

AmerenUE
Callaway Plant

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10 CFR 52.75
10 CFR 2.390

February 25, 2009

U.S. Nuclear Regulatory Commission
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ALNRC 00011

**AMERENUE – CALLAWAY PLANT UNIT 2,
NRC Docket No. 52-037**
SUBMITTAL OF REVISION 1 TO THE COMBINED LICENSE APPLICATION
FOR CALLAWAY PLANT UNIT 2

In Reference 1, Union Electric Company d/b/a AmerenUE, submitted to the U.S. Nuclear Regulatory Commission (NRC) a Combined License Application (COLA) for an AREVA NP U.S. Evolutionary Power Reactor (U.S. EPR) to be located at the current Callaway County, Missouri site of Callaway Power Plant (NRC License No. NPF-30).

In References 2 and 3, AmerenUE supplemented the COLA in response to NRC concerns documented in Reference 4.

In Reference 5, the NRC documented completion of their acceptance review and determined the COLA was acceptable for docketing. In that letter the NRC recommended that the COLA be amended to provide standard language identical to that in the R-COLA outside of braces "{ }". The purpose of this COLA revision is to adopt the NRC recommendation to standardize wording outside of braces to match the R-COLA wording.

In order to complete the COLA revision, it was necessary to revise all the COLAs associated with the U.S. EPR Design Centered Working Group (DCWG). This concept was presented to the NRC staff on January 16, 2009 at the U.S. EPR DCWG meeting held in Rockville, Maryland.

In addition to changes to standardize language outside of braces, AmerenUE has made additional corrections to site-specific language inside the braces since submittal of the original application. Enclosure 1 provides a description of changes

made in this COLA revision, including those related to the bracing convention for Part 5, Emergency Response Plan, that were discussed with the NRC staff by phone on February 11, 2009.

This COLA revision contains no Restricted Data or other defense information requiring separation in accordance with 10 CFR 50.33(j). Part 9 of this COLA revision contains certain financial, SUNSI and security-related information that AmerenUE is requesting the NRC to withhold from public disclosure in accordance with the requirements of 10 CFR 2.390. An appropriate affidavit is included with this letter supporting proprietary treatment of AmerenUE financial information pursuant to 10 CFR 2.390(b).

An updated set of the COLA documents is being provided in electronic file format on the two enclosed DVDs. The Public DVD contains information AmerenUE believes can be made publicly available; the Non-Public DVD contains information requested to be withheld from public disclosure.

This submittal contains PDF files, one or more of which contains hyperlinks to other files or to the Internet. These hyperlinks are either inoperable or are not essential to the use of the filing. Any material referenced by hyperlinks to the Internet that was essential for use of this filing has been submitted as part of the filing. Any material referenced by a hyperlink to another PDF that was essential for the use of this filing has either been included by reference or submitted as part of this filing.

Appropriate pre-submission checks have been successfully performed on the files for both disks to ensure compliance with the electronic filing guidelines provided on the NRC web site. A "packing slip" describing the COLA contents, pursuant to NRC instructions for electronic filing is provided.

If you have any questions, or need additional information, please contact Scott Bond at (573) 676-8519, SBond2@ameren.com or Dave Shafer at (573) 676-4722, DShafer@ameren.com. Counsels for the applicant are Jay E. Silberg, (202) 663-8063, jay.silberg@pillsburylaw.com, William B. Bobnar, (314) 554-3148, WBobnar@ameren.com and Joseph H. Raybuck, (314) 554-2976, JRaybuck@ameren.com.

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

Executed on February 25, 2009

A handwritten signature in black ink, appearing to read 'T.E. Herrmann', with a long horizontal line extending to the right.

T.E. Herrmann
Vice President, Engineering

Handwritten initials 'Law' in black ink.

