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April 6, 2016

ULNRC-06293

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

10 CFR 50.54(f)

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
CALLAWAY MITIGATING STRATEGIES ASSESSMENT (MSA) REPORT SUBMITTAL**

- 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, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident" (ADAMS Accession No. ML12053A340)
 2. ULNRC-05967, "Flooding Hazard Reevaluation Report in Response to NRC Request For information Regarding Recommendation 2.1, Flooding, of the Near-term Task Force Review of Insights From the Fukushima Dai-Ichi Accident," dated March 8, 2013 (ADAMS Accession No. ML13071A315)
 3. Letter dated January 29, 2014, from C. F. Lyon, USNRC, to Fadi Diya, Callaway Plant, Union Electric Company, "Callaway Plant, Unit 1 – Request for Additional Information RE: Callaway Flooding Hazard Reevaluation Report" (ADAMS Accession No. ML14028A264)
 4. ULNRC-06081, "Requested Information Regarding Callaway Flooding Hazard Reevaluation Report Submittal in Response to Near-Term Task Force Recommendation 2.1," dated February 27, 2014 (ADAMS Accession No. ML14059A232)
 5. Letter dated October 29, 2014, from Robert F. Kuntz, USNRC, to Fadi Diya, Callaway Plant, Union Electric Company, "Callaway Plant, Unit 1 – Staff Assessment of

Response to 10CFR 50.54(f) Information Request – Flood-Causing Mechanism
Reevaluation (TAC No. MF1096)” (ADAMS Accession No. ML14290A532)

6. Letter dated September 1, 2015, from William N. Dean, USNRC, to Power Reactor Licensees, “Coordination of Requests for Information Regarding Flooding Hazard Reevaluations and Mitigating Strategies for Beyond-Design Basis External Events” (ADAMS Accession No. ML15174A257)
7. Letter dated November 20, 2015, from Victor Hall, USNRC, to Fadi Diya, Callaway Plant, Union Electric Company, “Callaway Plant, Unit 1 – Mitigating Strategies Assessment with Respect to the Reevaluated Flood Hazards Submitted in Response to the 10CFR50.54(f) Information Request – Flood-Causing Mechanism Reevaluation (CAC No. MF1096)” (ADAMS Accession No. ML15314A108)

On March 12, 2012, the NRC issued Reference 1 to request information associated with Near-Term Task Force (NTTF) Recommendation 2.1 for Flooding. One of the Required Responses in Reference 1 directed licensees to submit a Flood Hazard Reevaluation Report (FHRR). For Callaway Plant, the FHRR was submitted on March 8, 2013 (Reference 2). The reevaluated flood hazard was further developed in response to requests for additional information (References 3 and 4). Per Reference 5, the NRC staff confirmed Ameren Missouri’s conclusions that the reevaluated hazard results for each flood-causing mechanism are bounded by the current design-basis flood hazard or do not inundate the plant site, and an Integrated Assessment is not necessary.

Reference 6 was issued on September 1, 2015, describing changes in the NRC’s approach to flood hazard reevaluations. Reference 7, issued on November 20, 2015, stated in part, “As described in the staff assessment, the NRC staff confirmed that the licensee responded appropriately to Enclosure 2 of the 50.54(f) letter. The NRC staff confirmed that the reevaluated hazard results for each reevaluated flood-causing mechanism are bounded by the current design-basis flood hazard and an integrated assessment or focused evaluation is not necessary for Callaway. The NRC staff has no additional information needs at this time with respect to Enclosure 2 of the 50.54(f) letter.”

Reference 7 went on to state, “The licensee is expected to perform an MSA (Mitigating Strategies Assessment) for Callaway.” In order to clarify the expectation for Callaway, a telecon was held between NRC and Callaway Plant staff on December 1, 2015. During this call, it was clarified by NRC staff that the expectation for Callaway is to submit a brief response stating that the reevaluated flood hazard is bounded by the current design basis and therefore no further action, including performance of an MSA, is required. Accordingly, Callaway confirms that the reevaluated flood hazard is bounded by the current design basis, and an MSA will not be performed.

This letter does not contain new commitments. If you have any questions concerning the content of this letter, please contact Roger Wink, Regulatory Affairs Manager, at 573-310-7025.

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

Sincerely,

Executed on: April 6, 2016



Timothy E. Herrmann
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