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Issues: Callaway Power Plant  
Witness: Charles D. Naslund  
Sponsoring Party: Union Electric Company  
Type of Exhibit: Direct Testimony  
Case No.: ER-2007-0002  
Date Testimony Prepared: July 5, 2006

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. ER-2007-0002**

**DIRECT TESTIMONY**

**OF**

**CHARLES D. NASLUND**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY  
d/b/a AmerenUE**

**St. Louis, Missouri  
July, 2006**

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1 **DIRECT TESTIMONY**

2 **OF**

3 **CHARLES D. NASLUND**

4 **CASE NO. ER-2007-0002**

5 **I. INTRODUCTION**

6 **Q. Please state your name and business address.**

7 A. Charles D. Naslund, Ameren Services Company ("Ameren Services"), One  
8 Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

9 **Q. What is your position with Ameren Services?**

10 A. I am Senior Vice President and Chief Nuclear Officer.

11 **Q. What is Ameren Services?**

12 A. Ameren Services provides various corporate, administrative and technical  
13 support services for Ameren Corporation ("Ameren") and its affiliates, including Union  
14 Electric Company d/b/a AmerenUE ("Company" or "AmerenUE"). Because AmerenUE is  
15 the only Ameren company owning or operating a nuclear power plant, all of Ameren  
16 Services' activities relating to nuclear generation are provided to AmerenUE.

17 **Q. Please describe your educational background and employment**  
18 **experience.**

19 A. I earned a bachelor's degree in Electrical Engineering in 1974 from the  
20 University of Missouri-Rolla and have completed 27 of 30 hours toward a master's degree in  
21 Civil Engineering Construction Management at the University of Missouri – Columbia.

22 I began my career at Union Electric Company in December 1974 as an  
23 assistant engineer in substation design. In February 1976 I became Construction Supervisor

1 for the new Callaway Nuclear Power Plant (“Callaway Plant”), working at the Callaway  
2 Plant at the time of its groundbreaking. In 1980, I was promoted to Supervising Engineer--  
3 Start-up and I became Superintendent of Start-up in 1983. After the nuclear core of the  
4 Callaway Plant was loaded in June 1984, I became the Superintendent of Instrument &  
5 Controls. Over the next thirteen years, I held the following additional positions at the  
6 Callaway Plant: Manager of Operations Support, 1986 to 1991; Manager of Nuclear  
7 Engineering, 1991 to 1998; and Assistant Vice-President of Power Operations, July 1998 to  
8 January 1999. From 1999 to September 2004, I was in charge of the fossil and hydroelectric  
9 generating fleet for AmerenUE. In September 2004, I returned to Callaway Plant as Vice-  
10 President, Nuclear Operations, and in December 2004 I was promoted to Senior Vice-  
11 President and Chief Nuclear Officer.

## 12 **II. PURPOSE AND SUMMARY OF TESTIMONY**

13 **Q. What is the purpose of your testimony in this proceeding?**

14 **A.** The purpose of my testimony is to: (a) provide a background of the Callaway  
15 Nuclear Plant’s performance and its importance to Missouri; (b) discuss the substantial  
16 capital additions made to the Callaway Plant since the Company’s last rate proceeding (Case  
17 No. EC-2002-1, initiated in July, 2001); (c) provide up-to-date information on several  
18 changes to the Callaway Plant’s security infrastructure and the associated operation and  
19 maintenance (“O&M”) cost increases, nearly all of which were driven by governmentally-  
20 mandated requirements following the September 11, 2001 terrorist attack; (d) discuss a key  
21 Callaway Plant operation, its regular (every 18 months) refueling outages; and (e) provide  
22 information related to a future decision that will have to be made regarding whether or not

1 the Company should seek to relicense the Callaway Plant. Attachment A is an Executive  
2 Summary of my testimony.

