

June 8, 2009

10 CFR 52.75

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
11555 Rockville Pike  
Rockville, MD. 20852

ALNRC 000021



Subject: AmerenUE, Callaway Plant Unit 2 (NRC Docket No. 52-037)  
Response to RAI No. 15 (eRAI 2599), Revision 0, SRP Section  
14.02, Initial Plant Test Program – Design Certification and New  
License Applicants.

Reference: Surinder Arora (NRC) to David E. Shafer (AmerenUE), “Final RAI  
No. 15 (eRAI 2599) - Public”, email dated May 12, 2009

The purpose of this letter is to respond to the Request for Additional Information (RAI) identified in the NRC e-mail correspondence to AmerenUE, dated May 12, 2009, (Reference). This RAI addresses the Initial Plant Test Program as discussed in Section 14.2 of the Final Safety Analysis Report (FSAR), as submitted in Part 2 of the Callaway Plant Unit 2 Combined License Application (COLA).

Enclosure 1 provides our response to RAI No. 15 (eRAI 2599), Revision 0.

This response does not include any new regulatory commitments or contain proprietary information.

COLA impacts associated with the response to this RAI are noted in Enclosure 2.

If there are any questions regarding this transmittal, please contact me at (573) 676-8519, SBond2@ameren.com or Dave Shafer at (573) 676-4722, DShafer@ameren.com.

DOTG  
NRC

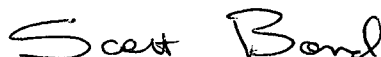
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2009

Handwritten signature of Scott M. Bond in black ink.

Scott M. Bond  
Manager, Nuclear Generation  
Development

SMB/AML/slk

Enclosure:

1. Response, RAI No. 15 (eRAI 2599), Revision 0
2. Proposed COLA Changes Associated with the Response to RAI No. 15 (eRAI 2599)

cc:

Mr. Elmo E. Collins, Jr. Regional Administrator U.S. Nuclear Regulatory Commission Region IV 612 E. Lamar Blvd., Suite 400 Arlington, TX 76011-4125	Senior Resident Inspector Callaway Resident Office U.S. Nuclear Regulatory Commission 8201 NRC Road Steedman, MO 65077
Bruce Olson, P.E. Environmental Project Manager U.S. EPR Projects Branch Division of New Reactor Licensing Office of New Reactors Bruce.Olson@nrc.gov	Surinder Arora, P.E. Project Manager U.S. EPR Projects Branch Division of New Reactor Licensing Office of New Reactors Surinder.Arora@nrc.gov
Joseph Colaccino, Chief U.S. EPR Projects Branch Division of New Reactor Licensing Office of New Reactors Joseph.Colaccino@nrc.gov	Michael Miernicki Senior Project Manager U.S. EPR Projects Branch Division of New Reactor Licensing Office of New Reactors Michael.Miernicki@nrc.gov
Project Team/Others Distribution List	RACC Members Distribution List

File code: A160.5761

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Enclosure 1

**Enclosure 1**

**Response to RAI No. 15 (eRAI 2599), Revision 0**

**Question 14.02-1**

FSAR Section 14.2.14.1, Essential Service Water Emergency Make-up System (ESWEMS), COL Applicant Site-Specific Tests:

This section identifies test methods under the initial testing program to demonstrate adequate operation of the ESWEMS. The test method verifies that each ESWEMS division can be operated from the ESWEMS Pumphouse. Clarify why the test to demonstrate remote control from the main control room or remote shutdown panel is not included.

**Response:**

FSAR Section 14.2.14.1 lacked the clarity necessary to ensure that the operation of each ESWEMS division would be verified from the main control room and the remote shutdown panel. The text of FSAR Section 14.2.14.1 will be revised as shown in Enclosure 2, Proposed COLA Changes Associated with the Response to RAI No. 15 (eRAI 2599).

**COLA Impact**

The Callaway Plant Unit 2 FSAR Section 14.2.14.1 will be revised as shown in Enclosure 2 during the next formal revision of the Callaway Plant Unit 2 COLA.

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Enclosure 2

**Enclosure 2**

**Proposed COLA Changes Associated with the Response to RAI No. 15  
(eRAI 2599)**

The U.S. EPR FSAR includes the following COL Item in Section 14.2.12.21.6:

A COL applicant that references the U.S. EPR design certification will provide site-specific information for the cooling tower.

These COL Items are addressed in Section 14.2.14.

#### 14.2.13 REFERENCES

No departures or supplements.

#### 14.2.14 COL APPLICANT SITE-SPECIFIC TESTS

This section is added to provide a location for COL applicants to list site-specific startup tests.

##### 14.2.14.1 Essential Service Water Emergency Makeup System (ESWEMS)

###### 1. OBJECTIVES

- a. To demonstrate the ability of the ESWEMS to supply makeup water as designed.
- b. To establish baseline performance data for future equipment surveillance and ISI.

###### 2. PREREQUISITES

- a. Construction activities on the ESWEMS, including the ESWEMS pond, Pumphouse and test bypass line, have been completed and the system is functional.
- b. ESWEMS instrumentation is functional and has been calibrated.
- c. Support systems required for operation of the ESWEMS are complete and functional.
- d. Test instrumentation available and calibrated.

###### 3. TEST METHOD

- a. ~~Verify that each ESWEMS division can be operated from the ESWEMS Pumphouse.~~  
Verify that each ESWEMS division can be operated from the main control room and the remote shutdown panel.
- b. Verify safety-related motor operated valves respond as designed to input signals.
- c. Verify valve position indication.
- d. Verify each ESWEMS pump discharge strainer operates as designed.
- e. Verify alarms, interlocks, display instrumentation, and status lights function as designed.
- f. Verify head versus flow characteristics for each ESWEMS pump.
- g. Verify valve performance data, where required.

###### 4. DATA REQUIRED

LBDCR 09-0175