

AmerenUE
Callaway Plant

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Hand delivered July 28, 2008

10 CFR 52.75
10 CFR 2.390

July 24, 2008

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

ATTN: Michael Johnson, Director
Office of New Reactors



ALNRC 00004

NRC PROJECT #750
AMERENUE – CALLAWAY PLANT UNIT 2
APPLICATION FOR COMBINED LICENSE FOR CALLAWAY PLANT UNIT 2

- References:
- 1) Letter from Sandra M. Sloan (AREVA NP) to U.S. Nuclear Regulatory Commission, "Application for Standard Design Certification of the U.S. EPR Project No. 733," dated December 11, 2007.
 - 2) Letter from Ronnie L. Gardner (AREVA NP) to U.S. Nuclear Regulatory Commission, "U.S. EPR Final Safety Analysis Report, Supplement 1," dated February 7, 2008
 - 3) Letter from Ronnie L. Gardner (AREVA NP) to U.S. Nuclear Regulatory Commission, "U.S. EPR Final Safety Analysis Report, Supplement 2," dated February 18, 2008
 - 4) Letter from George Vanderheyden (UniStar Nuclear Energy) to U.S. Nuclear Regulatory Commission, "Submittal of Revision 2 to the Partial Combined License Application for the Calvert Cliffs Nuclear Power Plant, Unit 3," dated March 14, 2008
 - 5) Letter from T.E. Herrmann (AmerenUE) to U.S. Nuclear Regulatory Commission, "Proposed Callaway Plant Unit 2 Physical Security Plan" ALNRC 00005 dated July 24, 2008

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In accordance with 10 CFR Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants," Union Electric Company d/b/a AmerenUE submits to the U.S. Nuclear Regulatory Commission (NRC) an application for a combined construction permit and operating license (COL) for an AREVA NP U.S. Evolutionary Power Reactor (U.S. EPR) to be located at the current Callaway County, Missouri site of Callaway Power Plant (NRC License No. NPF-30). This new advanced reactor unit is to be designated Callaway Plant Unit 2. In addition, AmerenUE is requesting special nuclear material licenses, by-product licenses, and source material licenses as required under 10 CFR Parts 30, 40, and 70.

This COL application includes the information required by 10 CFR 52.77 to 52.80 and incorporates by reference the application for a Standard Design Certification for the U.S. EPR that was submitted to the NRC by AREVA NP on December 11, 2007 (Reference 1). The U.S. EPR Final Safety Analysis Report (FSAR) portion of the application for a Standard Design Certification was supplemented by AREVA on February 7, 2008 (Reference 2) and February 18, 2008 (Reference 3). Incorporated by reference is the Tier 1 information set forth in the Standard Design Certification application for the U.S. EPR which is set forth in the U.S. EPR Final Safety Analysis Report Introduction (ADAMS accession number ML073531267).

The attached COL application is based upon and linked, as explained in the application documents, to the U.S. EPR reference COL application for UniStar's Calvert Cliffs Nuclear Power Plant Unit 3 (Reference 4). The Callaway Plant Unit 2 COL application utilizes, to the maximum practical extent, the standard content contained and designated as such in the Calvert Cliffs Nuclear Power Plant Unit 3 COL application. Standard content is identified as such, primarily in the FSAR of this application as outlined in FSAR Section 1.1, "Introduction." Information that is specific to Callaway Plant Unit 2 is set forth in brackets ({}).

This COL application comprises the following parts:

- Part 1 - General, Administrative and Financial Information
- Part 2 - Final Safety Analysis Report
- Part 3 - Environmental Report
- Part 4 - Technical Specifications
- Part 5 - Emergency Plan
- Part 6 - *[Not Used - Reserved for applications requesting Limited Work Authorization]*
- Part 7 - Departures and Exemption Requests
- Part 8 - Safeguards/Security Plans (contains Safeguards Information, provided under separate cover letter (Reference 5))
- Part 9 - Proprietary and Sensitive Unclassified Non-Safeguards Information (SUNSI)
- Part 10 - Proposed License Conditions, including Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)
- Part 11 - COLA Enclosures (e.g., Quality Assurance Program Description)

This application contains no Restricted Data or other defense information requiring separation in accordance with 10 CFR 50.33(j). Part 8 of this application contains Safeguards Information, which is provided under separate cover (Reference 5) and is controlled pursuant to 10 CFR 73.21(c). Part 9 of this application contains certain financial and security-related information that AmerenUE is requesting the NRC to withhold from public disclosure in accordance with the requirements of 10 CFR 2.390. An appropriate affidavit is included with this letter supporting proprietary treatment of AmerenUE financial information pursuant to 10 CFR 2.390(b).

Consistent with common licensing practice, most of the application text is written in the present tense, including discussion of facilities and programs not yet built or implemented. Exceptions to this approach are the discussions of operating experience and completed studies and evaluations, which are written in the past tense. It should be understood, however, that statements regarding facilities (e.g., structures, systems and components), and pre-construction, pre-operational, and operational activities (e.g., procedures and programs) typically address activities that have not yet been performed, and will not be performed until it is reasonable and appropriate to do so.

