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March 6, 2018

ULNRC-06417

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**  
**PATH FORWARD FOR RESOLUTION OF GSI-191**

**References:**

- 1) Ameren Missouri letter ULNRC-05989, "Path Forward for Resolution of GSI-191," dated May 16, 2013 (Accession No. ML13136A290).
- 2) Ameren Missouri Letter ULNRC-06100, "Path Forward for Resolution of GSI-191," dated March 31, 2014 (Accession No. ML14090A355).
- 3) Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," dated September 13, 2004 (Accession No. ML042360586).
- 4) NRC Policy Issue SECY-12-0093, "Closure Options for Generic Safety Issue - 191, 'Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance,'" dated July 9, 2012 (Accession No. ML121310648).

In the letter identified as Reference 1, Union Electric Co. (dba Ameren Missouri) described the closure path being taken for resolution of Generic Letter (GL) 2004-02 (Reference 3) and Generic Safety Issue (GSI) -191 (Reference 4) for the Callaway Plant. Specifically, Ameren Missouri proposed to achieve resolution of GL 2004-02 (GSI-191) by implementing Option 2b, "Full Risk-Informed Resolution Path," of SECY-12-0093 (Reference 4), utilizing the methodology developed by South Texas Project (STP). This resolution path is still being pursued by Ameren Missouri and is ongoing.

In Reference 1, it was noted that the necessary request/correspondence for resolving GSI-191 at Callaway Plant would be submitted by December 31, 2015. This was identified as a commitment (Commitment No. 50261) in Attachment 2 of the letter. In Reference 2, Ameren Missouri subsequently revised its submittal commitment, noting that the submittal would either be made by a

new, specified date or within one year following issuance of the Safety Evaluation for South Texas Project's GSI-191 resolution submittal. It was also clarified that the GSI-191 closure correspondence to be submitted for Callaway would likely be in the form of a license amendment request and proposed regulatory exemption (similar to STP's submittal).

Due to activities that have transpired subsequent to the Reference 2 letter, including submittal of Westinghouse topical report WCAP-17788, "Comprehensive Analysis and Test Programs for GSI-191 Closure," by the Pressurized Water Reactor Owners' Group (PWROG) to support GSI-191 closure, Ameren Missouri is submitting this letter to again revise its submittal commitment. Revision of the submittal commitment is based on recognizing that the success path for the risk-informed Option 2b approach is dependent on completion of the NRC staff's review and approval of WCAP-17788, including issuance of a Safety Evaluation (SE) for the report. At present, the PWROG is resolving the NRC staff's comments and requests for additional information, and by the current schedule, NRC issuance of the SE for WCAP-17788 is projected to be beyond Callaway's current submittal commitment date.

Based on the above, it is proposed that the date for submitting the GSI-191 closure correspondence for Callaway Plant be extended to September 26, 2019, or to one year after issuance of the NRC's SE for WCAP-17788, whichever is later. This extension of Ameren Missouri's submittal date will allow sufficient time for performing the necessary analysis using the WCAP-17788 methodology (when approved by the NRC). The revised commitment is documented in the attachment (Attachment 1) of this letter.

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,



Stephanie Banker  
Vice President - Engineering

Executed on: 3/6/18

Attachment 1: Revised Commitment

cc: Mr. Kriss M. Kennedy  
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Mr. Jay Silberg (Pillsbury Winthrop Shaw Pittman LLP)

**Attachment 1**

**Revised Commitment**

**Previous Commitment per ULNRC-05989**

<b>COMMITMENTS</b>	<b>Due Date/Event</b>	<b>Commitment Number</b>
Ameren Missouri will submit the necessary request/correspondence (e.g., regulatory exemption request) for resolving GSI-191 at Callaway Plant pursuant to Option 2b (risk-informed approach).	December 31, 2015	50261

**Current Commitment 50261 per ULNRC-06100**

<b>COMMITMENTS</b>	<b>Due Date/Event</b>	<b>Commitment Number</b>
Ameren Missouri will submit closure correspondence (e.g., License Amendment and regulatory exemption request) for resolving GSI-191 at Callaway Energy Center pursuant to SECY-12-0093 Option 2b (risk-informed approach).	September 1, 2017  OR  1 year following issuance of the Safety Evaluation for the STP risk-informed GSI-191 resolution submittal,  whichever is later.	50261, Rev. 1

**Proposed Change to Commitment 50261**

<b>COMMITMENTS</b>	<b>Due Date/Event</b>	<b>Commitment Number</b>
Ameren Missouri will submit closure correspondence (e.g., License Amendment and regulatory exemption request) for resolving GSI-191 at Callaway Energy Center pursuant to SECY-12-0093 Option 2b (risk-informed approach).	September 26, 2019  OR  1 year following issuance of the Safety Evaluation for WCAP-17788, "Comprehensive Analysis and Test Programs for GSI-191 Closure"  whichever is later.	50261, Rev. 2