



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 18, 2009

Mr. Adam C. Heflin
Senior Vice President and
Chief Nuclear Officer
Union Electric Company
Post Office Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 – CORRECTION TO SAFETY EVALUATION FOR AMENDMENT NO. 191 APPROVING ONE-TIME EXTENSION OF COMPLETION TIME FOR INOPERABLE ESSENTIAL SERVICE WATER SYSTEM TRAIN B AND ASSOCIATED EMERGENCY DIESEL GENERATORS (TAC NO. ME0210)

Dear Mr. Heflin:

On October 31, 2008, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML082810643) the U.S. Nuclear Regulatory Commission (NRC) staff issued Amendment No. 186 to the Facility Operating License No. NPF-30, for the Callaway Plant, Unit 1. The amendment revised the TS to permit a one-time extension of Completion Time for essential service water (ESW) Trains A and B (one at a time) and associated emergency diesel generators from 72 hours to 14 days, to allow the licensee to replace the ESW carbon steel piping. Subsequently, on February 24, 2009, the NRC staff issued Amendment No. 191 to re-approve the one-time extension of Completion Time for ESW Train B from 72 hours to 14 days, because the licensee could not complete the replacement of piping for ESW Train B by December 31, 2008, as required by Amendment No. 186.

On February 24, 2009, (ADAMS Accession No. ML090360533) Mr. George Yates of your staff suggested that the NRC make three corrections to the safety evaluation supporting the Amendment No. 191. All of the suggested corrections are in Commitment No. 2 on page 8 of the NRC staff's safety evaluation. The suggestions include: correcting the inadvertent omission of the commitment due date, adjusting the language in second sentence to state "times noted above" rather than "times note above," and replacing "PRA-modeled" with "PRA-credited" to clarify the applicability of the probabilistic risk analysis.

The NRC staff made an administrative error in omitting the due date for Commitment No. 2 and has revised page 8 of the safety evaluation. The NRC staff also agrees to make the typographical correction to state "times noted above," as suggested. The NRC staff believes that the term "PRA-modeled" is consistent with your submittal dated December 1, 2008, and the NRC staff approval of the prior submittal for Train A, as provided in Amendment No. 186, and, therefore, declines to make the suggested correction to replace the term "PRA-modeled" with "PRA-credited." Based on the above, the NRC staff has revised page 8 of the safety evaluation and indicated corrections with revision bars. Please replace page 8 of the February 24, 2009, safety evaluation with the enclosed replacement page 8.

A. Heflin

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These corrections do not change the NRC staff's conclusions in Amendment No. 191. If you have any questions, please contact me at 301-415-1476 or via email at mohan.thadani@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "Mohan C. Thadani". The signature is written in a cursive style with a large, stylized initial "M".

Mohan C. Thadani, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
As stated

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ENCLOSURE

Safety Evaluation page 8

AMENDED LIST OF REGULATORY COMMITMENTS MADE BY THE LICENSEE
ATTACHMENT 5 TO APPLICATION DATED DECEMBER 1, 2008

The following table identifies those actions committed to by the licensee, as a part of the review process for Amendment No. 186. They have been modified by the licensee in this Amendment to reflect application to replacement of ESW Train B and provide further clarifications derived from experience with replacement of ESW Train A piping.

COMMITMENT	Due Date/Event
<p>1. For no more than 48 hours during the 'A' ESW train LCO outage, and no more than 120 hours during the 'B' ESW train LCO outage, normal service water will not be available to the out-of-service ESW train. During these time limits, no PRA-modeled equipment, other than the out-of-service ESW train and supported systems rendered inoperable by that ESW train being out-of-service, will be voluntarily taken out-of-service during the one-time extended Completion Time taken on each train. This applies only to PRA-modeled equipment in the protected ESF [engineered safety feature] train (ESF train not served by the inoperable ESW train) during these time limits that normal service water is unavailable. No work will be allowed on the protected (operable) ESW train. The preceding was credited in the risk metric calculations supporting this license amendment request. No hot work will be allowed in the area of equipment in the protected ESF train (within 20 feet unless there is an intervening barrier) except for yard piping work and work in control building room 3101 where the underground piping enters the control building. Non-intrusive TS surveillances and preventive maintenance equipment status verifications that do not affect equipment operability/functionality will be allowed.</p>	<p>Administrative controls in place at time amendment is implemented. This is a Tier 2 commitment.</p>
<p>2. For the rest of the 'A' ESW train and 'B' ESW train LCO outages (the one-time 14-day Completion Times per ESW train minus the time limits noted above), the out-of-service ESW train loads will be cooled by normal service water. Credit has been taken in the risk metric calculations for the ESF equipment serviced by the protected ESW train for the entire 14-day LCO outage on the opposite train (and for normal service water supplying the protected train loads if the protected ESW pump were to fail) and for the ESF equipment that can be serviced by normal service water associated with the out-of-service ESW train for the times noted above. None of the PRA-modeled equipment in either train will be voluntarily taken out of service during the time that normal service water is available to supply the out-of-service ESW train loads. Non-intrusive TS surveillances and preventive maintenance equipment status verifications that do not affect equipment operability/functionality will be allowed. This commitment applies as long as the one-time 14-day Completion Time extension of TS 3.7.8 Condition A and TS 3.8.1 Condition B is in use; this commitment expires when these TS Conditions are exited.</p>	<p>Administrative controls in place at time amendment is implemented. This is a Tier 2 commitment.</p>

A. Heflin

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These corrections do not change the NRC staff's conclusions in Amendment No. 191. If you have any questions, please contact me at 301-415-1476 or via email at mohan.thadani@nrc.gov.

Sincerely,

/RA/

Mohan C. Thadani, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
As stated

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DATE	2/26/09	2/25/09	3/17/09	3/18/09

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