

ATTACHMENT 1

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OQAM, REVISION 16

ADDITIONAL CHANGES

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1906 15.8 Material nonconformances which would impact the conduct of a test shall be corrected or resolved prior to initiation of the test on the item. The decision to proceed with the testing of a system or subsystem with outstanding material nonconformances shall consider the nature of the nonconformance, its effect on test results, and the need for supplemental tests or inspections after correction of the nonconformance. The evaluations shall be documented.

1848 15.9 Repaired and reworked items shall be reinspected or tested. Measures may be established to conditionally release nonconforming items whose disposition is pending, provided that an evaluation indicates that further work or activity will not contribute adversely to the material nonconformance or preclude identification and correction.

15.10 Material nonconformance summaries shall be prepared and analyzed for potential adverse quality trends semiannually. For nonconformances discovered upon receipt inspection of new purchases or discovered after an item has been accepted by receipt inspection but before issue from the warehouse, the Manager, Operations Support shall have the trend analysis prepared. For nonconformances discovered after issue or on items considered installed, the Manager, Nuclear Engineering shall have the trend analysis prepared. The Quality Assurance Department shall perform an independent review of these analyses through routine audits and surveillances. ~~activities.~~ The result of these assessments shall be reported to management.

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the results
to management

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REGULATORY GUIDE 1.8 (cont.)

The experience, training, and education requirements for the positions of Shift Supervisor, Operating Supervisor, and Reactor Operator, and personnel fulfilling the duties of Shift Technical Advisor shall meet or exceed the requirements and recommendations of ANSI/ANS 3.1-1981 as endorsed by the Regulatory Guide 1.8.

For all other positions, qualification and training shall comply with ANSI/ANS 3.1-1978 as clarified below:

Refer to Callaway-SA FSAR Section 13.1 for a discussion of the qualifications of personnel responsible for plant operation and support.

Personnel responsible for directing or supervising the conduct of safety-related preoperational and startup tests and for review and approval of safety-related preoperational and startup test procedures or results met the qualifications of the Regulatory Guide, but were not required to be certified.

With regard to Section 5.6 of ANSI/ANS 3.1 - 1978 titled Documentation: UE shall maintain records in accordance with and to meet the requirements of OQAM Section 17 and ANSI N45.2.9 as specified herein.

UE may use additional non-Callaway employees or contract personnel to augment the unit staff. These persons may or may not report to the Manager-Callaway Plant. These groups include, but are not limited to, UE personnel from other plants as well as supplemental HP and I&C technicians and QC inspectors. When used to perform safety-related activities, these personnel shall meet the education and experience requirements of ANSI/ANS 3.1 - 1978 for equivalent UE staff positions. If no equivalent positions exist, these personnel may be qualified for assigned tasks either by Union Electric or by Vendors with Union Electric approved training and qualification programs. Inspection, examination and testing personnel shall meet the requirements for certification as inspection, examination and testing personnel as set forth in UE's commitment to ANSI N45.2.6-1978 given elsewhere in this Appendix.

REGULATORY GUIDE 1.28

REVISION 2

DATED 2/79

Quality Assurance Program Requirements (Design and Construction)
(Endorses ANSI N45.2-1977)

DISCUSSION:

This Regulatory Guide is not applicable to the operating phase. However, ANSI N45.2-1977 will be applied to suppliers of safety related items, components or services, as appropriate, as described under Regulatory Guide 1.123 (ANSI N45.2.13-1976).

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REGULATORY GUIDE 1.88 (cont.)

The specific location of a record "within a storage area" may not be delineated. (e.g. The specific location within a computer record file may not be constant. Further, UE may utilize a computer assisted random access filing system where such location could not be readily "documented," or would such a location be "relevant.") The storage location shall be delineated, but where file locations change with time, the specific location of a record within that file may not always be documented.

With regard to Section 4.2 of ANSI N45.2.9 - 1974 titled Timeliness: UE's contractual agreement with its contractors and suppliers shall constitute fulfillment of the requirements of this Section.

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With regard to Section 5.3.3 of ANSI N45.2.9-1974: The phrase "A method for verifying that the records received are in agreement with the transmittal document ~~and that the records are in good condition~~", is clarified to mean that internal Callaway Plant generated records received are in agreement with procedural guidelines contained in Callaway Plant Administrative procedures. If a transmittal does exist (e.g. on supplier-generated documents, etc.), the records received will be verified against the transmittal document.

The following clarification is substituted for the current subsection 5.4.3: "Provisions shall be made for special processed records (such as radiographs, photographs, negatives, microfilm and magnetic media) to prevent damage from excessive light, stacking, electromagnetic fields, temperature and humidity as appropriate to the records type." Consideration shall be given to manufacturer's recommendation.

With regard to Section 5.5 of ANSI N45.2.9 - 1974 titled Safekeeping: Routine General Offices and Plant site security systems and access controls shall be provided: no special security systems are required to be established for record storage areas.

With regard to Section 5.6 of ANSI N45.2.9 - 1974 titled Facility: This Section provides no distinction between temporary and permanent facilities. To cover temporary storage, the following clarification is added: "Active records (those completed but not yet duplicated or placed on microfilm) may be temporarily stored in one-hour fire rated file cabinets. In general, records shall not be maintained in such temporary storage for more than three months after completion without being duplicated (for dual storage) or being placed on microfilm. Open-ended documents --those revised or updated on a more-or-less continuing basis over an extended period of time (e.g. personnel qualification and training documents, equipment history cards, master audit or master surveillance schedules) and those which are cumulative in

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OQAM, REVISION 16

ADDITIONAL EXPLANATIONS AND
JUSTIFICATIONS FOR PROPOSED
CHANGES TO THE OQAM

These clarifications are submitted based on a telecon with the NRC on 9/30/93, in which agreement was reached on the purpose and intended implementation of the changes.