



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

May 9, 2023

ULNRC-06808

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
POST-AUDIT SUPPLEMENT TO LICENSE AMENDMENT REQUEST AND
EXEMPTION TO ALLOW USE OF FRAMATOME GAIA FUEL (LDCN 22-0002)
EPID L-2022-LLA-0150 AND EPID L-2022-LLE-0030**

References: Provided on Page 3

In the letter identified in Reference 1, Union Electric Company (Ameren Missouri) submitted an application for amendment and exemption request to Renewed Facility Operating License Number NPF-30 for the Callaway Plant, Unit 1 (Callaway). The requested amendment and exemption request would allow use of a limited number of Framatome GAIA fuel assemblies at Callaway. In the letter identified in Reference 2, Ameren Missouri provided its first supplement to the application for amendment (and exemption request). That supplement provided information needed to support acceptance of the requested license amendment and regulatory exemption. This supplement to Ameren Missouri's application herein provides information requested by the NRC resulting from the audit described in References 3, 4 and 5, which was conducted April 3 through 20, 2023.

Enclosure 1 to this letter contains sensitive information. Withhold from public disclosure under 10 CFR 2.390(a)(4). Upon removal of Enclosure 1, this letter is uncontrolled.

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Three enclosures are provided in this letter. Enclosure 1 provides Ameren Missouri's detailed responses to the information requests contained in References 3, 4 and 5. Enclosure 2 provides an affidavit for withholding proprietary information from public disclosure. Enclosure 3 provides the non-proprietary version of the content provided in Enclosure 1.

Since Enclosure 1 contains information identified as proprietary to Framatome, Inc., 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.

The supplemental information provided in Enclosure 1 to this letter has no impact on the changes requested and described in the LAR. As such, the supplemental information does not change 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.

Further, 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 supplement to the amendment request.

If there are any questions, please contact Mr. Tom Elwood, Supervisor Regulatory Affairs and Licensing, at 314-225-1905.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Deborah E. Farnsworth

Senior Director, Nuclear Operations

Executed on: _____

5/9/23

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Enclosures:

1. Response to Audit Questions (Proprietary Version)
2. Affidavit for Withholding
3. Response to Audit Questions (Non-Proprietary Version)

References:

1. Ameren Missouri letter ULNRC-06768, "Application for Technical Specification Change and Exemption Request Regarding Use of Framatome GAIA Fuel (LDCN 22-002)," dated October 12, 2022 (ADAMS Accession No. ML22285A115)
2. Ameren Missouri letter ULNRC-06783, "Supplement to License Amendment and Exemption Request Regarding Use of Framatome GAIA Fuel (LDCN 22-002) (EPID L-2022-LLA-0150 and L-2022-LLE-0030)," dated December 1, 2022 (ADAMS Accession No. ML22335A498)
3. NRC letter "Callaway Plant, Unit No. 1 – Regulatory Audit Plan and Setup of Online Reference Portal for License Amendment Request And Exemption For Fuel Transition To Framatome GAIA Fuel (EPID L-2022-LLA-0150 AND EPID L-2022-LLE-0030)," dated March 20, 2023 (ADAMS Accession No. ML23068A375)
4. NRC email "Regulatory Audit Questions - Callaway LAR And Exemption For Fuel Transition To Framatome GAIA Fuel - EPIDs - L-2022-LLA-0150 and L-2022-LLE-0030," dated April 17, 2023 (ADAMS Accession No. ML23107A181)
5. NRC email "Regulatory Audit Question - Callaway LAR And Exemption For Fuel Transition To Framatome GAIA Fuel – EPIDs - L-2022-LLA-0150 and L-2022-LLE-0030," dated April 24, 2023 (ADAMS Accession No. ML23114A230)

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Ms. Claire Eubanks (Missouri Public Service Commission)

Mr. Aaron Schmidt (DNR)

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