



November 3, 2022

ULNRC-06765

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  
LICENSE AMENDMENT REQUEST TO REVISE CALLAWAY PLANT, UNIT 1  
TECHNICAL SPECIFICATION 5.5.16, "CONTAINMENT LEAKAGE RATE  
TESTING PROGRAM," FOR PERMANENT EXTENSION OF TYPE A  
AND TYPE C LEAK RATE TEST FREQUENCIES (LDCN 2020-0004)**

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 change revises Callaway Plant's Technical Specification (TS) 5.5.16, "Containment Leakage Rate Testing Program," to allow for the permanent extension of the Type A Integrated Leak Rate Testing (ILRT) and Type C Leak Rate Testing frequencies based on the guidance in NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J," (Rev. 3-A).

Specifically, the proposed change will revise Callaway Plant's TS 5.5.16 by replacing the references to Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," with a reference to NEI 94-01, Revision 3-A, dated July, 2012, and the limitations and conditions specified in NEI 94-01, Revision 2-A, dated October 2008, as the documents used to implement the performance-based containment leakage testing program in accordance with Option B of 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors."

The proposed amendment is risk-informed and follows the guidance in RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," Revision 2.

The enclosure to this letter provides the evaluation of the proposed change and contains attachments that provide the evaluation of risk significance of permanent ILRT extension, the markup of the affected TS pages, and re-typed clean-copy TS pages.

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." 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.

Further, this submittal does not contain new commitments.

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

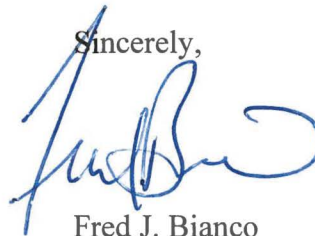
Ameren Missouri requests approval of the requested license amendment prior to October 11, 2023. This requested approval date will support timely extension of the ILRT, which is next required to be performed during the outage in the fall of 2023, if performed per the current (unextended) interval. Ameren Missouri further requests that the license amendment be made effective upon NRC issuance, to be implemented within 90 days from the date of issuance.

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.

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

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

Sincerely,



Fred J. Bianco  
Senior Director, Nuclear Operations

Executed on: 11/3/2022

Enclosure: Evaluation of the Proposed Change

Attachments to the Enclosure:

1. Evaluation of Risk Significance of Permanent ILRT Extension
2. Proposed Technical Specification 5.5.16 Changes (Markup)
3. Proposed Technical Specification 5.5.16 Changes (Clean Pages)

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