

June 3, 2003

Mr. Garry L. Randolph  
Vice President and Chief Nuclear Officer  
Union Electric Company  
P.O. Box 620  
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 - ISSUANCE OF AMENDMENT RE: GENERIC  
PERSONNEL TITLES IN ADMINISTRATIVE CONTROLS (TAC NO. MB8230)

Dear Mr. Randolph:

The Commission has issued the enclosed Amendment No. 155 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated March 21, 2003 (ULNRC-04830).

The amendment revises paragraphs in Section 5.0, "Administrative Controls," of the TSs to allow the use of generic personnel titles in place of plant-specific personnel titles and require either the operations manager or the assistant operations manager to hold a senior reactor operator license.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

**/RA/**

Jack N. Donohew, Senior Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosures: 1. Amendment No. 155 to NPF-30  
2. Safety Evaluation

cc w/encls: See next page

June 3, 2003

Mr. Garry L. Randolph  
Vice President and Chief Nuclear Officer  
Union Electric Company  
P.O. Box 620  
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 - ISSUANCE OF AMENDMENT RE: GENERIC  
PERSONNEL IN ADMINISTRATIVE CONTROLS (TAC NO. MB8230)

Dear Mr. Randolph:

The Commission has issued the enclosed Amendment No. 155 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated March 21, 2003 (ULNRC-04830).

The amendment revises paragraphs in Section 5.0, "Administrative Controls," of the TSs to allow the use of generic personnel titles in place of plant-specific personnel titles and require either the operations manager or the assistant operations manager to hold a senior reactor operator license.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

**/RA/**

Jack N. Donohew, Senior Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosures: 1. Amendment No. 155 to NPF-30  
2. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

PUBLIC

PDIV-2 Reading

RidsNrrDlpmLpdiv (HBerkow)

RidsNrrPMJDonohew

RidsNrrLAEPeyton

RidsOgcRp

RidsAcrsAcnwMailCenter

RidsRgn4MailCenter (AHowell)

DTrimble (NRR/DIPM)

RidsNrrDrip (RDennig)

GHill (2)

WBeckner (NRR/DRIP/RORP)

**Package No.: ML031560843**

**TS Pages No.: ML031560496 NRR-100**

**ADAMS Accession No.: ML031560842**

**NRR-058**

OFFICE	PDIV-2/PM	PDIV-2/LA	IEHB/SC	TSS/SC	OGC	PDIV-2/SC
NAME	JDonohew	EPeyton	DTrimble	RDennig	Uttal NLO	SDembek
DATE	5/12/2003	4/28/03	5/12/03	8/14/2003	5/30/03	6/2/03

DOCUMENT NAME: C:\ORPCheckout\FileNET\ML031560842.wpd

OFFICIAL RECORD COPY

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 155  
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Union Electric Company (UE, the licensee) dated March 21, 2003, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-30 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 155 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective as of its date of issuance, and shall be implemented within 30 days of the date of issuance including the incorporation of the Final Safety Analysis Report changes described in the licensee's application dated March 21, 2003, and the staff's Safety Evaluation for this amendment.

FOR THE NUCLEAR REGULATORY COMMISSION

**/RA/**

Stephen Dembek, Chief, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: June 3, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 155  
FACILITY OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Replace the following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains vertical lines indicating the areas of change.

REMOVE

5.0-1  
5.0-2  
5.0-3  
5.0-4  
5.0-6

INSERT

5.0-1  
5.0-2  
5.0-3  
5.0-4  
5.0-6

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 155 TO FACILITY OPERATING LICENSE NO. NPF-30  
UNION ELECTRIC COMPANY  
CALLAWAY PLANT, UNIT 1  
DOCKET NO. 50-483

1.0 INTRODUCTION

By application dated March 21, 2003, Union Electric Company (the licensee) requested changes to the Technical Specifications (TSs, Appendix A to Facility Operating License No. NPF-30) for the Callaway Plant, Unit 1 (Callaway). The proposed amendment would revise paragraphs in Section 5.0, "Administrative Controls," of the TSs to allow the use of generic personnel titles in place of plant-specific personnel titles and require either the operations manager or the assistant operations manager to hold a senior reactor operator license.

