



September 8, 2022

ULNRC-06766

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
CORRECTION OF TEXT CONTAINED IN ENCLOSURES PROVIDED
WITH SUPPLEMENTS TO REQUEST FOR LICENSE AMENDMENT AND
REGULATORY EXEMPTIONS FOR A RISK-INFORMED APPROACH
TO ADDRESS GSI-191 AND RESPOND TO GL 2004-02 (LDCN 19-0014)
(EPID L-2021-LLA-0059 AND EPID L-2021-LLE-0021)**

On March 31, 2021, and per Reference 1 identified in the list of references on page 5 of this letter, Ameren Missouri (Union Electric Company) submitted a license amendment request (LAR) to the NRC, in combination with a request for regulatory exemptions, to adopt a risk-informed approach for resolving GSI-191 and responding to Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," for the Callaway plant.

The combined submittal requests NRC approval of the risk-informed "RoverD" approach for addressing concerns about postulated, accident-generated debris in the containment and its potential effects on containment sump performance and core cooling in the event of pipe break/loss-of-coolant accident (LOCA) in the containment. This approach shows that the risk associated with debris from pipe breaks that generate quantities of debris not bounded by plant-specific prototypical testing is very small (in accordance with the acceptance criteria of RG 1.174). On the deterministic side, it shows that the effects of debris bounded by the plant-specific testing are acceptable or mitigated in accordance with NRC-accepted methodology for resolution of GL 2004-02.

As part of the requested changes, new Callaway Technical Specification (TS) 3.6.8, "Containment Sumps," based on Technical Specification Task Force (TSTF) traveler TSTF-567, "Add Containment

Sump TS to Address GSI-191 Issues," (Rev. 1) is proposed such that it would be dedicated to the containment sumps in lieu of having the sumps addressed only as a support system behind the Emergency Core Cooling System and Containment Spray System Technical Specifications (as is the case per the current Callaway Technical Specifications). The proposed Limiting Condition for Operation (LCO) for TS 3.6.8 would require both trains of containment sumps to be Operable such that Operability would be understood to include the condition that "containment accident generated and transported debris," as analyzed based on materials existing in the containment, is within analyzed limits. Proposed TS 3.6.8 would include Conditions and Required Actions that apply when the LCO is not met. Condition A would specifically address the condition of having one or more containment sumps "inoperable due to containment accident generated and transported debris exceeding the analyzed limits." Condition B addresses having one or more containment sumps "inoperable for reasons other than Condition A," such as when there is a physical deficiency (e.g., a sizable hole) in one or more of the sump strainers.

Subsequent to submittal of the Reference 1 LAR, a number of letters/supplements were submitted in support of the LAR and/or in response to NRC correspondence regarding the LAR. Of the various letters/supplements, only two are of concern to this submittal, and they are identified as References 2 and 3 in the list of references on page 5. Information provided in the letter identified as Reference 2 required correcting/revising information and/or certain pages that had been previously provided in Enclosure 2 of the Reference 1 LAR. The affected pages included, in particular, the marked-up and "clean" (retyped) TS pages provided to indicate the TS changes being proposed by the LAR. Since those pages were being revised, new/replacement pages were provided in a new Enclosure 2 to the Reference 2 letter, such that new Reference 2 Enclosure 2 was identified as a replacement for the previously provided Reference 1 Enclosure 2. The Reference 2 letter also addressed the need to correct a proprietary information concern, and that contributed to the decision to entirely replace Enclosure 2.

After submittal of the Reference 2 letter, an additional proprietary information concern was identified. Resolution of that concern also affected pages/information contained in previously provided Enclosure 2, such that it was again determined that Enclosure 2 should be replaced. A new Enclosure 2, replacing the two previously provided enclosures, was thus provided per the letter identified as Reference 3. The new Enclosure 2 again included marked-up and "clean" TS pages reflecting the proposed TS changes.

