



September 28, 2021

ULNRC-06636

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

10 CFR 50.67  
10 CFR 50.90  
10 CFR 2.390

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
LICENSE AMENDMENT REQUEST FOR ADOPTION OF ALTERNATE  
SOURCE TERM AND REVISION OF TECHNICAL SPECIFICATIONS**

References: NRC letter dated April 16, 2021, "Summary of March 15, 2021 Teleconference with Union Electric Company Regarding Proposed License Amendment Request to Implement Alternative Source Term for Callaway Plant Unit No. 1 (EPID L-2021-LRM-0020)" (ADAMS Accession No. ML21103A003)

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," and 10 CFR 50.67, "Alternate Source Term," Ameren Missouri (Union Electric) hereby requests an amendment to Renewed Facility Operating License No. NPF-30 for the Callaway Plant to incorporate the Alternate Source Term (AST) dose analysis methodology into its licensing basis and to revise Technical Specification (TS) 3.7.10, "Control Room Emergency Ventilation System (CREVS)," TS 5.5.11, "Ventilation Filter Testing Program (VFTP)," and TS 5.5.17, "Control Room Envelope Habitability Program."

Information essential to approving this request to adopt the AST dose analysis methodology, including the basis for the proposed TS changes, is provided in the enclosures to this letter. Specifically, Enclosure 1 provides an evaluation of the requested changes and includes attachments that summarize Callaway's conformance with applicable regulatory guidance for adoption of the AST and associated dose analyses. It should be noted that Enclosure 1 contains security sensitive information that is to be withheld from public disclosure pursuant to 10 CFR 2.390. A redacted version of Enclosure 1 is thus

Enclosure 1 to this letter contains sensitive information.  
Withhold from public disclosure under 10 CFR 2.390(a)(4).  
Upon removal of Enclosure 1, this letter is uncontrolled

provided as Enclosure 2. Enclosure 3 provides the proposed TS changes in the form of marked-up pages from the Callaway Plant Technical Specifications, and Enclosure 4 provides those changes in the form of "clean" (revised) pages. Enclosure 5 provides the proposed TS Bases changes in the form of marked-up pages, which are provided for information only. (The TS Bases changes will be processed in accordance with TS 5.5.14, "Technical Specification (TS) Bases Control Program.") Enclosure 6 provides the proposed FSAR changes, also for information only.

Evaluation of this amendment application pursuant to 10 CFR 50.92, "Issuance of amendment," has determined that the application does not involve a significant hazard consideration. It should also be noted that review of this amendment application pursuant to 10 CFR 50.54(q) has determined that no changes to the Radiological Emergency Response Plan requiring prior NRC approval are required.

It may be noted that this request for license amendment was discussed with the NRC staff in a public pre-submittal meeting (telephone conference) conducted on March 15, 2021, as summarized in the Reference identified on page 1 of this letter.

In may also be noted that this amendment application was reviewed by the Onsite Review Committee, and in accordance with 10 CFR 50.91, "Notice for public comment; State consultation," Section (b)(1), a copy of this amendment application is being provided to the designated Missouri State official.

Ameren Missouri requests approval of this license amendment request prior to September 30, 2022. It is anticipated that the license amendment, as approved, will be effective upon issuance and will be implemented within 120 days from the date of issuance.

For questions concerning this matter, please contact Mr. Tom Elwood at 314-225-1905.

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

Executed on: 9/28/2021

Sincerely,



Stephanie P. Banker  
Vice President, Nuclear  
Engineering and Support

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Enclosures:

1. Evaluation of Proposed Changes\*
2. Evaluation of Proposed Changes (Redacted)
3. Proposed Technical Specification Changes (Mark-up)
4. Revised Technical Specification Pages
5. Proposed TS Bases Changes (for information only)
6. FSAR Markups (for information only)

\*Enclosure contains security sensitive information.

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