

DESCRIPTION AND ASSESSMENT OF THE PROPOSED CHANGE

1.0	SUMMARY DESCRIPTION	Page 2
2.0	DETAILED DESCRIPTION	Page 2
3.0	TECHNICAL EVALUATION	Page 3
	3.1 Background	Page 3
	3.2 Deletion of Exceptions to ANSI/ANS 3.1-1978 from TS	Page 4
	3.3 Conforming Change to OQAM	Page 3
4.0	REGULATORY EVALUATION	Page 5
	4.1 Applicable Regulatory Requirements/Criteria	Page 5
	4.2 Precedent	Page 7
	4.3 No Significant Hazards Consideration Determination	Page 7
	4.4 Conclusions	Page 9
5.0	ENVIRONMENTAL EVALUATION	Page 9
6.0	REFERENCES	Page 9

DESCRIPTION AND ASSESSMENT OF THE PROPOSED CHANGE

1.0 SUMMARY DESCRIPTION

Ameren Missouri (Union Electric Company) is proposing to amend Renewed Facility Operating License NPF-30 for Callaway Plant. The proposed amendment would revise Technical Specification (TS) Administrative Control (AC) 5.3.1 and delete TS AC 5.3.1.1 and TS AC 5.3.1.2, as follows:

- TS AC 5.3.1 will be revised to state, in effect, that qualifications for members of the unit staff shall meet or exceed the minimum qualifications specified in the Operating Quality Assurance Manual (OQAM).
- TS AC 5.3.1.1 and TS AC 5.3.1.2, which contain details specified for the qualifications of certain positions within the unit staff that are duplicative with information in the OQAM, will be deleted.

2.0 DETAILED DESCRIPTION

TS AC 5.3, "Unit Staff Qualifications," presently states in part:

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, with the following exceptions:
- 5.3.1.1 Shift Managers, Operating Supervisors, Reactor Operators, and Shift Technical Advisors shall meet or exceed the qualifications of ANSI/ANS 3.1-1981 as endorsed by Reg. Guide 1.8, Revision 2, with the same exceptions as contained in the current revision to the Operator Licensing Examiner Standards, NUREG-1021, ES-202.
 - 5.3.1.2 The Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds the qualifications of USNRC Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager. The Radiation Protection Manager will be designated by the plant manager.

The exceptions to ANSI/ANS 3.1-1978 that are identified in TS AC 5.3.1.1 and 5.3.1.2 are also identified in the OQAM Appendix A commitment to Regulatory Guide 1.8, Rev. 2, "Qualification and Training of Personnel for Nuclear Power Plants." In order to reduce the regulatory burden associated with maintaining duplicate information in licensing documents that are subject to separate change processes (i.e., 10 CFR 50.90 for TS and 10 CFR 50.54(a) for the OQAM), it is proposed that TS AC 5.3.1.1 and TS AC 5.3.1.2 be deleted and that TS AC 5.3.1 be reworded as follows:

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications for the comparable position(s) addressed in the standard(s) that is referenced in the Callaway Plant Operating Quality Assurance Manual (OQAM), with exceptions specified in the OQAM.

A page markup reflecting the proposed change to TS AC 5.3.1 and deletion of TS AC 5.3.1.1 and TS AC 5.3.1.2 is provided in Attachment 1, and a retyped replacement TS page (reflecting the proposed changes) is provided in Attachment 3 to this Enclosure.

3.0 TECHNICAL EVALUATION

3.1 Background

The history of Callaway TS administrative controls for unit staff qualifications is described below.

During the initial licensing of Callaway Plant, the NRC established an obligation for Ameren Missouri to use personnel qualification standard ANSI/ANS 3.1-1978 for members of the unit staff (with exceptions for the qualifications of the Superintendent, Health Physics, licensed Operators and Senior Operators), as part of the Technical Specifications that were provided as Appendix A to the Callaway Plant Low Power License NPF-25 (issued as NUREG-1058, Rev. 0) and as Appendix A to the Callaway Plant Operating License NPF-30 (issued as NUREG-1058, Rev. 1). Unit staff qualifications were specifically addressed under TS 6.3.1 as established at the time.

The contents of TS 6.3.1 were based largely on a Note contained in model TS 6.3.1, "Unit Staff Qualifications," in NUREG-0452, Rev. 4, "Standardized Technical Specifications for Westinghouse Pressurized Water Reactors." The Note stated in part that "minimum staff qualifications for members of the unit staff shall be specified by use of an overall qualification statement referencing (an ANSI Standard agreed to by the NRC staff) or alternately by specifying individual position qualifications." As noted above, exceptions to the applicable standard, ANSI/ANS 3.1-1978, were specified in TS 3.6.1 in regard to the qualifications for certain positions.

