



February 28, 2013

ULNRC-05962

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  
OVERALL INTEGRATED PLAN  
IN RESPONSE TO MARCH 12, 2012 COMMISSION ORDER  
MODIFYING LICENSES WITH REGARD TO REQUIREMENTS  
FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN BASIS  
EXTERNAL EVENTS (ORDER NUMBER EA-12-049)**

- References: 1. Letter dated March 12, 2012 from E. J. Leeds and M. R. Johnson, USNRC, to Adam C. Heflin, Callaway Plant, Union Electric Company, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," (ADAMS Accession No. ML12054A736)
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, August 29, 2012 (ADAMS Accession Number ML12229A174)
3. Nuclear Energy Institute document NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, August 2012 (ADAMS Accession No. ML12242A378)
4. ULNRC-05924, "Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design Basis External Events," dated October 29, 2012

On March 12, 2012, the U. S. Nuclear Regulatory Commission (NRC) issued the order identified above as Reference 1 to Union Electric Company (dba Ameren Missouri) for Callaway Plant. Reference 1 was immediately effective and directs Ameren Missouri to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Section IV, Condition C.1.a of Reference 1 requires submission of an Overall Integrated Plan by February 28, 2013. The NRC Interim Staff Guidance (ISG) (Reference 2) was issued August 29, 2012 which endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 3 provides direction regarding the content of the Overall Integrated Plan.

Reference 4 provided Ameren Missouri's initial status report for Callaway Plant regarding mitigation strategies, as required by Reference 1.

The purpose of this letter is to provide the Overall Integrated Plan pursuant to Section IV, Condition C.1.a of Reference 1. This letter confirms Ameren Missouri has received Reference 2 and has an Overall Integrated Plan developed in accordance with the guidance for defining and deploying strategies that will enhance the ability to cope with conditions resulting from beyond-design-basis external events.

The enclosure to this letter provides Ameren Missouri's Overall Integrated Plan for mitigation strategies at Callaway Plant pursuant to Reference 3. The enclosed integrated plan is based on conceptual design information. Final design details and associated changes for implementation such as procedure guidance, as well as any revisions to the information contained in the Enclosure to this letter, will be provided in the 6-month Overall Integrated Plan updates required by Reference 1.

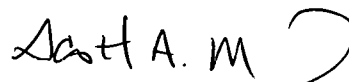
This letter does not contain new commitments.

If you have any questions concerning the content of this letter, please contact Scott Maglio, Regulatory Affairs Manager, at 573-676-8719.

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

Sincerely,

Executed on: 2/28/2013



Scott A. Maglio  
Regulatory Affairs Manager

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SJM/nls

Enclosure: Transmittal of Callaway Plant NRC FLEX Submittal for February 2013, LTR-FSE-13-24,  
Revision 0, dated February 22, 2013

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