3 **III. BACKGROUND OF CALLAWAY’S PERFORMANCE**

4 **Q. Please briefly describe the Callaway Plant.**

5 A. The Callaway Plant is a 1,292 megawatt (“MW”) nuclear plant located in  
6 Callaway County, Missouri. In 2005, the Callaway Plant was the third largest power  
7 producer on the Ameren system, accounting for 10.3 percent of AmerenUE’s total  
8 generation. Only the coal-fired Labadie and Rush Island plants produced more power than  
9 Callaway. Callaway’s 2005 net generation of 8 million megawatt-hours (“MWh”) was  
10 enough to supply all the electricity needs of more than 656,000 homes.

11 **Q. How has production from the Callaway Plant compared with production**  
12 **at other nuclear plants?**

13 A. Callaway’s production has exceeded that of most other nuclear units. Since  
14 beginning operation in 1984, Callaway has achieved the sixth highest lifetime generation  
15 among the 103 nuclear power plants operating in the U.S. (188,831,745 MWh through 2005).  
16 Callaway’s lifetime generation through 2005 also ranked 22<sup>nd</sup> in the world, out of 443  
17 nuclear plants operating in 30 countries.

18 **Q. How has the operation of the Callaway Plant impacted the economy in**  
19 **Central Missouri?**

20 A. Callaway is a major factor in both the state and local economy. More than  
21 1,000 AmerenUE employees and contractors work there full time, with a total annual payroll  
22 of \$81 million. During refueling outages which occur every 18 months, hundreds of  
23 additional workers are usually brought in for several weeks—providing a significant boost to

1 the local economy. The Callaway Plant is a major source of tax revenue to fund education  
2 and other critical services. In 2005, the plant accounted for \$9.5 million of AmerenUE's  
3 property taxes paid to Callaway County, with \$6.5 million of that amount going to local  
4 schools. In addition, assessed values based on AmerenUE's investment in the plant resulted  
5 in another \$20.9 million in taxes shared by the remaining 68 counties in AmerenUE's  
6 Missouri service area.

7 **IV. MAJOR CAPITAL ADDITIONS**

8 **Q. Please summarize the capital additions made to the Callaway Plant since**  
9 **2001.**

10 A. Significant major component replacements have been made to the Callaway  
11 Plant since 2001, including the 2005 replacement of the plant's four steam generators--the  
12 giant boilers that produce steam for generating electricity. In addition, in 2005 AmerenUE  
13 replaced one high pressure and three low pressure turbines and their associated casings and  
14 diaphragms. Turbines are the components of the plant which spin with steam pressure to  
15 operate the generators. Finally, the Company replaced the main feedwater isolation valve  
16 actuators, and installed new distributed control systems. In the area of plant security  
17 infrastructure, the Company installed a number of new security barriers, devices and systems  
18 required to meet federal guidelines. In total, the Company made \$449,677,723 in capital  
19 additions to the Callaway Plant over approximately the past 5 years. Schedule CDN-1  
20 summarizes each of these additions and their associated costs.

21 **Q. Please explain some of the key drivers that necessitated the nearly \$450**  
22 **million of capital additions at the Callaway Plant over this period.**

1           A.       From a general perspective, each of these additions to the Callaway Plant was  
2       necessary to ensure that Callaway remains a reliable source of power for AmerenUE and its  
3       Missouri ratepayers. The Callaway Plant has now been in operation for more than 20 years.  
4       Many of its components are at end of their useful lives and/or have become obsolete due to  
5       the unavailability of replacement parts necessary to perform proper maintenance on them.

6           **Q.       Are there more specific drivers?**

7           A.       Yes. Several components were fabricated almost 30 years ago from “alloy  
8       600” materials. “Alloy 600” is a special type of stainless steel metal used to fabricate steam  
9       generator tubing, piping and as a weld filler metal for many of the welds made in Callaway’s  
10      reactor coolant system. In the 1970’s when Callaway was being designed and components  
11      fabricated, alloy 600 was the best alloy available for the required temperature and pressure  
12      operating conditions. It is now known that alloy 600 materials were not able to withstand the  
13      operating temperature and pressure they were subjected to in a nuclear power plant, over the  
14      periods for which they were designed. As a result, the alloy 600 materials have failed  
15      prematurely. Among other consequences, the premature failure of the alloy 600 materials  
16      necessitated the replacement of all four of the Callaway Plant’s steam generators.

