



January 16, 2014

ULNRC-06073

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Director, Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

10 CFR 72  
Order No. EA 13-237

Ladies and Gentlemen:

**DOCKET NUMBER 50-483 AND 72-1045  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
FACILITY OPERATING LICENSE NPF-30  
ANSWER AND RESPONSE TO THE ORDER FOR IMPLEMENTATION  
OF ADDITIONAL SECURITY MEASURES AND FINGERPRINTING FOR  
UNESCORTED ACCESS FOR CALLAWAY PLANT INDEPENDENT  
SPENT FUEL STORAGE INSTALLATION**

Reference: Letter from NRC (Keith McConnell, Acting Director, Office of Nuclear Material Safety and Safeguards) to Ameren Missouri (Mr. Fadi Diya, Vice President-Nuclear Operations) dated December 30, 2013, "Issuance of Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access for Callaway Plant Independent Spent Fuel Storage Installation (EA-13-237)", ADAMS Accession No.: ML13357A495

As directed by EA-13-237, Union Electric Company, d/b/a Ameren Missouri, hereby submits information in response to the Order for Implementation of Additional Security Measures (ASM) and Fingerprinting for Unescorted Access for Callaway Plant Independent Spent Fuel Storage Installation (ISFSI) (hereinafter "Order").

Ameren Missouri consents to the Order as more fully set forth below, and specifically does not request a hearing on this Order. Upon implementation, Ameren Missouri will be able to comply with the requirements described in Enclosure 1, Attachments 1 and 2 of the Order and implementation of the requirements will not cause Ameren Missouri to be in violation of the provisions of any Commission

regulation or the facility license. Implementation of the requirements described in Enclosure 1, Attachments 1 and 2 of the Order will not adversely impact the safe storage of spent fuel. The first movement of spent fuel to the Callaway Plant ISFSI is currently scheduled to begin in April, 2015.

Ameren Missouri recognizes that the Order requires Callaway Plant to demonstrate compliance with certain security measures relative to Callaway Plant's ISFSI no later than 365 days from December 30, 2013 (or December 30, 2014), or 90 days before the first day fuel is initially placed in the ISFSI, whichever is first. However, Ameren Missouri is planning to use the Holtec HI-STORM UMAX MPC Storage System at Callaway Plant which is currently under review by the NRC and the review is expected to enter the rulemaking process on or about January 31, 2014. (Please reference USNRC Docket No. 72-1040, TAC No. 24626.) Due to the uncertainty of the timing of the rulemaking process, construction of the Callaway Plant ISFSI may not be to the stage that Ameren Missouri can demonstrate compliance with the ASM by December 30, 2014. Ameren Missouri does agree, however, to demonstrate compliance with the requirements in Attachments 1 and 2 to the Order no later than 90 days before the first day that spent fuel is initially placed in the ISFSI.

As provided for in Enclosure 1, Attachment 2 of the Order, Ameren Missouri has chosen to comply with the NRC approved reactor access authorization program currently in place at Callaway Plant as an alternative means to satisfy the provisions of sections B through G of Enclosure 1, Attachment 2.

Ameren Missouri will provide periodic updates of the ISFSI project status and will report to the Commission when it has achieved full compliance with the requirements described in Enclosure 1, Attachments 1 and 2 of the Order. Ameren Missouri will achieve full compliance with the Order no later than 90 days before the first day that spent fuel is initially placed in the ISFSI.

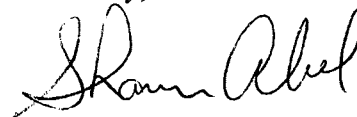
This communication contains one new commitment, which is described in Enclosure 1 to this letter.

If you have any questions with regard to this response, please contact me at or Mr. Scott Maglio at (573) 676-8719.

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

Executed on: January 16, 2014

Sincerely,



Shannon Abel  
Director, Engineering Projects

DS/nls

Enclosures: 1) List of Commitments

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cc: U.S. Nuclear Regulatory Commission (Original)  
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Enclosure 1

**LIST OF COMMITMENTS**

The following table identifies those actions committed to by Ameren Missouri in this document. Any other statements in this document are provided for information purposes and are not considered commitments. Please direct questions regarding this commitment to Mr. Scott Maglio at (573) 676-8719.

COMMITMENT	Due Date/Event	COMN
Achieve full compliance with the provisions of Enclosure 1, Attachments 1 and 2 of the NRC issued "Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access for Callaway Plant Independent Spent Fuel Storage Installation" (EA-13-237, dated. December 30, 2013).	No later than 90 days before the first day that spent fuel is initially placed in the ISFSI.	50391