARA Planning and Controls		12/05/2005	12/09/2005	Baseline Inspections
	<b>EB21 - ENG-SSD&amp;PC PART 1</b>		4			
1	IP 7111121	Safety System Design and Performance Capability		12/11/2006	12/15/2006	Baseline Inspections
	<b>PEB-05T - TRIENNIAL FIRE PROTECTION</b>		3			
1	IP 7111105T	Fire Protection [Triennial]		03/27/2006	03/31/2006	Baseline Inspections
1	IP 7111105T	Fire Protection [Triennial]		04/17/2006	04/21/2006	Baseline Inspections

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
1	<b>ALARA1 - ALARA PLANNING AND CONTROLS</b>		1			
	IP 7112102	ALARA Planning and Controls		03/20/2006	03/24/2006	Baseline Inspections
	<b>EP2 - EMERG PREP PROGRAM</b>		1			
1	IP 7111402	Alert and Notification System Testing		05/15/2006	05/19/2006	Baseline Inspections
1	IP 7111403	Emergency Response Organization Augmentation Testing		05/15/2006	05/19/2006	Baseline Inspections
1	IP 7111404	Emergency Action Level and Emergency Plan Changes		05/15/2006	05/19/2006	Baseline Inspections
1	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies		05/15/2006	05/19/2006	Baseline Inspections
1	IP 711151	Performance Indicator Verification		05/15/2006	05/19/2006	Baseline Inspections
	<b>ACRSA - ACCESS CONTROL TO RAD SIGNIFICANT AREAS</b>		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		08/21/2006	08/25/2006	Baseline Inspections
	<b>PEB - CAL PIR INSPECTION</b>		3			
1	IP 71152B	Identification and Resolution of Problems		10/16/2006	10/20/2006	Baseline Inspections
1	IP 71152B	Identification and Resolution of Problems		10/30/2006	11/03/2006	Baseline Inspections
	<b>ALARA2 - ALARA PLANNING AND CONTROLS</b>		1			
1	IP 7112102	ALARA Planning and Controls		10/23/2006	10/27/2006	Baseline Inspections
	<b>EB21 - SSD&amp;PC PART 2</b>		10			
1	IP 7111121	Safety System Design and Performance Capability		01/02/2007	01/05/2007	Baseline Inspections
1	IP 7111121	Safety System Design and Performance Capability		01/08/2007	01/12/2007	Baseline Inspections
	<b>ACRSA - ACCESS CONTROLS TO RAD AREAS</b>		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		04/16/2007	04/20/2007	Baseline Inspections
	<b>RP TEAM - RADIATION SAFETY TEAM</b>		5			
1	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment		06/04/2007	06/08/2007	Baseline Inspections
1	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		06/04/2007	06/08/2007	Baseline Inspections
1	IP 7112202	Radioactive Material Processing and Transportation		06/04/2007	06/08/2007	Baseline Inspections
1	IP 7112203	Radioactive Environmental Monitoring Program (REMP) And Radioactive Material Control F		06/04/2007	06/08/2007	Baseline Inspections
	<b>7111107B - HEAT SINK INSPECTION</b>		2			
1	IP 7111107B	Heat Sink Performance		06/18/2007	06/22/2007	Baseline Inspections
	<b>EB 02/17 - 50.59 &amp; PERMANENT PLANT MODS</b>		3			
1	IP 7111102	Evaluation of Changes, Tests, or Experiments		07/23/2007	07/27/2007	Baseline Inspections
1	IP 711117B	Permanent Plant Modifications		07/23/2007	07/27/2007	Baseline Inspections

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