

March 12, 2007

U.S. Nuclear Regulatory Commission
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Ladies and Gentlemen:

ULNRC-05380

**DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
CLARIFICATION REGARDING IMPLEMENTATION
OF PROPOSED LICENSE AMENDMENT TO REVISE
TECHNICAL SPECIFICATIONS FOR USE OF
BEACON POWER DISTRIBUTION MONITORING SYSTEM
(LICENSE AMENDMENT REQUEST OL-1268)**

By letter dated May 25, 2006, i.e., letter ULNRC-05297, "Proposed Revision to Technical Specifications for Use of BEACON Power Distribution Monitoring System (License Amendment Request OL-1268)," AmerenUE (Union Electric) requested amendment of the Facility Operating License for Callaway Plant in order to incorporate proposed changes to the Technical Specifications. The changes proposed in that amendment request, which are currently under review by the NRC staff, would support use of the BEACON power distribution monitoring system (PDMS) at Callaway Plant for performing power distribution surveillances required by the Technical Specifications.

Essential and supporting information for the requested amendment was provided in several attachments to AmerenUE's May 25, 2006 letter. Besides the proposed Technical Specification (TS) changes themselves, the attachments included marked-up TS Bases and Final Safety Analysis Report (FSAR) pages to indicate what changes would be made to those documents in conjunction with the TS changes. The FSAR changes included changes to be made to FSAR Chapter 16 wherein appropriate administrative controls and surveillance requirements for the BEACON PDMS would be specified. The proposed TS and FSAR changes were provided for information.

From the ongoing NRC review of the amendment request, AmerenUE was asked whether the TS Bases and FSAR changes, particularly the FSAR Chapter 16 changes that would specify the administrative controls and surveillance requirements for the BEACON PDMS, would be implemented in conjunction with

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the approved TS changes once the license amendment is approved and issued. The NRC noted that assurance of this is needed in light of the fact that the PDMS will be used to satisfy TS requirements for power distribution monitoring (per the proposed TS changes).

In response to the concern expressed by the NRC, this letter is submitted to provide assurance that the FSAR Chapter 16 changes will be implemented in conjunction with the requested license amendment after NRC approval. Thus, when the requested license amendment is approved and issued by the NRC, implementation of the amendment will include processing the FSAR Chapter 16 changes (and the TS Bases changes) such that they will be implemented at the same time that the approved TS changes are implemented.

This letter supplements the original amendment request submitted via the May 25, 2006 letter, but involves no changes to the requested TS changes themselves. No changes to the evaluations (including the environmental evaluation and Basis for No Significant Hazards Consideration) are involved, nor are there any changes to the supporting technical information that was provided.

Pursuant to 10 CFR 50.91(b)(1), AmerenUE is providing the State of Missouri with a copy of this letter which is associated with a proposed license amendment.

For any questions concerning this matter, please contact Dave Shafer at (314) 554-3104 or Tom Elwood at (314) 554-4593.

I declare under penalty of perjury that the foregoing is true and correct.

Very truly yours,

Executed on: March 12, 2007



David T. Fitzgerald
Manager, Regulatory Affairs

TBE/jdg

ULNRC-05380

March 12, 2007

Page 3

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