



Callaway Plant

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

September 3, 2020

ULNRC-06599

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**

References:

1. NRC Letter, "U.S Nuclear Regulatory Commission Planned Actions Related to the Requirements for Part 73, Appendix B, Section VI, During the Coronavirus Disease 2019 Public Health Emergency," from Ho K. Nieh, Director – Office of Nuclear Reactor Regulation, and John W. Lubinski, Director – Office of Nuclear Material and Safety and Safeguards, to Dr. Jennifer L. Uhle, Vice President – Generation and Suppliers, Nuclear Energy Institute, et al., dated April 20, 2020 (ML2015A483)
2. EGM 20-002, "Enforcement Guidance Memorandum – Dispositioning Violations of NRC Requirements During Coronavirus Disease 2019 (COVID-19)," April 15, 2020 (ML20083K794)

On January 31, 2020, the U.S. Department of Health and Human Services declared a public health emergency (PHE) for the United States in order 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

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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, including security personnel, to protect and maintain necessary staffing levels). Consequently, it is necessary for Ameren Missouri to request a temporary exemption from certain requirements in the Code of Federal Regulations (CFR), in this case, from those regulations concerning training and requalification activities for security personnel.

In particular, 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, specifically, subsections C.2.(a) and C.2.(b), regarding on-the-job training; subsection D.2.(a), regarding annual requalification; subsection D.1.(b)(3) regarding annual written exams; subsection E.1.(c) regarding annual firearms familiarization; and subsection F.5.(a) regarding annual weapons requalification.

As explained in the enclosure to this letter, a number of security force members have been required to self-quarantine or to be quarantined due to potential or actual COVID-19 exposure. This requires them to miss scheduled training/requalification activities or requires other security personnel scheduled for training/requalification activities to instead be on shift to fulfill required shift staffing. As the current/ongoing continuing training cycle ends this fall, and in light of the need to maintain minimum on-shift coverage, it will not be possible for all security personnel to have met all requalification requirements within the current cycle. Additionally, some security supervisors who were previously qualified (but not currently) will be going back on shift to support staffing. Relief from the identified Part 73 training/requalification requirements is therefore needed to support sufficient shift staffing in lieu of strictly complying with the Part 73 requirements.

The requested exemption supports the isolation restrictions (e.g., social distancing, group size limitations, self-quarantining, etc.) necessary to protect required site personnel so that a sufficiently healthy and available security force can be maintained. Callaway implemented the noted isolation restrictions for site personnel on March 17, 2020 in response to the PHE.

The requested exemptions from the identified Part 73 requirements will concurrently allow deviation from the associated items in the Callaway Training and Qualification Plan, in regard to continuing training and requalification activities. No exemption is requested for initial training activities/requirements.

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In lieu of the exempted activities, Callaway will implement site specific COVID-19 PHE training requalification controls consistent with those outlined in References 1 and 2. Those controls for managing personnel performing Security Program duties will be implemented upon approval of the requested exemption, but no later than October 30, 2020 (i.e., when the current security continuing training/requalification cycle ends). Consistent with that, and for the reasons explained in the enclosure, NRC approval of the temporary exemption requested per this letter is requested on or by October 1, 2020.

In accordance with the guidance of Reference 1, Ameren requests that the proposed exemption (if approved) be in effect until 90 days after the PHE is ended or until December 31, 2020, whichever occurs first.

This letter does not contain new commitments.

If there are any questions, please contact Tom Elwood at (314) 225-1905.

Sincerely,



Mark McLachlan
Senior Director, Plant Support

Enclosure
Security Training Requalification Exemption Request Justification

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