

AmerenUE
Callaway Plant

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December 2, 2005

U.S. Nuclear Regulatory Commission
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Ladies and Gentlemen:

ULNRC-05232

**CALLAWAY PLANT
DOCKET NUMBER 50-483
LETTER OF INTENT TO ADOPT NFPA 805
“PERFORMANCE-BASED STANDARD FOR FIRE PROTECTION FOR
LIGHT WATER REACTOR GENERATING PLANTS, 2001 EDITION”**

This letter serves to inform you of Callaway Plant’s intent to adopt NFPA 805 “Performance- Based Standard for Fire Protection for Light Water Reactor Generating Plants, 2001 Edition” in accordance with 10 CFR 50.48(c).

AmerenUE recognizes the benefits of NFPA 805 standard and we plan to start work in January 2006 to transition to this new standard. The actual start date will be contingent on finalizing the contract with our vendor. Callaway Plant will pursue transition to NFPA 805 on a schedule that will allow submittal of the License Amendment request within 24 months. NRC review and approval is expected within 12 months following submittal.

The NRC interim Enforcement policy (69 FR 33684, June 16, 2004) provides guidelines for enforcement discretion in the event of identified noncompliances. In order for enforcement discretion to apply to a noncompliance, it must meet the following: identified noncompliances must be in the licensee’s corrective action program, they must not be associated with findings that the Reactor Oversight Process Significance Determination (SDP) would evaluate as red, or would not be categorized at Severity Level 1 and appropriate compensatory actions must also be taken.

Enforcement discretion is requested for NRC unresolved items (URIs) and non-compliances identified during the process as well as previously identified non-compliances related to fire protection. Callaway understands that this letter of intent initiates a period of enforcement discretion during which no enforcement actions will be taken for non-

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compliances (which meet the enforcement policy guidelines). We request that this period of enforcement discretion be allowed for three years from start of this project, which will allow for program development, submittal of an amendment request and NRC approval of the request.

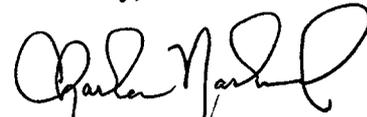
The actual schedule for this process is subject to change depending on the extent that the plant determines that it needs to make either physical modifications or changes to the fire protection program to comply with NFPA 805. An updated schedule will accompany the license amendment request required under 10 CFR 50.48(c)(3)(i).

In keeping with the schedule discussed above, Callaway Plant requests to be a pilot plant for transition to NFPA 805. We will schedule a meeting with the NRC staff for early 2006 to review the project plans and would at that time establish an ongoing communication plan. The communication plan will keep the staff informed of the project status and be a forum to discuss and resolve issues identified during the course of the project. We also request a waiver for any review fees for this process as part of the pilot plant program. AmerenUE believes that the pilot plant program will be beneficial for the industry and the NRC for transition to the NFPA 805 standard through the experience gained during the process with the NRC observation process. This pilot process will provide necessary technical and process information that can be used in future revisions of the Regulatory Guide and industry guidance governing NFPA 805 transition. Waiver of the licensing review fees will partially offset the expense and burden of Callaway participation in the on-site observation process.

This correspondence does not contain any regulatory commitments.

Please refer any questions regarding this submittal to Mr. Dave Shafer at 314-554-3104.

Sincerely,



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