17          **Q.       What materials were used to replace the alloy 600 materials?**

18          A.       In designing the new components, including the new steam generators,  
19      AmerenUE selected state-of-the-art materials that we expect to last for the remaining life of  
20      the plant. For the new steam generator tubing, alloy 690, a more durable stainless steel alloy  
21      was utilized. In addition, AmerenUE utilized modern design technologies to increase the  
22      efficiency of the components. This allowed the Company to improve both durability and  
23      plant output.

1           **Q.     What was involved in replacing the Callaway steam generators?**

2           A.     Replacing the steam generators was no small task, because each one is about  
3     70 feet tall and 17 feet in diameter, and weighs about 400 tons. The new steam generators  
4     were manufactured in France and contain tubing from Sweden. They feature improved  
5     technology that has proven to be more efficient and durable than the original units. The  
6     improved efficiency of the new steam generators, combined with turbine upgrades that were  
7     also performed during the 2005 outage, increased Callaway's net generating capacity by 60  
8     MW. The cost of the steam generator replacement and turbine upgrade projects was  
9     approximately \$200 million.

10          **Q.     Please address the increase in plant output more specifically.**

11          A.     As a byproduct of replacing the newly designed steam generators, turbines  
12     and actuators in 2005, the Company was able to increase the output of the Callaway Plant  
13     from 1,232 MW gross to 1,292 MW, or a 60 MW output increase. This increase in plant  
14     output further assists the Company in serving its growing loads with a low-cost supply of  
15     energy.

16          **Q.     Was the Company successful in completing its replacement projects in**  
17     **2005?**

18          A.     Yes. In 2005, Callaway set a new world record for the shortest time it took to  
19     replace four steam generators. Callaway's replacement time of 63 days and 13 hours was  
20     more than a day shorter than the previous record of 64 days and 17 hours set by the South  
21     Texas Project in 2002.

22                     The entire 2005 outage was completed on time, under budget, and with no  
23     lost-time accidents among either Ameren employees or contractors. This was the most



1 complex and challenging outage since construction, because it included replacement of all  
2 four steam generators as well as replacement of all four turbines. The plant shut down  
3 September 17 and returned to service on November 19.

4 As in past refueling outages, which occur approximately every 18 months,  
5 thousands of maintenance activities, modifications, inspections and tests were performed  
6 throughout the plant to ensure top safety and reliability until the next refueling. About 3,000  
7 people worked on the project, including more than 2,000 contractors and Ameren employees  
8 from other locations who joined the plant's regular staff to help handle the large volume of  
9 work. They completed approximately 2.1 million work hours.

10 **Q. You previously mentioned post-9/11 upgrades in security infrastructure**  
11 **and related costs. Please elaborate.**

12 A. After September 11, 2001, the Nuclear Regulatory Commission ("NRC")  
13 issued a series of orders to all U.S. nuclear plants, requiring major changes in how nuclear  
14 power plant operators must provide security for and defense of their nuclear plants. These  
15 changes were primarily driven by a revised Design Basis Threat, or "DBT." A DBT is the  
16 set of threat assumptions imposed by the NRC for which each nuclear plant must be able to  
17 defend against and protect the safety of the nuclear core. In order to meet these new  
18 requirements, the Company implemented a number of capital modifications by October  
19 2004. Schedule CDN-2 summarizes the capital costs incurred to meet this new DBT. In  
20 addition to the security/defense related capital additions to the plant itself, the new DBT  
21 required a substantial increase in staffing requirements and other O&M expenses. These  
22 security-related costs have added \$5 million per year to the Callaway Plant's O&M cost  
23 structure. These costs increases are also shown in Schedule CDN-2.

