



December 22, 2021

ULNRC-06705

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
FINAL SUPPLEMENT TO LICENSE AMENDMENT REQUEST 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)
5. Ameren Missouri Letter ULNRC-06678, "Supplemental Information for Application to Adopt 10 CFR 50.69, 'Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors'" dated July 29, 2021 (ML21210A025)
6. NRC Letter to Ameren Missouri, "Request for Additional Information - Callaway Plant, Unit 1 - License Amendment Request to Adopt 10 CFR 50.69, 'Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors,'" transmitted September 14, 2021
7. Ameren Missouri Letter ULNRC-06689, "Response to Request for Additional Information Regarding License Amendment Request to Adopt 10 CFR 50.69, 'Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors,'" dated October 13, 2021 (ML21286A681)

On October 30, 2020, per Reference 1 above, Ameren Missouri submitted a license amendment request (LAR) to the NRC to adopt the provisions of 10 CFR 50.69 for the Callaway plant. Based on the risk-informed categorization of equipment, the provisions of 10 CFR 50.69 allow adjustment of the scope of equipment subject to special treatment controls (e.g., quality assurance, testing, inspection, condition monitoring, assessment, and evaluation). This allows for improved focus on equipment that has safety significance, with a resultant improvement in plant safety.

At present, NRC review and processing of the Callaway LAR for adopting the provisions of 10 CFR 50.69 is nearly complete. This includes completion of the NRC staff's technical review of the LAR, completion of a regulatory audit, and issuance of requests for additional information, for which all responses have been submitted by Ameren Missouri and reviewed by the NRC staff. (All docketed correspondence related to these activities is reflected as References 1 through 7 above.) Recently, however, during verbal discussions with the NRC staff regarding the forthcoming license amendment, an NRC comment was received, which (as explained below) requires a specific change to be made to what was proposed in the Reference 1 LAR, thus requiring submittal of this letter.

In particular, in the Reference 1 LAR, a License Condition was proposed for the Callaway Operating License (OL) in accordance with NRC expectations for LARs requesting adoption of the provisions of 10 CFR 50.69. The proposed License Condition allows for implementation of the provisions of 10 CFR 50.69 by recognizing the program established for that and establishing necessary controls on the program. For Callaway, proposed License Condition 2.C.(19) was specifically proposed to be added to the Callaway Operating License (OL). The proposed License Condition was presented as a mark-up to the OL in Enclosure 2 of the Reference 1 LAR and in a "clean" copy of the affected OL pages (reflecting incorporation of the proposed License Condition) which was provided as Enclosure 3 of the LAR. The wording of the proposed License Condition was not changed in any of the subsequent correspondence identified as References 5 through 7 above; however, based on the recent comment from the NRC, a change is now needed to support approval of the proposed license amendment.

The change to be made to proposed License Condition 2.C.(19) is simply to add the following sentence at the end of what has already been proposed for the License Condition:

Prior NRC approval, under 10 CFR 50.90, is required for a change to the categorization process specified above (e.g., change from a seismic margins approach to a seismic probabilistic risk assessment approach).

The added sentence is needed to ensure that a license amendment is sought for a change to be made to the categorization process, i.e., of the type suggested by the included example (within parenthesis). The addition of this sentence to the proposed License Condition for Callaway is therefore reflected in a new mark-up of the affected Callaway OL page, as provided in Enclosure 1 to this letter. Accordingly, the change/addition is also reflected in the proposed "clean" pages for the proposed OL revision, per Enclosure 2 to this letter. Enclosures 1 and 2 thus supersede what was originally provided in corresponding Enclosures 2 and 3 of the Reference 1 LAR, in light of the revised License Condition wording.

It should be noted that there is one other difference between Enclosure 2 (provided herewith) and Enclosure 3 of the Reference 1 LAR, in regard to the number of revised OL pages provided (as "clean" pages). The difference is due to the addition/incorporation of new Licensing Condition 2.C.(19) which requires repagination of the OL pages containing the Licensing Condition and the pages that immediately follow the License Condition in the OL (including Attachments 1 and 2 of the OL). This effect was not reflected in Enclosure 3 of the Reference 1 LAR, but it is reflected now in Enclosure 2.

It should also be noted that in Section 2.3 of Enclosure 1 to the Reference 1 LAR, a description of the proposed change to the OL was provided, as part of the standard LAR contents. In describing the proposed change, the complete text of proposed Licensing Condition 2.C.(19) was provided. That text of course did not include the additional sentence being proposed now. It should thus be made clear that the License Condition proposed in this letter and its enclosures is now regarded as the complete and proposed License Condition. Revision and re-submittal of Enclosure 1 to the Reference 1 LAR was deemed to be unnecessary, based on that understanding.

Finally, it should be noted that the additional information provided in the enclosures to this letter has no impact on the "No Significant Hazards Consideration" conclusions reached in the LAR, nor does it 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 final supplement to the Reference 1 LAR was reviewed by the Callaway Plant Onsite Review Committee.

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: 12/22/2021

Enclosures:

1. Mark-up of Operating License (OL)
2. Clean Copy of Affected OL Pages (Reflecting Proposed Change)

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