

August 13, 2008

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

ULNRC-05534

Ladies and Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
ONE-TIME COMPLETION TIME EXTENSION
FOR ESSENTIAL SERVICE WATER (ESW) SYSTEM
(OL1282 - TAC NO. MD7252)



- References:
1. ULNRC-05445 dated October 31, 2007
 2. ULNRC-05476 dated February 21, 2008
 3. ULNRC-05482 dated March 7, 2008
 4. NRC Request for Additional Information dated March 31, 2008
 5. ULNRC-05500 dated May 6, 2008
 6. NRC Request for Additional Information (RAI) Letter from Mohan C. Thadani to Charles D. Naslund dated June 10, 2008
 7. ULNRC-05520 dated July 10, 2008

In Reference 1 above AmerenUE requested a license amendment that would revise Callaway Technical Specification (TS) 3.7.8, "Essential Service Water (ESW) System," and TS 3.8.1, "AC Sources – Operating," to allow a one-time Completion Time extension from 72 hours to 14 days per ESW train to be used prior to December 31, 2008, for replacing underground ESW piping.

From the NRC's ongoing review of the subject license amendment request (LAR), several requests for additional information (RAIs) have been transmitted to AmerenUE, to which AmerenUE has responded. The letters that transmitted NRC RAIs, as well as AmerenUE's responses to the NRC RAIs, are in the above list of references.

With regard to information provided via the letters of References 5 and 7, two additional, clarifying questions were identified by the NRC staff and then received via an electronic request on July 28, 2008. AmerenUE's responses to those questions are hereby provided in Attachment 1 to this letter. Within the attachment, each

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question is presented and followed by AmerenUE's response. There are no new commitments associated with these responses.

If you have any questions on this letter or its enclosures, please contact Mr. Scott Maglio at (573) 676-8719.

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

Very truly yours,

Executed on: 8-13-2008



Luke H. Graessle
Manager – Regulatory Affairs

GGY/nls

Attachments: 1 – Response to Additional NRC Questions

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cc:

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ATTACHMENT 1

RESPONSE TO ADDITIONAL NRC QUESTIONS

Question:

1. Does Callaway have procedures and operator training in place to permit local/manual operation of the turbine driven AFW pump during long term station blackout conditions or post-fire conditions?

Response:

Emergency Operating Procedure (EOP) ECA-0.0, "Loss of All AC Power," steps 4.a and 4.b provide guidance for restoring the turbine-driven auxiliary feedwater pump (TDAFP).

EOP Addendum 18 is used to assure proper AFW valve emergency alignment, including the steam and water supply valves to the TDAFP turbine, flow control discharge valves to the steam generators, turbine mechanical trip and throttle valve, and turbine speed governor control valve. All of these valves can be operated from the auxiliary shutdown panels if the main control room is inaccessible as discussed in off-normal procedure OTO-ZZ-00001, "Control Room Inaccessibility," which would be used for a control room fire.

Lastly, Attachments R and W of Callaway's Emergency Coordinator Supplemental Guideline provide directions to be used, as directed by the Emergency Coordinator, to start the TDAFP after a loss of AC and DC power and to align firewater (from pumper truck(s) if necessary) to the TDAFP.

Training is conducted on the use of the above procedures.

Question:

2. Callaway states the temporary diesels are located in the switchyard. What consideration was given to assuring the presence of diesel fuel oil in the switchyard is adequate from a fire protection point of view? Are the temporary diesels adequately separated from equipment needed for offsite power to the station in the event of a diesel fire? Will the diesels be operated in the switchyard during the extended CT for testing purposes?

Response:

The temporary modification for the alternate AC power supply commitment (four supplemental diesel generators (DGs) located in the switchyard) is still being designed, and fire protection provisions are still under evaluation. However, the design and implementation of this temporary modification will meet the requirements of FSAR Site Addendum Section 9.5.1, "Fire Protection System," including Section 9.5.1.12, with respect to administrative controls governing the control of flammable liquids. A combination of fire protection features – control of combustibles (a preliminary review

has concluded that no fuel oil containment dike or berm is needed), physical separation, manual suppression equipment, and fire barriers (if required) – will assure that a fire in the switchyard will not prevent a safe shutdown of the plant.

Storage of flammable liquids will comply with the requirements of NFPA 30-1973, "Flammable and Combustible Liquids Code." Physical separation from the safeguard transformer ring bus (as shown on FSAR Site Addendum Figure 8.2-5 and as discussed in response to RAI 2.b in ULNRC-05482 dated March 7, 2008) will be maintained to the extent allowed by the switchyard configuration. An underground yard main provides fire fighting water to the switchyard. Fire hydrants are located at approximately 250-foot intervals along the yard main with manual fire fighting equipment supplied by two mobile units.

Each temporary DG will be filled with approximately 1,000 gallons of diesel fuel. There will also be two oil-filled transformers to step the voltage up to the required level. These combustible loads have preliminarily been evaluated by the design engineer and found to not require berms. The nearest permanently-installed plant structure, system, or component (SSC) in the switchyard will be the 'B' safeguards transformer V24 (its complete equipment tag number is XMDV24) which is one of the two preferred sources of offsite power to the Class 1E AC power system. The redundant 'A' safeguards transformer V22 (its complete equipment tag number is XMDV22, and is also a permanently-installed SSC in the switchyard) is located approximately 188 feet plant north of V24 and therefore is outside the vicinity of the temporary installation and will be available regardless of any potential damage. (FSAR Site Addendum Figure 8.2-7 shows the equipment arrangement for these permanent plant SSCs.) Furthermore, the temporary DGs will be situated at the maximum available distance from transformer V24. This distance (which is not yet firmly established) will be evaluated for its potential fire hazard as part of the temporary modification. If there is a potential risk associated with the proximity of the diesels to nearby plant SSCs, further steps will be taken to mitigate the fire hazards, such as installation of fire barriers or re-positioning of the diesels.

Each of the four supplemental DGs will be load tested to 1600 kW, prior to entering the one-time 14-day LCO outage on each train, in order to demonstrate that the supplemental DGs can together supply a load equal to the 6,201 kW continuous duty rating of one station emergency DG. During the LCO outage, inspections will be conducted once every 8 hours to assure operational readiness. These commitments were made in response to RAI 2.b in ULNRC-05482. Upon successful completion of the pre-outage load test runs, the supplemental DGs will be maintained "ready to start" for the duration of the LCO outage with 24-hour support staff coverage. There will be no scheduled preventive maintenance testing, or test runs, during the LCO outage.