



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005**

September 19, 2006

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

SUBJECT: CALLAWAY PLANT - NOTIFICATION OF AN NRC TRIENNIAL FIRE PROTECTION BASELINE INSPECTION WHILE TRANSITION TO 10 CFR PART 50.48 (c) IS IN PROGRESS. (05000483/2006008)

Dear Mr. Naslund:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC), Region IV staff will conduct a triennial fire protection baseline inspection at your Callaway Plant in October and November of 2006. The inspection team will be comprised of reactor inspectors from the NRC Region IV office and a contractor. The inspection will be conducted in accordance with Inspection Procedure 71111.05TTP, the NRC's baseline fire protection inspection procedure for plants in the process of implementing 10 CFR 50.48(c), NFPA 805. The inspection guidance is different from the regular triennial inspections in that the inspectors will concentrate on the fire protection program infrastructure and the adequacy of compensatory measures implemented for identified departures for code requirements. The inspectors will not routinely inspect for or evaluate circuit related issues.

The schedule for the inspection is as follows:

- Information gathering visit: October 23 - 25, 2006
- Onsite inspection: November 13 - 17, 2006
November 27 - December 1, 2006

Members of the inspection team will visit the Callaway Plant on October 23 - 25, 2006, to gather information and documents needed to support the inspection, obtain unescorted access, to become familiar with your fire protection program, and to select the fire areas of interest for the inspection. The enclosure to this letter provides a list of documents the team will need to review. You are requested to transmit copies of some of the documents to the NRC Region IV office for team use in preparation for the inspection by the dates listed.

We request that during the onsite inspection weeks, you ensure that copies of analyses, evaluations, or documentation regarding the implementation and maintenance of the fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest are those documents that establish that your fire

protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. Also, appropriate personnel knowledgeable of: (1) those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room, (2) the electrical aspects of the post-fire safe shutdown analyses, (3) reactor plant fire protection systems, and (4) the fire protection program and its implementation should be available to support the team at the site during the inspection.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection or the inspection team's information or logistical needs, please contact John M. Mateychick at 817-276-6560.

Sincerely,

John M. Mateychick for

Linda J. Smith, Chief
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Docket: 50-483
License: NPF-30

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Triennial Fire Protection Inspection Documentation Requested

Please provide the following documentation prior to the onsite information gathering trip, preferably no later than October 10, 2006. Where practical, please provide copies electronically on compact discs.

1. The current version of your fire protection program and fire hazards analysis.
2. Post-fire safe shutdown analysis and any supporting calculations which demonstrate acceptable plant response.
3. Copies of the licensing basis documents for fire protection (Safety Evaluation Reports, pertinent sections of the Final Safety Analysis Report, exemptions, deviations, letters to/from the NRC regarding fire protection/fire safe shutdown, etc.).
4. The Fire PRA or portions of the plant's IPEEE addressing fire events.

Please provide the following documentation during the onsite information gathering trip October 23 - 25, 2006. Where practical, please provide copies electronically on compact discs. However, drawings should be provided as paper copies of sufficient size that all details are legible. Fire protection program implementing procedures (e.g., administrative controls, surveillance testing).

5. Operating procedures used for achieving and maintaining hot and cold shutdown conditions from the control room in the event of a fire outside the control room (III.G.2 areas).
6. Operating procedure(s) used to implement an alternative shutdown (III.G.3 areas) capability with or without control room evacuation.
7. Pre-fire plans for the selected fire areas (areas to be selected by the team during the information-gathering trip).
8. A list of equipment used to achieve and maintain hot standby and cold shutdowns in the event of a fire (safe shutdown equipment lists), and two copies of the piping and instrumentation (flow) diagrams for these systems of a size sufficient to read all details. These should include the systems used for RCS makeup, RCS pressure control, decay heat removal, and reactivity control, including the essential support systems.
9. Piping and instrumentation (flow) diagrams showing the components used to achieve and maintain hot standby and cold shutdowns for fires outside the control room and those components used for those areas requiring alternative shutdown capability.
10. Plant layout and equipment drawings for the selected fire areas that identify (a) the physical plant locations of major hot standby and cold shutdown equipment; (b) plant fire

Enclosure

area and/or fire zone delineation; and (c) the locations of fire protection equipment, such as detection, suppression, and post-fire emergency lighting units, and (d) fire area boundaries.

11. Procedures/instructions that govern the implementation of plant modifications, temporary modifications, maintenance, and special operations, and their impact on fire protection.
12. A listing of design change packages, which were determined to impact fire protection and post-fire safe shutdowns, performed in the last 3 years.
13. A listing of Generic Letter 86-10 evaluations performed in the last 3 years.
14. A listing of open and closed fire protection condition reports initiated in the last 3 years which relate to the fire protection program or equipment.
15. A listing of the applicable codes and standards (e.g. NFPA) related to the design of plant fire protection features and evaluations of any code deviations.
16. Drawings the portions of the emergency lighting system which support fire response.
17. Procedures used to remove smoke from safety-related areas and the engineering studies or calculations which support the design basis.
18. Drawings of communication systems credited in the license basis for firefighting and plant operations during fires where control room is occupied and/or evacuated.
19. Piping and instrumentation (flow) diagrams for the fire water and sprinkler systems.
20. Maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.
21. Maintenance Rule performance criteria and 3 years worth of performance history for fire protection program systems or functions monitored within the Maintenance Rule program.
22. A copy of fire protection program requirements (e.g. limiting conditions for operation, surveillance test requirements) covered by Technical Specifications, Technical Requirements Manual, UFSAR, or similar documents.
23. Copies of internal and external self-assessments, audits, peer-assessments or similar reviews related to post-fire safe shutdown capability or the fire protection program completed within the last 3 years.
24. A list of manual actions taken outside the control room which are credited to mitigate the consequences of fires in III.G.2 areas (non-alternative shutdown areas). The list should group actions by the initiating fire area or zone and indicate where the action must take place.

25. Electronic copies of operator study guides (lesson plan text and graphics) or design basis documents that describe the purpose/function/operating characteristics of the safe shutdown systems (RCS makeup, RCS pressure control, decay heat removal, and reactivity control, including the essential support systems).
26. Two copies of one-line diagrams of the electrical distribution system. These should depict how power gets from the switchyard to ESF loads (480V and 4160V). Also, include the vital DC distribution system one-line diagrams.
27. Please provide a list of automatic and manually initiated gaseous fire suppression systems in the plant, giving location and the key equipment being protected.
28. Please provide a list of repairs (and the procedure that controls the actions) needed to:
a) reach and/or maintain hot shutdown; b) reach and/or maintain cold shutdowns.
28. A list of high to low pressure interface valves.
29. A copy of procedures governing the training and operation of the fire brigade.
30. The team would like to observe a fire brigade drill in the plant, if possible, during the week of November 27, 2006. Please put us in contact with the appropriate personnel for planning drills during the onsite information gathering trip October 23 - 25, 2006.
31. Organization charts of site personnel down to the level of fire protection staff personnel.
32. A contact list of key site personnel who will be supporting this inspection, giving location of their office and phone number onsite.