

December 12, 2005

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

Ladies and Gentlemen:

ULNRC-05235

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
FACILITY OPERATING LICENSE NPF-30  
COMMITMENT STATUS FOR NRC BULLETIN 2003-01,  
"POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY  
SUMP RECIRCULATION AT PRESSURIZED-WATER REACTORS"**

- Ref: 1. ULNRC-04884, dated August 8, 2003  
2. ULNRC-04966, dated March 25, 2004  
3. ULNRC-05026, dated July 9, 2004  
4. ULNRC-05205, dated September 13, 2005  
5. NRC letter dated November 16, 2005 from Jack Donohew  
to Charles Naslund

Reference 1 through 4 transmitted the Union Electric Company (AmerenUE) responses to NRC Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized Water Reactor," dated June 9, 2003. Reference 5 provided NRC closeout of NRC Bulletin 2003-01 for the Callaway Plant. During the review of the NRC closeout letter, several discrepancies were identified.

On November 30, 2005, a teleconference was held between the NRC Project Manager, and AmerenUE personnel to discuss these concerns. As a result of the teleconference, the NRC Project Manager requested additional information on the status of the commitments made in the references above. Enclosure 1 to this letter provides AmerenUE response to the request for additional information.

In addition, in Reference 5 the reason for not implementing candidate operator actions (COA) 10 – "Termination of one train of HPSI prior to recirculation" at Callaway is not correct. In Reference 3 AmerenUE explained that this action was not implemented due to unacceptable core damage consequences demonstrated by single failure analysis as described in WCAP 16204.

This letter does not contain new commitments.

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If you have any questions concerning this matter, please contact Dave Shafer  
at (314) 554-3104.

Sincerely,



Keith D. Young  
Manager - Regulatory Affairs

BFH/jdg

Enclosure 1. Commitment Status Report

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cc: Mr. Bruce S. Mallett  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-4005

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Mr. Jack N. Donohew (2 copies)  
Licensing Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop 7E1  
Washington, DC 20555-2738

Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
PO Box 360  
Jefferson City, MO 65102-0360

Mr. Ron Reynolds  
Director  
Missouri State Emergency Management Agency  
P.O. Box 116  
Jefferson City, MO 65102

**STATUS OF COMMITMENTS**

The following table identifies those actions committed to by AmerenUE in response to NRC Bulletin 2003-01 and their current status.

<b>COMMITMENT</b>	<b>SOURCE DOC. / DATE</b>	<b>STATUS</b>
<p>Procedure OSP-SA-00004, "Visual Inspection of Containment for Loose Debris", will be revised as follows:</p> <ul style="list-style-type: none"> <li>• add a step to verify refueling pool drain pipe screens are not blocked with debris</li> <li>• add a step to verify that the radiation barrier gates at the four secondary shield wall entrances are not blocked with debris</li> </ul>	ULNRC-04884 August 8, 2003	Completed on 10/17/2003.
The work document associated with installation of the refueling pool drain pipe screens will be revised to ensure an inspection is performed to ensure no debris or blockage exists in the refueling pool drain pipe.	ULNRC-04884 August 8, 2003	Completed on 07/24/2003.
Callaway Plant will conduct Licensed Operator Continuing Training on indications of and responses to sump clogging. The training will include a simulator scenario.	ULNRC-04884 August 8, 2003	Completed The sump issues was taught in LOCT cycle 03-5 Simulator Scenario #4
Callaway Plant will develop and conduct training for the Technical Support Center engineering staff of the Emergency Response Organization to provide guidance on the parameters which would indicate that recirculation sump screen blockage may be developing and what mitigating actions should be considered.	ULNRC-04884 August 8, 2003	Completed on 03/18/2004.
Callaway Plant will develop and conduct training for contractor and plant personnel with unescorted access to the RCA to increase awareness of the issues related to containment sump screen blockage and the importance of containment cleanliness.	ULNRC-04884 August 8, 2003	Completed on 04/02/2004.
Callaway Plant will conduct training for the engineering staff to raise awareness of more aggressive containment cleanliness requirements, the potential for recirculation sump blockage, and actions being taken to address Bulletin 2003-01 concerns.	ULNRC-04884 August 8, 2003	Completed on 02/23/2004.

<p>A work document will be planned and performed to accomplish additional inspections and cleaning, as required, on targeted horizontal surfaces that are not usually accessed.</p>	<p>ULNRC-04884        August 8, 2003</p>	<p>Completed on        09/05/2003.</p>
<p>Procedural controls will be developed to maintain a more aggressive cleaning strategy for subsequent refuel outages (for refuel outages after refuel 13).</p>	<p>ULNRC-04884        August 8, 2003</p>	<p>Completed on        12/17/2004.</p>
<p>Accessible sump screen surfaces will be inspected to confirm that the sump enclosure boundaries formed by the middle screens, gratings, and miscellaneous structural steel have no openings that are larger than 1/2 +/- 1/8 inch, or for boundaries formed by the inner screens, gratings, and miscellaneous structural steel that there are no openings larger than 1/8 +/- 1/16 inch. Inspection findings will be evaluated using acceptance criteria contained in plant design documents and any deficiencies identified will be entered into the plant work control and corrective action program to report and resolve the identified deficiency.</p>	<p>ULNRC-04966        March 25, 2004</p>	<p>Completed on        05/13/2004.</p>
<p>Implementation of the following WOG candidate operator actions at the Callaway Plant as part of the overall Emergency Operating Procedure (EOP's) upgrade effort.</p> <ul style="list-style-type: none"> <li>• COA 1A - Operator action to secure one spray pump before recirculation alignment</li> <li>• COA 5 - Refill of RWST</li> <li>• COA 8 - Provide Guidance on Symptoms and Identification of CTMT sump blockage</li> <li>• COA 9 - Develop contingency actions to be taken in response to CTMT sump blockage</li> </ul>	<p>ULNRC-05026        July 9, 2004</p>	<p>Completed on        04/29/2005.</p>