

UNION ELECTRIC COMPANY

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ST. LOUIS, MISSOURI

DONALD F. SCHNELL  
VICE PRESIDENT

October 8, 1984

MAILING ADDRESS:  
P. O. BOX 149  
ST. LOUIS, MISSOURI 63166

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Denton:

ULNRC- 941

DOCKET NUMBER 50-483  
CALLAWAY PLANT, UNIT 1  
REVISION TO TECHNICAL SPECIFICATION 6.5.1.2 AND  
FIGURE 6.2-2 AND CORRECTION TO TECHNICAL SPECIFICATION 3.3.3.7  
Reference: ULNRC-935 dated September 27, 1984

Union Electric Company is transmitting three (3) original and forty (40) conformed copies of an application for Amendment to Facility Operating License No. NPF-25 for the Callaway Plant, Unit 1.

This application requests that Callaway Technical Specification 6.5.1.2 be revised to include an additional member, the Assistant Manager, Administrative, to the On-site Review Committee (ORC); and that Figure 6.2-2 be revised to include two additional positions for Assistant Manager, Administrative and Superintendent, Outages. As described in the referenced letter, these organizational changes were made to enhance the effectiveness and capability of the Operations Department. While these revisions represent changes in reporting relationships and responsibilities, they do not represent a change in any organizational commitments. Furthermore, the addition of the Assistant Manager, Administrative to ORC is purely administrative, since the actual personnel involved are currently members of ORC.

In addition, this amendment request includes a correction to a reference in Technical Specification 3.3.3.7. The reference to Specification 4.6.1.6 is in error and should be corrected to Specification 4.6.1.5. This correction involves a purely administrative change to the Technical Specification.

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PDR ADOCK 05000483  
P PDR

Rec'd w/ check \$150.00  
# 329571

Acc'd  
1/1

These organizational revisions and appointments have been made and became effective on October 1, 1984. Attachment 1 to this letter describes all enclosures transmitted herewith.

Enclosed is a check for the \$150 application fee as requested by 10CFR171.21.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Donald F. Schnell".

Donald F. Schnell

DJW/lw

Attachments

STATE OF MISSOURI )  
                              )     S S  
CITY OF ST. LOUIS )

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell  
Donald F. Schnell  
Vice President  
Nuclear

SUBSCRIBED and sworn to before me this 8<sup>th</sup> day of October, 1984.

Barbara J. Pfaff  
BARBARA J. PFAFF  
NOTARY PUBLIC, STATE OF MISSOURI  
MY COMMISSION EXPIRES APRIL 22, 1985  
ST. LOUIS COUNTY

Attachment 1

Enclosure A	Safety Evaluation
Enclosure B	Significant Hazards Consideration
Enclosure C	Marked Technical Specification Pages

### Safety Evaluation

This amendment request revises Technical Specification Figure 6.2-2 to include two additional positions, and also revises Technical Specification 6.5.1.2 to include an additional member to the On-Site Review Committee (ORC). The additions to Figure 6.2-2 include the new positions of Assistant Manager, Administrative and the Superintendent, Outages. The addition of the Assistant Manager, Administrative is designed to enhance the effectiveness and capability of the Operations Department by segregating certain administrative and personnel matters from the operation and maintenance of the plant. In the same effort to enhance plant operations and maintenance, the Superintendent, Outages will be responsible for all aspects of planning and scheduling plant outages. Mr. A. P. Neuhalfen, formerly Assistant Manager, Operations and Maintenance is appointed to the position of Assistant Manager, Administrative. Mr. D. C. Poole, Advisor to the Manager, Callaway Plant is appointed, in addition, the Assistant Manager-Operations and Maintenance. Mr. W. H. Sheppard, formerly Superintendent-Engineering is appointed to the new position of Superintendent-Outages. Mr. W. R. Campbell, formerly Assistant Superintendent-Engineering is promoted to Superintendent-Engineering. While this amendment request represents changes in reporting relationships and responsibilities, it does not represent a change in any organizational commitments. Furthermore, the addition of the Assistant Manager, Administrative to ORC in Technical Specification 6.5.1.2 is purely administrative since the actual personnel involved are currently members of ORC.

In addition, this amendment request includes a correction to a reference in Technical Specification 3.3.3.7. The reference to Specification 4.6.1.6 is in error and should be corrected to Specification 4.6.1.5. This correction involves a purely administrative change to the Technical Specification.

Pursuant to the information above, the proposed revisions to Technical Specification Figure 6.2-2 and to Technical Specification 6.5.1.2, as well as the correction to Technical Specification 3.3.3.7, do not adversely affect or endanger the health or safety of the general public, and do not involve an unreviewed safety question.



### Significant Hazards Consideration

This amendment request revises Technical Specification Figure 6.2-2 to include two additional positions, and also revises Technical Specification 6.5.1.2 to include an additional member to the On-Site Review Committee (ORC). The additions to Figure 6.2-2 include the new positions of Assistant Manager, Administrative and the Superintendent, Outages. The addition of the Assistant Manager, Administrative is designed to enhance the effectiveness and capability of the Operations Department by segregating certain administrative and personnel matters from the operation and maintenance of the plant. In the same effort to enhance plant operations and maintenance, the Superintendent, Outages will be responsible for all aspects of planning and scheduling plant outages. Mr. A. P. Neuhalfen, formerly Assistant Manager, Operations and Maintenance is appointed to the position of Assistant Manager, Administrative. Mr. D. C. Poole, Advisor to the Manager, Callaway Plant is appointed, in addition, the Assistant Manager-Operations and Maintenance. Mr. W. H. Sheppard, formerly Superintendent-Engineering is appointed to the new position of Superintendent-Outages. Mr. W. R. Campbell, formerly Assistant Superintendent-Engineering is promoted to Superintendent-Engineering. While this amendment request represents changes in reporting relationships and responsibilities, it does not represent a change in any organizational commitments. The changes do constitute additional organizational controls not presently included in the Technical Specifications. Furthermore, the addition of the Assistant Manager, Administrative to ORC in Technical Specification 6.5.1.2 is purely administrative since the actual personnel involved are currently members of ORC.

In addition, this amendment request includes a correction to a reference in Technical Specification 3.3.3.7. The reference to Specification 4.6.1.6 is in error and should be corrected to reference Specification 4.6.1.5. This correction involves a purely administrative change to the Technical Specification.

The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (48 FR 14870). One of the examples of actions involving no significant hazards consideration relates to a purely administrative change to Technical Specifications. Another example involving no significant hazards consideration is a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications.

These requests do not involve a significant increase in the probability or consequence of an accident or other adverse condition over previous evaluations; or create the possibility of a new or different kind of accident or condition over previous evaluations; or involve a significant reduction in a margin of safety. Based on this information, the requested license amendment does not present a significant hazard.