



SENSITIVE INFORMATION – WITHHOLD UNDER 10 CFR 2.390(a)(4)

August 29, 2022

ULNRC-06723

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
LICENSE AMENDMENT REQUEST REGARDING PROPOSED TECHNICAL
SPECIFICATION CHANGES FOR SPENT FUEL STORAGE (LDCN 22-0015)**

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 Facility Operating License Number NPF-30 for the Callaway Plant Unit 1 (Callaway). The proposed license amendment request (LAR) would revise Technical Specification (TS) TS 3.7.16, "Fuel Storage Pool Boron Concentration"; TS 3.7.17, "Spent Fuel Assembly Storage"; Figure 3.7.17-1, "Minimum Required Fuel Assembly Burnup as a Function of Initial Enrichment to Permit Storage in Regions 2 and 3"; and TS 4.3.1, "Criticality."

The proposed TS changes are needed to reflect the performance of a new/revised criticality safety analysis (CSA) for fuel assembly storage in the Callaway spent fuel pool (SFP) storage racks, based on the methodology described in Attachment 6 of Enclosure 1, which is compliant with the guidance in Regulatory Guide 1.240, "Fresh and Spent Fuel Pool Criticality Analyses," Revision 0. Specifically, the updated CSA will: (1) revise the current CSA based on the latest methodologies consistent with current NRC guidance and acceptance criteria, (2) simplify the storage configuration by establishing two regions within the spent fuel racks (SFRs) located within the SFP, and (3) provide an evaluation that encompasses a future fuel design. The scope of this change does not include the new fuel storage facility.

Attachment 6 to this letter contains sensitive information. Withhold from public disclosure under 10 CFR 2.390(a)(4). Upon removal of Attachment 6, this letter is uncontrolled.

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TS Bases changes, consistent with the proposed revision to TS 3.7.16 and TS 3.7.17, are included for information. Final TS 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.

Enclosure 1 provides the evaluation and supporting technical justification for the proposed changes. Attachments to Enclosure 1 are summarized below:

- Attachment 1 provides the proposed marked-up TS pages.
- Attachment 2 provides the re-typed clean TS pages.
- Attachment 3 provides the marked-up TS Bases pages (for information only).
- Attachment 4 provides the HOLTEC International, Inc. (HOLTEC) affidavit for withholding proprietary information from public disclosure.
- Attachment 5 contains the Criticality Safety Evaluation Report (Non-proprietary version)
- Attachment 6 contains the Criticality Safety Evaluation Report (Proprietary version)

Since Attachment 6 contains information proprietary to HOLTEC, it is supported by an affidavit signed by a representative of the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.390. Accordingly, it is respectfully requested that the proprietary information be withheld from public disclosure in accordance with 10 CFR 2.390.

Ameren Missouri has evaluated the proposed amendment and determined that it 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. The basis for these determinations is included in Enclosure 1.

This submittal does not contain new commitments.

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 June 23, 2023. Ameren Missouri further requests that the license amendment be made effective upon NRC issuance, to be implemented within 90 days from the date of issuance. The requested due date is associated with the expected date of receipt of four Framatome GAIA fuel assemblies that are to be used during operating cycle 27. These assemblies will require storage in the SFP until placement in the reactor core during the refueling outage scheduled for the fall of 2023. A separate license amendment request to support Callaway's use of Framatome's GAIA fuel is under development.

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.

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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,



Fred J. Bianco
Senior Director, Nuclear Operations

Executed on: 8/29/2022

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Enclosure 1 – Description and Assessment of the Proposed Change

Enclosure 1 contains the following Attachments:

1. Marked-up Existing Technical Specifications
2. Revised Clean Technical Specifications
3. Marked-up Technical Specification Bases (For Information Only)
4. HOLTEC Affidavit for Withholding
5. Criticality Safety Evaluation Report (Non-Proprietary Version)
6. Criticality Safety Evaluation Report (Proprietary Version)

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