

February 16, 2001

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555-0001

Gentlemen:

ULNRC- 04390

**DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
PROPOSED REVISION TO TECHNICAL SPECIFICATIONS 5.2.1
"ONSITE AND OFFSITE ORGANIZATION"**

Pursuant to 10 CFR 50.90, AmerenUE hereby requests an amendment to the Facility Operating License No. NPF-30 for Callaway Plant. The amendment request incorporates the attached change into the Callaway Plant Technical Specifications.

AmerenUE requests approval of the proposed License Amendment by June 30, 2001. The proposed organization change is currently in effect and full implementation (revised procedures and licensing documents) will occur within 60 days of the issuance of the license amendment. The approval date was administratively selected to allow for NRC review, although the organization change is currently effective. Because the proposed change represents an enhancement to the organization, without major revision to specific function responsibilities, requirements, or qualifications, the proposed change is not required to be fully implemented in order for continued safe full power operation of Callaway Plant.

Attachment 1 is the required Affidavit. Attachment 2 provides a detailed description, safety analysis of the proposed change, and Callaway's determination that the proposed change does not involve a significant hazards consideration. Attachment 3 provides the existing TS page marked-up to show the proposed change. Attachment 4 provides a clean copy of the proposed Technical Specification page.

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Pursuant to 10 CFR 50.91(b)(1), AmerenUE is providing the State of Missouri with a copy of this proposed amendment.

If you should have any questions on the above or attached, please contact Dave Shafer at (314) 554-3104 or Dwyla Walker at (314) 554-2126.

Very truly yours,


for Alan C. Passwater
Manager, Corporate Nuclear Services

DJW/jdg

- Attachments:
- 1) Affidavit
 - 2) Description of Proposed License Change and Assessment
 - 3) Existing Marked-up Technical Specification page
 - 4) Revised Technical Specification page

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STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

David Shafer, of lawful age, being first duly sworn upon oath says that he is Supervising Engineer, Corporate Nuclear Services, Regulatory Operations for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By David Shafer
David Shafer
Supervising Engineer,
Regulatory Operations,
Corporate Nuclear Services

SUBSCRIBED and sworn to before me this 16th day
of February, 2001.

K. A. Bell
K. A. BELL
Notary Public — Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: October 13, 2002

ULNRC-04390

ATTACHMENT 2

DESCRIPTION OF PROPOSED LICENSE CHANGE AND ASSESSMENT

SAFETY ANALYSIS

1.0 INTRODUCTION

- 1.1** This letter is a request to revise Technical Specification (TS) 5.2.1, "Onsite and Offsite Organization" for Callaway Plant.
- 1.2** The organization change will be reflected in a revision to Chapter 13.1 of the Callaway Plant FSAR. The change includes the effect of all safety evaluations performed to support this request.

2.0 DESCRIPTION

The proposed License amendment would revise Technical Specification 5.2.1 to replace the title 'Vice President and Chief Nuclear Officer' with 'Senior Vice President and Chief Nuclear Officer'. The revised organization includes the addition of a 'Vice President-Nuclear' who reports directly to the 'Senior Vice President and Chief Nuclear Officer'. Certain lower tier titles continue to report to the same individual, now titled "Senior Vice President and Chief Nuclear Officer". However, the Manager, Nuclear Engineering, the Manager, Operations Support, and the Manager, Callaway Plant, now report to the Vice President-Nuclear. This organization change enhances overall responsibility for site activities and for supervision of major projects, while the Chief Nuclear Officer is involved in off-site activities.

In summary the proposed change revises the title of the most senior individual in the nuclear organization and adds another level of management oversight to site activities.

3.0 BACKGROUND

The current Technical Specification (TS) 5.2.1 reflects that the Vice President and Chief Nuclear Officer has corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the nuclear staff. Due to an increased requirement for the Chief Nuclear Officer's involvement in off-site activities, the position of 'Vice President-Nuclear' was created to enhance oversight of site activities and supervision of major projects. The title of Vice President and Chief Nuclear Officer is changed to Senior Vice President and Chief Nuclear Officer, and the Vice President-Nuclear reports directly to the Senior Vice President and Chief Nuclear Officer. Plant functions for Engineering, Operations, and Operations Support are centralized under the direction of the Vice President-Nuclear. The Manager, Engineering, the Manager, Operations Support, and the Manager, Callaway Plant report directly to the Vice President-Nuclear.

4.0 TECHNICAL ANALYSIS

Corporate level organizational changes are made to the Callaway Plant organization. Due to an increased requirement for the Chief Nuclear Officer's involvement in off-site activities, the position of 'Vice President-Nuclear' was created to enhance oversight of site activities and supervision of major projects. The title of Vice President and Chief Nuclear Officer is changed to Senior Vice President and Chief Nuclear Officer, and the Vice President-Nuclear position is created. The Vice President-Nuclear reports directly to the Senior Vice President and Chief Nuclear Officer. Plant functions for Engineering, Operations, and Operations Support are centralized under the direction of the Vice President-Nuclear. The net effect for the change is to create another level of oversight for plant activities without changing core function responsibilities or requirements and without changing personnel requirements or qualifications.