U.S. EPR nuclear power plants that are licensed, constructed, and operated in cooperation with UniStar Nuclear Operating Services LLC (UniStar Nuclear Operating Services) are standardized to the extent practical. This allows for a standardized Combined License Application (COLA). Information that is unique to Callaway Plant Unit 2 is enclosed in braces "{ }". Information not enclosed in braces is generic for all UniStar Nuclear Operating Services facilities. The terms "braces" and "brackets" are used interchangeably in this document. Minor changes are made within the generic text that are not identified as site specific. These include figure and table numbers, which are organized sequentially within sections, and minor grammatical changes necessary to support introduction of site specific text. Tables and figures containing site specific information use the convention of brackets/braces around the table or figure title, not the entire table or figure contents. This convention indicates the entire table or figure is site specific.

A complete set of application documents (identified above) is provided in electronic file format on the two enclosed disks (Enclosures 1 and 2). Enclosure 1 contains a publicly available version of the COL application with the information requested to be withheld from public disclosure redacted; Enclosure 2 contains the COL application with the information requested to be withheld from public disclosure included in Part 9.

Appropriate pre-submission checks have been successfully performed on the files for both disks to ensure compliance with the guidelines provided on the NRC web site and they have been found acceptable for electronic submittal. Each disk includes a "packing slip" describing its contents, pursuant to NRC instructions for electronic filing.

AmerenUE understands the NRC will review this application to determine its sufficiency for docketing. At the end of this review period, which is expected to take no more than 60 days, it is requested the NRC issue a detailed schedule to review this application in accordance with the combined licensing process.

If you have any questions, or need additional information, please contact Scott Bond at (573) 676-8519, SBond2@ameren.com or David Shafer at (573) 676-4722, DShafer@ameren.com. Counsel for the applicant are Jay E. Silberg, (202) 663-8063, jay.silberg@pillsburylaw.com and William B. Bobnar, (314) 554-3148, WBobnar@ameren.com.

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

Executed on July 24, 2008

A handwritten signature in black ink, appearing to read 'T. E. Herrmann', with a long horizontal line extending to the right.

T. E. Herrmann
Vice President, Engineering

TEH/PGL/lrd

Enclosures: 1) Callaway Plant Unit 2 COL Application, Public Version DVD
 2) Callaway Plant Unit 2 COL Application, Non-Public Version DVD
 3) Affidavit

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cc: (w/ attachments)

Mr. Elmo E. Collins, Jr.
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

cc: (w/o attachments)

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

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Enclosure 1
Page 1

Callaway Plant Unit 2 COL Application DVDs (public version)

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Enclosure 2
Page 1

Callaway Plant Unit 2 COL Application DVDs (proprietary version)

AFFIDAVIT OF TIMOTHY E. HERRMANN

STATE OF MISSOURI)

) ss

COUNTY OF CALLAWAY)

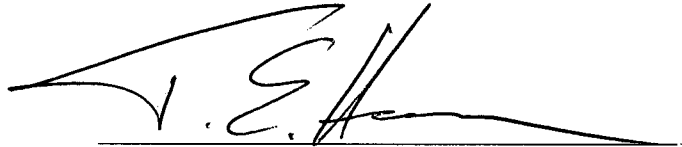
I, Timothy E. Herrmann, Vice President, Engineering, AmerenUE, do hereby affirm and state:

- 1) I am authorized to execute this affidavit on behalf of AmerenUE, (hereinafter referred to as "AUE"). I am further authorized to review information submitted to the Nuclear Regulatory Commission ("NRC") and apply for the withholding of information from disclosure. I am making this affidavit in conformance with the provisions of the NRC's regulations at 10 CFR 2.390 and in support of AUE's request for proprietary treatment of certain financial information.
- 2) I have knowledge of the criteria used by AUE in designating information as sensitive, proprietary, or confidential.
- 3) Pursuant to the provision of paragraph (a)(4) of 10 CFR 2.390, the following is furnished for consideration by the NRC in determining whether the information sought to be withheld from public disclosure should be withheld.
 - a. The information sought to be withheld from public disclosure is owned by AUE and has been held in confidence by AUE.
 - b. The information sought to be protected is not available to the public to the best of my knowledge and belief.
 - c. The information of the type that would customarily be held in confidence by AUE. The information that AUE is requesting to be withheld from public disclosure is AUE's cost projections for construction, fuel supply, and operating costs for Callaway Unit 2. AUE limits access to these cost projections to those with a "need to know" subject to maintaining confidentiality. Public disclosure of these cost projections is likely to harm AUE because it would allow other contractors, vendors, and competitors to understand AUE's competitive

expectations and position prior to securing necessary contracts and services at competitive prices.

- d. The proprietary information sought to be withheld from public disclosure is identified in Part 9 of the COL application and is marked as proprietary as it appears in the application.
- e. The information is transmitted to the NRC in confidence and under the provisions of 10 CFR 2.390; it is to be received in confidence by the NRC.

Timothy E. Herrmann, being duly sworn, states that he is Vice President, Engineering, AmerenUE, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this combined license application for the Callaway Plant Unit 2, and that all the matter and facts set forth herein are true and correct to the best of his knowledge.



T. E. Herrmann
Vice President, Engineering

Subscribed and sworn to before me, a Notary Public, in and for the county and state above named, this 24th day of July, 2008.

Lori L. Twillman
Notary Public in and for State of Missouri

My Commission Expires: 9-19-2011



LORI L. TWILLMAN
My Commission Expires
September 19, 2011
Callaway County
Commission #07387126