



June 7, 2018

ULNRC-06437

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.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
CYCLE 22 COMMITMENT CHANGE SUMMARY REPORT**

Please find attached the Cycle 22 Commitment Change Summary Report required by NEI 99-04, "Guideline for Managing NRC Commitment Changes," for changes requiring NRC notification annually or at a frequency consistent with that required for FSAR updates per 10 CFR 50.71(e)(4). These commitment revisions were completed at Callaway Plant for the period between May 10, 2016 and December 19, 2017, and were not reported to NRC in a previous submittal. The Cycle 22 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 Mr. Tom Elwood, Supervising Engineer, Regulatory Affairs and Licensing at 314-225-1905.

This letter does not contain new commitments.

Sincerely,

Roger C. Wink  
Manager, Regulatory Affairs

Enclosure

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## CYCLE 22 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 two changes were completed for Callaway Plant for the period from May 10, 2016 to December 19, 2017. A description of each change completed, along with a brief justification for each revised commitment, is provided as follows:

### Commitment 42090 (Ref. NRC Generic Letter 89-13, ULNRC-02146)

Selected sections of Essential Service Water system (ESW) 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 ESW piping. This commitment specified the use of Low Frequency Electromagnetic Technique (LFET) to quickly obtain a general idea of the condition of a section of pipe, along with Ultrasonic Testing (UT) measurements to confirm and quantify the wall loss indications.

#### Justification:

This commitment has been revised to eliminate mention of specific methods used to identify and quantify corrosion in ESW piping. This will allow for the use of different non-destructive inspection techniques to inspect ESW piping for corrosion. Union Electric (Ameren Missouri) letter ULNRC-02146, "Response to Generic Letter 89-13 Service Water System Problems Affecting Safety-Related Equipment," 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."

Commitment 50122 (Ref. NRC Generic Letter 89-13, ULNRC-02146)

The periodic retest program for the heat exchangers associated with Item II of GL 89-13 consists of thermal performance testing or frequent regular maintenance, which could include periodic replacement, with a frequency not to exceed 5 years. The thermal performance periodic retest program activities may be performed on a representative sample of heat exchangers in order to verify the heat transfer capability of similar service heat exchangers. The other monitoring methods described in Callaway procedures EDP-ZZ-01112, "Heat Exchanger Predictive Performance Manual"; OSP-EF-P001A/B, "Essential Service Water Train A/B Inservice Test"; and OSP-EF-0002A/B, "Essential Service Water Train A/B Flow Verification," provide additional opportunities to detect degraded performance. The program activities to be performed per the GL 89-13 commitment were specified or described on a per-group basis, where each group of heat exchangers was based on function or type. The specified program activities were not necessarily the same from group to group.

Justification:

This commitment is being revised to allow for thermal performance testing or frequent regular maintenance (up to or including replacement) for any GL 89-13 heat exchanger. Thermal performance testing may still be performed on a representative similar service sample of GL 89-13 heat exchangers. This method of testing allows for adequate detection of degraded heat transfer capabilities, with additional flexibility, and yet still satisfies the periodic retest program in accordance with Item II of GL 89-13. In addition, this commitment is being revised to update procedure document numbers.