

10 CFR 52.75
10 CFR 2.390

September 10, 2008

U.S. Nuclear Regulatory Commission
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ALNRC 00006

NRC PROJECT #750
AMERENUE – CALLAWAY PLANT UNIT 2
CLARIFICATION OF REFERENCES TO U.S. EPR REVISION 1

Reference: Letter from T.E. Herrmann (AmerenUE) to U.S. Nuclear Regulatory Commission, "Application for Combined License for Callaway Unit 2, NRC Project Number 750," ALNRC 00004 dated July 24, 2008

The purpose of this letter is to clarify the references to Revision 1 to the U.S. EPR Final Safety Analysis Report (FSAR) contained in AmerenUE's Combined License Application (COL) for Callaway Plant Unit 2 (reference). During development of the Callaway Plant Unit 2 COL, it was anticipated that information regarding the spent fuel storage racks and spent fuel criticality analysis would be contained in Revision 1 to the U.S. EPR FSAR. Furthermore, it was anticipated that a letter would be submitted to the NRC by AREVA in July 2008 providing the plan for incorporating the spent fuel pool storage racks and criticality analysis information into the U.S. EPR FSAR.

The spent fuel pool storage racks and criticality analysis information will be incorporated into the U.S. EPR FSAR in a future revision. A marked-up revision of the changes to the affected sections of the Callaway Plant Unit 2 COL are included as Enclosure 1 to this letter. These changes will be incorporated into the next revision of the Callaway Plant Unit 2 COL.

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If you have any questions, or need additional information, please contact Scott Bond at (573) 676-8519 or David Shafer at (573) 676-4722.

Executed on September 10, 2008



Ronald T. Lamb
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RTL/RCW/slk

Enclosure: Callaway Plant Unit 2 COL Application, Clarification Changes Regarding
References to U.S. EPR FSAR, Revision 1

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cc: (w/ enclosure)

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Enclosure 1

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Callaway Plant Unit 2 COL Application
Clarification Changes Regarding References to U.S. EPR FSAR, Revision 1

Table 1.6-1—Reports Referenced

Report No.	Title/Revision	Date Submitted to the NRC	FSAR Section
UN TR-08-001	Spent and New Fuel Storage Analyses for U.S. EPR Topical Report, Revision 0	March 2008	9.1
NEI 07-08	Generic FSAR Template Guidance for Ensuring that Occupational Radiation Exposures Are As Low As Is Reasonably Achievable (ALARA), Revision 0	September 2007	12.1.3
NEI 07-03	Generic FSAR Template Guidance for Radiation Protection Description, Revision 2	October 2007	12.5
NEI 06-13A	Template for an Industry Training Program Description, Revision 0	October 2007	13.2
{AmerenUE QAPD}	Quality Assurance Program Description, Revision 1	August 2008 (Part 11A)	17.5}
NEI 07-02A	Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part 52, Revision 3	March 2008	17.6
NEI 07-09	Generic FSAR Template Guidance for Offsite Dose Calculation Manual (ODCM) Program Description	February 26, 2008	11.5
NEI 07-10	Generic FSAR Template Guidance for Process Control Program (PCP) Description	February 26, 2008	11.4

9.0 AUXILIARY SYSTEMS

This chapter of the U.S. EPR Final Safety Analysis Report (FSAR) is incorporated by reference with supplements as identified in the following sections.

9.1 FUEL STORAGE AND HANDLING

This section of the U.S. EPR FSAR is incorporated by reference with the following supplements.

9.1.1 CRITICALITY SAFETY OF NEW AND SPENT FUEL STORAGE AND HANDLING

9.1.1.1 Design Bases

No departures or supplements.

9.1.1.2 Facilities Description

No departures or supplements.

9.1.1.3 Safety Evaluation

The U. S. EPR FSAR includes the following COL Item in Section 9.1.1.3:

A COL applicant that references the U.S. EPR design certification will demonstrate that the design satisfies the criticality analysis requirements for the new and spent fuel storage racks, and describe the results of the analyses for normal and credible abnormal conditions, including a description of the methods used, approximations and assumptions made, and handling of design tolerances and uncertainties.