In summary the proposed change is acceptable because it enhances the ability for corporate responsibility for overall plant nuclear safety and for implementing necessary measures to ensure acceptable performance of the nuclear staff.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

AmerenUE has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10 CFR 50.92(c) as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change revises Callaway Plant management organization by changing the title, Vice President and Chief Nuclear Officer to Senior Vice President and Chief Nuclear Officer; creating the title Vice President-Nuclear, to add another corporate level of oversight for plant site activities and nuclear staff supervision; and centralizing the Operations, Operations Support, and Engineering functions under the Vice President-Nuclear. These are administrative changes.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change revises Callaway Plant management organization by changing the title, Vice President and Chief Nuclear Officer to Senior Vice President and Chief Nuclear Officer; creating the title Vice President-Nuclear, to add another corporate level of oversight for plant site activities and nuclear staff supervision; and centralizing the Operations, Operations Support, and Engineering functions under the Vice President-Nuclear. These are administrative changes.

Therefore, the proposed revision will not create a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change revises Callaway Plant management organization by changing the title, Vice President and Chief Nuclear Officer to Senior Vice President and Chief Nuclear Officer; creating the title Vice President-Nuclear, to add another corporate level of oversight for plant site activities and nuclear staff supervision; and centralizing the Operations, Operations Support, and Engineering functions under the Vice President-Nuclear. These are administrative changes.

Therefore, the proposed changes to the Technical Specifications do not involve a significant reduction in the margin of safety.

Based on the above evaluations, AmerenUE concludes that the activities associated with the above described changes present no significant hazards under the standards set forth in 10 CFR 50.92 and accordingly, a finding by the NRC of no significant hazards consideration is justified.

5.2 Regulatory Safety Analysis

Applicable Regulatory Requirements/Criteria

The regulatory basis for TS 5.2.1, "Onsite and Offsite Organization," derives from AmerenUE commitments to the NRC made during the review of the initial organization as part of the application process for the Callaway Plant operating license. AmerenUE commitments are also based on Regulatory Guide 1.8,

Revision 2, dated 4/87, Qualification and Training of Personnel for Nuclear Power Plants, which endorses portions of ANSI/ANS 3.1-1981 for Shift Technical Advisors, Licensed Operators, and Radiation Protection, and ANSI/ANS 181.1-1971 for all other positions. Organizational commitments are discussed in the Callaway FSAR Chapter 13.1, "Conduct of Operations" and the OQAM, Sections 1.0, "Organization" and Appendix, "OQAM Conformance to Applicable NRC Regulatory Guides".

Analysis

The proposed change to TS 5.2.1 does not alter the regulatory bases committed to for plant organization. The change enhances the ability of management to be responsible for oversight of plant activities and supervision of nuclear staff. Qualifications and training requirements remain unchanged as a result of the proposed change. Function responsibilities for plant operation or support remain unchanged as a result of the proposed change.

Conclusion

The analysis performed by AmerenUE demonstrates that the proposed change continues to be compliant with the above regulatory requirements.

6.0 ENVIRONMENTAL EVALUATION

AmerenUE has determined that the proposed amendment is a change to a (i) surety, insurance and/or indemnity requirement, or to a (ii) recordkeeping, reporting, or administrative procedures requirement. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

7.0 REFERENCES

FSAR Section 13.1, "Conduct of Operations."

OQAM, Section 1.0, "Organization"

OQAM, APPENDIX, "OQAM Conformance to Applicable NRC Regulatory Guides."

8.0 PRECEDENTS

There are no precedents that AmerenUE cites as applicable in support of the proposed organization change.

ULNRC- 04390

ATTACHMENT 3

EXISTING MARKED-UP TECHNICAL SPECIFICATION PAGES

T/S 5.2.1, page 5.0-2

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR;
- b. The Manager, Callaway Plant shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. The Vice President and Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

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5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. An equipment operator shall be assigned when fuel is in the reactor and an additional equipment operator shall be assigned when the unit is in MODE 1, 2, 3, or 4.
- b. Shift crew composition may be one less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f for a period of time not to

(continued)

ULNRC- 04390

ATTACHMENT 4

REVISED TECHNICAL SPECIFICATION PAGES

T/S 5.2.1, page 5.0-2

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR;
- b. The Manager, Callaway Plant shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. The Senior Vice President and Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. An equipment operator shall be assigned when fuel is in the reactor and an additional equipment operator shall be assigned when the unit is in MODE 1, 2, 3, or 4.
- b. Shift crew composition may be one less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f for a period of time not to

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