Ameren MISSOURI

Callaway Plant

December 9, 2010

ULNRC-05751

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

10 CFR 50.71(e)(4)

Ladies and Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
CYCLE 17 COMMITMENT CHANGE SUMMARY REPORT

Please find attached the Cycle 17 Commitment Change Summary Report required by NEI 99-04, "Guideline for Managing NRC Commitment Changes," for changes requiring NRC notification within the next refuel outage interval. These commitment revisions were completed at Callaway Plant Unit 1 for the period between November 8, 2008 and June 12, 2010 and were not reported to NRC in a previous submittal. The Cycle 17 Commitment Change Summary Report provides a description of each change completed along with a brief justification for each revised commitment.

If you should have any questions concerning this report, please contact Scott Maglio at (573) 676-8719.

This letter does not contain new commitments.

Sincerely,

Scott A. Maglio

Scott A. Maglio
Regulatory Affairs Manager

EMF/nls

Enclosure

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CYCLE 17 COMMITMENT CHANGE SUMMARY REPORT

In accordance with NEI 99-04, "Guidelines for Managing NRC Commitment Changes," as endorsed in Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," the following commitment changes are being submitted. The following revisions were completed for Callaway Plant Unit 1 for the period from November 8, 2008 to June 12, 2010. The Commitment Change Summary Report provides a description of each change completed along with a brief justification for each revised commitment.

50094

Commitment 50094 is documented by ULNRC-05031 in response to NRC Bulletin 2004-01, "Inspection of Alloy 82/182/600 Materials used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized Water Reactors." The change to this commitment documents deletion of the first part of the commitment and completion of the second part.

Commitment:

1. All of the locations of interest will continue to receive bare metal visual examinations near the beginning of each outage, as is required by the boric acid program, as well as the VT-2 examination at the end of each outage, as is required by the pressure testing program (each refueling outage).
2. Submit to the NRC a report indicating that the inspections described in Callaway Plant's response to item (1)(c) of this bulletin were completed and a description of the as-found condition of the pressurizer shell, any findings of relevant indications of through wall leakage, follow-up NDE performed to characterize flaws in leaking penetrations or steam space piping connections, a summary of all relevant indications found by NDE, a summary of the disposition of any findings of boric acid, and any corrective actions taken and/or repairs made as a result of the indications found. Due within 60 days of plant restart following the next inspection of the Alloy 82/182/600 pressurizer penetrations and steam space piping connections.

Justification:

1. Bare metal exams no longer need to be performed because the Alloy 600/82/182 portion of the Pressurizer nozzles have been mitigated with full structural weld overlays and the overlays have been volumetrically examined as indicated in ULNRC-05424, "Results of Inspections Performed for Pressurizer Full Structural Weld Overlays Installed at Callaway Plant." The reference to performing a VT-2 at the end of each outage is a requirement of Callaway's In-Service Inspection program through 10 CFR 50.55a, not this commitment. Therefore, this commitment is no longer applicable, and is thus being closed.
2. This was met with ULNRC-05253, "Additional Response to NRC Bulletin 2004-01, 'Inspection of Alloy 82/182/600 Materials used in the Fabrication of Pressurizer Penetrations

and Steam Space Piping Connections at Pressurized Water Reactors.'" Thus, this commitment is closed.

50130

Commitment 50130, covering the provisions related to the Snubber LCO 3.0.8, is documented by the Safety Evaluation Report related to Amendment 179 dated 1/31/2007. The change to this commitment allows the restrictions to be imposed for LCO 3.0.8a and 3.0.8b.

Original Commitment:

At least one Auxiliary Feedwater (AFW) train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), must be available when LCO 3.0.8a is used.

At least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), or some alternative means of core cooling (e.g., feed and bleed, fire water system, or "aggressive secondary cooldown" using the steam generators) must be available when LCO 3.0.8b is used.

Revised Commitment:

When LCO 3.0.8a or LCO 3.0.8b is used, one of the following must be available (Mode of Applicability dependent):

- -At least one Auxiliary Feedwater train with a minimum set of supporting equipment required for its successful operation that is not associated with the inoperable snubber(s), or
- -An alternative means of core cooling such as:
  - -"Aggressive Secondary Cooldown" using the steam generators, or
  - -Feed and Bleed capability.

Justification: A problem was identified with applying the original commitment associated with LCO 3.0.8a to Pressurized Water Reactors during shutdown. EXCEL Services Corporation provided a document, "Evaluation of the Need for a Revision to LCO 3.0.8," which justifies this change. The change to the commitment is to allow the same flexibility in LCO 3.0.8a as is given in LCO 3.0.8b.