

REQUEST FOR ADDITIONAL INFORMATION
CALLAWAY PLANT, UNIT 1
UNION ELECTRIC COMPANY,
LICENSE AMENDMENT APPLICATION (LCDN 10-0036) TO
ADD NEW SURVEILLANCE REQUIREMENT 3.3.8.6 TO TECHNICAL SPECIFICATION 3.3.8,
“EMERGENCY EXHAUST SYSTEM ACTUATION INSTRUMENTATION”
TAC NUMBER ME5173

The NRC staff requests additional information to complete its review of the license amendment request (LAR) to add new Surveillance Requirement (SR) 3.3.8.6 to Technical Specification (TS) 3.3.8, “Emergency Exhaust System (EES) Actuation Instrumentation.”

By letter dated December 10, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML103470204), Union Electric Company (the licensee) proposed this new SR that would require the performance of response time testing on the portion of the EES required to isolate the normal fuel building ventilation exhaust flow path and initiate the fuel building ventilation isolation signal (FBVIS) mode of operation. By email dated January 14, 2011 (ADAMS Accession No. ML110140849), the NRC provided its acceptance of this amendment request which will enable the NRC to complete its detailed technical review.

Following NRC staff review of the provided application, the NRC staff has the following question listed below:

In Attachment 1, page 4, the LAR proposed to change a parameter (assumption) used in evaluating the radiological consequences of a design basis Fuel Handling Accident (FHA) at Callaway Plant (Callaway). Specifically, a 90-second response time is proposed as an appropriate limit for Fuel Building Ventilation Exhaust engineered safety feature (ESF) response time. The LAR indicated that because the fuel building FHA analysis had not previously been performed with an assumed Fuel Building Ventilation Exhaust ESF response time of 90 seconds, reanalysis of this event resulted in small increases in the calculated dose consequences. The new/recalculated dose values for the exclusion area boundary (EAB) and low population zone (LPZ) are reflected on the mark-up for Table 15.7-8, which was provided in Attachment 5 of the LAR. However, no new/recalculated control room (CR) dose values for the proposed change are reported.

Pursuant with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix A, “General Design Criteria for Nuclear Power Plants,” General Design Criterion (GDC) 19, “Control Room,” please provide the new/recalculated dose to verify that the proposed change would not result in CR dose consequences that exceed the 5 rem regulatory limit.

Please also verify that no other parameters, assumptions, and/or methodologies have been changed as it relates to the current radiological consequence analyses of record (AOR) for Callaway.

In addition, please provide an evaluation of the impact of the proposed change on all applicable accidents in the design bases or include a justification supporting why an evaluation of the impact is not needed. If an evaluation of other design bases accidents is provided, please provide the regulatory bases for the acceptance criteria (e.g. 10 CFR, Part 50, Appendix A, GDC 19, 10 CFR Part 100, etc.) and any regulatory guidance used to make this determination.

Additionally, please provide confirmation that the new/recalculated dose values will become the updated licensing basis values for the applicable accidents evaluated and will be included in the next revision to the Updated Final Safety Analysis Report (UFSAR) for Callaway.