Recently, from the NRC staff's review of the Reference 1 LAR and its supplements, an inconsistency was identified in regard to the marked-up and "clean" TS pages provided within Enclosure 2 of the LAR and noted supplements. The inconsistency concerns the wording proposed/intended for Condition A of new TS 3.6.8, which reads as follows, based on what was provided in Enclosure 2 of the Reference 1 LAR:

- A. One or more containment sumps inoperable due to containment accident generated and transported debris exceeding the analyzed limits.

By comparing the above wording to what was included within the versions of Enclosure 2 provided per References 2 and 3, it has been confirmed that the phrase "exceeding the analyzed limits" was omitted (but should have been included) in those versions.

Besides the above discrepancy regarding Condition A, a discrepancy regarding Condition B was also identified within Enclosure 2 of the same LAR supplements (References 2 and 3). In this instance, an extraneous "6 hours" was inadvertently placed in the upper portion of the Completion Time column for Required Action B.1, for which "72 hours" was already appropriately specified in the lower portion of the Completion Time column for this Required Action. This extraneous text was not included (and not intended to be included) in proposed TS 3.6.8 as provided in the original (Reference 1) LAR.

Since the TS 3.6.8 wording provided in Enclosure 2 of the Reference 1 LAR is what was intended for each of the above cases (as based on the wording prescribed by TSTF-567), and since Enclosure 2 was subsequently replaced by the Reference 2 letter and then again by the Reference 3 letter, an updated/corrected version of the TS 3.6.8 wording needs to be provided, thereby affirming the intended Condition A wording. The purpose of this letter, therefore, is to provide the corrected wording, which is herewith provided in the attachments to this letter. As it is not necessary to entirely replace Enclosure 2, in this case, the attached TS 3.6.8 pages are provided as replacement pages for what was previously provided in Enclosure 2 of the Reference 2 and Reference 3 letters. Accordingly, marked-up TS 3.6.8 pages are provided in Attachment 1, and "clean" retyped pages for TS 3.6.8 are provided in Attachment 2. The Condition A and Condition B (Required Action B.1 Completion Time) wording in the attached is identical to what was provided in the Reference 1 LAR.

Since this correction letter affirms the intended TS changes and serves to ensure consistency between the LAR and its supplements, there are no changes to the intended TS changes as proposed. Consequently, there is no change to the "No Significant Hazards Consideration" conclusions reached in the LAR, nor is there any change to the conclusion regarding no need for an environmental assessment based on the categorical exclusion provisions of 10 CFR 51.22.

This letter does not contain new commitments.

If there are any questions, please contact Mr. Tom Elwood at 314-225-1905.

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

Sincerely,



Todd A. Witt
Manager, Regulatory Affairs

Executed on: 9-8-2022

Attachments:

1. Marked-up TS pages for TS 3.6.8
2. Retyped TS pages for TS 3.6.8

References:

1. Ameren Missouri letter ULNRC-06526, "Request for License Amendment and Regulatory Exemptions for a Risk-Informed Approach to Address GSI-191 and Respond to GL 2004-02 (LDCN 19-0014)," dated March 31, 2021 (ADAMS Accession No. ML21090A184)
2. Ameren Missouri letter ULNRC-06651, "Supplement to Request for License Amendment and Regulatory Exemptions for a Risk-Informed Approach to Address GSI-191 and Respond to GL 2004-02 (LDCN 19-0014)," dated July 22, 2021 (ADAMS Accession No. ML21203A192)
3. Ameren Missouri Letter ULNRC-06692, "Third Supplement to Request for License Amendment and Regulatory Exemptions for a Risk-Informed Approach to Address GSI-191 and Respond to GL 2004-02 (LDCN 19-0014)," dated October 7, 2021 (ADAMS Accession No. ML21280A379)

cc: Mr. Scott A. Morris
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Steedman, MO 65077

Mr. M. Chawla
Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O8B1A
Washington, DC 20555-0001

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