

December 10, 2007

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

ULNRC-05461



Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
REQUEST FOR EXTENSION OF COMPLETION DATE FOR
CORRECTIVE ACTIONS ASSOCIATED WITH NRC GENERIC
LETTER 2004-02, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE
ON EMERGENCY RECIRCULATION DURING DESIGN BASIS
ACCIDENTS AT PRESSURIZED-WATER REACTORS"**

- References: 1. AmerenUE Letter ULNRC-05408, dated May 1, 2007.
2. AmerenUE Letter ULNRC-05235, dated December 12, 2005.

By letter dated May 1, 2007 (Reference 1), Union Electric Company (AmerenUE) committed to completing all corrective actions associated with Generic Letter (GL) 2004-02 prior to or on December 31, 2007. This submittal requests an extension to delay the completion of remaining corrective actions until June 30, 2008.

In SECY-06-0078, dated March 31, 2006, the NRC staff recognized that licensees may encounter situations that could delay the implementation of corrective actions committed to in response to GL 2004-02. The NRC staff plans to review extension requests using the criteria of SECY-06-0078. For each licensee requesting an extension(s), the criteria require the licensee to 1) develop a plant-specific technical/experimental plan with milestones and schedule to address outstanding technical issues with enough margin to account for uncertainties, 2) identify mitigative measures to be put in place prior to December 31, 2007, and 3) describe how these mitigative measures will minimize the risk of degraded ECCS and CSS functions during the extension period.

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Rec'd on 4/1/08

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AmerenUE has the following plant-specific technical/experimental plan with milestones and a schedule to address outstanding technical issues with enough margin to account for uncertainties:

- Additional plant-specific tests that support assumptions and corresponding conclusions contained in the GL 2004-02 evaluations for Callaway Plant (Callaway) are planned to begin in mid-January, 2008. Although the actual testing at the vendor testing facility is expected to be completed in late January, 2008, numerous additional actions are required prior to the vendor completing a final test report that meets the procurement specifications requirements, including those of 10 CFR 50, Appendix B for control of purchased services and procurement document control.
- Following receipt of the final test report from the vendor, numerous additional actions are also required by Callaway to complete formal verification of design inputs, assumptions and conclusions of Callaway calculations and evaluations conducted in response to issues identified in GL 2004-02. These activities include assessing the impact of the test results on strainer NPSH calculations, the impact of strainer bypass sampling on downstream effects analyses (in-vessel and ex-vessel), and the potential impact on other Generic Letter 2004-02 corrective action evaluations. These activities also include compliance with 10 CFR 50, Appendix B requirements for design control, document control and quality assurance records.

The following mitigative measures have been or will be put in place prior to December 31, 2007:

- Plant hardware modifications developed in response to issues identified in GL 2004-02, as described in Reference 1, are installed in Callaway and are supporting compliance with the regulatory requirements for long term cooling following a design basis loss of coolant accident. The hardware modifications included replacement of sump strainers and installation of debris barriers in the "A" and "D" loop entrances.
- By December 31, 2007, implementation will be completed for Callaway administrative procedures and processes described in Reference 1 to support the GL 2004-02 hardware modifications and revised operating practices, as well as to support the assumptions, initial conditions and conclusions of the expected final version of GL 2004-02 related evaluations, when the evaluations are completed and documented. Administrative procedures and processes include implementation of changes to programmatic controls for design change processes and containment material controls, as well as implementation of a containment coatings assessment program and a containment latent debris assessment program.

- Interim compensatory measures implemented at Callaway in accordance with NRC Bulletin 2003-01, as described in Reference 2, remain in effect to minimize interim risks associated with post-accident debris blockage while GL 2004-02 evaluations are being completed. In accordance with NRC Bulletin 2003-01, these measures will remain in place at a minimum until all evaluations and corrective actions for GL 2004-02 are complete.

This letter transmits changes in AmerenUE's regulatory commitments contained in Reference 1. The commitment changes are being submitted in accordance with guidance provided by industry document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," as endorsed in Regulatory Issues Summary 2000-017, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff." Attachment 1 provides an updated list of AmerenUE's outstanding commitments associated with the corrective actions identified for GL 2004-02. The list of commitments contained in Attachment 1 supersedes the list provided in Reference 1, as it provides revised due dates for each commitment.

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

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

Sincerely,


Luke H. Graessle
Manager, Regulatory Affairs

Executed on: December 10, 2007

Enclosure

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LIST OF COMMITMENTS

The following table identifies revised due dates for actions originally committed to by AmerenUE in Reference 1 of the cover letter. The numbering in this table is maintained consistent with Reference 1. Any other statements in this document are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to Tom Elwood, Supervising Engineer, Regulatory Affairs and Licensing at 573-676-6479.

COMMITMENT	Due Date/Event
2 The following corrective action activities will be completed:	
b. Downstream effects evaluation.	June 30, 2008
c. Upstream effects evaluation.	June 30, 2008
3. Submit an update to information contained in Callaway's response to Generic Letter 2004-02 Requested Information Item 2	June 30, 2008
4. The following evaluations and testing will be completed:	
b. NEI 04-07 debris generation calculation.	June 30, 2008
c. NEI 04-07 debris transport calculation.	June 30, 2008
d. Evaluate the impact of chemical effects on containment emergency sump strainer head loss during design basis accident conditions	June 30, 2008
e. Confirmation that the replacement sump strainer design provides for available NPSH to be in excess of required NPSH.	June 30, 2008
f. Completion of the final site acceptance review of the Westinghouse team analysis summary report.	June 30, 2008
g. Replacement sump screen head loss testing	June 30, 2008
5. The following item will be completed:	
c Evaluation and implementation of potential modification to the safety injection system to address downstream effects.	June 30, 2008
6. Callaway will complete removal of containment spray system (CSS) pump cyclone separators, if required based on the results of the downstream effects evaluation.	June 30, 2008
7. The following programs and controls will be implemented at Callaway to control debris sources.	
a. Changes to design change process procedures to ensure that necessary engineering evaluations will be performed for plant design that either directly or indirectly affects containment, ECCS, or CSS.	Complete

b. Changes to containment entry and material control procedure requirements for control of materials during work activities conducted in the containment.	December 31, 2007
c. Changes to programs and procedures that have the potential to add tags and labels inside containment.	December 31, 2007
d. Implementation of a containment coatings assessment program	Complete
e. Implementation of a containment latent debris assessment program	December 31, 2007
f. Implementation of changes to the inspection processes for the installed sump strainers	Complete
8. A final response will be submitted to the NRC to provide a final status of actions requested by Generic Letter 2004-02.	June 30, 2008



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