

October 23, 1995

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Senior Vice President  
Nuclear

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, D.C. 20555

ULNRC-03281

Gentlemen:

**DOCKET NUMBER 50-483**  
**CALLAWAY PLANT**  
**REVISION TO TECHNICAL SPECIFICATION 6.0**  
**ADMINISTRATIVE CONTROLS**

- Reference:
1. ULNRC-3033, dated June 21, 1994 from Union Electric to NRC
  2. Letter from NRC to Union Electric dated September 1, 1995
  3. Teleconference Memorandum dated October 10, 1995 between Ray Wharton (NRC) and Dave Shafer (Union Electric)

Union Electric Company herewith transmits a Supplement to the application for amendment to Facility Operating License No. NPF-30 for Callaway Plant. The original amendment request is detailed in Reference 1. References 2 and 3 are attached for your convenience.

The original amendment application and the supplement delete the Callaway Technical Specification sections describing the On-Site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB). All of the information contained in these sections is also contained in Chapter 13 of the Callaway Plant Final Safety Analysis Report.

Based on the NRR's response in Reference 2, review and audit requirements cannot be deleted from the T.S. unless they are relocated to a document subject to review per 10CFR50.54(a), NRR has indicated its unwillingness to allow revisions of review and audit requirements to be determined by the licensee through the 10CFR50.59 mechanism. Although we believe 10CFR50.59 provides assurance that such requirements can be dealt with responsibly by licensees, we have deferred to the NRR's position. In response to Reference 2, this Supplement to the original Amendment Request (Reference 1) relocates the sections removed from the Callaway Technical Specifications to the

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Operational Quality Assurance Manual (OQAM). Under the Operational Quality Assurance Program, any program changes are performed in accordance with 10 CFR 50.54(a).

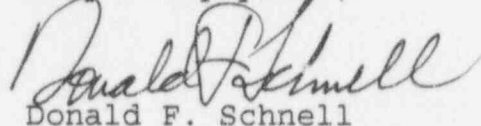
In addition, Reference 2 and 3 provide supplemental guidance in which NRR indicated acceptance of 24-month performance based audit frequencies. Included among the changes are revisions to audit frequencies based upon performance, not to exceed 24 months, and in conformance with References 2 and 3. However, a triennial audit of fire protection utilizing a non-Union Electric fire protection consultant is still a requirement.

Union Electric will continue to support NEI and all industry efforts to reduce unnecessary regulatory burdens by proposed revisions to 10 CFR 50.54(a) that change the control process requiring the need for NRC review.

Concurrent with this Amendment Request, the Quality Assurance Program changes are being submitted to the Region IV NRC office for review. Attachment 5 provides the proposed revisions to the OQAM, including those associated with this supplemental submittal. Attachments 1, 2, 3, and 4 contain the revised Safety Evaluation, the Significant Hazards Evaluation, the Environmental Evaluation, and the Proposed Technical Specification Changes. Revision bars delineate the changes associated with this Supplement in contrast to the original submittal.

This change request has been approved by the Callaway Onsite Review committee and the Nuclear Safety Review Board.

Very truly yours,



Donald F. Schnell

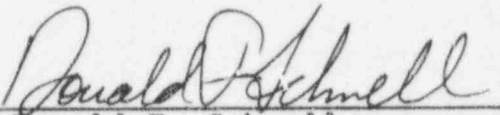
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- Attachment 1 - Safety Evaluation
- Attachment 2 - Significant Hazard Evaluation
- Attachment 3 - Environmental Consideration
- Attachment 4 - Proposed Technical Specification Changes
- Attachment 5 - Operating Quality Assurance Manual Revisions
- Reference 2 - Letter from NRC to Union Electric dated September 1, 1995
- Reference 3 - Teleconference Memorandum dated October 10, 1995, between Ray Wharton (NRC) and Dave Shafer (Union Electric)

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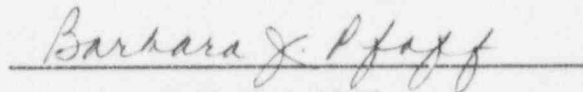
Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Senior Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power 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  
Senior Vice President  
Nuclear

SUBSCRIBED and sworn to before me this 23rd day  
of October, 1995.



BARBARA J. PFAFE  
NOTARY PUBLIC—STATE OF MISSOURI  
MY COMMISSION EXPIRES APRIL 22, 1997  
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### SAFETY EVALUATION

- References:
1. Supplement to ULNRC-3033, dated 6/21/94
  2. NRC Letter dated 9/1/95
  3. Teleconference Memorandum with NRC (R. Wharton) and Union Electric (D. E. Shafer) dated October 10, 1995

### Background

Effective July 1, 1994 the Manager, Nuclear Safety and Emergency Preparedness (a member of the Nuclear Safety Review Board) will retire. That position will no longer exist, and the responsibilities will be divided between the Manager, Quality Assurance and the Manager, Emergency Preparedness and Organizational Support.

Rather than making a Technical Specification change of narrow scope now, and making subsequent changes upon each title or organizational change, we request a Technical Specification revision of the Administrative Controls section based on the latest proposed revision of the Standardized Technical Specifications.

