



June 10, 2011

ULNRC-05795

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

10 CFR 50.54(f)

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
30-DAY RESPONSE TO NRC BULLETIN 2011-01, "MITIGATING STRATEGIES"**

Pursuant to 10 CFR 50.54(f), this letter provides the Ameren Missouri (Union Electric Company) 30-day response to NRC Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011. The bulletin was issued to confirm continued compliance with 10 CFR 50.54(hh)(2) and request information regarding the mitigation strategies program.

The NRC identified the following three objectives:

1. To require that addressees provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(hh)(2),
2. To notify addressees about the NRC staff's need for information associated with licensee mitigating strategies under 10 CFR 50.54(hh)(2) in light of the recent events at Japan's Fukushima Daiichi facility in order to determine if 1) additional assessment of program implementation is needed, 2) the current inspection program should be enhanced, or 3) further regulatory action is warranted, and
3. To require that addressees provide a written response to the NRC in accordance with 10 CFR 50.54(f).

NRC Bulletin 2011-01 requested that, within 30 days, licensees submit a response to questions to confirm continued compliance with 10 CFR 50.54(hh)(2), and that within 60 days, licensees provide

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information regarding mitigation strategies programs required by 10 CFR 50.54(hh)(2). Ameren Missouri's 30-day response is provided in the attachment.

This letter does not contain new commitments.

If you have questions regarding this letter please contact Steve Hogan at 573-544-5881.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Cleveland O. Reasoner III", with a stylized flourish at the end.

Cleveland O. Reasoner III
Vice President Engineering

Executed on: 6/10/11

KRA

Enclosure:

1. 30-Day Response to Bulletin 2011-01

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30-Day Response to Bulletin 2011-01

The NRC has requested the following information:

In order to confirm continued compliance with 10 CFR 50.54(hh)(2), within 30 days of the date of this bulletin, the NRC requests that licensees provide the following information on their mitigating strategies programs.

NRC Request 1

Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?

Ameren Missouri Response 1

Ameren Missouri inspected and inventoried equipment necessary to implement the mitigating strategies required by 10 CFR 50.54 (hh)(2) and verified it was available. With two exceptions, all components were found to be available and functional. Two items were not located, a manifold and hose for venting containment. This condition was documented in our corrective action program and corrective actions are complete. Note that our strategy does provide alternate strategies for the missing equipment. In addition, the portable pump required for some of the strategies was tested to ensure it was capable of performing its intended function with respect to the mitigation strategies.

This inspection and equipment testing was re-performed recently as a result of the events at Fukushima. Letters of Agreement/ Memorandums of Understanding with offsite organizations were also re-validated and/or re-issued, as appropriate.

NRC Request 2

Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

Ameren Missouri Response 2

Ameren Missouri verified that the mitigation strategies associated with large area fires and explosions are available and capable of being performed as described in our Mitigation Strategy License Condition. Each procedure implementing the required mitigation strategies was walked down to ensure the procedure(s) is in place and capable of being implemented. The mitigation strategies have been maintained. During this verification, one calculation was performed to confirm the upper limit of containment pressure in which the containment depressurization strategy could be used effectively. This calculation validated that the depressurization strategy would not work within one specific guideline, so it was deleted from that guideline. Note that alternate strategies are provided to depressurize containment. Additionally, a precaution was added to other guidelines where the

depressurization strategy is used to note the identified limitation. This condition was documented in our corrective action program and corrective actions are complete.

Ameren Missouri's mitigation strategies continue to meet the commitments described in our B.5.b submittals as documented in the B.5.b Safety Evaluation Report - SER. (See Reference 1 below.) Further, Ameren Missouri is capable of executing the strategies with the current staffing. As discussed above, each procedure implementing the required mitigation strategies was walked down to ensure the procedures were in place and capable of being implemented. In developing the strategies, Ameren Missouri considered staffing and skill levels in order to perform the strategies. Operations and support staff have had training and periodic retraining, as required, on the mitigation strategies procedures.

In the event of certain threats, plant personnel are directed to disperse in accordance with procedures to maximize survivability in order to implement the strategies should they be needed. Procedures identify the command and control responsibilities, including succession, as appropriate. Procedures are in place to call back fire brigade/security/emergency response organization members to assure adequate staffing in the event of a large fire or explosion.

Reference 1: Callaway Plant, Unit 1 - Conforming License Amendment to Incorporate The Mitigation Strategies Required by Section B.5.b. of Commission Order EA-02-026 (TAC No. MD4518), dated June 27, 2007