



August 29, 2011

ULNRC-05781

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

10 CFR 50.90

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
REQUEST FOR LICENSE AMENDMENT TO ADOPT NFPA 805,
“PERFORMANCE-BASED STANDARD FOR FIRE PROTECTION FOR
LIGHT WATER REACTOR GENERATING PLANTS (2001 EDITION)”
(LICENSE AMENDMENT REQUEST LDCN 11-0012)**

- References:
- (1) Letter from AmerenUE to NRC, “Letter of Intent to Adopt NFPA 805 ‘Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants, 2001 Edition,’” ULNRC-05232 dated December 2, 2005
 - (2) Letter from NRC to AmerenUE, “NRC Response to AmerenUE’s Letter of Intent to Adopt 10 CFR 50.48(c) (NFPA 805 Rule) for Callaway Plant, Unit 1,” dated January 31, 2006
 - (3) Letter from AmerenUE to NRC, “Clarification of Letter of Intent to Adopt NFPA 805, ‘Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants, 2001 Edition,’” ULNRC-05342 dated November 14, 2006
 - (4) Letter from AmerenUE to NRC, “Request for Extension of Enforcement Discretion,” ULNRC-05541 dated September 29, 2008

Attachments C, D, E, G, K, S, U, V, and W of Enclosure 1 to this letter contain security-related information. Withhold from public disclosure under 10 CFR 2.390. Upon removal of Attachments C, D, E, G, K, S, U, V, and W of Enclosure 1, this letter is uncontrolled.

(5) Letter from Ameren Missouri to NRC, "Request for Extension of Enforcement Discretion and Commitment to Submittal Date for 10 CFR 50.48(c) License Amendment Request," ULNRC-05797 dated June 28, 2011

In accordance with the Code of Federal Regulations, Title 10, Part 50.90, "Application for amendment of license, construction permit or early site permit," Union Electric Company (dba Ameren Missouri) requests an amendment to Facility Operating License No. NPF-30 for Callaway Plant, Unit No.1. Implementation of the regulatory actions presented in the attachments to this License Amendment Request (LAR) will enable Callaway Plant to adopt a new fire protection licensing basis that complies with the requirements in 10 CFR 50.48(a) and (c) and the guidance in Revision 1 of Regulatory Guide (RG) 1.205, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants."

As documented in this request, Ameren Missouri has met all of the NRC's regulatory requirements for the transition of its fire protection licensing basis. Information associated with Callaway's transition is provided in the enclosed Callaway Transition Report, including the technical and regulatory justifications required to support this LAR.

With regard to the enclosed, Enclosure 1 to this letter provides Callaway Plant's NFPA 805 Transition Report. Major topics in this Transition Report are presented as Attachments A through X (as attached to the report), summarized as follows:

- Attachment A – NEI 04-02 Table B-1 – Transition of Fundamental Fire Protection Program and Design Elements
- Attachment B – NEI 04-02 Table B-2 – Nuclear Safety Capability Assessment - Methodology Review
- Attachment C – NEI 04-02 Table B-3 – Fire Area Transition – **Security-Related Information**
- Attachment D – Non-Power Operational Modes Transition – **Security-Related Information**
- Attachment E – NEI 04-02 – Radioactive Release Transition – **Security-Related Information**
- Attachment F – Fire-Induced Multiple Spurious Operations Resolution
- Attachment G – Recovery Actions Transition – **Security-Related Information**
- Attachment H – NFPA 805 Frequently Asked Question Summary Table
- Attachment I – Definition of Power Block
- Attachment J – Fire Modeling V&V
- Attachment K – Existing Licensing Action Transition – **Security-Related Information**
- Attachment L – NFPA 805 Chapter 3 Requirements for Approval (10 CFR 50.48(c)(2)(vii))
- Attachment M – License Condition Changes
- Attachment N – Technical Specification Changes

- Attachment O – Orders and Exemptions
- Attachment P – Risk-Informed, Performance-Based Alternatives to NFPA 805
10 CFR 50.48(c)(4)
- Attachment Q – No Significant Hazards Evaluations
- Attachment R – Environmental Considerations Evaluation
- Attachment S – Plant Modifications and Items to be Completed During Implementation –
Security-Related Information
- Attachment T – Clarification of Prior NRC Approvals
- Attachment U – Internal Events PRA Quality – **Security-Related Information**
- Attachment V – Fire PRA Quality – **Security-Related Information**
- Attachment W – Fire PRA Insights – **Security-Related Information**
- Attachment X – Other Requests for Approval

In accordance with the guidance in Regulatory Position C.2.2.4.2 of Regulatory Guide 1.205, Revision 1, the total risk change associated with pre-transition fire protection program variances meeting the NFPA 805 performance-based approach (via the fire risk evaluation process) has been evaluated. Further, upon completion of the plant modifications, as referenced in section 4.8.2 of the Transition Report, the total change in risk associated with Callaway's transition to NFPA 805 will be consistent with the acceptance guidelines in Regulatory Guide 1.174.

The Callaway Onsite Review Committee and a subcommittee of the Nuclear Safety Review Board have reviewed and approved the proposed changes and have approved the submittal of this amendment application. In addition, the license amendment does not present a significant hazards consideration and the criteria have been met for a categorical exclusion from the need for an environmental assessment. Further, in accordance with 10 CFR 50.91(b), Ameren Missouri is providing the state of Missouri with a copy of the proposed license amendment.

Section 5.4 of the Transition Report provides Callaway's proposed implementation schedule for transitioning Callaway to the new fire protection licensing basis. Based on this, Ameren Missouri requests approval of this license amendment, with implementation to occur within 180 days of approval.

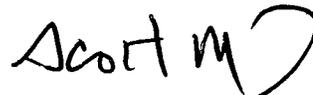
This letter contains new commitments, in Attachment 1, to be implemented following NRC approval of the LAR.

Questions regarding the submittal should be directed to Scott Maglio (Regulatory Affairs Manager) at 573-676-8719 or Roger Wink (Supervising Engineer, Regulatory Initiatives) at 314-225-1561.

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

Sincerely,

Executed on: 8/29/2011

A handwritten signature in black ink that reads "Scott M" followed by a large, stylized flourish.

Scott Maglio
Regulatory Affairs Manager

Attachment:

1. List of Commitments

Enclosure:

1. Callaway Plant NFPA 805 Transition Report

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cc: (copy w/out Attachments C, D, E, G, K, S, U, V, and W of Enclosure 1 except as noted with asterisk*)

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Missouri Public Service Commission
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ATTACHMENT 1
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 Roger Wink (Supervising Engineer, Regulatory Initiatives) at 314-225-1561.

COMMITMENT	Due Date/Event	COMN
Callaway will complete activities necessary to support the new licensing basis as indicated in Callaway Plant's NFPA 805 Transition Report Table S-2, "Plant Modifications Committed."	June 30, 2013	50143 – 50145
Callaway will complete activities necessary to support the new licensing basis as indicated in Callaway Plant's NFPA 805 Transition Report Table S-3, "Implementation Items."	The later of 6 months after Refuel Outage 19 or 6 months after NRC approval.	50146 – 50207