2.0 BACKGROUND

The licensee adopted the Improved Technical Specifications (ITS) in License Amendments No. 133 (issued May 28, 1999) based on NUREG-1431, "Standard Technical Specifications [STS], Westinghouse Plants," Revision 1, dated April 1995. Since then, industry and the NRC staff have been working to improve the ITS, in NUREG-1430 through NUREG-1434 for the different plant vendors, and as a result, generic changes have been developed for the standard ITS in NUREG-1431.

In its application, the licensee stated that the proposed amendment is consistent with the NRC-approved Technical Specification Task Force (TSTF) Traveler Number 65, Revision 1, "Use of Generic Titles for Utility Positions" (hereafter referred to as TSTF-65). The TSTF was approved by the NRC staff in a letter dated November 10, 1994, for the use of licensees in proposing changes to plant-specific TSs based on NUREG-1431 for Westinghouse plants, and the TSs for Callaway are based on NUREG-1431. In reviewing the TSTF, the NRC staff agrees that the TSTF applies to Callaway, and the proposed amendment is consistent with the TSTF.

TSTF-65 revises TSs 5.1, 5.2.1, 5.2.2, and 5.5.1 to allow the use of generic personnel titles in the TSs as provided in ANSI/ANS 3.1, "Selection, Qualification, and Training of Personnel for Nuclear Power plants," in lieu of plant-specific personnel titles. The licensee's purpose for proposing to add TSTF-65 to the TSs for Callaway is the same purpose that the staff stated in approving the TSTF for NUREG-1431. In the TS Bases changes given in TSTF-65, the TSTF specified that the ANSI standard for titles shall be the same standard referenced in TS 5.3 for

unit staff qualifications and that the unit staff titles shall be specified in the Final Safety Analysis Report (FSAR) or Quality Assurance Plan for the plant in which changes to the titles would be controlled by 10 CFR 50.59 or 50.54(a), respectively. As stated in TS 5.3.1.1, the ANSI standard referenced in the TSs for the minimum unit staff qualifications is ANSI/ANS 3.1-1978 except for shift supervisors, operating supervisors, reactor operators, shift technical advisors, and the radiation protection manager.

### 3.0 REGULATORY REQUIREMENTS

Paragraph 50.34(b)(6)(i) of Title 10 of the Code of Federal Regulations (CFR) requires that the FSAR for a license to operate a nuclear power plant include information concerning the organizational structure, personnel qualifications, and related matters. Paragraph 50.36(c)(5), "Administrative controls," of 10 CFR Part 50, requires administrative controls related to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner to be in the TSs. In meeting 10 CFR 50.36(c)(5), the TSs list requirements regarding the organization for the safe operation of the facility, including listing titles of positions within the organization structure. Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," provides an acceptable method for implementing 10 CFR 50.34(b)(6)(i).

Section 50.36(c)(5) states that administrative controls are the provisions relating to organization and management necessary to ensure operation of the facility in a safe manner. The details of the organization and management that are required to be in the TSs were delineated in Generic Letter (GL) 88-06, "Removal of Organization Charts From Technical Specifications Administrative Control Requirements," dated March 22, 1988. These details included the "Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license."

In addition, applying the Commission's Final Policy Statement criterion to identify design conditions and associated surveillances to be retained in STS as LCOs has resulted in improved STS (i.e., NUREGs 1430-1434 for the different nuclear steam supply systems vendors, such as Westinghouse for Callaway). Licensees may, over time, voluntarily make changes to take advantage of the evolution in policy and guidance as to the required content and preferred format of technical specifications.

### 4.0 TECHNICAL EVALUATION

The licensee proposed the following changes to the Administrative Controls section of the TSs for Callaway:

1. TS 5.1.1, replace "Manager, Callaway Plant" by "plant manager" in two places.
2. TS 5.2.1.a, add the phrase "including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in the Technical Specifications" to the sentence that states "These requirements shall be documented in the FSAR."
3. TS 5.2.1.b, replace "Manager, Callaway Plant" by "plant manager."

