ATTACHMENT 1

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IDENTIFICATION OF CHANGES

1904 15.4 Material nonconformances shall be processed in
1905 accordance with documented procedures and shall
1907 identify the specifics of the nonconformance stating the particular drawing, specification or other requirement; shall record the disposition; and shall register the signature of an approval authority. Procedures shall prescribe the individuals or groups assigned the responsibility and authority to approve and verify the implementation of the disposition of material nonconformance.

1907 15.5 Material nonconformance disposition categories
2334 shall include:

1. "Use-as-is" or "acceptable" (including conditional releases)
2. "Reject" or "not acceptable, scrap, or return to vendor"
3. "Rework" in accordance with approved procedures
4. "Repair" in accordance with approved procedures

Material nonconformances shall be reviewed and accepted, rejected, repaired, reworked, or conditionally released in accordance with documented procedures. An approved disposition of a nonconformance which allows a reduction in the requirements of a safety-related structure, system, or component, shall be treated as a design change subject to the controls prescribed in Section 3.

1848 15.6 Nuclear Engineering shall be responsible for
1905 approving material nonconformance dispositions of
1907 "use-as-is" and "repair". Licensing and Fuels
2335 shall be responsible for approving material nonconformance dispositions of "use-as-is" and "repair" on nuclear fuel which are generated prior to the arrival of such fuel at the Callaway Plant. Regarding material nonconformances identified on-site, QC personnel shall be responsible for verification that approved dispositions have been implemented and for the final sign-off.

15.7 Nonconformance documents which record defects in basic components ~~or deviations from technical requirements in procurement documents~~ shall be reviewed for reporting applicability under 10CFR21 and other Federal reporting requirements. Significant nonconforming conditions involving a defect or material noncompliance in a ~~delivered~~ component or a service which could create a substantial safety hazard shall be reported to the Nuclear Regulatory Commission pursuant to the requirements of 10CFR21.

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receipt acceptal
which has commenced

16.2 Conditions adverse to quality which are classified as nonconformances shall be controlled in accordance with the additional requirements described in OQAM, Section 15.

16.3 Conditions adverse to quality which impede the implementation or reduce the effectiveness of the Operating QA Program shall be considered significant conditions adverse to quality. Significant conditions adverse to quality may include, but are not limited to, noncompliance with procedural requirements which impact nuclear or personnel safety; reportable occurrences required by regulations; adverse nonconformance trends; deficiencies identified in the OQAP; recurring conditions for which past corrective action has been ineffective; and managerial controls which could result in the failure of a plant system to perform it's intended function. Examples of such conditions include those which match the descriptions in Callaway Plant Technical Specification 6.5.1.6f, g, h, l, m (potential hazards to nuclear safety) and NPDES violations.

16.4 Conditions adverse to quality which involve defects in basic components ~~or deviations from technical requirements in procurement documents~~ shall be reviewed for reporting applicability under 10CFR21 and other Federal reporting requirements. Reportable conditions adverse to quality are classified as significant.

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16.5 The nature of the condition adverse to quality may be such that remedial actions must be taken immediately, whereas development and implementation of corrective action to preclude recurrence may take substantially longer.

1871 16.6 Nuclear Engineering personnel shall review conditions adverse to quality which involve design deficiencies or which involve recommending design changes as corrective action. Licensing and Fuels should review conditions adverse to quality for fuel-related issues. The ORC shall review significant conditions adverse to quality.

16.7 Corrective action documents shall be closed by verifying the implementation and adequacy of corrective action. The closure of corrective action documents shall be accomplished as promptly as practicable after the corrective action taken has been verified. Verification may be accomplished through direct observations, written communications, re-audit, surveillances, or other appropriate means.

ATTACHMENT 2

OQAM, CN 94-04

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EXPLANATIONS OF AND JUSTIFICATIONS
FOR PROPOSED CHANGES TO THE OQAM

OQAM
CN 94-04

Description of Change:

Revise OQAM Sections 15.7 and 16.4 to enable reporting of 10CFR Part 21 via other reporting mechanisms.

Justification:

10CFR Part 21.2(c), dated March 31, 1994, allows persons operating under 10CFR Part 50 to evaluate and report potential defects under 10CFR50.72, 10CFR50.73, or 10CFR73.71. This satisfies the responsibility to report defects under section 206 of the Energy Reorganization Act of 1974. As discussed in Part 21, Proposed Rule Making dated April 30, 1992, this change was made to eliminate potential duplicative evaluation and reporting requirements.

In an effort to streamline reporting and clarify Union Electric's reporting process, Union Electric will report significant defects to basic components via part 21 for those components that have been receipt accepted by QC, but have not been installed in the system. For items installed in the system that have significant defects, the condition will be reported via plant LER procedures. For items that have not been installed in the system and have not been receipt accepted, reporting is the responsibility of the vendor. UE will notify the vendor of such problems. The evaluation of material defects is performed as a part of plant corrective action programs. Since there is no change in reporting, only the reporting mechanism, for basic components with significant defects, this change does not result in any unreviewed safety question and the OQAM will continue to satisfy the requirements of 10CFR50 Appendix B.