



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 19, 2024

Fadi Diya
Senior Vice President and
Chief Nuclear Officer
Ameren Missouri
Callaway Energy Center
8315 County Road 459
Steedman, MO 65077

SUBJECT: CALLAWAY PLANT, UNIT NO. 1 – ACCEPTANCE OF REQUESTED
LICENSING ACTION – PROPOSED ALTERNATIVE TO THE REQUIREMENTS
OF THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS CODE
(EPID L-2023-LLR-0061)

Dear Fadi Diya:

By letter dated October 26, 2023 (Agencywide Documents Access and Management System, Accession No. ML23299A195), as supplemented by letter dated December 21, 2023 (ML23355A180), Union Electric Company (Ameren Missouri, the licensee) submitted a request for relief from requirements of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, Subsection IWL regarding examination and testing of the unbonded post-tensioning system (Relief Request C3R-01) for Callaway Energy Center (Callaway Plant). The ASME BPV Code, Section XI, Subsection IWL requires periodic visual examination of containment concrete as well as visual examination and physical testing of post-tensioning system. Ameren Missouri proposes extending the interval for post-tensioning system examinations and testing and detailed visual examination of concrete adjacent to tendon bearing plates from 5 years to 10 years.

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff's acceptance review of the proposed relief request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether any submittal has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1) and 10 CFR 50.55a(z)(2), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of 10 CFR 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your submittal, as supplemented, and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternative in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, as supplemented, the NRC staff has estimated that this licensing request will take approximately 320 hours to complete. The NRC staff expects to complete this review by August 15, 2024. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the applications; they could change, due to several factors including requests for additional information, and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at 301-415-8371 or via email at Mahesh.Chawla@nrc.gov.

Sincerely,

/RA/

Mahesh L. Chawla, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
As stated

cc: Listserv

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