



October 21, 2021

ULNRC-06688

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
REQUEST FOR LICENSE AMENDMENT TO REVISE TECHNICAL SPECIFICATIONS TO
ADOPT TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED
COMPLETION TIMES – RITSTF INITIATIVE 4B," AND TSTF-439, REVISION 2,
"ELIMINATE SECOND COMPLETION TIMES LIMITING TIME FROM DISCOVERY OF
FAILURE TO MEET AN LCO" (LDCN 20-0007)**

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit," Ameren Missouri (Union Electric Company) herewith transmits an application for amendment to Renewed Facility Operating License Number NPF-30 for the Callaway Plant. The requested amendment would revise applicable Technical Specifications to implement risk-informed Completion Times and the Risk-Informed Completion Time (RICT) Program in accordance with the guidance of TSTF-505, Revision 2. In support of the adoption of TSTF-505, TSTF-439, Revision 2, which involves the elimination of second Completion Times currently specified in the Technical Specifications, will also be adopted. In addition, the requested amendment would remove obsolete one-time Completion Times contained in the applicable Technical Specifications.

Specifically, the proposed amendment would modify the Technical Specification requirements related to Completion Times (CTs) for specific Required Actions to provide the option to calculate a longer, risk-informed CT (RICT). A new program, the Risk-Informed Completion Time Program, is to be added to TS Section 5, Administrative Controls. The methodology for using the RICT Program is described in NEI 06-09-A, "Risk Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines," Revision 0, which was approved by the NRC on May 17, 2007. Adherence to NEI-06-09-A is required by the RICT Program. The proposed amendment is consistent with NRC-approved TSTF-505, Revision 2, "Provide Risk Informed Extended Completion Times - RITSTF Initiative 4b." To support the adoption of TSTF-505, TSTF-439, Revision 2, is also adopted. TSTF-439 deletes the second Completion Times from specific Required Actions, revises the Improved Standard Technical Specification Example 1.3-3 to remove

the second Completion Times, and revises the discussion in that Example to state that alternating between Conditions in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO is inconsistent with the basis of the Completion Times and is inappropriate. Administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO will be implemented.

Essential information is provided in the Attachments and Enclosures to this letter. Attachments 1 through 6 provide the Description and Assessment of the proposed changes, a mark-up of the proposed Technical Specifications, the retyped Technical Specifications, a mark-up of the proposed Technical Specification Bases, a cross-reference between the TSTF-505 changes and Callaway Technical Specifications, and a Description and Assessment of proposed changes resulting from adoption of TSTF-439, respectively, in support of this amendment request. The mark-up of the proposed Technical Specification Bases is provided for information only. (Technical Specification Bases changes will be processed under the program for updates per TS 5.5.14, "Technical Specifications Bases Control Program," at the time this amendment is implemented.) The enclosures provide supporting technical information, as described in Attachment 1.

As described in Attachment 1, it has been determined that this license amendment application does not involve a significant hazard consideration as evaluated per 10 CFR 50.92, "Issuance of amendment." It has also been determined that pursuant to 10 CFR 51.22, "Criterion categorical exclusion or otherwise not requiring environmental review," Section (b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

This submittal does not contain new commitments.

The Callaway Plant Onsite Review Committee has reviewed and approved the proposed changes and has approved the submittal of this amendment application.

Ameren Missouri requests approval of the requested license amendment within 12 months of the date of receipt of this letter. Ameren Missouri further requests that the license amendment be made effective upon NRC issuance, to be implemented within 180 days from the date of issuance.

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.

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

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

Sincerely,



Stephanie P. Banker
Vice President, Nuclear Engineering
and Support

Executed on: 10/21/21

Attachments:

1. Description and Assessment
2. Proposed Technical Specification Changes (Mark-up)
3. Revised Technical Specification Pages
4. Proposed Changes To Technical Specification Bases Changes (Mark-Up) Pages (For Information)
5. Cross-Reference of TSTF-505 and Callaway Technical Specifications
6. Description and Assessment Specific to TSTF-439

Enclosures:

1. List of Revised Required Actions to Corresponding PRA Functions
2. Information Supporting Consistency with Regulatory Guide 1.200, Revision 2
3. Information Supporting Technical Adequacy of PRA Models Without PRA Standards Endorsed by Regulatory Guide 1.200, Revision 2
4. Information Supporting Justification of Excluding Sources of Risk Not Addressed by the PRA Models
5. Baseline Core Damage Frequency (CDF) and Large Early Release Frequency (LERF)
6. Justification of Application of At-Power PRA Models to Shutdown Modes
7. PRA Model Update Process
8. Attributes of the Real Time Risk Model
9. Key Assumptions and Sources of Uncertainty
10. Program Implementation
11. Monitoring Program
12. Risk Management Action Examples

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