

**From:** Chawla, Mahesh  
**Sent:** Thursday, March 10, 2022 6:24 PM  
**To:** Elwood, Thomas B  
**Cc:** Dixon-Herrity, Jennifer; Hoffman, Raymond; norris, michael; Quichocho, Jessie  
**Subject:** Callaway Plant, Unit 1 - LIC-109 Acceptance of License Amendment Request for Proposed Revision to Radiological Emergency Response Plan Regarding Response and Notification Goals - EPID L-2022-LLA-0024

Dear Mr. Elwood,

By letter dated February 8, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22039A317), Union Electric Company dba Ameren Missouri (the licensee), submitted a license amendment request for Callaway Plant, Unit 1. In the application, Ameren Missouri (Union Electric Company) requests NRC approval of proposed changes to the Radiological Emergency Response Plan (RERP) for the Callaway Plant, as contained in proposed Revision 54 to the plan. The changes proposed per Revision 54 of the RERP are being submitted for approval prior to implementation, pursuant to 10 CFR 50.54(q)(4). The proposed RERP changes would: 1) Remove the 15-minute and 30-minute "Normal Hours" response and activation goals, leaving the 75-minute and 90-minute "Off-Normal Hours" activation goals as the station standard to cover all hours, and 2) Extend the State and counties "follow-up" notification goal from 30 minutes to 60 minutes and allow for even further increases when conditions are stable, with the agreement of the State of Missouri and local counties. These changes are considered to constitute a reduction in effectiveness of the RERP.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment 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 the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application 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 amendment 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 NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal and discussions during the pre-licensing meeting on August 2, 2021 [Meeting Summary dated September 7, 2021 (ADAMS Accession No. ML21243A004)], the NRC staff has estimated that this licensing request will take approximately 250 hours to complete. The NRC staff expects to complete this review in approximately 12 months, which is March 10, 2023. 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 application and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. 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, you can contact me. Thanks

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