TEH/RCW/slk

Enclosures:

- 1) Description of changes included in Callaway Plant Unit 2 COL Application Revision 01.
- 2) Affidavit

References:

- (1) Letter from T. E. Herrmann (AmerenUE) to U.S. Nuclear Regulatory Commission, "AmerenUE-Callaway Plant Unit 2 Application for Combined License for Callaway Plant Unit 2" ALNRC 00004 dated July 24, 2008
- (2) Letter from S. M. Bond (AmerenUE) to U.S. Nuclear Regulatory Commission, "Submittal of Final Safety Analysis Report, Revision 1 for the Callaway Plant Unit 2 Combined License Application" ALNRC 00009 dated November 14, 2008
- (3) Letter from T. E. Herrmann (AmerenUE) to U.S. Nuclear Regulatory Commission, "Clarification, Final Safety Analysis Report, Revision 1, Supplements the Callaway Plant Unit 2 Combined License Application" ALNRC 00010 dated November 25, 2008
- (4) Letter from Surinder Arora (NRC) to AmerenUE, "Callaway Plant Unit 2, Status of the Acceptance Review of the Combined License Application", dated October 16, 2008
- (5) Letter from Joseph Colaccino (NRC) to AmerenUE, "Combined License Application Acceptance Review for Callaway Plant Unit 2 Nuclear Power Plant", dated December 12, 2008

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cc: (w/enclosures)

Mr. Elmo E. Collins, Jr.
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

(w/o enclosures)

Senior Resident Inspector
Callaway Resident Office
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8201 NRC Road
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Description of changes included in Callaway Plant Unit 2 COLA, Revision 01

Part 1: General Information: This COLA Part is completely site specific.

Part 2: FSAR: Generic Text (i.e. text outside braces) is now consistent between the 4 U.S. EPR COLAs. The text inside braces is site specific. Changes have been made inside braces to the Callaway Plant Unit 2 COLA to remain consistent with the R-COLA when practical.

Additional site specific corrections to the FSAR are described below:

- Table 3.2-1 was corrected to indicate the row labeled "Ventilation Equipment" related to the Fire Water Supply System is category "II-SSE" equipment. In addition the column for 10CFR50 Appendix B was changed from "no" to "yes".
- Figure 3E.4-5 was replaced with the correct figure.
- Figure 9B-21 was replaced with the correct figure.
- The previously submitted FSAR Chapter 14 did not contain a test description for the ESW blowdown system. This test description has been included in Section 14.2.14.2 of this COLA revision.
- Section 17.4.4.1.1.1 was changed to correct the title of "Vice President Engineering" rather than "Senior Vice President Engineering".

Part 3: Environmental Report: This COLA Part is now completely site specific.

Additional site specific corrections to the FSAR are described below:

- Table 3.8-1 has been removed (and Table 3.8-2 renumbered accordingly). Table 3.8-1 in COLA revision 0 should have mirrored the data in U.S. EPR FSAR Table 11.4-1 per a previously approved licensing basis document change request. Rather than maintaining Table 3.8-1 consistent with the U.S. EPR FSAR, the text was modified to point to U.S. EPR FSAR Table 11.4-1 for this data.
- Section 6.3.2.1 was revised in the 2nd paragraph to clarify permit numbers associated with the U.S. Corps of Engineers and the Missouri Department of Natural Resources.

- Section 7.1, 3rd paragraph, was revised to remove the term "Feedwater Line Break" in accordance with a previously approved licensing basis document change request.
- Table 7.1-1 was revised to remove a duplicate row.
- Table 7.1-2 was revised to incorporate data for Radionuclide Rb-89. This data was missing from the previous COLA revision.
- Table 7.1-4 was revised to correct the units for the second column.

Part 4: Technical Specifications: All four U.S. EPR COL Applicants have changed to incorporate the U.S. EPR Generic Technical Specifications by reference. Part 4 has been modified to provide information required by the U.S. EPR Generic Technical Specifications as reviewer notes. This part contains generic and site specific information.

To support this change, technical specification departures were removed from FSAR Chapter 1 and from COLA Part 7. Finally a proposed license condition has been added to COLA Part 10 to submit a license amendment following completion of a plant-specific setpoint study following selection of the plant-specific instrumentation.

Part 5: Emergency Plan: For Callaway Plant Unit 2 this COLA Part is now completely site specific. Braces were not used in this Part, since it is completely site specific as described on the cover sheet for this transmittal letter. Part 7 contains a description of the DCD departure associated with the decision to use a combined Unit 1 and Unit 2 TSC/OSC. This also resulted in ITAAC Table 2.3-1 of COLA Part 10 being shown as all site specific.

Additional site specific corrections to the Emergency Plan are described below:

- Appendix G had several editorial errors corrected in addition to slight adjustments to evacuation time estimates to reflect data contained in the most current analysis.

