Ameren MISSOURI

Callaway Plant

November 21, 2013

ULNRC-06056

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

10 CFR 50.71(e)(4)

Ladies and Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
CYCLE 19 COMMITMENT CHANGE SUMMARY REPORT

Please find attached the Cycle 19 Commitment Change Summary Report required by NEI 99-04, "Guideline for Managing NRC Commitment Changes," for changes requiring NRC notification within the next refuel outage interval. These commitment revisions were completed at Callaway Plant Unit 1 for the period between November 26, 2011 and May 28, 2013 and were not reported to NRC in a previous submittal. The Cycle 19 Commitment Change Summary Report provides a description of each change completed along with a brief justification for each revised commitment.

If you should have any questions concerning this report, please contact Scott Maglio at (573) 676-8719.

This letter does not contain new commitments.

Sincerely,

Scott A. M

Scott A. Maglio
Regulatory Affairs Manager

DRB/ns

Enclosure

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CYCLE 19 COMMITMENT CHANGE SUMMARY REPORT

In accordance with NEI 99-04, "Guidelines for Managing NRC Commitment Changes," as endorsed in Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," the following commitment changes are being reported. The changes were completed for Callaway Plant Unit 1 for the period from November 26, 2011 to May 28, 2013. A description of each change completed, along with a brief justification for each revised commitment, is provided.

Commitments 43216 through 43223 (ref. ULNRC-03156)

Commitments 43216 through 43223 were originally established to implement Generic Letter 88-18, "Plant Record Storage on Optical Disks." These commitments were superseded by commitments 50208 through 50211.

Justification for change:

Callaway Plant decided to use a more modern electronic type of media (i.e., magnetic storage in lieu of older optical disk technology) to store electronic records, which is covered by RIS 2000-18, "Guidance on Managing Quality Assurance Records in Electronic Media." New commitments 50208 through 50211 were initiated to reflect the current requirements from RIS 2000-18.

RIS 2000-18 states that the following four NIRMA guidelines provide an acceptable basis for managing electronic quality assurance records:

1. NIRMA TG 11-1998, "Authentication of Records and Media"
2. NIRMA TG 15-1998, "Management of Electronic Records"
3. NIRMA TG 16-1998, "Software Configuration Management and Quality Assurance"
4. NIRMA TG 21-1998, "Electronic Records Protection and Restoration"

New commitments 50208 through 50211 document Callaway Plant's compliance with the above NIRMA documents, with certain exceptions taken as specified in commitments 50208 and 50209.

NIRMA TG 11-1998 section 5.6.2 references an obsolete standard for conducting equipment testing that is not referenced in newer versions of the TG. Callaway Plant utilizes a testing methodology described in Callaway Plant procedure ADP-ZZ-RM001, "Receipt, Processing, Image Capture, Storage and Maintenance of Records."

NIRMA TG 15-1998 section 5.2.1 provides a listing of indexing information that each record *should* include. The newer version of the TG provides a similar listing of indexing information that each record type *may* include.

Callaway Plant procedure ADP-ZZ-DC003, "Indexing Instructions and Record Analysis," provides guidance for the preparation of indexing instructions and records analysis of records to ensure retrieval

of documentation. The Administration department works with the record originating department to ensure that appropriate indexing instructions are applied to each record type, such that each record is individually retrievable. This approach meets the intent of the TG.

NIRMA TG 15-1998 states in multiple locations that records *should* be maintained in off-line storage. The newer version of the TG states that copies of electronic records *may* be maintained off-line. Callaway Plant's archival storage solution does not include an off-line records storage component. Storage technology has evolved to provide redundant dual storage at separate geographical locations without one being off-line. They are both kept on-line during normal operations, although one location at a time may be taken off-line for maintenance.

Commitment 50122 (ref. ULNRC-02146, ULNRC-05425)

This commitment implements Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment." The primary change in this commitment was to change the primary monitoring method for containment air coolers from frequent regular maintenance (clean and inspect) to thermal performance testing. Such testing will be performed on a minimum of one containment cooler at an interval not to exceed five years, as a representative sample for the heat removal capability of all of the containment coolers.

Justification for change:

Changing the primary monitoring method for the containment coolers from frequent regular maintenance (clean and inspect) to thermal performance testing with a testing interval not to exceed 5 years meets the intent of GL 89-13. In addition to this testing, additional monitoring methods (performance of thermography, flow verification and testing of similar heat exchangers) provide adequate opportunity to detect degraded performance between thermal performance tests.

Commitment 42090 (ref. ULNRC-02146)

Selected sections of Essential Service Water system (ESWS) piping are routinely inspected for corrosion, erosion and biofouling. This program is governed by plant procedures, whose purpose is to ensure structural integrity of the ESWS piping. The program is in compliance with requirements of NRC Generic Letter 89-13.

Justification for change:

This commitment is being revised to reflect changes in the methods used to identify corrosion in ESW piping. Specifically, the statement in letter ULNRC-02146 that radiography is used to determine any localized pitting, has been removed from the commitment. The revised commitment states that Low Frequency Electromagnetic Technique (LEFT) is used to obtain a general idea of the condition of a section of pipe, and Ultrasonic Testing (UT) measurements are taken to confirm and quantify wall loss indications. ULNRC-02146 states in part "Union Electric responses are based on current and planned Callaway programs which are subject to change as plant procedures and practices are revised."