

ATTACHMENT 1
TECHNICAL SPECIFICATION CHANGES

ADMINISTRATIVE CONTROLS

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Administrative Procedures shall be approved by the appropriate Department Head as designated in writing by the General Manager Nuclear Operations. The Manager, Callaway Plant, shall approve Administrative Procedures and Radiological Emergency Response Plan implementing procedures. The Manager, Operations Support, shall approve the Security Plan implementing procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation;
- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Manager, Callaway Plant. Each such modification shall be reviewed by a qualified individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Manager, Callaway Plant;
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by a qualified individual/group other than the individual/group which prepared the proposed test or experiment. Proposed test and experiments shall be approved before implementation by the Manager, Callaway Plant;

Replace w/
"VICE PRESIDENT"

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.2.2 The NSRB shall be composed of at least the following members:

Chairman:	Manager, Licensing and Fuels
Member:	Manager, Nuclear Engineering
Member:	Manager, Nuclear Safety and Emergency Preparedness
Member:	Manager, Quality Assurance
Member:	General Manager, Nuclear Operations
Member:	Supervising Engineer, Nuclear Fuels

Replace w/ "VICE PRESIDENT"

Additional members and Vice Chairman may be appointed by the Chairman.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the NSRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NSRB activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NSRB Chairman to provide expert advice to the NSRB.

MEETING FREQUENCY

6.5.2.5 The NSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUALIFICATIONS

6.5.2.6 The NSRB members shall hold a Bachelor's degree in an engineering or physical science field, or equivalent experience, and a minimum of 5 years of technical experience of which a minimum of 3 years shall be in one or more of the disciplines of Specification 6.5.2.1.

QUORUM

6.5.2.7 The quorum of the NSRB necessary for the performance of the NSRB review and audit functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least two-thirds of the NSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit. For the purpose of a quorum, those considered to have line responsibility will include the General Manager, Nuclear Operations, and personnel reporting to the General Manager, Nuclear Operations.

*Replace w/
"VICE PRESIDENT"*

ATTACHMENT 2
SAFETY EVALUATION

SAFETY EVALUATION

This amendment application requests a revision to Technical Specification Section 6 to reflect the change in the title "General Manager, Nuclear Operations" to "Vice President, Nuclear Operations."

The Vice-President, Nuclear Operations will continue to serve on the Nuclear Safety Review Board and have line responsibility for operation of the Callaway Plant as specified in Technical Specifications 6.5.2.2 and 6.5.2.7. The proposed change has been evaluated and determined to have no adverse impact on the ability of plant personnel to perform their responsibilities.

The proposed change to Technical Specification Section 6 does not involve an unreviewed safety question because operation of the Callaway Plant with this change would not:

1. Increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report.

The proposed change does not affect accident initiators or assumptions. The radiological consequences of any accident previously evaluated remain unchanged.

2. Create the possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report.

The proposed change does not create any new accident initiators nor involve any modifications or changes in the plant.

3. Reduce the margin of safety as defined in the basis for any technical specification.

The proposed change does affect any safety limits or boundary or system performance.

The proposed change does not reduce the overall base of experience at the Callaway Plant nor the commitment to minimum qualifications. The duties, reporting relationships, and approval responsibilities are not altered. Callaway Plant personnel will continue to have the training, experience, and expertise necessary to recognize, analyze, assess, evaluate, and effectively respond to plant transients or other abnormal events.

Given the above discussions, as well as those presented in the Significant Hazards Consideration, the proposed change does not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

ATTACHMENT 3
SIGNIFICANT HAZARDS EVALUATION

SIGNIFICANT HAZARDS EVALUATION

This amendment application requests a revision to Technical Specification Section 6 to reflect the change in the title "General Manager, Nuclear Operations" to "Vice President, Nuclear Operations."

The Vice-President, Nuclear Operations will continue to serve on the Nuclear Safety Review Board and have line responsibility for operation of the Callaway Plant as specified in Technical Specifications 6.5.2.2 and 6.5.2.7. The proposed change has been evaluated and determined to have no adverse impact on the ability of plant personnel to perform their responsibilities.

The proposed change to Technical Specification Table 6.2-1 does not involve a significant hazards consideration because operation of the Callaway Plant with this change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The change does not affect accident initiators or assumptions. The radiological consequences of any accident previously evaluated remain unchanged.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

The proposed change does not create any new accident initiators nor involve any modifications or changes in the plant.

3. Involve a significant reduction in a margin of safety.

The proposed change will not affect any safety limits or boundary or system performance.

The proposed change does not reduce the overall base of experience at the Callaway Plant nor the commitment to minimum qualifications. The duties, reporting relationships, and approval responsibilities are not altered. Callaway Plant personnel will continue to have the training, experience, and expertise necessary to recognize, analyze, assess, evaluate, and effectively respond to plant transients or other abnormal events.

As discussed above, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any previously evaluated, or result in a significant reduction in a margin of safety. Therefore, it has been determined that the proposed change does not involve a significant hazards consideration.

ATTACHMENT 4
ENVIRONMENTAL CONSIDERATION

ENVIRONMENTAL CONSIDERATION

This amendment application requests a revision to Technical Specification Section 6 to reflect the change in the title "General Manager, Nuclear Operations" to "Vice President, Nuclear Operations."

The proposed amendment involves a change to the administrative controls on plant personnel located within the restricted area as defined in 10 CFR 20. Union Electric has determined that the proposed amendment does not involve:

- 1) A significant hazard consideration, as discussed in Attachment 3 of this amendment application;
- 2) A significant change in the types or significant increase in the amounts of any effluents that may be released offsite;
- 3) A significant increase in individual or cumulative occupational radiation exposure.

Accordingly the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.12(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.