

October 31, 2007

Mr. Charles D. Naslund
Senior Vice President and
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Post Office Box 620
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SUBJECT: CALLAWAY PLANT, UNIT 1 - AUDIT OF LICENSEE REGULATORY
COMMITMENT MANAGEMENT PROGRAM (TAC NO. MD6618)

Dear Mr. Naslund:

An audit of the Callaway Plant, Unit 1, regulatory commitment management program was performed at the Callaway Plant on August 22-23, 2007. Based on this audit, the NRC staff concludes that Callaway Plant has an adequate program to implement and manage regulatory commitments. Details of the audit are provided in the enclosed audit report, including our observations and recommendations.

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

Enclosure: Audit Report

cc w/encl: See next page

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Callaway Plant, Unit 1

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June 2007

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION
MANAGEMENT OF REGULATORY COMMITMENTS MADE BY THE LICENSEE TO
THE U.S. NUCLEAR REGULATORY COMMISSION
UNION ELECTRIC COMPANY
CALLAWAY PLANT, INC.
DOCKET NO. 50-483

1.0 INTRODUCTION AND BACKGROUND

In SECY-00-045, "Acceptance of NEI [Nuclear Energy Institute] 99-04, 'Guidelines for Managing NRC Commitments,'" the U.S. Nuclear Regulatory Commission (NRC, the Commission) staff informed the Commission that it found that industry guidance document NEI 99-04 contains acceptable guidance for controlling regulatory commitments made by commercial reactor licensees to the NRC and the Commission endorsed NEI 99-04. The guidance in NEI 99-04 provides the NRC staff and its stakeholders with a common reference for handling regulatory commitments, which are defined as "explicit statement[s] to take a specific action agreed to, or volunteered by, a licensee *and* submitted in writing on the docket to the NRC."

The NRC staff has agreed that NEI 99-04 provides acceptable guidance to licensees for the control of regulatory commitments made to the NRC staff. See Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000. The commitments will be controlled in accordance with the licensee's Commitment Management Program (CMP) in accordance with NEI 99-04. Any change to the regulatory commitments is subject to licensee management approval and subject to the procedural controls established at the plant for commitment management in accordance with NEI 99-04, which include appropriate notification of the NRC.

The NRC's Office of Nuclear Reactor Regulation (NRR) performs audits of regulatory commitments made by commercial reactor licensees. An NRR project manager audits the licensee's CMP by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (e.g., amendments, relief requests, exemptions) and activities (e.g., bulletins, generic letters). An audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Union Electric Company's (the licensee's) program for managing regulatory commitments at the Callaway Plant, the CMP, was performed at the plant site on August 22-23, 2007. Since no such audit had been performed at Callaway prior to this date, the NRC staff defined the period of this audit to encompass approximately 6 years prior to the date of the audit, twice the normal period of 3 years.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented those commitments made to the NRC as part of past licensing activities, satisfying both the action committed to and the overall intent of the commitment.

The NRC staff selected a sample of individual and unrelated regulatory commitments that were approved by the NRC to justify a licensing action or resolve a licensing activity. This sample emphasized regulatory commitments encompassing a variety of systems, a variety of engineering disciplines, and a variety of licensing actions.

The NRC staff reviewed reports generated by the licensee's CMP along with other relevant documentation to evaluate the status of the completion of regulatory commitments. The results of this review are listed in the attached Table 1. The NRC staff found that the licensee's CMP had adequately incorporated and implemented all of the regulatory commitments that were selected by the NRC staff for this audit.

2.2 Verification of Licensee's Program for Managing NRC Commitment Changes

The primary focus of this part of the audit is the licensee's performance related to implementing controls for modifying or deleting regulatory commitments made to the NRC in order to ensure that changes to regulatory commitments are evaluated in accordance with the licensee's programs and procedures, that the licensee's technical evaluations adequately justify the change, and that the NRC is informed of regulatory commitment changes that have safety or regulatory significance in accordance with NEI 99-04.

