



December 1, 2022

ULNRC-06781

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 TO CLARIFY SUPPORT SYSTEM REQUIREMENTS
FOR THE RESIDUAL HEAT REMOVAL SYSTEM AND CONTROL ROOM AIR
CONDITIONING SYSTEM UNDER TECHNICAL SPECIFICATIONS
3.4.8, 3.7.11, AND 3.9.6 (LDCN 22-0029)**

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. The proposed amendment is requesting NRC approval of a change (clarification) to the plant's licensing basis, i.e., the Technical Specification (TS) Bases and FSAR, to allow use of one train of the normal, non-safety related Service Water system to solely provide cooling water support for one of two redundant trains of TS-required equipment when both equipment trains are required to be Operable during cold shutdown/refueling conditions. The supported equipment/systems affected by the proposed change are the Residual Heat Removal system and Control Room Air Conditioning system, as applicable during Modes 5 and 6. The applicable/affected TS Limiting Conditions of Operation (LCOs) are TS LCO 3.4.8, "RCS Loops – Mode 5, Loops Not Filled," TS LCO 3.7.11, "Control Room Air Conditioning System (CRACS)," and TS LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level."

The proposed change to the licensing basis was determined to be needed following the results of the most recently completed Biennial Problem Identification and Resolution Inspection at the Callaway plant (September 2022). Three green, non-cited violations (NCVs) were identified from the inspection, and one of those described in the resultant NRC Inspection Report (i.e., NCV 05000483/2022010-02) reflects an NRC position that is different from how the plant's licensing basis was previously interpreted at Callaway. Prior to the inspection, use of Service Water (in lieu of

safety-related Essential Service Water) to support one (and only one) of the two trains of RHR during Modes 5 and 6 was considered to be consistent with the Improved Standard Technical Specifications (NUREG-1431) and their Bases, as adopted by Callaway in the 1999-2000 timeframe, in which an underlying basis for system requirements in Modes 5 and 6 is that it is not necessary to assume a single failure concurrent with a loss of offsite power during these Modes. This is reflected, for example, in the less restrictive Technical Specification requirements for electrical power sources and distribution in Modes 5 and 6, which permit non-safety related power sources and distribution to be used for one train of equipment when redundant equipment trains are required in these Modes.

In light of the NCV, continued application of the previous interpretation regarding cooling water support for RHR in Modes 5 and 6 must be considered a change to the plant's licensing basis. From 10 CFR 50.59 review of this change, it has been determined that NRC approval is required, based on the conservative determination that the proposed change involves more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the FSAR, per 10 CFR 50.59(c)(2)(ii).

The enclosure to this letter provides the evaluation of the proposed change and contains attachments that provide markups of the affected FSAR pages and TS Bases sections.

It has been determined that this 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 not contain new commitments.

The Callaway 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 October 11, 2023. This requested approval date will support scheduling and/or contingencies for the next planned refueling outage (fall 2023), which is the next period during which the TS sections of concern are anticipated to be applicable. Specifically, the flexibility to utilize the Service Water system as a support system to one train of RHR and CRACS during Modes 5 and 6 allows for a more efficient approach to scheduling maintenance and system/train outages for the Essential Service Water system during plant refueling outages, without a corresponding reduction in plant safety or an increase in overall risk. 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.

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,



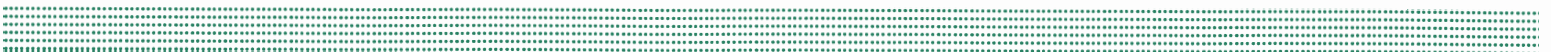
Deborah Farnsworth
Senior Director, Nuclear Operations

Executed on: December 1, 2022

Enclosure: Description and Assessment of the Proposed Change

Attachments to the Enclosure:

1. Proposed FSAR Changes (Markups)
2. Proposed TS Bases Changes (Markups)



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