1           **Q.     What was the nature of these security changes?**

2           A.     The security changes to the plant include a concrete barrier around the entire  
3 site perimeter to act as a vehicle barrier to defend against the design basis threat. A portal  
4 through this barrier system to allow the processing of materials in and out of the plant was  
5 constructed. Multiple new fences with detection and monitoring systems were installed.  
6 Elevated hardened defense positions that provide 100% oversight of the site's perimeter were  
7 also constructed. Finally a new training facility and firing range were constructed to meet the  
8 training requirements established for the security force.

9                               **V.     PERIODIC REFUELINGS**

10          **Q.     You mentioned in the purpose section of your testimony the subject of**  
11 **periodic refuelings of the Callaway Plant. Please explain the need for those refuelings**  
12 **and what a “refueling outage” entails.**

13          A.     The Company completed the most recent refueling outage at the Callaway  
14 Plant in November of 2005. Like all nuclear power plants, the Callaway Plant's nuclear fuel  
15 must be replaced; i.e., the reactor must be “refueled” periodically. In the case of the  
16 Callaway Plant, refuelings must occur nominally every 18 months. During a refueling  
17 outage, the Company not only completes the necessary refueling, but also uses the outage as  
18 an opportunity to perform required maintenance of the plant and implement any  
19 capital/maintenance modifications required to meet regulatory requirements, address  
20 reliability issues or replace obsolete equipment. By combining scheduled maintenance and  
21 capital addition work with refuelings, the Company can minimize outage time and maximize  
22 the efficiency of the necessary operations. Schedule CDN-3 summarizes the duration and

1 costs of each outage since Callaway went online in December 1984. During this 21 year  
2 period and 14 outage cycles, Callaway has averaged 49.4 days per outage.

3 **VI. FUTURE DECISIONS REGARDING CALLAWAY**

4 **Q. You indicated earlier that the Callaway Plant had been in operation for**  
5 **over 20 years and that the age of the plant required these rather major upgrades. What**  
6 **is the life of the Callaway Plant?**

7 A. When the Callaway Plant commenced operations in 1984, the NRC granted  
8 the Company a 40 year license for the plant. This license will expire approximately 18 years  
9 from now in 2024. The plant is thus just over one-half of the way through its licensing  
10 period. The NRC has established a process for extending the original licenses an additional  
11 20 years. This process normally is started about 10 years before the license is scheduled to  
12 expire. Consequently, AmerenUE will not be deciding whether or not to commence the  
13 relicensing process until around 2014. As of now, AmerenUE has made no decision as to  
14 whether it should request an extension of the Callaway license. The Company continues to  
15 engage in extensive data gathering, including monitoring critical plant components for life  
16 impacts due to radiation exposure and high temperature environments. The single most  
17 critical consideration in determining whether or not relicensing may be feasible is the  
18 condition of the reactor vessel itself. Extensive monitoring is in place to measure neutron  
19 embrittlement of the vessel wall. The additional data gained over the next approximately  
20 eight years will be critical in assisting the Company in making a relicensure decision. While  
21 no decision can be made for a number of years, the Company continues to do all the things  
22 necessary to preserve this option.

1           **Q.     Are there other factors that AmerenUE will consider in deciding whether**  
2 **to seek a license extension for the Callaway Plant?**

3           A.     Yes. The overall cost of continuing to operate the plant will also be a  
4 consideration. The cost can be impacted by a number of factors including changing  
5 regulatory requirements, increases in the cost of purchasing fuel or disposing of spent fuel  
6 rods and increases in O&M costs. In addition, the relative costs of other power sources will  
7 have to be considered at the time the decision is made.

