



~~SENSITIVE INFORMATION - WITHHOLD UNDER 10 CFR 2.390(a)(4)~~

June 4, 2020

ULNRC-06582

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

10 CFR 73, Appendix B, Section VI
10 CFR 73.5

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
RENEWED FACILITY OPERATING LICENSE NPF-30
SECURITY TRAINING EXEMPTION REQUEST DUE TO COVID-19**

Reference: EGM 20-002, "Enforcement Guidance Memorandum – Dispositioning Violations of NRC Requirements during Coronavirus Disease 2019 (COVID-19)," April 15, 2020

On January 31, 2020, the U.S. Department of Health and Human Services declared a public health emergency (PHE) for the United States to aid the nation's healthcare community in responding to the Coronavirus Disease 2019 (COVID-19). On March 13, 2020, the Governor of the State of Missouri declared a state of emergency. In addition, on March 11, 2020, the COVID-19 outbreak was characterized as a pandemic by the World Health Organization, and on March 13, 2020, the President of the United States of America declared the Coronavirus (COVID-19) pandemic a national emergency. In response to these declarations and in accordance with Ameren Missouri's pandemic response plan, some Callaway Plant (Callaway) activities have been postponed due to isolation actions and activities (for example, social distancing, group size limitations, self-quarantining, and the possibility of isolating required station personnel to protect and maintain necessary staffing levels). Consequently, it is necessary for Ameren Missouri to request a certain temporary exemption to the Code of Federal Regulations (CFR), for Callaway, as described in the enclosure to this letter.

Specifically, as a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE), Callaway expects that it will no longer be able to comply with the requirements of 10 CFR Part 73, Appendix B, Section VI Subsection E.1.(f) – Weapons range activities on a nominal 4-month

Enclosure to this letter contains ~~sensitive information~~.
Withhold from public disclosure under 10 CFR 2.390(a)(4).
Upon removal of Enclosure, this letter is uncontrolled.

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periodicity. Callaway will implement site specific COVID-19 PHE training requalification controls consistent with those outlined in the Reference letter (identified above) and its enclosures.

The enclosure provides details on the required security exemption request for Callaway. Ameren Missouri requests a temporary exemption from the security training requalification requirement identified in the enclosure. No exemption is requested for initial training. Granting of the requested exemption will allow deviation from the associated items in the Callaway Training and Qualification Plan. This temporary exemption supports the isolation restrictions (e.g., social distancing, group size limitations, self-quarantining, etc.) necessary to protect required site personnel in response to the 2020 COVID-19 virus. These restrictions are needed to ensure personnel are isolated from the COVID-19 virus and remain capable of maintaining plant security. Callaway implemented isolation restrictions for site personnel on March 17, 2020.

In accordance with the provisions of 10 CFR 73.5, and consistent with the conditions specified in the EGM-20-002 (Reference), Callaway is requesting exemption from the requirements of Appendix B to Part 73 as identified in the enclosure, along with the associated items in the Callaway Training and Qualification Plan. Callaway will begin implementing its site-specific COVID-19 PHE controls for managing personnel performing Security Program duties on June 22, 2020, or upon NRC approval. The enclosure provides justification.

This letter does not contain new commitments.

If there are any questions, please contact Billy Brown at (314) 203-3629.

Sincerely,



Mark McLachlan
Senior Director, Plant Support

Enclosure
Security Training Requalification Exemption Request Justification

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