



March 30, 2012

ULNRC-05843

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

10 CFR 2.202

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
FACILITY OPERATING LICENSE NPF-30  
RESPONSE TO COMMISSION ORDER TO MODIFY  
LICENSES WITH REGARD TO RELIABLE SPENT FUEL  
POOL INSTRUMENTATION  
(ORDER NUMBER EA-12-051)**

Reference: EA-12-051, Issuance of Order to Modify Licenses with  
Regard to Reliable Spent Fuel Pool Instrumentation

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective order in the captioned matter entitled Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately) ("Order") to, *inter alia*, Union Electric (dba Ameren Missouri). The Orders state that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC had decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically, the NRC is requiring additional defense-in-depth measures to address uncertainties associated with protection from beyond-design-basis external events. With respect to this Order, licensees are specifically directed to provide a reliable means of remotely monitoring "wide-range spent fuel pool levels" to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2 will be achieved to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following

issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this order in August 2012. Finally, the order requires full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

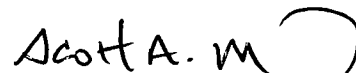
Pursuant to 10 C.F.R. § 2.202 and the terms specified in the Order, Ameren Missouri hereby submits its answer to the Order. Ameren Missouri consents to the Order and does not request a hearing. Based on information currently available, Ameren Missouri has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, Ameren Missouri has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the integrated plan, or December 31, 2016, whichever is earlier. Ameren Missouri will provide further responses as required by Section IV.C in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of Ameren Missouri to comply with the specific compliance deadline dates based on the probable availability of that guidance, Ameren Missouri's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

If you have any questions regarding this letter, please contact Scott Maglio at 573-676-8719.

This letter does not contain new commitments.

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

Sincerely,

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

Scott A. Maglio  
Regulatory Affairs Manager

Executed on: 3/30/2012

SJM/nls

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