8           **Q.     Does this conclude your testimony?**

9           A.     Yes, it does.

In the Matter of Union Electric Company )  
d/b/a AmerenUE for Authority to File )  
Tariffs Increasing Rates for Electric )  
Service Provided to Customers in the )  
Company's Missouri Service Area. )

**STATE OF MISSOURI           )**  
**) ss**  
**CITY OF ST. LOUIS          )**

Charles D. Naslund

Gore & Sweetman  
Notary Public

**LORI L. TWILLMAN**  
**Notary Public - Notary Seal**  
**STATE OF MISSOURI**  
**Callaway County**  
**My Commission Expires: Aug. 3, 2007**

# EXECUTIVE SUMMARY

**Charles D. Naslund**

*Senior Vice President and Chief Nuclear Officer*

\* \* \* \* \*

The purpose of my testimony is to: (a) provide a background of the Callaway Nuclear Plant's performance and its importance to Missouri; (b) discuss the substantial capital additions made to the Callaway Plant since the Company's last rate proceeding (Case No. EC-2002-1); (c) provide up-to-date information on several changes to the Callaway Plant's security infrastructure and the associated operation and maintenance ("O&M") cost increases, nearly all of which were driven by governmentally-mandated requirements following the September 11, 2001 terrorist attack; (d) discuss a key Callaway Plant operation, its regular (every 18 months) refueling outages; and (e) provide information related to a future decision that will have to be made regarding whether or not the Company should seek to relicense the Callaway Plant.

Callaway's production has exceeded that of most other nuclear units. Callaway's lifetime generation was the sixth highest among the 103 operating U.S. nuclear power plants, and 22<sup>nd</sup> in the world, out of 443 nuclear plants operating in 30 countries. Callaway has over 1,000 full-time employees and contractors. In 2005, the plant accounted for \$9.5 million of AmerenUE's property taxes paid to Callaway County, with \$6.5 million of that amount going to local schools.

Significant major component replacements have been made to the Callaway Plant since 2001, including the 2005 replacement of the plant's four steam generators--the giant

boilers that produce steam for generating electricity. In total, the Company made \$449,677,723 in capital additions to the plant over approximately the past 5 years.

In order to meet new security requirements imposed by the Nuclear Regulatory Commission (“NRC”) after September 11, 2001, the Company implemented a number of capital modifications by October 2004 and substantially increased staffing and other O&M expenses. These security-related costs have added \$5 million per year to the Callaway Plant’s O&M cost structure.

The Company completed a regular refueling outage at the Callaway Plant in November of 2005. By combining scheduled maintenance and capital addition work with such refuelings, the Company minimizes outage time and maximizes the efficiency of these necessary operations.

The NRC license for the Callaway Plant will expire approximately 18 years from now in 2024. The NRC’s process for extending licenses an additional 20 years normally is started about 10 years before the license is scheduled to expire. Consequently, AmerenUE will not be deciding whether or not to commence the relicensing process until around 2014. The single most critical consideration in determining whether or not relicensing may be feasible is the condition of the reactor vessel itself. The additional data gained over the next approximately eight years will be critical in assisting the Company in making a relicensure decision. During that time, the Company will continue to do all the things necessary to preserve this option.