In response to the NRC Letter, dated September 1, 1995, this Supplement to the original Amendment Request, dated June 21, 1994, relocates the sections removed from the Callaway Technical Specifications to the Operational Quality Assurance Manual (OQAM). Under the Operational Quality Assurance Program, any program changes are performed in accordance with 10 CFR 50.54(a). Union Electric continues to support the industry and Nuclear Energy Institute's rulemaking efforts to reduce regulatory burdens through proposed revisions to 10 CFR 50.54(a).

### Proposed Changes

The proposed technical specification changes delete the sections describing the On-Site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB). All of the information contained in these sections is also contained in Chapter 13 of the Callaway Plant Final Safety Analysis Report (FSAR).

The relocated sections, including the audit and review requirements, will be incorporated into the Operational Quality Assurance Manual and will be controlled in conformance with 10 CFR 50.54(a). The audit frequencies contained in the former Technical Specification 6.5.2.9, are relocated to the OQAM and revised to reflect performance based audit frequencies, not to exceed 24 months, and in conformance with the referenced NRC Letter, dated September 1, 1995 and the Teleconference Memorandum dated October 10, 1995.



References to the Independent Safety Engineering Group (ISEG) will reflect that it now reports to the Manager, Quality Assurance, who is also a member of the NSRB, instead of the

Manager, Nuclear Safety and Emergency Preparedness. All references to the Manager, Nuclear Safety and Emergency Preparedness will be removed as that position no longer exists.

The affected Technical Specification Sections are 6.2.3, 6.5.1, 6.5.2, 6.5.3, and the Index.

#### Evaluation

The sections being deleted describe the function, composition, alternate membership, meeting frequency, quorum, responsibilities, and records of the On-site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB). These topics are covered in equivalent detail in the Callaway Plant Final Safety Analysis Report (FSAR) and plant administrative procedures as required by our commitment to ANSI N18.7-1976. When relocated to the OQAM, changes to these sections are controlled and updated in accordance with 10 CFR 50.54(a). No change is made to the ORC or the NSRB, except for the retirement of the Manager, Nuclear Safety and Emergency Preparedness, and no change is made to the manner in which they function.

The audit and review function requirements of 10 CFR 50.36(c)(5) continue to be described in Technical Specification section 6.5.3 and is controlled by the Operational Quality Assurance Manual (OQAM).

The proposed changes are administrative in nature. No change is required to plant facilities, components, or systems. The changes do not significantly reduce the overall base of experience at the Callaway Plant nor the commitment to minimum qualifications. 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.

The proposed changes to the Technical Specifications do not involve an unreviewed safety question because operation of the Callaway Plant with these changes would not:

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

The proposed changes do not affect accident initiators or assumptions. The radiological consequences of any accident previously evaluated remain unchanged. The changes are

administrative and equivalent descriptions and requirements for these oversight committees are contained in the OQAM.

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

The proposed changes do not create any new accident initiators nor involve any modifications or changes in the plant. The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in the OQAM.

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

The proposed changes do not affect any safety limits or boundary or system performance. The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in the OQAM.

On the basis of the above discussions and the considerations presented in the Significant Hazards Evaluation, the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

### SIGNIFICANT HAZARDS EVALUATION

The proposed technical specification changes delete the sections defining the composition and responsibilities of the On-Site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB). All of the information contained in these sections is also contained in Chapter 13 of the Callaway Plant Final Safety Analysis Report (FSAR).

In addition, references to the Independent Safety Engineering Group (ISEG) will reflect that it now reports to the Manager, Quality Assurance instead of the Manager, Nuclear Safety and Emergency Preparedness. The Manager, Quality Assurance is also a member of the NSRB. All references to the Manager, Nuclear Safety and Emergency Preparedness will be removed as that position no longer exists.

The affected Technical Specification Sections are 6.2.3, 6.5.1, 6.5.2, 6.5.3, and the Index.

The proposed changes do not involve a significant hazards consideration because operation of Callaway Plant with these changes would not:

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

The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in the OQAM.

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

These changes do not involve any physical alterations to the plant. There is no new type of accident or malfunction created and the method and manner of plant operation will not change. The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in the OQAM.

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

The margin of safety remains unaffected since no design change is made and plant operation remains the same. The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in the OQAM.



As discussed above, the proposed changes are strictly administrative in nature and have no effect on plant operations. They do not involve a significant increase in the probability or consequences of an accident previously evaluated or create the possibility of a new or different kind of accident from any previously evaluated. These changes do not result in a significant reduction in a margin of safety. Therefore, it has been determined that the proposed changes do not involve a significant hazards consideration.

ENVIRONMENTAL CONSIDERATION

This amendment application requests revisions to Technical Specification Sections 6.2.3, 6.5.1, 6.5.2, 6.5.3, and the Index. The proposed changes delete the sections describing the On-Site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB). All of the information contained in these sections is relocated to the OQAM and controlled in accordance with 10 CFR 50.54(a).

In addition, references to the Independent Safety Engineering Group (ISEG) will reflect that it now reports to the Manager, Quality Assurance instead of the Manager, Nuclear Safety and Emergency Preparedness.

Union Electric has determined that the proposed amendment involves changes in record keeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared in connection with the issuance of this amendment.