

January 15, 2020

ULNRC-06557

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

10 CFR 50.90

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
RENEWED FACILITY OPERATING LICENSE NPF-30
SUPPLEMENT TO LICENSE AMENDMENT REQUEST
REGARDING PERFORMANCE BASED METHOD ALTERNATIVE
FOR THERMAL INSULATION MATERIAL (LDCN 19-0012)**

References:

1. Ameren Missouri letter ULNRC-05781, "Request for License Amendment to Adopt NFPA 805, 'Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants (2001 Edition)," dated August 29, 2011 (ADAMS Accession No. ML112420022)
2. NRC letter from Carl Lyon, USNRC, to Adam Heflin, Union Electric Company, "Callaway Plant, Unit 1 - Issuance of Amendment Regarding Transition to a Risk-Informed, Performance-Based Fire Protection Program in Accordance with 10 CFR 50.48(c)," dated January 13, 2014 (ADAMS Accession No. ML13274A596)
3. Ameren Missouri letter ULNRC-06509, "Performance Based Method Alternative for Thermal Insulation Material (LDCN 19-0012)," dated November 7, 2019 (ADAMS Accession No. ML19312B657)

By letter dated November 7, 2019 (Reference 3 above), Ameren Missouri (Union Electric) submitted a license amendment request (LAR) for approval to modify the NFPA 805-based fire protection (FP) program that was approved for the Callaway Plant via License Amendment 206 (as issued by NRC letter dated January 13, 2014 (Reference 2 above)) and which is described in License Condition 2.C.(5) of the Callaway Operating License. The requested license amendment would allow, as a performance based method, use of closed cell foam thermal insulation materials in limited applications subject to the appropriate engineering reviews and controls.

Subsequent to submittal, it was determined that the LAR should have included proposed changes to License Condition 2.C.(5). Besides providing a general description of the FP program and specifying

provisions for making risk-informed changes to the program, License Condition 2.C.(5) identifies the specific application and approval documents (by date) that were issued for License Amendment 206. It was thus determined that the Reference 3 LAR submittal letter and any follow-up submittal letters should likewise be identified in License Condition 2.C.(5), along with the Safety Evaluation that will be issued for the anticipated license amendment, assuming approval. (For the latter, a placeholder is to be proposed into which the date of the Safety Evaluation ultimately issued with the requested license amendment will be inserted at the time of issuance of the amendment.)

Based on the foregoing, and as a supplement to the Reference 3 LAR, changes to the first paragraph of Operating License Condition 2.C.(5) are hereby proposed, as reflected in the mark-ups that are provided as Attachment 1 to this letter and in the "clean" pages provided as Attachment 2 to this letter. As described above, the proposed changes consist of inserting dates for the Reference 3 LAR letter and this letter into that part of the paragraph where the original NFPA 805 LAR letters are identified by date, as well as inserting a placeholder for inserting the date of the Safety Evaluation anticipated to be issued for the requested license amendment.

The OL changes proposed in this supplement to Ameren Missouri's November 7, 2019 LAR are administrative in nature and have no impact on what was presented in the LAR in regard to the requested FP program change. The changes are merely intended to include the LAR and resultant license amendment (i.e., NRC Safety Evaluation) in the FP program scope described in License Condition 2.C.(5), consistent with how the original NFPA 805 LAR and its supplements (along with the resultant Safety Evaluation) are identified in the License Condition. As such, the additional changes requested per this LAR supplement do not change the "No Significant Hazards Consideration" conclusions reached in the LAR, nor do they change the conclusion regarding no need for an environmental assessment based on the categorical exclusion provisions of 10 CFR 51.22.

It should be noted that this submittal does not contain new commitments. In addition, the Callaway Onsite Review Committee has reviewed and approved the proposed changes and has approved submittal of this supplement to the November 7, 2019 amendment application.

In accordance with 10 CFR 50.91, "Notice for Public Comment; State Consultation," Section (b)(1), a copy of this amendment application is being provided to the designated Missouri State official.

If there are any questions on this amendment application, please contact Mr. Tom Elwood at 314-225-1905.

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

Executed on: _____

1/14/20

Sincerely,



Frederick J. Bianco
Senior Director, Nuclear Operations

Enclosures:

1. Operating License Condition 2.C.(5) Marked-Up Page
2. Operating License Condition 2.C.(5) Clean Page

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Mr. Dan Beck (Missouri Public Service Commission)
Ms. Katie Jo Wheeler (DNR)

Attachment 1

Operating License Condition 2.C.(5)
Marked-Up Page

(4) Surveillance of Hafnium Control Rods (Section 4.2.3.1(10), SER and SSER #2)

Deleted per Amendment No. 169.

(5) Fire Protection Program

and
11/7/2019

s

Union Electric shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment request dated 8/29/2011 (and supplements dated 1/7/2011, 4/17/2012, 7/12/2012, 2/19/2013, 8/5/2013, 9/24/2013, and 12/19/2013) and as approved in the safety evaluation report dated 1/13/2014. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

s

and
1/15/2020

and
[date]

Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

- (a) Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.
- (b) Prior NRC review and approval is not required for individual changes that result in a risk increase less than 1×10^{-7} /year (yr) for core damage frequency (CDF) and less than 1×10^{-8} /yr for large early release frequency (LERF). The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

Attachment 2

Operating License Condition 2.C.(5)
Clean Page

(4) Surveillance of Hafnium Control Rods (Section 4.2.3.1(10), SER and SSER #2)

Deleted per Amendment No. 169.

(5) Fire Protection Program

Union Electric shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment requests dated 8/29/2011 and 11/17/2019 (and supplements dated 11/9/2011, 4/17/2012, 7/12/2012, 2/19/2013, 8/5/2013, 9/24/2013, 12/19/2013 and 1/15/2020) and as approved in the safety evaluation reports dated 1/13/2014 and [DATE]. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

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