The licensee manages regulatory commitments using administrative procedure APA-ZZ-00540, "Commitment Management Program." In accordance with this procedure, commitments are initiated using form CA 1571, "Commitment Revision, Initiation, Deletion Request (CRIDR)," and evaluated using form CA 2358, "Commitment Evaluation." The NRC staff reviewed Revision 010 of these procedures and concluded that they are consistent with the guidance of NEI 99-04; that the procedures constitute adequate administrative controls for modifying and deleting regulatory commitments made to the NRC; that the programs provide guidance regarding the evaluation of proposed changes to regulatory commitments in terms of safety and regulatory significance; and that the guidance included criteria consistent with NEI 99-04 for determining when it would be appropriate to notify the NRC of a regulatory commitment change.

The NRC staff selected a sample of regulatory commitment changes that were reported to the NRC. The sample is listed in the attached Table 2. In one instance (Table 2, Item 20), the

licensee was unable to locate documentation of the evaluation of a regulatory commitment change. Otherwise, the NRC staff found that the licensee had evaluated all of the regulatory commitments that were sampled and reported those changes to NRC that met the criteria in NEI 99-04.

2.3 Additional Observations and Recommendations

- (a) The licensee explicitly identifies regulatory commitments in correspondence to the NRC and when such correspondence does not include any commitments, the licensee will include a statement to the effect, "There are no commitments associated with this submittal" in the cover letter. When such commitments are included in the letter, there is an attachment to the letter that clearly states that the attachment contains regulatory commitments, what these commitments are, and when the commitments will be implemented. These explicit statements that the correspondence contain or do not contain regulatory commitments represent clear and effective communications, and is considered by the NRC staff to be a positive initiative on the part of the licensee.
- (b) The licensee's Commitment Tracking System software—described in the CMP—is a computer database used to maintain and track commitments. This software has undergone some recent changes, moving from a dedicated standalone system to be incorporated within the licensee's document management system. During the audit, the licensee personnel had great difficulty locating and referencing commitments and commitment changes within this system. A licensee staff member identified several potential causes of this difficulty, including but not limited to: the limited data fields available within the document management system, the change in staff responsible for maintaining the Commitment Tracking System, inconsistent and one-directional document linking within the system that resulted in difficulty locating and correlating commitments with the documents in which they were made, and inconsistencies in the entry of commitments into the system (e.g., combining multiple commitments or actions into one listing, limited or absent cross-referencing related documents, inconsistent use of data fields, etc.). Consequently, the audit relied heavily on informal records maintained independently of that system.
- (c) The CMP requires that a commitment evaluation form (CA2358) be completed to document the evaluations performed to revise or delete a commitment. No record of a commitment evaluation form could be located for one commitment change (Table 2, Item 20) in the sample. The licensee later identified at least one other commitment which lacked this record. The licensee initiated corrective action to evaluate procedure revision and to complete the commitment evaluation forms for those commitments that lack commitment evaluation forms on record.

3.0 CONCLUSION

Based on the above audit, the NRC staff concludes that (1) the licensee has an adequate program to implement and manage regulatory commitments, and (2) the licensee has an adequate program to implement and manage changes to regulatory commitments.

4.0 LICENSEE PERSONNEL CONTACTED AT SITE FOR THIS AUDIT

Justin Hiller

Attachments:

