

January 23, 2009

ULNRC-05582

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

10 CFR 50.90

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC CO.
APPLICATION FOR AMENDMENT TO
FACILITY OPERATING LICENSE NPF-30
REVISION OF TECHNICAL SPECIFICATIONS 3.3, 3.7, AND 3.8
TAC NO. MD8953 (OL1283)**

- References:
1. Ameren UE Letter ULNRC-05494, "Application for Amendment of Facility Operating License NPF-30: OL-1283 – Revision of Technical Specifications 3.3, 3.7, and 3.8," dated June 3, 2008
 2. Ameren UE Letter ULNRC-05581, "Application for Amendment of Facility Operating License NPF-30: OL-1283 – Revision of Technical Specifications 3.3, 3.7, and 3.8," dated January 9, 2009, Response to NRC Request for Additional Information (RAI) dated October 3, 2008

AmerenUE submitted a license amendment request via Reference 1 that proposed changes to Technical Specifications (TSs) 3.3.7, 3.3.8, 3.7.10, 3.7.13, 3.8.2, 3.8.5, 3.8.8, and 3.8.10 as contained in Facility Operating License Number NPF-30 for the Callaway Plant. AmerenUE responded to an NRC request for additional information (RAI) via Reference 2. In the response to Question 1 in Reference 2, AmerenUE committed to the revision of the markups requested for TS 3.7.13. Attachments 1 through 3 provide the Markup of Technical Specifications, Retyped Technical Specifications, and Proposed Technical Specification Bases Changes, respectively, to satisfy that commitment. Attachment 3 is provided for information only. Final Bases changes will be processed under our program for updates per TS 5.5.14, "Technical Specifications Bases Control Program," at the time this amendment is implemented.

The conclusions of the licensing evaluations submitted in Reference 1 (i.e., the no significant hazard consideration evaluation and the environmental

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consideration evaluation) remain valid and unchanged. In addition, it should be noted that, similar to the original amendment request, there are no commitments contained in this letter.

The Callaway Onsite Review Committee has reviewed and approved the submittal of the revised TS 3.7.13 markups.

Consistent with the Reference 2 letter, AmerenUE requests approval of this license amendment request by June 3, 2009. AmerenUE further requests that the license amendment be made effective upon NRC issuance, to be implemented within 90 days from the date of issuance.

In accordance with 10 CFR 50.91, a copy of this letter is being provided to the designated Missouri State official.

If you have any questions on this amendment application, please contact me at (573) 676-8528, or 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: 1-23-09



Scott Sandbothe
Manager, Regulatory Affairs

GGY/nls

Attachments

- 1 - Markup of Technical Specifications
- 2 - Retyped Technical Specifications
- 3 - Proposed Technical Specification Bases Changes (for information only)

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cc:

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ATTACHMENT 1

MARKUP OF TECHNICAL SPECIFICATIONS

3.7 PLANT SYSTEMS

3.7.13 Emergency Exhaust System (EES)

LCO 3.7.13 Two EES trains shall be OPERABLE.

----- NOTE -----
The auxiliary or fuel building boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, and 4,
During movement of irradiated fuel assemblies in the fuel building.

----- NOTE -----
The SIS mode of operation is required only in MODES 1, 2, 3 and 4. The FBVIS mode of operation is required only during movement of irradiated fuel assemblies in the fuel building.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One EES train inoperable.	A.1 Restore EES train to OPERABLE status.	7 days
B. Two EES trains inoperable due to inoperable auxiliary building boundary in MODE 1, 2, 3 or 4.	B.1 Restore auxiliary building boundary to OPERABLE status.	24 hours

(continued)

----- NOTE -----
LCO 3.0.3 is not applicable to the FBVIS mode of operation.

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ATTACHMENT 2

RETYPE TECHNICAL SPECIFICATIONS

3.7 PLANT SYSTEMS

3.7.13 Emergency Exhaust System (EES)

LCO 3.7.13 Two EES trains shall be OPERABLE.

----- NOTE -----
The auxiliary or fuel building boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, and 4,
During movement of irradiated fuel assemblies in the fuel building.

----- NOTE -----
The SIS mode of operation is required only in MODES 1, 2, 3 and 4. The FBVIS mode of operation is required only during movement of irradiated fuel assemblies in the fuel building.

ACTIONS

----- NOTE -----
LCO 3.0.3 is not applicable to the FBVIS mode of operation.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One EES train inoperable.	A.1 Restore EES train to OPERABLE status.	7 days
B. Two EES trains inoperable due to inoperable auxiliary building boundary in MODE 1, 2, 3 or 4.	B.1 Restore auxiliary building boundary to OPERABLE status.	24 hours

(continued)

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION BASES CHANGES (for information only)

BASES

LCO
(continued)

- b. HEPA filter and charcoal adsorber are not excessively restricting flow, and are capable of performing their filtration function, and
- c. Heater, ductwork, and dampers are OPERABLE, and air circulation can be maintained.

The LCO is modified by a Note allowing the auxiliary or fuel building boundary to be opened intermittently under administrative controls. For entry and exit through doors the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for auxiliary or fuel building isolation is indicated. Plant administrative controls address the breached pressure boundary.

APPLICABILITY

In MODE 1, 2, 3, or 4, the Emergency Exhaust System is required to be OPERABLE to support the SIS mode of operation to provide fission product removal associated with ECCS leaks due to a LOCA and leakage from containment and annulus.

In MODE 5 or 6, the Emergency Exhaust System is not required to be OPERABLE since the ECCS is not required to be OPERABLE.

During movement of irradiated fuel in the fuel building, the Emergency Exhaust System is required to be OPERABLE to support the FBVIS mode of operation to alleviate the consequences of a fuel handling accident.

The Applicability is modified by a Note. The Note clarifies the Applicability for the two safety-related modes of operation of the Emergency Exhaust System, i.e., the Safety Injection Signal (SIS) mode and the Fuel Building Ventilation Isolation Signal (FBVIS) mode. The SIS mode which aligns the system to the auxiliary building is applicable when the ECCS is required to be OPERABLE. In the FBVIS mode the system is aligned to the fuel building. This mode is applicable while handling irradiated fuel in the fuel building.

ACTIONS

A.1

*INSERT
B-1
(revised on
next page)*

With one Emergency Exhaust System train inoperable, action must be taken to restore OPERABLE status within 7 days. During this period, the remaining OPERABLE train is adequate to perform the Emergency Exhaust System function. The 7 day Completion Time is based on the risk from an event occurring requiring the inoperable Emergency Exhaust

(continued)

INSERT B1

LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, 3, or 4, would require the unit to be shutdown unnecessarily.

during movement of irradiated fuel assemblies in the fuel building

to the FBVIS mode of operation.