Later in Callaway Plant's licensing history, License Amendment 60 relocated the exceptions to ANSI/ANS 3.1-1978 from TS 6.3.1 to new TS 6.3.1.1 and TS 6.3.1.2. License Amendment 60 also modified the exception for licensed Operators and Senior Operators (i.e., in TS 6.3.1.1), and made the exception apply specifically to the position titles "Shift Supervisors, Operating Supervisors, Reactor Operators and Shift Technical Advisors." License amendment 92 replaced the specific position title "Superintendent, Health Physics" with the ANSI/ANS 3.1-1978 generic position title "Radiation Protection Manager," and added a description of the position to TS 6.3.1.2, without altering the exception that had been taken to ANSI/ANS 3.1-1978.

In the 1999-2000 timeframe, License Amendment 133 was issued, which reflected Callaway Plant's conversion to Improved Technical Specifications (ITS). License amendment 133 relocated TS 6.3.1, TS 6.3.1.1 and TS 6.3.1.2 to new TS AC 5.3.1, TS AC 5.3.1.1 and TS AC 5.3.1.2, respectively, as part of ITS implementation. The most recent TS change related to the exceptions to ANSI/ANS 3.1-1978 was License Amendment 173, which revised TS AC 5.3.1.1 to replace the specific (plural) position title "Shift Supervisors" with "Shift Managers."

3.2 Deletion of Exceptions to ANSI/ANS 3.1-1978 from TS

Exceptions to personnel qualification standard ANSI/ANS 3.1-1978 are also specified in the Operating Quality Assurance Manual (OQAM) Appendix A commitment to Regulatory Guide 1.8, Rev. 2, "Qualification and Training of personnel for Nuclear Power Plants." The full text of the OQAM commitment reads as follows:

Ameren Missouri complies with the recommendations of this Regulatory Guide with the following clarifications and exceptions:

Revision 1, dated 9/75, applies to the position of Radiation Protection Manager only, in accordance with the Callaway Plant Technical Specifications. For the position of Radiation Protection Manager only, Regulatory Guide 1.8, Revision 1, September, 1975 is clarified by USNRC HPPOS-020, Clarification of Regulatory Guide 1.8 on Qualification of Radiation Protection Manager.

The experience, training, and education requirements for the positions of Shift Manager, 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, Revision 2, with the same exceptions as contained in the current revision to the Operating Licensing Examiner Standards, NUREG 1021, ES 202.

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.

Ameren Missouri may use additional Ameren employees or contract personnel to augment the unit staff. These groups include, but are not limited to, Ameren personnel from outside Nuclear Generation as well as supplemental Radiation Protection 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 positions or specified education and experience requirements for non-equivalent positions. As an alternative, these personnel can be qualified for assigned tasks either by Ameren Missouri through its systematic approach to training or by Vendors with Ameren Missouri approved training and qualification programs. Inspection, examination and testing personnel shall meet the requirements for certification as inspection, examination or testing personnel as set forth in Ameren Missouri's commitment to ANSI N45.2.6-1978 given elsewhere in this Appendix.

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

As shown above, the fourth paragraph of the OQAM commitment to Regulatory Guide 1.8, Rev. 2, specifies the use of ANSI/ANS 3.1-1978 for qualification and training, with exceptions for the positions of Shift Manager, Operating Supervisor, Reactor Operator, and Shift Technical Advisor being provided in the second paragraph of the commitment, and exceptions for the Radiation Protection Manager being provided in the third paragraph of the commitment. It can be seen that the exceptions that are taken to ANSI/ANS 3.1-1978 in the OQAM commitment are identical to those contained in TS AC 5.3.1.1 and TS AC 5.3.1.2.

In consideration of the above, the proposed deletion of the exceptions to ANSI/ANS 3.1-1978 from the TS is administrative in nature, and will not result in a change to Callaway Plant's commitment to the noted standards for qualification of members of the unit staff.

3.3 Conforming Change to OQAM

It should be noted that the proposed changes to TS AC 5.3.1, including the deletion of TS AC 5.3.1.1 and TS AC 5.3.1.2, if approved, will require a change be made to the OQAM. Specifically, in the OQAM Appendix A commitment to Regulatory Guide 1.8, Rev. 2, the text of which was just presented in Section 3.2, it can be seen that the second paragraph describes or clarifies qualification requirements applicable to the position of Radiation Protection Manager "in accordance with the Callaway Plant Technical Specifications." In light of the proposed change to delete TS AC 5.3.1.2, this reference to the TS will no longer be applicable or appropriate if the proposed TS changes in this license amendment request are approved. The noted OQAM text will thus be revised as shown in Attachment 2 to this Enclosure. This OQAM change is presented for information only, and will be implemented in connection with implementation of the proposed license amendment after approval.