**Ameren Corporation**  
**Project Based**  
**Proj Sum - Cap**  
**In-Budget Row Only**

**Escalated, Accountable Dollars**

Project	Grand Total	Opening Balance	Year 2001	Year 2002	Year 2003	Year 2004	Year 2005	Closing Balance
02000 - RADIATION DETECTION INSTRUMENTS	109,782	14,831	13,926	81,025				
02050 - UPGRADE LAB MATERIAL CONDITION	105,909			4,683	28,918	71,096	1,211	
02069 - NIS COMPUTER ROOM HVAC	143,380				81,828	61,552		
02233 - PERM PLTRMS ON ISOPHASE STRUCTURE	98,016			97,824	192			
02397 - LOAD INDICATORS FOR THE POLAR CRANE	104,982					103,213	1,769	
02460 - LN CONTNMNT SUMPS WITH STNLS STEEL	233,348		111,185	110,847	7,575	3,741		
02483 - STATOR COOLING WATER LEAK MONITORNG	107,446	62,417	9,763	35,266				
02485 - LAN CONNECTED TELEMETRY	141,891			90,023	51,869			
0A015 - CAPITAL SP PART (UOP) & INITIAL PUR	1,812,221			229,974	33,481	1,047,270	501,496	
0A173 - WORK CONTROL CAPITAL TOOL PURCHASE	170,479						170,479	
0A216 - OFFICE FURNITURE	239,321						239,321	
0A502 - MISC HP - OPERATIONS CAPITAL EQPMT	150,656						150,656	
0A505 - MISC CHEMISTRY CAPITAL EQUIPMENT	108,802						108,802	
10376 - HP FEEDWATER HEATER DUMP VALVE RPLC	386,902	250,894	133,887	2,120			646	
10579 - UPGRD OF TERRY TURB CNTL-DIG CNTLR	425,069	56,679	167,632	162,614	22,748	14,751		
10591 - RADIATION DETECTN INSTR CALIBRATOR	108,888		108,888					
10669 - COOLING TOWER FILL ADDITION	559,211		529,787	29,424				
10704 - VOLTAGE CORRECTION EQUIPMENT	4,767,032	2,524,589	1,783,411	439,117	11,406	8,509		
10806 - TUBE BUNDLE REPLCMNT-FEEDWATER HTRS	4,981,129	1,049,892	3,928,779	2,457				
10878 - 98-1027 REPL 2 IN CS PIPE WITH SS	653,619						653,619	
11009 - STEAM GENERATOR REPLACEMENT	1,625,542	267,225	1,119,597	203,394	35,327			
11013 - INSTALL SVC WATER BASKET STRAINERS	673,443	17,352	656,091					
11028 - RENOVATE THE HP ACCESS AREA	373,012	217,155	155,857					
11030 - RPLC MN STEAM ISOLATION VLV ACTUATR	12,614,905		763,999	2,545,407	1,181,731	4,597,524	1,089,149	2,437,095
11031 - REMOVE & DISPOSE OF FILTER ABSORBER	156,472		11,219	141,156	4,098			
11040 - CARBON STEEL PIPING REPLACEMENT	1,608,381	4,510	476,630	266,207	206,316	541,392	113,326	
11041 - INFRASTRUCTURE FOR DIGITAL CNTL SYS	2,852,759	8,301	838,021	1,199,831	696,814	109,686	105	
11042 - DIESEL GEN EXCITOR CONTROLS RPLCMNT	4,688,685		6,797	49,948	140,215	957,574	792,450	2,741,701
11043 - DIGITL FDWATER HEATER LVL CNTLS RPL	3,217,289				330,920	1,346,864	237,050	1,302,456
11044 - UPGRD CNTLS-POLSHR WASTE WATER PROC	5,239,302	934,002	1,500,659	1,328,473	1,371,704	113,743	(9,280)	
11045 - INSTALL MN STEPUP XFRMR GAS MONITRS	364,939	100,779	51,127	164,207	48,584	242		
11064 - ADD 10 ESW ISOLATION VLVs FOR 5 RM	739,897	15,863	186,087	198,866	105,356	233,725		
11123 - RPLC ATMOSPHERIC STEAM DUMP SILENCR	157,733		157,733					
11140 - REPLACE CONTAINMENT COOLER COILS	4,818,198	84,131	3,053,096	1,651,924	29,048			
11151 - CONDENSER TUBE REPLACEMENT	32,785,662				9,223,586	23,530,703	31,373	
11183 - RPLC FIRE PROTECTION SYSTEM EQPMT	1,158,538		18,795	228,154	338,683	582,956	(10,051)	
11185 - RPLCMNT OF PK11&PK12 BATTERY BANKS	339,547			317,458	22,089			
11189 - UPGRD RDWSTE BLDG DRUM STORAGE AREA	477,937		107,464	120,387	97,425	130,197	251	22,214