4. TS 5.2.1.c, replace "The Senior Vice President and Chief Executive Officer" by "A specified corporate officer."
5. TS 5.2.2.d, replace "Plant Manager" by "plant manager" in two places.
6. TS 5.2.2.e, replace "Superintendent, Operations" by "operations manager or assistant operations manager."
7. TS 5.3.1.2, replace "Plant Manager" by "plant manager."
8. TS 5.5.1, second item b, replace "Plant Manager" by "plant manager."

The above eight changes are changes in title in accordance with TSTF-65; however, the sixth change will also allow either the operations manager or the assistant operations manager to hold a senior reactor operator (SRO) license. This is a change that is in addition to the TSTF. These proposed changes are addressed below.

#### 4.1 TSTF-65 Changes

The TSTF-65 changes are the eight changes listed above. These changes are the same changes shown in the NRC-approved TSTF. In its application, the licensee stated that the proposed changes to the TSs involving TSTF-65 are to allow the use of generic personnel titles as provided by ANSI/ANS-3.1-1978 in lieu of plant-specific personnel. The proposed changes are to (1) allow the licensee the flexibility to rotate management personnel into the various positions and revise position titles while still meeting the appropriate ANSI/ANS-3.3-1978 qualifications, and (2) to eliminate the need for future license amendments involving plant-specific position titles.

The licensee explained that the use of generic personnel titles does not change any of the qualifications or any of the duties and responsibilities of the positions affected by the proposed changes. The relationships between the titles in ANSI/ANS-3.1-1978 and the plant-specific personnel titles will be described in the FSAR, as is required by the words proposed to be added to TS 5.2.1.a. As stated in TS 5.3.1.1, the ANSI standard referenced in the TSs for unit staff qualifications is ANSI/ANS 3.1-1978 and this standard has been endorsed by RG 1.8, Revision 2, and 10 CFR Part 55.

Because the proposed TS changes are consistent with the approved TSTF-65, which is applicable to Callaway, and the justification for the TSTF-65 changes is applicable to Callaway, the staff concludes that the Callaway TSs continue to meet 10 CFR 50.36 and the Commission's Final Policy Statement that recognizes selective incorporation of improved STS requirements. Because of this and because (1) the proposed changes do not change any of the qualifications or any of the duties and responsibilities of the positions affected by the changes, (2) the relationship between the titles of these positions and the titles in ANSI/ANS-3.3-1978 standard, which is endorsed by RG 1.8, revision 2, and 10 CFR Part 55, will be delineated in the FSAR, and (3) this ANSI/ANS standard is referenced in the TSs for unit staff qualifications for the titles being changed, the staff concludes that the proposed changes meet 10 CFR 50.34(b)(6)(i) and 50.36(c)(5) and are, therefore, acceptable.



#### 4.2 Change Other than TSTF-65

For TS 5.2.2.e, in addition to the TSTF-65 changes discussed above, the licensee has also proposed to revise the TSs on unit staff organization to allow either the operations manager or the assistant operations manager (i.e., the currently entitled Superintendent, Operations or the Assistant Superintendent, Operations) to hold an SRO license. In the current TSs, the Superintendent, Operations, which would be replaced by the new title "operations manager," would be required to hold an SRO license. Based on the current TS 5.2.2.e, the assistant operations manager could hold an SRO license, but the operations manager would be required to also have an SRO license.

The licensee stated in its application that the Superintendent, Operations and the Assistant Superintendent, Operations meet the same minimum qualifications requirements and have the same responsibilities, duties, and authorities, and allowing the "operations manager or assistant operations manager" to hold an SRO license would provide additional flexibility in rotating the unit staff personnel while maintaining the appropriate qualification requirements. The licensee also stated that this change is consistent with TSTF-65.

