



January 29, 2025

ULNRC-06915

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  
PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS TO ALLOW H-08 CONTROL  
ROD TO BE REMOVED FOR CYCLE 28 (LDCN 25-0005)**

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 license amendment would revise TS 4.2.2 to add a note permitting operation with 52 control rods during Cycle 28 in lieu of the 53 control rods normally required per TS 4.2.2. In particular, based on the results of control rod drop tests performed over the last few years at Callaway, troubleshooting is scheduled to be performed for control rod H-08 during Refuel 27 (scheduled to begin on March 29, 2025). The troubleshooting activity could indicate the need for a repair that would not be able to be performed during the outage. In that case, control rod H-08 would be removed and remain removed from the reactor throughout Cycle 28 (per the proposed TS change) such that the H-08 control rod drive mechanism would be repaired or replaced in Refuel 28.

The Enclosure to this letter provides additional details, including an evaluation of the impact of having control rod H-08 removed per the proposed change to TS 4.2.2, for Cycle 28. Attachments 1 and 2 to the Enclosure provide a markup of Technical Specifications and retyped Technical Specifications changes, respectively, in support of this license amendment request (LAR).

As further explained in the Enclosure, 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." Additionally, 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. It should also be noted that, 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.

Further, this submittal does not contain or involve any new or revised commitments.

The Callaway Onsite Review Committee has reviewed and approved the proposed changes and has approved the submittal of this amendment application.

Ameren Missouri respectfully requests review of the requested license amendment on an expedited basis such that it is approved and issued on or before core reload during Refuel 27, which is scheduled to occur on approximately April 17, 2025 (which is subject to change with any outage schedule changes). 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 intent of this LAR is to allow the NRC at least some time for review and approval of the request ahead of Refuel 27, in lieu of being asked to process a license amendment on an exigent basis upon identification of the need during the outage.

If there are any questions, please contact Thomas Elwood, Manager - Regulatory Affairs, at 314-225-1905.

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

Sincerely,



Travis Hart,  
Senior Director, Nuclear Operations  
and Plant Manager

Executed on: 1/28/25

TRW

Enclosure: Description and Assessment of the Proposed Change

Attachments to the Enclosure:

1. Technical Specifications Page Markups
2. Retyped Technical Specification Pages

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