4.0 **REGULATORY EVALUATION**

4.1 Applicable Regulatory Requirements / Criteria

The regulatory requirements and/or guidance documents associated with this amendment application include the following:

The regulations in paragraph (c)(5) of 10 CFR 50.36, "Technical specifications," provide requirements for the content of the TS in the category of administrative controls.

The regulations in 10 CFR 50.120, "Training and qualification of nuclear power plant personnel," require training and qualification for personnel to operate and maintain the facility in a safe manner in all modes of operation.

Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR 50 provides requirements for quality assurance programs. The regulations in 10 CFR 50.54(a)

provides requirements for making changes to quality assurance programs. Paragraph 50.54(a)(3) of 10 CFR states in part that:

Each licensee described in [10 CFR 50.54(a)(1)] may make a change to a previously accepted quality assurance program description included or referenced in the Safety Analysis Report without prior NRC approval, provided the change does not reduce the commitments in the program description as accepted by the NRC. Changes to the quality assurance program description that do not reduce the commitments must be submitted to the NRC in accordance with the requirements of [10 CFR] 50. 71(e).

Paragraph 50.54(a)(4) of 10 CFR requires changes to the quality assurance program that do reduce commitments to be submitted to the NRC and receive NRC approval prior to implementation.

Section 13.2.2, "Non-Licensed Plant Staff Training," (ADAMS Accession No. ML 15006A129) of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: [Light-Water Reactor] LWR Edition," provides guidance for the review of training programs for non-licensed plant staff.

NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995 (ADAMS Accession No. ML031110271), provides guidance for relocating requirements from the administrative controls section of TSs in cases where adequate controls are provided by other methods.

AL 95-06 notes that the quality assurance program is a logical candidate for such relocations due to the controls imposed on the quality assurance program by regulations (e.g., 10 CFR 50, Appendix B, and 10 CFR 50.54(a)), and the existence of NRC-approved quality assurance plans and commitments to industry quality assurance standards.

NRC Regulatory Guide (RG) 1.8, Revision 4, "Qualification and Training of Personnel for Nuclear Power Plants," dated June 2019 (ADAMS Accession No. ML19101A395), provides guidance that is acceptable to the NRC staff regarding training and qualifications of nuclear power plant personnel. Revision 1 of RG 1.8 endorsed ANSI N18.1-1971 with one exception. Revision 2 (April 1987) of RG 1.8 endorsed ANSI/ANS-3.1-1981 for certain positions and ANSI N18.1-1971 for other positions, with exceptions, clarifications, and additions. Revision 3 (May 2000) of RG 1.8 endorsed ANSI/ANS-3.1-1993, with exceptions, clarifications, and additions. Revision 4 of RG 1.8 endorsed ANSI/ANS-3.1-2014, with exceptions, clarifications, and additions.

There are no changes being proposed in this amendment application such that conformance or commitments to the regulatory requirements and/or guidance documents above would come into question. The evaluations documented herein confirm that Callaway Plant will continue to comply with all applicable regulatory requirements.

In conclusion, based on considerations discussed herein, (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) issuance of the

amendment will not be inimical to the common defense and security or to the health and safety of the public.

4.2 Precedent

A precedent for the proposed change to relocate qualification requirements and exceptions from the TS to the OQAM may be found in a letter dated August 2, 2018 from the NRC Office of Nuclear Reactor Regulation (NRR) to Exelon (Reference 19), which approved changes to the QA Topical Report (QATR) for Exelon (the fleet equivalent to Callaway Plant's OQAM), and issued license amendments to Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 2 and 3; James A. Fitzpatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; R. E. Ginna Nuclear Power Plant; and Three Mile Island Nuclear Station, Unit 1. Section 3.0 of the Safety Evaluation Report attached to the August 2, 2018 letter states in part:

The relocation of the licensee's staff qualification requirements to the Exelon QATR is consistent with the guidance in AL 95-06 and with past precedent.

The NRC staff concludes that the requirements of 10 CFR 50.36 and 50.120 will continue to be met because the licensee's staff qualification requirements will not be changed by these amendments. In addition, future changes to the licensee's staff qualification requirements that are relocated to the Exelon QATR must be made in accordance with 10 CFR 50.54(a). Future reduction in commitments associated with the licensee's staff qualification requirements that are relocated to the Exelon QATR will require NRC approval, per 10 CFR 50.54(a)(4), prior to implementation. Therefore, the proposed TS changes and relocation of the licensee's staff qualification requirements to the Exelon QATR are acceptable.