In Amendment No. 37 for Callaway, dated June 21, 1988, the TSs were amended to remove the offsite and unit organization charts and add the requirement that the Superintendent, Operations or the Assistant Superintendent, Operations shall hold an SRO license. The basis for the amendment was that the proposed requirement met GL 88-06, and thus met 10 CFR 50.36(c)(5). In Amendment No. 37, dated December 21, 1993, the TSs were amended to remove the reference to "or Assistant Superintendent, Operations" because the position was to be abolished. Now the licensee has proposed to add a reference to the Assistant Superintendent, Operations (the title will be assistant operations manager in accordance with TSTF-65) because the position now exists. Since the proposed change is simply incorporating into the TSs what was approved in Amendment No. 37 because the position now exists, the staff concludes that the proposed change to allow either the Superintendent, Operations and the Assistant Superintendent, Operations to hold an SRO license (i.e., the operations manager or assistant operations manager in accordance with TSTF-65) is acceptable because it meets 10 CFR 50.36(c)(5).

#### 4.3 Conclusion

Based on the conclusions drawn in Sections 4.1 and 4.2 above of the safety evaluation, including the incorporation of the relationships between the titles in ANSI/ANS-3.1-1978 and the plant-specific personnel titles in the FSAR, the staff concludes that the proposed amendment is acceptable. By its commitment in Attachment 6 to its application, the licensee has agreed to incorporate the FSAR changes, including the relationships between the titles in ANSI/ANS-3.1-1978 and the plant-specific personnel titles in the FSAR, as described in the licensee's letter of March 21, 2003, during the implementation of the amendment. This is a condition of the amendment. The full incorporation of the change into the FSAR would then occur in the next update of the FSAR by the licensee in accordance with 10 CFR 50.71(e). This is acceptable to the staff.

Based on the above, the staff also concludes that the amendment also meets the requirements of the regulations (i.e., 10 CFR 50.34(b)(6)(i) and 50.36(c)(5)). This is to say that the FSAR for the license to operate Callaway includes information concerning the organizational structure and personnel qualifications and the TSs list requirements on the organization for the safe operation of the facility, including listing titles of positions within the organization structure.

#### 5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Missouri State official was notified of the proposed issuance of the amendment. The State official did not offer any comments.

#### 6.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Jack N. Donohew

Date: June 3, 2003

Callaway Plant, Unit 1

cc:

Professional Nuclear Consulting, Inc.  
19041 Raines Drive  
Derwood, MD 20855

John O'Neill, Esq.  
Shaw, Pittman, Potts & Trowbridge  
2300 N. Street, N.W.  
Washington, D.C. 20037

Mr. Mark A. Reidmeyer, Regional  
Regulatory Affairs Supervisor /  
Regulatory Affairs  
AmerenUE  
P.O. Box 620  
Fulton, MO 65251

U.S. Nuclear Regulatory Commission  
Resident Inspector Office  
8201 NRC Road  
Steedman, MO 65077-1302

Mr. J. V. Laux, Manager  
Quality Assurance  
AmerenUE  
P.O. Box 620  
Fulton, MO 65251

Manager - Electric Department  
Missouri Public Service Commission  
301 W. High  
P.O. Box 360  
Jefferson City, MO 65102

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

Mr. Ronald A. Kucera  
Deputy Director for Public Policy  
Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102

Mr. Rick A. Muench  
President and Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
P.O. Box 411  
Burlington, KA 66839

Mr. Dan I. Bolef, President  
Kay Drey, Representative  
Board of Directors Coalition  
for the Environment  
6267 Delmar Boulevard  
University City, MO 63130

Mr. Lee Fritz, Presiding Commissioner  
Callaway County Court House  
10 East Fifth Street  
Fulton, MO 65151

Mr. David E. Shafer,  
Superintendent Licensing  
Regulatory Affairs  
AmerenUE  
P.O. Box 66149, MC 470  
St. Louis, MO 63166-6149

Mr. John D. Blosser, Manager  
Regulatory Affairs  
AmerenUE  
P.O. Box 620  
Fulton, MO 65251

Mr. Scott Clardy, Director  
Section for Environmental Public Health  
P.O. Box 570  
Jefferson City, MO 65102-0570