1. Table 1: Implemented Regulatory Commitments
2. Table 2: Revised or Deleted Regulatory Commitments

Principal Contributor: Adam Hoffman, NRR

Date: October 31, 2007

AUDIT OF UNION ELECTRIC CO. MANAGEMENT OF

REGULATORY COMMITMENTS

AT CALLAWAY PLANT, UNIT 1

PERFORMED AUGUST 22-23, 2007

LIST OF COMMITMENTS INCLUDED IN AUDIT

Table 1. Implemented Regulatory Commitments

Item No.	Commitment Source Document	Commitment Date	Description of Commitment	Status
1	ULNRC-4519	8/31/2001	Provide a description of the extent of vessel head penetration nozzle leakage and cracking detected, in response to Bulletin 2001-01.	Closed
2	ULNRC-4519	8/31/2001	If vessel head penetration cracking is identified, a description of the inspections, repairs, and other corrective actions shall be provided.	Closed
3	ULNRC-04920	11/19/2003	Provide the information requested in Bulletin 2003-02, Item 2 (i.e., a summary of inspections performed on the reactor pressure vessel lower head penetrations).	Closed
4	ULNRC-04920	11/19/2003	Perform a visual inspection of the lower reactor pressure vessel head penetration as committed in ULNRC-04799.	Closed
5	ULNRC-04949	2/5/2004	The proposed changes to Callaway Technical Specifications (TSs) and TS Bases will be implemented (revising the completion time for an inoperable turbine-driven auxiliary feedwater pump in TS 3.7.5 to incorporate a one-time provision that extends the allowed outage time for up to an additional 72 hours).	Closed
6	ULNRC-04949	2/5/2004	Administrative controls shall be put in place to ensure the Tier 2 restrictions are assured during the extended TS 3.7.5 Required Action Completion Time, as detailed in ULNRC-04949.	Closed

Item No.	Commitment Source Document	Commitment Date	Description of Commitment	Status
7	ULNRC-05074	10/27/2004	Provide the requested operating data in Generic Letter 97-02 to the NRC via an industry database.	Closed
8	ULNRC-05206	9/9/2005	Amendment No. 170 to Facility Operating License No. NPF-30 (incorporating changes to the feedwater isolation valves closure time in the TSs) will be implemented no later than entry into Mode 3 during startup from refueling outage 15.	Closed
9	ULNRC-05206	9/9/2005	The associated revisions to the TS Bases and the Final Safety Analysis Report will be incorporated in the next regulatory update after the amendment is issued.	Closed
10	ULNRC-05206	9/9/2005	Closure-time baseline testing of the main feedwater isolation valves will be performed prior to implementation of the amendment.	Closed
11	ULNRC-05295	6/30/2006	Perform a containment walkdown to provide current assessment of Callaway's containment coatings and latent debris (in response to Generic Letter 2004-02).	Closed
12	ULNRC-05408	6/1/2007	Perform structural analysis of the replacement sump strainers (in response to Generic Letter 2004-02).	Closed
13	ULNRC-05408	6/1/2007	Resolve debris generation calculation unverified assumption of 5D zone of influence for qualified coating (in response to Generic Letter 2004-02).	Closed
14	ULNRC-05408	6/1/2007	Complete industry chemical effects testing (in response to Generic Letter 2004-02).	Closed
15	ULNRC-05408	6/1/2007	Replace containment recirculation sump strainers (in response to Generic Letter 2004-02).	Closed
16	ULNRC-05408	6/1/2007	Modify containment debris barrier and interceptors as required (in response to Generic Letter 2004-02).	Closed

Table 2. Revised or Deleted Regulatory Commitments

Item No.	Source Document	Commitment Change Date	Description of Commitment	Change to Commitment	Reported to NRC?	Evaluation Consistent with Procedure?
17	ULNRC-01779	8/30/2006	In response to Generic Letter 88-05, the licensee committed to the recommended boric acid inspections.	The inspection period was reduced from monthly to quarterly to reduce heat stress, radiation dose and equipment usage.	Yes	Yes
18	ULNRC-02146	1/17/2007	In response to Generic Letter 89-13, the licensee committed to inspect pump bays for mollusks, sediment, and corrosion during maintenance.	The commitment was reworded to inspect for macrofouling, corrosion, and other debris.	Yes	Yes
19	ULNRC-01880	4/8/2007	In response to Generic Letter 88-17, the licensee committed to a 0.5 square foot or greater hot leg vent when a second centrifugal charging pump is taking suction from the RWST.	The original vent size is overly conservative; an approved calculation is used to determine the required vent size based upon time since shutdown.	Yes	Yes
20	ULNRC-05189	1/9/2006	In response to Bulletin 2005-02, the licensee committed to update its Emergency Plan and EAL implementing procedure to reflect the information provided in IBE 2005-02.	The commitment was revised to reflect the information provided in the Industry White Paper dated November 22, 2005.	Yes	No*

*The required commitment evaluation form (CA2358) for this commitment could not be located. Justification of the commitment change was provided on the commitment change processing form (CA1571).