



January 27, 2022

ULNRC-06690

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
FOURTH (POST-AUDIT) 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)
(EPID L-2021 LLA 0059 AND EPID L-2021-LLE-0021)**

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 (ADAMS Accession No. ML21090A184)
2. Ameren Missouri Letter ULNRC-06664, "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)," dated May 27, 2021 (ADAMS Accession No. ML21147A222)
3. Ameren Missouri letter ULNRC-06651, "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)," dated July 22, 2021 (ADAMS Accession No. ML21203A192)
4. Ameren Missouri letter ULNRC-06692, "Third 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)," dated October 7, 2021 (ADAMS Accession No. ML21280A379)
5. NRC Letter to Ameren Missouri, "Callaway Plant, Unit No. 1 – Audit Plan and Setup of Online Reference Portal for License Amendment Request Regarding Risk-Informed Approach for Closure of Generic Safety Issue-191 (EPID L-2021-LLA-0059)," dated July 23, 2021 (ADAMS Accession No. ML21197A063)
6. NRC Letter to Ameren Missouri, "Callaway Plant, Unit No. 1– Audit Summary for License Amendment Request and Regulatory Exemptions for a Risk-Informed Approach to Address Generic Safety Issue-191 and Respond to Generic Letter 2004-02 (EPID L-2021 LLA 0059 and EPID L-2021-LLE-0021)," dated September 14, 2021 (ADAMS Accession No. ML21238A138)

Enclosure 6 to this letter contains proprietary information.
Withhold from public disclosure under 10 CFR 2.390.
Upon removal of Enclosure 6 this letter is uncontrolled.

On March 31, 2021, Ameren Missouri submitted a license amendment request (LAR), in combination with a request for regulatory exemptions, to the NRC in order to adopt a risk-informed approach to resolve GSI-191 and respond to GL 2004-02, per Reference 1 above. Supplements to the LAR and regulatory exemption requests were submitted per References 2, 3, and 4 above. As a result of additional activities completed following submittal of the LAR and regulatory exemption requests, this letter is submitted as a supplement to the LAR and request for regulatory exemptions, in order to provide additional/revised information.

In the letter identified as Reference 5 above, the NRC provided its plan for conducting an audit in regard to Ameren Missouri's LAR and request for regulatory exemptions, which included topics, discussion questions, and information requests (i.e., audit items) for the audit. The NRC then conducted the virtual audit from August 10 to August 12, 2021, with a concluding session on August 17, 2021. Following the audit, and per the letter identified as Reference 6 above, the NRC provided an audit summary to Ameren Missouri. In an appendix to the provided audit summary, a summary discussion of each audit item was provided, which included what additional information is needed for the audit item and whether a follow-up written response for the item/discussion point is needed. The main purpose of this letter is to provide the required responses, which are hereby provided in Enclosures 5 and 6 to this letter.

The reason for providing two enclosures (i.e., Enclosures 5 and 6) is that the response to one of the audit items/discussion points in Enclosure 5, i.e., audit item/question 27, contains information from WCAP-17788-P (Rev. 0), "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090)," which is proprietary to Westinghouse. Enclosure 5 contains the responses to all of the identified audit questions/responses, including a redacted version of the response to audit item/question 27. Enclosure 6 contains the full, proprietary response to audit item/question 27 (but only that response). It is accordingly requested that Enclosure 6 be withheld from public disclosure under 10 CFR 2.390. Information regarding the basis for the proprietary information presented in Enclosure 6 is provided in Enclosures 5 and 6.

The responses provided in Enclosures 5 and 6 provide new information and in some cases require changes to be made to the enclosures provided in the original (Reference 1) LAR. As all four of the enclosures provided in the LAR are affected, updated versions of Enclosures 1, 2, 3 and 4 are provided with this letter. Revision bars are used to indicate where text/information in the enclosures has been changed. (Although updates/changes are being made to the primary licensing document markups or "clean" pages provided in Enclosure 2, i.e., in Attachments 2-2 through 2-5, revision bars were not used to show new information since revision bars are already used therein to show what changes are being made to the licensing documents.)

