

January 7, 2021

ULNRC-06629

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

10 CFR 26

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO  
ADDITIONAL REQUEST FOR EXEMPTION FROM SPECIFIC  
REQUIREMENTS OF 10 CFR PART 26, "FITNESS FOR DUTY PROGRAMS"**

References:

1. Ameren Missouri letter ULNRC-06625, "Additional Request for Exemption from Specific Requirements of 10 CFR Part 26, 'Fitness for Duty Programs,'" dated December 31, 2020 (ADAMS Accession Number ML20366A062)
2. NRC electronic correspondence, "Request for Additional Information – (COVID-19) Callaway Plant, Unit 1 - Additional Request for Exemption from Specific Requirements of 10 CFR Part 26, 'Fitness For Duty Programs'" - EPID L-2021-LLE-0242.

In the letter identified as Reference 1, Union Electric Company (Ameren Missouri) submitted an additional request for exemption from specific requirements of 10 CFR Part 26, "Fitness for Duty Programs." From review of the Reference 1 submittal, the NRC staff electronically transmitted per Reference 2 a request for additional information (RAI) on January 6, 2021. This letter provides Ameren Missouri's response to the RAI. Specifically, Ameren Missouri's responses to the RAI questions/requests are provided in the enclosure to this letter.

Consistent with Reference 1, Ameren Missouri respectfully requests NRC approval of the requested exemption by no later than January 16, 2021, in order to continue implementation of the safety benefits of the alternative controls.

This letter does not contain new commitments.

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

Sincerely,



M. A. McLachlan  
Senior Director, Nuclear Plant Support

Enclosure: Ameren Missouri Response to NRC RAI



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**Enclosure to**

**ULNRC-06629**

**Ameren Missouri Response to NRC RAI**

**3 pages**

### **Ameren Missouri Response to NRC RAI**

On January 6, 2021, the NRC electronically transmitted a Request for Additional Information (RAI) in regard to the Part 26 exemption request submitted for the Callaway plant by Ameren Missouri per Letter ULNRC-06625, "Additional Request for Exemption from Specific Requirements of 10 CFR Part 26, 'Fitness for Duty Programs,'" dated December 31, 2020 (ADAMS Accession Number ML20366A062). The following provides Ameren Missouri's responses to the RAI questions/requests.

1. The guidance contained in the NRC's November 10, 2020 letter (ADAMS Accession No. ML20261H515) states, in part, that licensees requesting approval for a subsequent exemption should provide the following information:
  - actual hours worked during the initial exemption period of each work group for which the licensee is requesting an exemption from the work hour controls
  - the site-specific administrative controls that will be used to manage worker fatigue during the subsequent exemption period

With regards to the eight (8) security officers for whom alternate work hour controls were utilized during the initial exemption period that commenced on November 17, 2020, please provide the following information:

- During which dates were the security officers working under alternative work hour controls?

Response:

The table below documents the dates when the security officers were working under the alternative work hour controls. For each instance of when alternative work hours were utilized by an individual, a Condition Report was generated under the plant's corrective action program. Note that while there were eight (8) cases documented, there were only six (6) security officers impacted.

Condition Report for use of alternative work hour controls	Dates working under alternative work hour controls
Condition Report 202006997	December 4, 2020
Condition Report 202007109	December 10, 2020
Condition Report 202007109	December 10, 2020
Condition Report 202007153	December 13, 2020
Condition Report 202007242	December 17, 2020
Condition Report 202007434	December 26, 2020
Condition Report 202007434	December 27, 2020
Condition Report 202007469	December 31, 2020

- Does the station expect to have utilized the alternative work hour controls during the fourteen (14) days prior to the requested January 16, 2021, implementation date of the subsequent exemption period? (In other words, does the station expect that they will need to utilize alternate work hours anytime between January 2 and January 15, 2021?)

Response:

No, the station does not expect to utilize alternate work hours between January 2 and January 15, 2021. The shift cycle changed on January 3, which makes more days available for security personnel to work without having to utilize the alternate work hours. However, with the COVID-19 cases increasing in the area, conditions may change such that the alternate work hours controls are utilized.

- If so, what measures have been or will be taken to address the potential for cumulative fatigue among individuals for whom alternate controls will have been utilized during that 14-day period?

Response:

In the event that the alternate work-hour controls are utilized during that 14-day period, the following administrative tools are available to address the potential for cumulative fatigue:

- During each shift brief, every security force member (SFM) is briefed to report fatigue.
  - SEC-DIR-003, "Security Operational Expectations Directive," has a stand-and-call policy to inform a supervisor if the SFM begins to feel fatigued.
  - APA-ZZ-00911, "Fatigue Management," describes the process for the management of fatigue, including provisions for self-declarations and fatigue assessments.
2. The second bullet on Page 3 of the submittal – which states that no exceedances of the work hour controls listed in 10 CFR 26.205(d)(1)-(d)(7) have occurred – appears to contradict the first bullet, which states that alternative controls were utilized for eight security officers.

Please clarify whether the alternative controls utilized for the eight officers consisted of an exceedance of the usual work hour controls outlined in 10 CFR 26.205(d)(1)-(d)(7).

Response:

Yes, as clarification, the alternative controls utilized in the eight instances did consist of an exceedance of the usual work hour controls outlined in 10 CFR 26.205(d)(1)-(d)(7).

3. The guidance contained in the November 10, 2020, letter states that licensees requesting approval for a subsequent exemption should provide the following:
  - the scheduled modes of operation for the reactor unit(s) during the subsequent exemption period.

Please provide this information.

Response:

The station is currently in a forced outage (i.e., in hot standby/Mode 3 at present). Ameren Missouri is still determining the extent of damage that caused the forced outage, as well as the repairs required, so a complete schedule for the outage is still to be developed. The intent is to return the plant to power operation (Mode 1) as soon as possible from the current forced outage, but there is no current projection of when that will occur (and therefore, it is not known whether the plant's return to power operation will occur during the requested exemption period). Another unknown is whether the plant will be taken to cold shutdown (Mode 4) for an extended period of time. In that case, the plant would be started up and returned to power through the typical Mode sequence. No additional outages are planned for the unit.

4. The guidance contained in the November 10, 2020, letter states in part that alternate work hours controls should ensure the following:
  - The calculation of work hours and days off includes all work hours and days off during the applicable calculation periods, including those work hours and days off preceding initiation of the exemption period.

Response:

The controls implemented at Callaway will ensure that the calculation of work hours and days off includes all work hours and days off during the applicable calculation periods, including those work hours and days off preceding initiation of the exemption period.

Access Authorization personnel are working with the corporate Digital Team on updating software to track work hours consistent with the work hour controls. They are currently running an evaluation in a test environment until the changes get pushed into production. In addition, Security personnel are manually tracking the hours.