

## Callaway2COLPEm Resource

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**From:** Surinder Arora  
**Sent:** Monday, June 01, 2009 5:10 PM  
**To:** Shafer, David E  
**Cc:** Callaway2COL Resource; Joseph Colaccino; Ann Hodgdon; Kevin Williams; Don Johnson; Surinder Arora; NPUnit2-EPR@ameren.com  
**Subject:** Callaway SCOLA - Draft RAI No. 24 (eRAI No. 2913) - Public  
**Attachments:** RAI 2913.doc

Dave,

Attached is DRAFT RAI No. 24 (eRAI No. 2913). You have until June 15, 2009 to review it and decide whether you need a conference call to discuss it. After the call or after June 15, 2009, the RAI will be finalized and sent to you for response. You will then have 30 days to respond. In reviewing the draft RAI, please also review and confirm that the RAI does not contain any proprietary information.

**SURINDER ARORA, PE**  
**PROJECT MANAGER,**  
**Office of New Reactors**  
**US Nuclear Regulatory Commission**

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**From:** Surinder Arora

**Created By:** Surinder.Arora@nrc.gov

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**Post Office:** HQCLSTR01.nrc.gov

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**Options**

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Draft Request for Additional Information No. 2913 Revision 0

6/1/2009

Callaway Unit 2  
AmerenUE  
Docket No. 52-037  
SRP Section: 13.03 - Emergency Planning  
Application Section: 13.3

QUESTIONS for EPR Projects Branch (NARP)

13.03-3

The staff has reviewed your response to RAI 1902 and has further questions or concerns that must be addressed to support the technical review of your application.

In your response to Critical Element 2, the staff has the following questions or concerns:

1. The staff requires a commitment to a specific document as part of this critical element. Your response states "...or the most current NRC endorsed version available at the time of the EAL submittal." Please revise your response to this critical element and specify the document, and version, that you will use for your EALs.
2. The staff requires enough information to support the deviations from the endorsed guidance. Your response to this critical element references EAL FAQs that the staff has not received. Please provide all the deviations from the endorsed guidance in sufficient detail to support the staff's evaluation and reasonable assurance finding.
3. While you provided two additional EALs related to digital I&C in HOT operating modes, the staff questions why there should not be equivalent EALs in COLD operating modes. Please provide detailed justification or revise your application accordingly.

In your response to Critical Element 3, the staff has the following concern:

1. Your response states that you will submit your developed EALs "...to the NRC for approval at least 180 days prior to..." This statement is incorrect in that the staff will confirm that you developed your EALs as required by your license condition. Please revise "approval" to "confirmation" or provide sufficient documentation to support using the word "approval."

In your response to Critical Element 4, the staff has the following concern:

1. Your response to this element implies that only the details of EAL development will be maintained in accordance with 10 CFR 50.54(q). The staff expects all information related to EALs to be maintained in accordance with 10 CFR 50.54(q). Please revise your application accordingly, or provide sufficient justification to support the current proposed wording.

The staff expects a revised Emergency Plan, Section D, to be provided with your RAI response. Please revise, or provide sufficient justification for why it is not necessary. This revised section should only contain the following three elements:

1. Definition of the 4 emergency classification levels with the general actions to be taken at each level.
2. Specific reference to the document that will contain the EALs.
3. A statement that commits to using the 10 CFR 50.54(q) process for the document that will contain the EALs.