Part 6: LWA: Not applicable.

Part 7: DCD Departures: This COLA Part is now completely site specific. See discussion above in Part 4 regarding departures removed in this COLA revision.

Part 8: Security Plan: No changes.

Part 9: Proprietary and SUNSI: This COLA Part is now completely site specific.

Part 10: ITAAC: Generic text (i.e. text outside braces) is now consistent between the 4 U.S. EPR COLAs. The text inside braces is site specific. Changes have been made inside braces to the Callaway Plant Unit 2 COLA to remain consistent with the R-COLA when practical.

Additional site specific corrections to the FSAR are described below:

- Table 2.3-1 is now shown as site specific in its entirety due to a combined TSC/OSC between Callaway Plant Units 1 and 2.
- Table 2.4-14 was revised to include line items 2 and 3. The current intent is to maintain a consistent design for the Fire Protection Building Ventilation System with the R-COLA. Thus, even though the table is site specific the text was updated to match that of the R-COLA.

Part 11: Supporting Documents: State and local emergency plans have been relocated from Part 5 to Part 11H to simplify division of public and non-public information.

AFFIDAVIT OF TIMOTHY E. HERRMANN

STATE OF MISSOURI)

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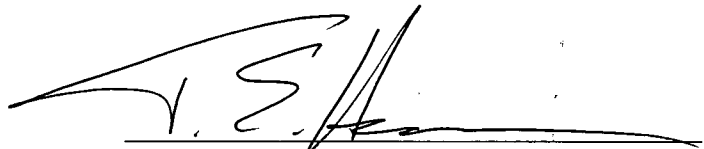
COUNTY OF CALLAWAY)

I, Timothy E. Herrmann, Vice President, Engineering, AmerenUE, do hereby affirm and state:

- 1) I am authorized to execute this affidavit on behalf of AmerenUE, (hereinafter referred to as "AUE"). I am further authorized to review information submitted to the Nuclear Regulatory Commission ("NRC") and apply for the withholding of information from disclosure. I am making this affidavit in conformance with the provisions of the NRC's regulations at 10 CFR 2.390 and in support of AUE's request for proprietary treatment of certain financial information.
- 2) I have knowledge of the criteria used by AUE in designating information as sensitive, proprietary, or confidential.
- 3) Pursuant to the provision of paragraph (a)(4) of 10 CFR 2.390, the following is furnished for consideration by the NRC in determining whether the information sought to be withheld from public disclosure should be withheld.
 - a. The information sought to be withheld from public disclosure is owned by AUE and has been held in confidence by AUE.
 - b. The information sought to be protected is not available to the public to the best of my knowledge and belief.
 - c. The information is of the type that would customarily be held in confidence by AUE. The information that AUE is requesting to be withheld from public disclosure is AUE's cost projections for construction, fuel supply, and operating costs for Callaway Unit 2. AUE limits access to these cost projections to those with a "need to know" subject to maintaining confidentiality. Public disclosure of these cost projections is likely to harm AUE because it would allow other contractors, vendors, and competitors to understand AUE's competitive expectations and position prior to securing necessary contracts and services at competitive prices.

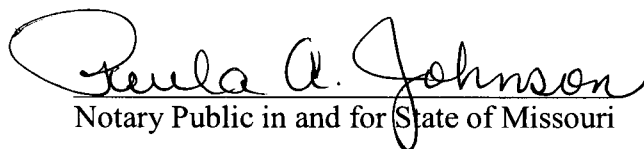
- d. The proprietary information sought to be withheld from public disclosure is identified in Part 9 of the COL application and is marked as proprietary as it appears in the application.
- e. The information is transmitted to the NRC in confidence and under the provisions of 10 CFR 2.390; it is to be received in confidence by the NRC.

Timothy E. Herrmann, being duly sworn, states that he is Vice President, Engineering, AmerenUE, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this combined license application revision for the Callaway Plant Unit 2, and that all the matter and facts set forth herein are true and correct to the best of his knowledge.



T. E. Herrmann
Vice President, Engineering

Subscribed and sworn to before me, a Notary Public, in and for the county and state above named, this 25th day of February, 2009.



Notary Public in and for State of Missouri

My Commission Expires: July 31, 2011