

November 7, 2006

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

SUBJECT: CALLAWAY PLANT, UNIT 1 - REQUEST FOR ADDITIONAL INFORMATION
REGARDING RESPONSES TO GENERIC LETTER 2003-01, "CONTROL
ROOM HABITABILITY" (TAC NO. MB9783)

Dear Mr. Naslund:

Generic Letter (GL) 2003-01, "Control Room Habitability," was issued by the Nuclear Regulatory Commission (NRC) on June 12, 2003, and requested confirmation that the control room meets the applicable habitability regulatory requirements and that it is designed, constructed, configured, operated, and maintained in accordance with the facility's design and licensing bases. The GL further states that emphasis should be placed on confirming that the most limiting unfiltered inleakage into the control room envelope (and the filtered inleakage, if applicable) is no more than the value assumed in the plant design-basis radiological analyses and hazardous chemical assessments for the control room, and requested a description of how and when the analyses, tests, and measurements were performed for this confirmation. You have responded for the Callaway Plant, Unit 1 (Callaway) by the following three letters: August 11, 2003 (ULNRC-04885); December 15, 2004 (ULNRC-05104); and June 6, 2006 (ULNRC-05298) (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML032370463, ML050040232, and ML061720088, respectively).

In your letters dated December 15, 2004, and June 6, 2006, the results of the unfiltered inleakage test were reported using the Atmospheric Tracer Depletion (ATD) test method developed by Brookhaven National Laboratory. In the responses, it was stated that the alternative method of unfiltered inleakage testing was needed for Callaway because of the plant-specific control room/control building (CR/CB) design, which is different from other nuclear power plants. It was stated that the American Society for Testing and Materials (ASTM) E741 test method was not able to provide valid results for the plant CR/CB design and, therefore, the ATD method was used. A description/applicability of the ATD test method and a comparison between the ATD and ASTM E741 methods was provided in an enclosure to the December 15, 2004, letter. The use of ATD method and the reasons for its use in place of the ASTM E741 method have also been discussed with the NRC staff in two conference calls.

In NRC Regulatory Guide (RG) 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Regulatory Position 1.1 states that an integrated test performed using the ASTM E741 test method is acceptable to the staff. Therefore, to evaluate the acceptability of the results from the alternative test method used at Callaway, the NRC staff requests that you submit the information, listed in the 12 bullets in RG 1.197, Regulatory Position 1.3, "Alternative Test Methods," on the ATD test method. The information in the

enclosure to the December 15, 2004, letter has been reviewed, but it does not provide all the information listed in RG 1.197, Position 1.3. Where the enclosure provides the requested information, you may reference that enclosure in your response. Because your position is that the ASTM E741 test method is not applicable to the Callaway CR/CB design, you may decide not to perform the correlation of results of the ATD method with a test performed on the Callaway CR/CB design with a methodology described in ASTM E471. If so, you are requested to provide an assessment to show that the use of the alternative ATD test method provides an equivalent level of quality and safety in the determination of the unfiltered inleakage into the Callaway control room envelope.

Sincerely,

/RA/

Jack Donohew, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: See next page

enclosure to the December 15, 2004, letter has been reviewed, but it does not provide all the information listed in RG 1.197, Position 1.3. Where the enclosure provides the requested information, you may reference that enclosure in your response. Because your position is that the ASTM E741 test method is not applicable to the Callaway CR/CB design, you may decide not to perform the correlation of results of the ATD method with a test performed on the Callaway CR/CB design with a methodology described in ASTM E471. If so, you are requested to provide an assessment to show that the use of the alternative ATD test method provides an equivalent level of quality and safety in the determination of the unfiltered inleakage into the Callaway control room envelope.

Sincerely,
/RA/
Jack Donohew, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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Callaway Plant, Unit 1

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June 2006