June 2, 2022

ULNRC-06729

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

10 CFR 50.12
10 CFR 50.90

Ladies and Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
RENEWED FACILITY OPERATING LICENSE NPF-30
APPLICATION FOR TECHNICAL SPECIFICATION CHANGE AND EXEMPTION
REQUEST REGARDING TRANSITION TO FRAMATOME FUEL, LDCN 22-0002

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit," and 10 CFR 50.12, "Specific exemptions," Ameren Missouri (Union Electric Company) herewith transmits an application for amendment to Renewed Facility Operating License Number NPF-30 and asks for exemption from specific regulations for Callaway Plant Unit 1.

The proposed license amendment request (LAR) will revise the Technical Specifications (TS) to allow the use of Framatome GAIA fuel at Callaway Plant Unit 1. Additionally, pursuant to 10 CFR 50.12, Ameren Missouri requests an exemption from the provisions of 10 CFR 50.46, "Acceptance criteria for emergency core cooling systems for light-water nuclear power reactors," and Appendix K to 10 CFR 50, "ECCS Evaluation Models," to allow the use of M5® fuel rod cladding in future core reload applications.

Enclosure 1 provides the evaluation of the proposed TS changes, including the description of the proposed changes, the no significant hazards consideration determination, the existing TS pages marked up to reflect the proposed changes, the revised (clean) TS pages, an informational copy of the marked-up TS Bases, and the supporting technical evaluations for the new fuel. Within Enclosure 1 are attachments that provide the Framatome affidavits for withholding of proprietary technical reports from the public; the supporting Framatome proprietary technical reports referenced in the technical

Enclosure 1 Attachments 9, 10, 11 and 12 to this letter contain sensitive information. Withhold from public disclosure under 10 CFR 2.390(a)(4). Upon removal of Enclosure 1 Attachments 9, 10, 11 and 12, this letter is uncontrolled.

evaluation, and attachments that provide the non-proprietary version of the Framatome technical reports.

Enclosure 2 provides the request for exemption from 10 CFR 50.46 and Appendix K to 10 CFR 50 requirements for the use of M5 clad for the new fuel.

Independent of this license amendment application, a separate LAR will be submitted to address changes required as a result of an updated spent fuel pool criticality analysis. That analysis is ongoing and requires the coordination of multiple vendors which precludes it from being ready for submittal as part of this LAR. The separate LAR will address a change to TS 4.3, Fuel Storage, to reflect the physical differences associated with the GAIA fuel. In addition, that LAR will also address a change to TS 3.7.17, Spent Fuel Assembly Storage. The separate submittal of that LAR will also require approval prior to the date required for this submittal and, therefore, is being treated as a separate licensing action. As previously indicated, approval of this fuel transition amendment is not reliant on the approval of the amendment addressing spent fuel storage.

It has been determined that this license amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92, "Issuance of amendment." 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.

Further, this submittal does contain new commitments. Enclosure 3 provides the new regulatory commitments (as defined by NEI 99-04, "Guidelines for Managing NRC Commitment Changes," Revision 0) to be implemented.

In accordance with the Callaway Operating Quality Assurance Manual, the 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 prior to September 30, 2023. Ameren Missouri further requests that the license amendment be made effective upon NRC issuance, to be implemented prior to commencement of operating cycle 27.

In accordance with 10 CFR 50.91 "Notice for public comment; State consultation," Section (b)(1), a copy of this license 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,

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Fred J. Bianco
Senior Director, Nuclear Operations

Executed on: 6/2/22

Enclosures:
1. Description and Assessment of the Proposed Change
   Attachments to Enclosure 1 include:
   1 Marked-up Existing Technical Specifications
   2 Revised Clean Technical Specifications
   3 Marked-up Technical Specification Bases
   4 Framatome Affidavits for Withholding
   5 Non-Proprietary Version LAR Inputs Document
   6 Non-Proprietary Version RLBLOCA Summary Report
   7. Non-Proprietary Version SBLOCA Summary Report
   8. Non-Proprietary Version Non-LOCA Summary Report
   9. Proprietary Version LAR Inputs Document
   10 Proprietary Version RLBLOCA Summary Report
   11 Proprietary Version SBLOCA Summary Report
   12 Proprietary Version Non-LOCA Summary Report
2. Exemption Request
3. Regulatory Commitments

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cc: Mr. Scott A. Morris
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