4.3 No Significant Hazards Consideration Determination

Ameren Missouri has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," 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 license amendment would delete exceptions to personnel qualification standard ANSI/ANS 3.1-1978 that are identified in the Administrative Controls section of the Callaway Plant Technical Specifications but which are also identified in, and would remain in the Callaway Plant Operating Quality Assurance Manual (OQAM). The proposed changes will not impact the design, operation, testing, performance, or reliability of any plant system or component. The changes do not affect licensed operator qualifications or training, which will continue to comply

with applicable regulations. The changes do not affect operating procedures or operator response to any accidents previously evaluated in the Final Safety Analysis Report (FSAR).

Therefore, it is concluded that this change does 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 license amendment is administrative in nature and does not introduce any credible new failure mechanisms, malfunctions, or accident initiators. The changes will not alter the plant configuration, require new plant equipment to be installed, alter accident analysis assumptions, introduce any new accident initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected.

Therefore, it is concluded that this change does not create the possibility of 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 margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change is administrative in nature and does not involve any physical changes to the plant or alter the manner in which plant systems are operated, maintained, modified, tested, or inspected. The proposed change does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside the design basis. The proposed change does not adversely affect systems that respond to safely shutdown the plant or are used to maintain the plant in a safe shutdown condition.

Therefore, it is concluded that the proposed change does not involve a significant reduction in a margin of safety.

In consideration of all of the above, Ameren Missouri concludes that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and on that basis, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

Based on the considerations discussed above, 1) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed changes, 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.

5.0 ENVIRONMENTAL EVALUATION

The proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

6.0 REFERENCES

1. ANSI/ANS 3.1-1978, "Standard for Selection and Training of Personnel for Nuclear Power Plants"
2. ANSI/ANS 3.1-1981, " Selection, Qualification and Training of Personnel for Nuclear Power Plants"
3. Regulatory Guide 1.8, Rev. 2, "Qualification and Training of Personnel for Nuclear Power Plants" (April 1987)
4. NUREG-1021 Rev. 10, "Operator Licensing Examiner Standards – Final Report" (ADAMS Accession No. ML14352A297)
5. Regulatory Guide 1.8 Rev. 1, "Personnel Selection and Training" (September 1975)
6. NUREG-0452, Rev. 4, "Standardized Technical Specifications for Westinghouse Pressurized Water Reactors,"
7. NUREG-1431 Rev. 4, "Standard Technical Specifications – Westinghouse Plants"
8. NUREG-1058 Rev. 0, "Technical Specifications Callaway Plant, Unit No. 1"
9. NUREG-1058 Rev. 1, "Technical Specifications Callaway Plant, Unit No. 1"
10. NRC Letter dated December 7, 1990 from A. T. Gody to D. F. Schnell, "Amendment No. 60 to Facility Operating License No. NPF-30 (TAC No. 75506)" (ADAMS Accession No. ML021680076)
11. NRC Letter dated September 6, 1994 from L. R. Wharton to D. F. Schnell, "Amendment No. 92 to Facility Operating License No. NPF-30 – Callaway Plant, Unit 1 (TAC No. MB6075)" (ADAMS Accession No. ML021640006)
12. NRC letter dated May 28, 1999 from J. N. Donohew to G. L. Randolph, "Conversion to Improved Technical Specifications for Callaway Plant, Unit 1 – Amendment No. 133 to Facility Operating License No. NPF-30 (TAC No. M98603)" (ADAMS Accession No. ML021640446)
13. NRC letter dated July 11, 2006 from J. Donohew to C. D. Naslund, "Callaway Plant, Unit 1 – Issuance of Amendment Re: Revising a Position Title and Department Name in

- Technical Specification 5.0, Administrative Controls" (TAC No. MD1161)" (ADAMS Accession No. ML061250207)
14. US NRC Health Physics Position HPPOS-020, "Clarification of Regulatory Guide 1.8 on Qualification of Radiation Protection Manager" (ADAMS Accession No. ML103420211)
 15. NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: [Light-Water Reactor] LWR Edition," Section 13.2.2, "Non-Licensed Plant Staff Training" (ADAMS Accession No. ML 15006A129)
 16. NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995 (ADAMS Accession No. ML031110271)
 17. Regulatory Guide 1.8, Rev. 3, "Qualification and Training of Personnel for Nuclear Power Plants" (May 2000) (ADAMS Accession No. ML003706932)
 18. Regulatory Guide 1.8, Rev. 4, "Qualification and Training of Personnel for Nuclear Power Plants" (June 2019) (ADAMS Accession No. ML19101A395)
 19. NRC Letter dated August 2, 2018 from B. L. Purnell to B. C. Hanson, "Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 2 and 3; James A. Fitzpatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; R. E. Ginna Nuclear Power Plant; and Three Mile Island Nuclear Station, Unit 1 - Issuance of Amendments to Relocate the Staff Qualification Requirements (EPID L-2018-LLA-0053)" (ADAMS Accession No. ML18206A282)