



June 28, 2011

ULNRC-05797

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

10 CFR 50.48(c)

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
FACILITY OPERATING LICENSE NPF-30  
REQUEST FOR EXTENSION OF ENFORCEMENT  
DISCRETION AND COMMITMENT TO SUBMITTAL DATE  
FOR 10 CFR 50.48(c) LICENSE AMENDMENT REQUEST**

- References:
- 1) SECY-11-0061, "A Request to Revise the Interim Enforcement Policy for Fire Protection Issues on 10 CFR 50.48(c) to Allow Licensees to Submit License Amendment Requests in a Staggered Approach (RIN 3150-AG48)," dated April 29, 2011
  - 2) Staff Requirements Memorandum (SRM) SECY-11-0061, "A Request to Revise the Interim Enforcement Policy for Fire Protection Issues on 10 CFR 50.48(c) to Allow Licensees to Submit License Amendment Requests in a Staggered Approach (RIN 3150-AG48)," dated June 10, 2011
  - 3) ULNRC-05541 Letter from Callaway Plant to Document Control Desk (NRC), "Request for Extension of Enforcement Discretion," dated September 29, 2008
  - 4) Letter from NRC to Union Electric Company, "Callaway Plant Unit 1 – Evaluation of the Request for an Extension of Enforcement Discretion in Accordance with the Interim Enforcement Policy for Fire Protection Issues during Transition to National Fire Protection Standard NFPA 805 (TAC No. ME0060)," dated December 8, 2008

In accordance with Reference 1, and as approved by the Commission per Reference 2, Union Electric Company (dba Ameren Missouri) commits to submitting the License Amendment Request (LAR) for implementing 10 CFR 50.48(c) at Callaway Plant, Unit 1 no later than September 2, 2011.

In accordance with Reference 3 the current enforcement discretion period for submitting an NFPA 805 LAR expires 6 months after the date of the NRC's safety evaluation approving the second pilot plant LAR, which is on June 29, 2011. Ameren Missouri has made substantial progress in development of the Callaway Plant LAR for adopting the provisions of 10 CFR 50.48(c). The enforcement discretion extension to September 2, 2011 would provide Ameren Missouri the additional time necessary to finalize the site acceptance review of associated vendor documents/calculations prepared in support of the transition to NFPA 805. The license amendment request is currently undergoing site review and Onsite Review Committee approval. Any comments generated during the site review and approval process will require disposition prior to submittal of the LAR.

The following modifications have recently been completed which have substantially improved the risk metrics associated with the operation of the Callaway Plant. Incorporation of the design features of these modifications in the Fire Probabilistic Risk Assessment models required substantial rework that contributed to the need for this request for enforcement discretion extension.

- Completed installation of a non-safety related Auxiliary Feedwater Pump that is electrically powered by the new offsite alternate emergency supply discussed below. This non-safety related Auxiliary Feedwater Pump is a diverse backup to the safety related Motor Driven and Turbine Driven Auxiliary Feedwater Pumps.
- Completed installation of 4 non-safety related diesel generators (8 MW total) at a nearby electric cooperative substation. These generators are capable of supplying power to either safety related bus and the non-safety related Auxiliary Feedwater Pump under Station Blackout conditions.

Ameren Missouri requests that the enforcement discretion be extended to correspond to the LAR submittal commitment date. Per the enforcement discretion policy, once the LAR is submitted, the enforcement discretion would then continue until the NRC disposes the LAR and the license amendment is implemented for transition to NFPA 805, consistent with Reference 1.

This request for enforcement discretion extension is a change to the schedule submitted in Reference 3 with approval granted in Reference 4. This letter contains one new commitment (as identified on page 5).

If there are any questions, please contact Scott Maglio at 573-823-4970 or Roger Wink at 314-225-1561.

Sincerely,



Scott A. Maglio  
Regulatory Affairs Manager

cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)  
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**LIST OF COMMITMENTS**

The following table identifies those actions committed to by Ameren Missouri in this document. Any other statements in this document are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to Thomas B. Elwood at 314-225-1905:

<b>COMMITMENT</b>	<b>Due Date/Event</b>	<b>COMN</b>
The LAR associated with the transition to NFPA 805 will be submitted.	September 2, 2011	50142