



July 22, 2021

ULNRC-06651

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  
REQUEST FOR LICENSE AMENDMENT AND REGULATORY EXEMPTIONS  
FOR A RISK-INFORMED APPROACH TO ADDRESS GSI-191  
AND RESPOND TO GL 2004-02 (LDCN 19-0014)**

- References: 1. Ameren Missouri letter ULNRC-06526, "Request for License Amendment and Regulatory Exemptions for a Risk-Informed Approach to Address GSI-191 and Respond to GL 2004-02 (LDCN 19-0014)," dated March 31, 2021

In the letter identified as Reference 1, Union Electric Company (Ameren Missouri) submitted its proposed resolution for addressing GSI-191 and responding to Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," for the Callaway plant. As submitted, the letter is a combined request for regulatory exemptions and license amendment, as it also requests NRC approval of the risk-informed "RoverD" approach for addressing concerns about accident generated debris in the containment and its potential effects on sump performance and core cooling.

The license amendment request (LAR) part of Reference 1 includes proposed Technical Specification (TS) changes based on Technical Specifications Task Force (TSTF) traveler TSTF-567, Rev. 1, "Add Containment Sump TS to Address GSI-191 Issues." The primary change is the proposed addition of new TS 3.6.8, "Containment Sumps," including new Surveillance Requirement (SR) 3.6.8.1 for inspection of the sump strainers, which would replace existing SR 3.5.2.8. The proposed TS changes also include revision of TS Administrative Control (AC) 5.5.15, "Safety Function Determination Program," to clarify the application of TS LCO 3.0.6 to the containment sumps.

Several enclosures were provided with the Reference 1 letter. Enclosure 1 describes and provides the basis for the proposed regulatory exemptions identified to be needed in support of the risk-informed approach for Callaway. Enclosure 2 provides the evaluation and basis for the LAR, i.e., the proposed Technical Specification changes and method(s) of evaluation employed to establish a basis for the debris limits referenced in the revised Technical Specifications (as proposed). Enclosure 2 includes page markups and retyped pages for the affected Technical Specification (TS) pages. Enclosure 3 describes and provides details about the "RoverD" methodology used by Ameren Missouri, including the risk-informed approach to resolving GSI-191 concerns, consistent with RG 1.174 guidance. It also includes a final response to GL 2004-02, for Callaway, following the NRC's content guide for that.

Subsequent to submittal of the Reference 1 letter and enclosures, the NRC staff began its acceptance review of the submittal, and from their initial review, in particular, the NRC staff identified two concerns that require resolution. Resolution of those concerns is the basis for this follow-up letter, which is being provided as a supplement to the Reference 1 LAR. For the first concern, it was identified that the TS pages provided in Enclosure 2 to the Reference 1 letter were not fully consistent with the format of the pages contained in the Callaway Technical Specifications (in regard to the lack of a proper footer for the provided pages). It was noted that this applied as well to the TS Bases pages provided for information in Enclosure 2. In addition, a marked-up/revised Table of Contents page was not included with the TS pages, for reflecting the proposed, new TS 3.6.8. From follow-up discussions with the NRC staff about this concern, it was agreed that Ameren Missouri would submit corrected pages (i.e., replacement/additional pages) in a follow-up/supplement to the LAR.

The second concern was that the NRC staff reviewer(s) identified information (i.e., numerical values) within Enclosure 3 that appeared to be taken from a proprietary technical report and as such should be considered proprietary to the preparer of that report. (The information was not identified as proprietary in the LAR/enclosure). Ameren Missouri promptly confirmed the information as proprietary and then also identified that such information was included in Enclosure 2 as well. Action was promptly taken by the NRC to withdraw Enclosure 3 (and then Enclosure 2) from ADAMS. Ameren Missouri also took actions, including agreeing to submit a supplement to the LAR to resolve the proprietary information concern. It was determined that the best approach would be to replace the proprietary numerical values with specific references to the technical report as needed. In this way, the replacement Enclosures would not contain proprietary information and thus would not have to be redacted.

In response to the two noted concerns and how they are to be resolved, as described above, replacements are now being provided for the enclosures, i.e., Enclosures 2 and 3, that were provided with the Reference 1 letter. To be clear, the enclosures provided as Enclosures 2 and 3 to this letter are to be considered replacements for Enclosures 2 and 3 of the Reference 1 letter, respectively, and thus entirely supersede those enclosures. A summary of changes to Enclosures 2 and 3 of the Reference 1 letter, which are included in Enclosures 2 and 3 to this letter, is provided in Enclosure 1 to this letter.

The replacement documents provided in this supplemental information submittal have no impact on the changes requested and described in the LAR. As such, they 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.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," Section (b)(1), a copy of this supplemental information submittal provided in connection with the March 31, 2021 amendment application is being provided to the designated Missouri State official.

This letter does not contain new commitments.

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

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

Sincerely,



Steve J. Meyer  
Manager, Regulatory Affairs

Executed on: 7/22/2021

Enclosures: Enclosure 1 - Summary of Changes to Enclosure 2, "License Amendment Request," and Enclosure 3, "Callaway Methodology for a Risk-Informed Approach to Address Generic Letter 2004-02," of ULNRC-06526

Enclosure 2 - (Replacement for Enclosure 2, "License Amendment Request," of ULNRC-06526)

Enclosure 3 - (Replacement for Enclosure 3, "Callaway Methodology for a Risk-Informed Approach to Address Generic Letter 2004-02," of ULNRC-06526)

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