**Ameren Corporation**  
**Project Based**  
**Proj Sum - Cap**  
**In-Budget Row Only**

**Escalated, Accountable Dollars**

Project	Grand Total	Opening Balance	Year 2001	Year 2002	Year 2003	Year 2004	Year 2005	Closing Balance
11218 - OFFICE FURN. FOR CALLAWAY FOR 2001	216,528		200,165	282,958		16,362		
11219 - FURNITURE 2002	283,097				140			
11220 - FURNITURE 2003	232,378			232,318		60		
11221 - FURNITURE 2004	196,788				198,786		(1,998)	
11234 - LOW PRESSURE ROTOR ELEMENT REPLCMNT	60,861,174			71,961	594,748	23,653,560	35,435,564	1,105,341
11283 - REPLACEMENT HEALTH PHYSICS SOFTWARE	510,803		65,417	445,386				
11286 - TRAINING CENTER HVAC UNITS	323,865		26,800	1,338				
11289 - MAIN FEED PUMP EHC UPGRADE	4,579,005				253,331	42,396		3,368,516
11293 - MN TURBINE GENERATOR GOVERNOR CNTLS	3,431,636				348,328	862,162	671,157	1,369,011
11298 - BOP NON-1E ANALOG CONTROLS REPLCMNT	424,344				315,827	1,075,640		
11307 - MAIN CONTROL BOARD UPGRADE	759,695				265,409	147,427	11,507	40,124
11308 - LSELS, ESFAS, MSFIS UPGRADE	14,572,038			1,502,355	269,256	532,612	(82,297)	4,946,601
11309 - DCS ACTIVITIES	282,136			139,519	1,181,269	7,525,779	(325,200)	
11311 - BCMS UPGRADE	366,225		20,628	162,180	467,817	50,258	2,694	
11312 - FLUX MAPPING SYSTEM UPGRADE	1,957,632			235,215	1,088,372	632,251	1,794	
11316 - WASTE GAS H2 ANALYZER REPLACEMENT	964,262		4,226	806,402	76,623	89,012	(35,405)	23,404
11339 - CONTROL ROOM SIMULATOR UPGRADE	4,660,514			846,186	1,456,573	1,257,880	1,099,875	
11342 - PLANT COMPUTER UPGRADE	9,813,035		248,917	1,009,430	1,034,148	2,570,478	1,533,043	3,417,018
11470 - 2004 WALKUP COPIER REPLACEMENT	145,737					145,737		
11472 - 2003 HIGH VOLUME COPIER REPLACEMENT	226,101			25,129	205,917	20,184		
11683 - REPLACE HVAC UNITS - 2 FL SERV BLDG	295,278		269,855		294			
11692 - MOLD REMOVAL IN CENTRAL PROCESS FAC	105,276		105,276					
11806 - RETIRE PASS	158,370		49,624	104,625	4,121			
12077 - INSTLL DIVERSION VLV:NEW HELPER TWR	492,679		492,679					
12319 - VIDEO CAPTURE & IRIS SCAN DOOR COMP	116,988				29,827	87,161		
12638 - STEAM GENERATOR REPLACEMENT	188,629,606		1,279,111	20,271,228	34,151,787	23,786,892	105,606,430	3,534,158
12748 - GAMMA 10 UPGRADE/REPLACEMENT	254,696				254,696			
12774 - REPLACE AUX BUILDING ROOF	628,792					394,176	228,381	6,235
12780 - CYCLE 12 SEC SIDE EROSION PIPE RPLC	1,762,403			1,750,157		12,246		
12817 - X-RAY MACHINE REPLACEMENTS	102,390			51,504	50,885			
12821 - BACKFILL UNIT 2 EXCAVATION	884,821			870,672				
12825 - REFUEL 13 NON SGR ACTIVITIES	2,142,469		5,896		121,314	2,594,090	(572,935)	
12829 - DOCKING FACILITY	2,574,195		115	6,827	49,762	2,522,447	1,986	
12830 - SECURITY UPGRADE	3,718,106			8,534	301,238	1,664,241	1,745,685	
12866 - 01-1001 RPLC LIQUID RADWASTE SYSTEM	1,461,152				265,195	1,177,339	10,084	
12940 - UPGRADE MN GSU TRANSFORMER COOLERS	242,461				93,626	139,811	9,023	93,147
12970 - REPLACE MAIN FEEDWATER PIPING	1,083,233				27,230	907,941	54,915	
13128 - INSTALL VNRD SUPPLIED CHEM ADD EQPT	2,959,407		9,646	2,959,407				
13129 - RPLC ACID ADDTN EQPT FOR COOLING TWR	3,083,337			1,688,779	395,864	894,270	95,278	45,403
	554,080			360,914	40,601	66,389	40,773	

