

October 3, 2006

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

ULNRC-05336

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
FACILITY OPERATING LICENSE NPF-30  
EMERGENCY PREPAREDNESS**

This letter requests pre-approval of a proposed change to the Callaway Plant Radiological Emergency Response Plan (RERP) Emergency Action Levels 3I and 3J. This revision is being made per discussions with NRC Region IV personnel to correct overly conservative initiating conditions in our current EAL scheme based on the definition of a hazardous atmosphere in CDP-ZZ-01100, which is referenced in the current EAL indicators.

This change was discussed with NRC Region IV personnel during a teleconference brief on September 21, 2006. The current EALs have been revised based on the NEI 99-01 Rev. 4, HU3 and HA3 guidance, staying as close as possible to the exact verbiage in the document. In addition, verbiage pertaining to asphyxiates has been added to address a new FAQ scheduled for issue to modify the wording in HU3 and HA3 to include asphyxiates as an element in the EALs.

This change represents an improvement in our current EAL indicators for 3I and 3J that will prevent unnecessary Unusual Event and Alert declarations at the site. The change also meets current NRC industry excepted standards. Per discussions during the September 21, 2006 brief, this change represents a reduction of effectiveness per 10CFR50.54(q) due to our current EAL initiating conditions being reached at a more conservative indicating level than that set forth in NEI 99-01 Rev. 4 guidance. Callaway Plant hereby requests an expeditious review and approval of this proposed change to the RERP.

Attached are the current copy (Revision 28) and the proposed changes (Revision 29) of the 3I and 3J EALs from Table 4-1 of the RERP.


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The Callaway Onsite Review Committee and a subcommittee of the Nuclear Safety Review Board have reviewed and approved the attached proposed RERP revision and have approved the submittal of this request for NRC pre-approval of the proposed change to the RERP.

If you have any questions or require additional information, please contact Luke H. Graessle, Superintendent, Protective Services, at 573-676-8129.

Sincerely,

  
*for* Keith D. Young  
Manager, Regulatory Affairs

KDY/DES/DJW/slk

Executed on October 3, 2006.

Enclosures: RERP Table 4-1, Revision 28 (current)  
RERP Table 4-1, Revision 29 (proposed)

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*(Certrec receives ALL attachments  
as long as they are non-safeguards  
and public disclosed).*

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**Table 4-1  
EMERGENCY ACTION LEVELS**

**Group 3 HAZARDS AFFECTING PLANT SAFETY**

**Toxic Gas**

<u>UNUSUAL EVENT</u>	<u>ALERT</u>
<p>I. Release of Toxic or Flammable Gases Deemed Detrimental to Safe Operation of the Plant.</p> <p>MODES: At All Times</p> <p><u>Indicators</u> Any of the following:</p> <ol style="list-style-type: none"> <li>Report or detection of toxic or flammable gases that enter within the Exclusion Area Boundary, that have created a HAZARDOUS ATMOSPHERE per CDP-ZZ-01100, deemed detrimental to safe operation.</li> <li>Confirmed report by local, County or State Officials of potential evacuation of site personnel as determined from the DOT evacuation tables for selected hazardous materials in the DOT Emergency Response Guide for Hazardous Materials.</li> </ol>	<p>J. Release of Toxic or Flammable Gases Within a Facility Structure Which Jeopardizes Operation of Systems Required to Establish or Maintain Cold Shutdown.</p> <p>MODES: At All Times</p> <p><u>Indicators</u> Any of the following:</p> <ol style="list-style-type: none"> <li>Report or detection of toxic or flammable gases, not properly contained, within or adjacent to any of the following Safe Shutdown Areas, that have created a HAZARDOUS ATMOSPHERE per CDP-ZZ-01100, jeopardizing operation of systems required to establish or maintain Cold Shutdown <ul style="list-style-type: none"> <li>• Area 5</li> <li>• Containment</li> <li>• Aux Feed Pump Rooms</li> <li>• Aux Building</li> <li>• Diesel Generator Building</li> <li>• UHS Cooling Tower</li> <li>• ESW Pumphouse</li> <li>• Control Building</li> <li>• RWST</li> <li>• Fuel Building</li> </ul> </li> </ol>

**Control Room Evacuation Events**

<u>ALERT</u>	<u>SITE EMERGENCY</u>
<p>K. Control Room Evacuation Has Been Initiated.</p> <p>MODES: At All Times</p> <p><u>Indicators</u> Entry into OTO-ZZ-00001, Control Room Inaccessibility, is required.</p>	<p>L. Control Room Evacuation Has Been Initiated and Plant Control Cannot Be Established.</p> <p>MODES: At All Times</p> <p><u>Indicators</u></p> <ol style="list-style-type: none"> <li>Entry into OTO-ZZ-00001, Control Room Inaccessibility, is required.</li> </ol> <p>and</p> <ol style="list-style-type: none"> <li>Control of the Aux Feed System and a SG PORV for cooldown cannot be established within 15 minutes.</li> </ol>

Table 4-1  
**EMERGENCY ACTION LEVELS**

**Group 3 HAZARDS AFFECTING PLANT SAFETY**

**Toxic Gas**

<u>UNUSUAL EVENT</u>	<u>ALERT</u>
<p>I. Release of Toxic, Asphyxiating OR Flammable Gases Deemed Detrimental to Normal Operation of the Plant.</p> <p>MODES: At All Times</p>	<p>J. Release of Toxic, Asphyxiating OR Flammable Gases Within OR Contiguous to a SAFE SHUTDOWN AREA Which Jeopardizes Operation of Systems Required to Maintain Safe Operations OR Establish OR Maintain Safe Shutdown.</p> <p>MODES: At All Times</p>
<p><u>Indicators</u> Any of the following:</p> <ol style="list-style-type: none"> <li>Report OR detection of toxic, asphyxiating OR flammable gases that enter within the Exclusion Area Boundary in amounts that can affect Normal Plant Operations.</li> <li>Confirmed report by local, County OR State Officials for evacuation OR Sheltering of site personnel based on an offsite event.</li> </ol>	<p><u>Indicators</u> Any of the following:</p> <ol style="list-style-type: none"> <li>Report OR detection of toxic OR asphyxiating gases within or contiguous to a SAFE SHUTDOWN AREA in concentrations that may result in an atmosphere IMMEDIATELY DANGEROUS TO LIFE AND HEALTH (IDLH).</li> <li>Report or detection of gases in concentrations greater than the LOWER FLAMMABILITY LIMIT within or contiguous to a SAFE SHUTDOWN AREA.</li> </ol> <p>SAFE SHUTDOWN AREAs</p> <ul style="list-style-type: none"> <li>Area 5</li> <li>Containment</li> <li>Aux Feed Pump Rooms</li> <li>Aux Building</li> <li>Diesel Generator Buildings</li> <li>UHS Cooling Tower</li> <li>ESW Pumphouse</li> <li>Control Building</li> <li>RWST</li> <li>Fuel Building</li> </ul>

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<p><u>Indicators</u> Entry into OTO-ZZ-00001, Control Room Inaccessibility, is required.</p>	<p><u>Indicators</u> 1. Entry into OTO-ZZ-00001, Control Room Inaccessibility, is required.</p> <p><u>and</u></p> <p>2. Control of the Aux Feed System and a SG PORV for cooldown cannot be established within 15 minutes.</p>