



July 29, 2021

ULNRC-06678

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

10 CFR 50.90
10 CFR 50.69

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT NO. 1
UNION ELECTRIC CO.
RENEWED FACILITY OPERATING LICENSE NPF-30
SUPPLEMENTAL INFORMATION FOR APPLICATION TO ADOPT 10 CFR 50.69, "RISK-
INFORMED CATEGORIZATION AND TREATMENT OF STRUCTURES, SYSTEMS AND
COMPONENTS FOR NUCLEAR POWER REACTORS"**

References:

1. Ameren Missouri letter ULNRC-06550, "Application to Adopt 10 CFR 50.69, 'Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors,'" dated October 30, 2020 (ML20304A454)
2. NRC Letter To Ameren Missouri, "Callaway Plant, Unit No. 1– Audit Plan and Setup of Online Reference Portal for License Amendment Request to Adopt 10 CFR 50.69, 'Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors,'" dated February 18, 2021 (ML21039A222)
3. NRC Letter to Ameren Missouri, "Audit Questions for License Amendment Request to Adopt 10 CFR 50.69, 'Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors,'" dated April 27, 2021 (ML21110A123)
4. NRC Letter To Ameren Missouri, "Callaway Plant, Unit No. 1– Audit Summary for License Amendment Request to Adopt 10 CFR 50.69, 'Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors,'" dated June 9, 2021 (ML21139A022)

On October 30, 2020, Ameren Missouri submitted a license amendment request (LAR) to the NRC to adopt the provisions of 10 CFR 50.69 per Reference 1 above. As a result of activities completed following submittal of the LAR, this letter is submitted as a supplement to the LAR in order to provide additional/revised information.

After submittal of the Reference 1 LAR, Ameren Missouri conducted a focused scope peer review on the resolution of Fire PRA Suggestion Fact & Observation (F&O) FSS-B1-03, which was an upgrade. This focused scope peer review identified additional F&Os, which were addressed and subsequently closed in an F&O closure review. This focused scope peer review and closure of all F&Os has resolved the commitment identified in Enclosure 4 of Reference 1. Therefore, an update regarding this commitment is provided in Enclosure 2 to this letter.

Much of the information provided in the Reference 1 LAR was based on Update 8.0 of the fully quantified probabilistic risk assessment (PRA) models for the Callaway Plant. However, after submittal of the Reference 1 LAR, Update 9.01 to the PRA models for Callaway Plant was issued, which included changes that were needed to address the above noted peer reviews.

Based on the changes incorporated in Update 9.01 to the PRA model, some of the information provided in Enclosure 1 of the Reference 1 LAR has now been revised, and therefore, a revised Enclosure 1 (which supersedes the previously provided Enclosure 1) is now provided as Enclosure 1 to this letter. Revision bars indicate where information has been changed.

Also, the Reference 1 LAR was prepared using Revision 2 to Regulatory Guide 1.200, "Acceptability of Probabilistic Risk Assessment Results for Risk-Informed Activities." However, after submittal of the Reference 1 LAR, Revision 3 to Regulatory Guide 1.200 was issued. Therefore, Enclosure 1 to this letter includes changes that reflect alignment to Revision 3 to the Regulatory Guide, with revision bars to indicate where information has been changed.

In addition, in a letter identified as Reference 2 above, the NRC provided its plan for conducting an audit in regard to Ameren Missouri's 10 CFR 50.69 LAR. Audit questions and information requests were provided in advance of the audit via the letter identified as Reference 3 above. The NRC then conducted the virtual audit from May 11 to May 13, 2021. Per the letter identified as Reference 4 above, the NRC subsequently provided an audit summary to Ameren Missouri. The summary included revised audit questions based on interactions between the NRC and Ameren Missouri during the audit. As a result of the audit, clarifications and supplemental information were incorporated into the LAR and are thus reflected in Enclosure 1. (Again, as previously noted, revision bars indicate where information has changed.) Along with those changes, a new Attachment 8 to Enclosure 1 is included in order to provide the NRC's revised audit questions and the Ameren Missouri response to each question.

It should be noted that the additional information and changes reflected in Enclosure 1 to this letter have no impact on 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 supplement to the Reference 1 LAR is being provided to the designated Missouri State official.

This supplement to the Reference 1 LAR was reviewed by the Callaway Plant Onsite Review Committee.

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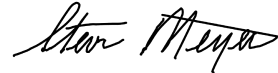
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For any questions regarding this submittal, please contact Tom Elwood (Supervisor, Regulatory Affairs - Licensing) at (314) 225-1905.

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

Sincerely,



Steve J. Meyer
Manager, Regulatory Affairs

Executed on: 07/29/2021

Enclosures:

1. Evaluation of the Proposed Change
2. Regulatory Commitment Update

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