This COL Item is addressed as follows:

The design and analyses for the new and spent fuel storage racks will be incorporated into a **future revision** Revision 1 to the U.S. EPR FSAR, as committed in an AREVA letter dated July, 2008 (AREVA, 2008). This revision will include the analyses in UniStar Topical Report UN-TR-08-001, Spent and New Fuel Storage Analyses for U.S. EPR Topical Report, dated March 2008 (UniStar, 2008) and **which will** incorporate additional analyses to bound the site-specific conditions at {Callaway Plant Unit 2}.

9.1.1.4 References

{~~UniStar, 2008. Spent and New Fuel Storage Analyses for U. S. EPR Topical Report, UniStar Topical Report UN-TR-08-001, March 2008.~~} **{No departures or supplements.}**

9.1.2 NEW AND SPENT FUEL STORAGE

No departures or supplements.

9.1.2.1 Design Bases

No departures or supplements.

9.1.2.2 Facilities Description

9.1.2.2.1 New Fuel Storage

The U. S. EPR FSAR includes the following COL Item in Section 9.1.2.2.1:

A COL applicant that references the U.S. EPR design certification will describe the new fuel storage racks, including a description of confirmatory structural dynamic and stress analyses.

This COL Item is addressed as follows:

The design and analyses for the new and spent fuel storage racks will be incorporated into a **future revision** Revision 1 to the U.S. EPR FSAR. ~~This revision will include the analyses in UniStar Topical Report UN-TR-08-001, Spent and New Fuel Storage Analyses for U.S. EPR Topical Report, dated March 2008 (UniStar, 2008) and~~ **which will** incorporate additional analyses to bound the site-specific conditions at {Callaway Plant Unit 2}.

9.1.2.2.2 Spent Fuel Storage

The U. S. EPR FSAR includes the following COL Item in Section 9.1.2.2.2:

A COL applicant that references the U.S. EPR design certification will describe the spent fuel storage racks, including a description of confirmatory structural dynamic and stress analyses and thermal-hydraulic cooling analyses.

This COL Item is addressed as follows:

The design and analyses for the new and spent fuel storage racks will be incorporated into a **future revision** Revision 1 to the U.S. EPR FSAR. ~~This revision will include the analyses in UniStar Topical Report UN-TR-08-001, Spent and New Fuel Storage Analyses for U.S. EPR Topical Report, dated March 2008 (UniStar, 2008) and~~ **which will** incorporate additional analyses to bound the site-specific conditions at {Callaway Plant Unit 2}.

9.1.2.3 Safety Evaluation

No departures or supplements.

9.1.2.4 Inspection and Testing Requirements

No departures or supplements.

9.1.2.5 Instrumentation Requirements

No departures or supplements.

9.1.2.6 References

~~{UniStar, 2008. Spent and New Fuel Storage Analyses for U. S. EPR Topical Report, UniStar Topical Report UN-TR-08-001, March 2008.}~~ **{No departures or supplements.}**

9.1.3 SPENT FUEL POOL COOLING AND PURIFICATION SYSTEM

No departures or supplements.

15.6 DECREASE IN REACTOR COOLANT INVENTORY EVENTS

This section of the U.S. EPR FSAR is incorporated by reference.

15.7 RADIOACTIVE RELEASE FROM A SUBSYSTEM OR COMPONENT

This section of the U.S. EPR FSAR is incorporated by reference.

15.8 ANTICIPATED TRANSIENTS WITHOUT SCRAM

This section of the U.S. EPR FSAR is incorporated by reference.

15.9 BOILING WATER REACTOR STABILITY

This section of the U.S. EPR FSAR is incorporated by reference.

15.10 SPENT FUEL POOL CRITICALITY AND BORON DILUTION ANALYSIS

This section of the U.S. EPR FSAR is incorporated by reference with the following supplements.

The spent fuel pool criticality analysis will be incorporated into **a future revision to Revision 1 of the U.S. EPR FSAR which will incorporate additional analyses to bound the site-specific conditions at {Callaway Plant Unit 2}**. ~~This revision will include the spent fuel pool criticality analysis from the previously submitted UniStar Topical Report UN-TR-08-001, Spent and New Fuel Storage Analyses for U.S. EPR Topical Report, dated March 2008 (UniStar, 2008).~~

15.10.1 REFERENCES

~~{This section is added as a supplement to the U.S. EPR FSAR.~~

~~UniStar, 2008. Spent and New Fuel Storage Analyses for U.S. EPR Topical Report, UniStar Topical Report UN-TR-08-001, March 2008.~~ **{No departures or supplements.}**