**Escalated, Accountable Dollars**

### Schedule CDN-1-3

### **Capital Costs Relating to NRC Orders**

2002 Interim Compensatory Measures Order \$3.3 million

- Supplemental Vehicle Barrier System
- New Owner Controlled Access Facility
- Pavement of construction parking lot and roads
- Lighting of construction parking lot

2003 Orders \$25.3 million

Design Basis Threat  
Security Training  
Security Working Hours

- New permanent Vehicle Barrier System
- New active Vehicle Barrier System (sally port)
- New hardened fixed security response positions
- New delay fences
- Modifications to our Secondary Alarm Station due to Design Basis Threat
- Movement of security multiplexer
- New intrusion detection system
- New camera system
- Electrical upgrades to security equipment
- Upgrades to the Security Firing Range

Total Orders 

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\$28.6 million

### **O&M Increases in Costs 2001-2005**

#### **Total O&M Security Budget (By Year):**

2001	\$4.8 million	
2002	\$6.9 million	<ul style="list-style-type: none"><li>• Implementation of the Interim Compensatory Measures Order</li><li>• Additional security personnel to accommodate Order requirements</li><li>• Additional searches of vehicles and personnel</li><li>• Additional training requirements</li></ul>
2003	\$6.8 million	
2004	\$9 million	<ul style="list-style-type: none"><li>• Implementation of the Design Basis Threat Order, the Security Training Order, and the Security Working Hours Order.</li><li>• Change in security strategy required additional staffing</li><li>• Additional security weapons</li><li>• Moving security presence out to OCA required additional staffing</li><li>• Security Training Order required additional training with required us to move to a 5-crew schedule</li><li>• Security working hours limits required less scheduled overtime therefore more people to cover the shifts</li></ul>
2005	\$9.8 million	<ul style="list-style-type: none"><li>• NRC evaluated Force on Force Exercise</li><li>• Support of RF14</li></ul>

Increase from 2001 to 2004: \$5 million

**CALLAWAY REFUEL OUTAGE MAINTENANCE COSTS**

	Refuel 1 Spring 1986	Refuel 2 Fall 1987	Refuel 3 Spring 1989	Refuel 4 Fall 1990	Refuel 5 Spring 1992	Refuel 6 Fall 1993	Refuel 7 Spring 1995
Maintenance Projects Excluding AmerenUE Wages			\$14.0	\$16.1	\$23.0	\$19.8	\$20.7
Incremental AmerenUE Overtime Wages			\$4.0	\$5.7	\$5.1	\$5.0	\$4.5
Replacement Energy			\$8.3	\$7.2	\$7.7	\$13.6	\$8.6
TOTAL	Not Available	Not Available	\$26.3	\$29.0	\$35.8	\$38.4	\$33.8
Duration	49 days	65 days	53 days	60 days	60 days	52 days	48 days

	Refuel 8 Fall 1996	Refuel 9 Spring 1998	Refuel 10 Fall 1999	Refuel 11 Spring 2001	Refuel 12 Fall 2002	Refuel 13 Spring 2004	Refuel 14 Fall 2005
Maintenance Projects Excluding AmerenUE Wages	\$16.8	\$16.3	\$22.0	\$23.1	\$22.6	\$40.1	\$21.5
Incremental AmerenUE Overtime Wages	\$3.5	\$5.1	\$5.0	\$8.0	\$4.9	\$9.7	\$9.3
Replacement Energy	\$10.0	\$7.7	\$12.7	\$18.1	\$10.2	\$24.3	\$25.4
TOTAL	\$30.0	\$29.1	\$39.7	\$49.2	\$37.7	\$74.1	\$56.2
Duration	31 days	31 days	35 days	45 days	34 days	65 days	63D 13H