

License Renewal Application
Responses to Environmental RAI Set 2

Hydrology and Water Quality – Surface Water

1. NRC Request:

Provide documentation from the Missouri Department of Natural Resources confirming that a separate Clean Water Act Section 401 certification will not be required for the purposes of license renewal in the form of a State regulation, policy statement, or written statement from the State.

Ameren Response:

Ameren Missouri submitted a letter to the Missouri Department of Natural Resources (MDNR) on 08/07/2012 requesting a renewed 401 Certification or a letter stating that recertification is not necessary. A copy of this letter is included as Enclosure 2. As of the signing of this letter Ameren has not received a response from MDNR. Upon receipt of a decision from MDNR Ameren will submit a copy of the renewed certification, or letter from MDNR, to NRC.

Terrestrial Ecology

1. NRC Request:

Provide a discussion of future plans to extend the Reform Conservation Area lease agreement after expiration in 2016.

Ameren Response:

Prior to the end of 2016, Ameren Corporate and Callaway Energy Center personnel will meet with the Missouri Department of Conservation (MDC) to review the current and proposed Reform Conservation Area Plan (Plan). Callaway Energy Center along with Ameren Real Estate Department will make appropriate modifications to the Plan. If it is determined the proposed Plan is in the best interest of the Callaway Energy Center, and after successful negotiations, a lease with MDC will be executed to extend the Plan. The lease agreement may be renewed as many times as both parties desire.

2. NRC Request:

Provide a copy of any studies completed to document threatened and endangered species in the transmission line corridors.

Ameren Response:

Ameren does not perform studies along existing transmission lines, however Ameren does correspond with the Missouri Department of Conservation and the US Fish and Wildlife Service to obtain records of species found along transmission line corridors. Through this process threatened and endangered species that may occur on or near Callaway are identified. The most recent correspondence is included as Enclosure 3.

3. NRC Request:

Provide the basis for or source of the following sentence on page 2-19 of the environmental report (ER): "... a gray bat was documented in a cave nearby in an off-site segment of Auxvasse Creek."

Ameren Response:

The Callaway License Renewal Environmental Report states:

"Two federally endangered bat species, the gray bat (Myotis grisescens) and the Indiana bat (M. sodalis), are found in the counties of interest (Table 2.5-1). Neither has been observed on the plant site, although a gray bat was documented in a cave nearby in an off-site segment of Auxvasse Creek."

Ameren conducted a comprehensive ecological study of the Callaway site in 2007-2008 for the Combined Operating License application environmental report (COLA ER). These

studies are described in MACTEC (2007), submitted as Enclosure 4, with the terrestrial species results reported in Table 2.4-2, "Important Terrestrial Species and Habitat Identified at the AmerenUE Property 2007-2008," of the COLA ER (AmerenUE 2009). Table 2.4-2 reports that the gray bat was observed in a "Cave along Auxvasse Creek."

4. NRC Request:

Provide the basis for or source of the sentence on page 2-21 of the ER that explains that the eastern hellbender has not been observed on the site.

Callaway Response:

The Callaway License Renewal Environmental Report states:

"The eastern hellbender (Cryptobranchus alleganiensis) is the only protected amphibian known to occur in the four counties of interest, and is state-listed as endangered in Montgomery, Gasconade, and Osage counties (Table 2.5-1). It inhabits riffles in clear, permanent, gravel-bottomed streams and threats include landscape impacts that affect water quality. This species has not been observed on the site."

Ameren does not mean to imply that the eastern hellbender does not occur on site, but that it has not been observed in the two comprehensive studies of the site. The first comprehensive study was conducted in 1974-1975 and is reported in Union Electric (1976), the operating license environmental report (OL-ER). Table 2.2-35, "Amphibians and Reptiles Observed in the Vicinity of the Callaway Plant Site, Callaway County, Missouri, 1974-1976," of the OL-ER does not identify the eastern hellbender.

Furthermore, Ameren conducted consultations with the Missouri Department of Conservation regarding both license renewal and the Unit 2 COLA, resulting in no mention by MDC of the eastern hellbender occurring onsite.

5. NRC Request:

According to Section 2.5 of the ER, Ameren contractors examined historical records and consulted resource agencies to determine the potential occurrence of threatened and endangered species. Please list or describe what historical records Ameren contractors reviewed. Please list or describe which resource agencies Ameren contractors contacted and provide any available documentation, such as phone call summaries, that is not already included in Appendix C of the ER.

Ameren Response:

The Callaway License Renewal Environmental Report states:

"Ameren contractors examined historical records and consulted resource agencies to determine if these fish species were likely to occur in the vicinity of the Callaway site, as part of an assessment of potential impacts of a proposed new generating unit at the site."

Ameren contractors examined historical records and consulted resource agencies to determine if these fish species were likely to occur in the vicinity of the Callaway site, as part of an assessment of potential impacts of a proposed new generating unit at the site. Ameren License Renewal contractors also contacted the Missouri Department of Conservation regarding pallid sturgeon on 05/14/2012 as documented in Enclosure 5. Below is a list of historical records that were examined. All of these documents have been previously submitted or are publicly available.

- Union Electric Company 1976. Callaway Plant Environmental Report, Operating License Stage, Volume I.
- CDM (Camp, Dresser & McKee, Inc.) 1981. Annual Report to Union Electric Company, St. Louis Missouri: Water Quality and Aquatic Biological Preoperational Monitoring Program for the Callaway Nuclear Plant, June 1980 through May 1981, July.
- CDM (Camp, Dresser & McKee, Inc.) 1982. Annual Report to Union Electric Company, St. Louis Missouri: Water Quality and Aquatic Biological Preoperational Monitoring Program for the Callaway Nuclear Plant, June 1981 through May 1982, September.
- NRC (U.S. Nuclear Regulatory Commission) 1982. Final Environmental statement related to the operation of Callaway Plant, Unit No. 1. NUREG-0813, Docket No 50-483.
- AmerenUE 2009. Callaway Plant Unit 2: Combined License Application. Part 3: Environmental Report, Revision 1

References Requested for Docketing (Terrestrial Ecology)

Item	Request	ULNRC-05902 Enclosure #
A	AmerenUE 2007. Ameren Transmission Vegetation Management Program. April.	6
B	MACTEC (MACTEC Engineering and Consulting, Inc) 2007. Standard Operating Procedures for Callaway Plant, Unit 2, Siting Study and the Natural Resources Field Sampling and Analysis. November.	4
C	MACTEC 2009. Preliminary Jurisdictional Wetland and Stream Delineation Report for the Callaway Nuclear Plant.	7