



December 13, 2011

ULNRC-05832

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
REVISION OF TECHNICAL SPECIFICATION 3.3.8, TAC NO. ME5173**

- References:
1. Ameren Missouri letter ULNRC-05744 dated December 10, 2010
 2. Ameren Missouri letter ULNRC-05793 dated June 16, 2011
 3. Callaway License Amendment No. 202 dated July 29, 2011, "Callaway Plant, Unit 1 - Issuance of Amendment re: Adoption of TSTF-425, Revision 3, 'Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b' (TAC NO. ME4506)," ADAMS Accession Number ML111661877
 4. Ameren Missouri letter ULNRC-05821 dated October 27, 2011

In Reference 1 above, Ameren Missouri submitted an application for amendment to Facility Operating License Number NPF-30 for the Callaway Plant. Per that amendment application changes are being proposed to Technical Specification (TS) 3.3.8, "Emergency Exhaust System (EES) Actuation Instrumentation," that would add new Surveillance Requirement (SR) 3.3.8.6. The new SR 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.

In Reference 2 above, Ameren Missouri provided responses to an NRC staff request for additional information (RAI) during the review of Reference 1.

In Reference 3 above, the NRC issued Callaway License Amendment No. 202 which approved the creation of a Surveillance Frequency Control Program (SFCP) with regard to the applicable Surveillance Requirement frequencies specified in the Technical Specifications. The changes approved in Amendment No. 202 were based on TSTF-425-A, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b," and NEI 04-10, Revision 1, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies." Those industry documents justify the relocation of all periodic Surveillance Frequencies from the Technical Specifications and placing the Frequencies under licensee control in accordance with a new program, the Surveillance Frequency Control Program.

In Reference 4 above, Ameren Missouri requested that the specified Frequency for new SR 3.3.8.6 also be covered under the SFCP since the new surveillance is of a recurring, periodic nature and does not meet any exclusion criteria in the above industry documents. The initial surveillance test interval (STI) for new SR 3.3.8.6 prior to the first application of the NEI 04-10 process will be 18 months on a STAGGERED TEST BASIS. This SFCP request is consistent with the approvals given in Callaway Amendment No. 202 for response time surveillances covered by SR 3.3.1.16, SR 3.3.2.10, SR 3.3.5.4, SR 3.3.6.6, and SR 3.3.7.6.

Although Amendment No. 202 was effective on its issuance date, that amendment was not implemented at Callaway Plant until November 15, 2011. This letter provides TS markups and clean TS retyped pages for proposed SR 3.3.8.6 that reflect the implementation of Amendment No. 202. Attachments 1 and 2 provide the final Technical Specifications Page Markups and Retyped Technical Specification Pages, respectively, in support of the amendment request for SR 3.3.8.6. The Proposed Technical Specification Bases Page Markups and Proposed FSAR Changes, provided for information only in Attachments 2 and 3 of Reference 4, are not affected.

The information provided in the Attachments does not affect the licensing evaluations submitted in the Reference 1 amendment application, nor do the Attachments alter the conclusions of those licensing evaluations.

Ameren Missouri requests approval of this license amendment request prior to December 30, 2011. Ameren Missouri further requests that the license amendment be made effective upon NRC issuance, to be implemented within 90 days from the date of issuance with the following exception:

Since SR 3.3.8.6 is a new Surveillance Requirement, the first required performance will come due by the end of the first surveillance interval that begins or is in effect on the date of implementation of this amendment. (This is similar to the License Condition applied to new Surveillance Requirements added by License Amendment 133 for the Improved Technical Specification conversion.) Since the license amendment will be issued after the start of Refuel 18, SR 3.3.8.6 will first be met during Refuel 19 (Spring 2013).

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No commitments are contained in this correspondence. If you have any questions on this amendment application or the attached information, please contact me at (573) 676-8719 or Mr. Thomas Elwood at (314) 225-1905.

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

Very truly yours,

Executed on: 12/13/2011



Scott A. Maglio
Regulatory Affairs Manager

GGY/nls
Attachments

- 1 - Technical Specifications Page Markups
- 2 - Retyped Technical Specification Pages

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ATTACHMENT 1

TECHNICAL SPECIFICATIONS PAGE MARKUPS

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.8.5	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program

 *INSERT 1*

INSERT 1

SURVEILLANCE	FREQUENCY
<p>SR 3.3.8.6 -----NOTE----- Radiation monitor detectors are excluded from response time testing. ----- Verify Fuel Building Ventilation Exhaust ESF RESPONSE TIMES are within limits.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

Table 3.3.8-1 (page 1 of 1)
EES Actuation Instrumentation

FUNCTION	APPLICABLE MODES OR SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	NOMINAL TRIP SETPOINT
1. Manual Initiation	(a)	2	SR 3.3.8.4	NA
2. Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	(a)	2 trains	SR 3.3.8.3 SR 3.3.8.6	NA
3. Fuel Building Exhaust Radiation - Gaseous	(a)	2	SR 3.3.8.1 SR 3.3.8.2 SR 3.3.8.5 SR 3.3.8.6	(b)

- (a) During movement of irradiated fuel assemblies in the fuel building.
 (b) Nominal Trip Setpoint concentration value ($\mu\text{Ci}/\text{cm}^3$) shall be established such that the actual submersion dose rate would not exceed 4 mR/hr in the fuel building.

ATTACHMENT 2

RETYPE TECHNICAL SPECIFICATION PAGES

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.8.5	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program
SR 3.3.8.6	<p>----- NOTE ----- Radiation monitor detectors are excluded from response time testing. -----</p> <p>Verify Fuel Building Ventilation Exhaust ESF RESPONSE TIMES are within limits.</p>	In accordance with the Surveillance Frequency Control Program

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3. Fuel Building Exhaust Radiation - Gaseous	(a)	2	SR 3.3.8.1 SR 3.3.8.2 SR 3.3.8.5 SR 3.3.8.6	(b)

(a) During movement of irradiated fuel assemblies in the fuel building.

(b) Nominal Trip Setpoint concentration value ($\mu\text{Ci}/\text{cm}^3$) shall be established such that the actual submersion dose rate would not exceed 4 mR/hr in the fuel building.