

October 5, 2007

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

ULNRC-05438



Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
RESPONSES TO REQUESTS FOR ADDITIONAL INFORMATION
REGARDING REQUEST FOR PARTIAL SITE RELEASE**

Reference 1: AmerenUE Letter ULNRC-05394,
"Request for Partial Site Release,"
dated May 15, 2007

By letter dated May 15, 2007 (Reference 1) Union Electric, d/b/a AmerenUE, reported the discovery that prior approval per 10 CFR 50.83 had not been obtained from the NRC for the sale of non-impacted land from the Callaway Plant site. In its letter, Ameren UE requested after-the-sale approval to release the non-impacted property. Supporting information was provided in accordance with 10 CFR 50.83(b).

From its ongoing review of this request for partial site release, the NRC staff has transmitted several requests for additional information (RAIs) for which responses from AmerenUE are needed in order to support completion of the NRC's review. Accordingly, this letter provides AmerenUE's responses to the NRC's RAIs in Attachment 1. Within the attachment each of the individual questions/requests contained in the associated RAI is stated and immediately followed with AmerenUE's response. Text from the NRC's RAIs is shown in italics.

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Please contact Tom Elwood, Supervising Engineer, Regulatory Affairs and Licensing at 573-676-6479 for any questions you may have regarding this request for partial site release.

This letter does not contain any new commitments.

Sincerely,



Luke H. Graessle
Manager, Regulatory Affairs

LHG/KRG/nls

Attachments: 1) Responses to NRC RAI Questions Regarding 10 CFR 50.83(b)
Request for Partial Site Release

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**Responses to NRC RAI Questions Regarding 10 CFR 50.83(b)
Request for Partial Site Release**

Paragraph 50.83(a) of Title 10 of the Code of Federal Regulations (10 CFR) states that prior written NRC approval is required to release part of a facility or site for unrestricted use at any time before receiving approval of a license termination plan. Paragraph 50.83(b) further states that for the release of non-impacted areas, the licensee may submit a written request for NRC approval of the release if a license amendment is not otherwise required.

In its submittal dated May 15, 2007, Union Electric Company (AmerenUE) reported the discovery that NRC approval per 10 CFR 50.83 had not been obtained prior to the sale of non-impacted land from the Callaway Plant site. AmerenUE requested after-the-sale approval from the NRC to release the non-impacted property. AmerenUE's request is currently under review by the NRC staff.

To continue the review of Ameren UE's request for partial site release, the NRC staff requests the following additional information.

1. Where are the following addressed in the application?

a. The dose to individual members of the public with respect to the limits and standards of 10 CFR Part 20, Subpart D. The letter dated May 15, 2007 addressed 10 CFR Part 20, Subpart E in Item i on page 2 of 4 of Attachment I to the letter.

Response

The dose to individual members of the public will not exceed the limits in 10 CFR 20 Subpart D as a result of the release of this property. Although Subpart D was not specifically referenced in the application, it is part of the reference made to 10 CFR 20 on page 3 of 4 of Attachment I to the letter dated May 15, 2007. As there is no residual radioactivity on this property, release of the property will not result in dose to the public.

b. A historical site assessment of the part of the facility or site to be released. A historical site assessment is given in Attachment IV to the letter, but the assessment does not appear to address historic cultural considerations.

Response

Recent history of AmerenUE's use of the subject property was discussed in the historical site assessment. The cultural resources survey for the site was reviewed, and there are no identified cultural resource sites associated with the property that was released.

c. The recordkeeping requirements specified in 10 CFR 50.75 that are associated with a partial site release.

Response

AmerenUE did not specifically address recordkeeping requirements in its May 15, 2007 application. However, records related to decommissioning activities are maintained pursuant to 10 CFR 50.75(g). In this case, because of the failure to obtain prior NRC approval for the subject partial release of site property, a record of this event was also captured in Callaway's corrective action program. The corrective action document concerning the release and sale of this property contains the keyword "DECOMMISSION" and references the application to the NRC. It also states that there is no residual radioactivity on the property and that the final disposition is that NRC approval is still pending.

2. What will AmerenUE be doing to prevent the recurrence of selling land from the Callaway site without requesting approval from the NRC?

Response

AmerenUE is adding appropriate steps to Real Estate Department documents to:

- ensure that the Callaway Licensing Department is contacted when a sale of Callaway site property is under consideration and
- verify that NRC approval has been obtained before proceeding with the sale.

The above actions are being tracked to completion in Callaway's corrective action program.