Finally, in regard to the responses provided in Enclosure 5, it is noted in the response to audit item/question 23 that a complete response has not yet been fully developed. (All other responses are considered complete.) Please be advised, therefore, that Ameren Missouri intends to submit a follow-up letter (supplement) for providing the complete response in the near future.

Enclosure 6 to this letter contains proprietary information. Withhold from public disclosure under 10 CFR 2.390. Upon removal of Enclosure 6 this letter is uncontrolled.

In regard to the LAR, it should be noted that the new/additional information and changes reflected in the enclosures 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 and regulatory exemption requests is being provided to the designated Missouri State official. This supplement to the Reference 1 LAR and regulatory exemption requests 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: 1/27/2022

Enclosure 6 to this letter contains proprietary information.
Withhold from public disclosure under 10 CFR 2.390.
Upon removal of Enclosure 6 this letter is uncontrolled.

Enclosures:

1. Request for Exemptions for Callaway Risk-Informed Approach to Resolution for Generic Letter 2004-02
 - Attachment 1-1 Request for Exemption from 10 CFR 50.46(a)(1)
 - Attachment 1-2 Request for Exemption from General Design Criterion 35
 - Attachment 1-3 Request for Exemption from General Design Criterion 38
 - Attachment 1-4 Request for Exemption from General Design Criterion 41
2. License Amendment Request for Callaway Risk-Informed Approach to Resolution of Generic Letter 2004-02
 - Attachment 2-1 List of Regulatory Commitments
 - Attachment 2-2 Technical Specification Page Markups
 - Attachment 2-3 Technical Specification Bases Page Markups (for information only)
 - Attachment 2-4 Retyped Technical Specification Pages
 - Attachment 2-5 Final Safety Analysis Report Page Markups (for information only)
3. Callaway Methodology for a Risk-Informed Approach to Address Generic Letter 2004-02
 - Attachment 3-1 Introduction
 - Attachment 3-2 Deterministic Basis - Generic Letter 2004-02 Supplemental Response
 - Attachment 3-3 Risk-Informed Basis
 - Attachment 3-4 Defense-In-Depth and Safety Margin
4. Acronyms and Definitions
5. LAR Supplement to Address Audit Discussion Points Summarized in NRC Letter Dated September 14, 2021 (ML21238A138) (Redacted)
6. Response to Audit Question/Item 27 in NRC Letter Dated September 14, 2021 (ML21238A138) (Unredacted)

Enclosure 6 to this letter contains proprietary information.
Withhold from public disclosure under 10 CFR 2.390.
Upon removal of Enclosure 6 this letter is uncontrolled.

cc: Mr. Scott A. Morris
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Steedman, MO 65077

Mr. Mahesh Chawla
Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O81A
Washington, DC 20555-0001

Enclosure 6 to this letter contains proprietary information.
Withhold from public disclosure under 10 CFR 2.390.
Upon removal of Enclosure 6 this letter is uncontrolled.

Index and send hardcopy to QA File A160.0761

Hardcopy:

Certrec Corporation
6500 West Freeway, Suite 400
Fort Worth, TX 76116
(Certrec receives ALL attachments as long as they are non-safeguards and may be publicly disclosed.)

Electronic distribution for the following can be made via Tech Spec ULNRC Distribution:

F. M. Diya
B. L. Cox
F. J. Bianco
S. P. Banker
B. L. Jungmann
M. A. McLachlan
K. A. Mills
S. J. Meyer
D. S. Pallardy
T. B. Elwood
R. J. Andreasen
NSRB Secretary
STARS Regulatory Affairs
Mr. Jay Silberg (Pillsbury Winthrop Shaw Pittman LLP)
Ms. Clair Eubanks (Missouri Public Service Commission)
Ms. Katie Jo Wheeler (DNR)

Enclosure 6 to this letter contains proprietary information.
Withhold from public disclosure under 10 CFR 2.390.
Upon removal of Enclosure 6 this letter is uncontrolled.