



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 1, 2016

Mr. Fadi Diya
Senior Vice President and
Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 – OPERATING QUALITY ASSURANCE MANUAL
REVISION 31, CHANGE NOTICE 15-002 (CAC NO. MF6789)

Dear Mr. Diya:

By letter dated October 7, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15280A447), as supplemented by letter dated January 12, 2016 (ADAMS Accession No. ML16014A026), Union Electric Company (dba Ameren Missouri, the licensee), submitted a request to the U.S. Nuclear Regulatory Commission (NRC) to change the Operating Quality Assurance Manual (OQAM) for Callaway Plant, Unit 1, pursuant to paragraph 50.54(a) of Title 10 of the *Code of Federal Regulations* (10 CFR). The change involves a reduction in commitment to incorporate a quality assurance program alternative, which was approved by the NRC in a Final Safety Evaluation dated February 9, 2015 (ADAMS Accession No. ML14322A535), for Nuclear Energy Institute (NEI) Technical Report NEI 14-05, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," Revision 1, dated August 2014 (ADAMS Accession No. ML14245A392).

The NRC staff has reviewed the subject request and concludes that the proposed change to OQAM Revision 31, Change Notice 15-002 meets the criteria of Appendix B to 10 CFR Part 50 and is, therefore, acceptable.

F. Diya

- 2 -

If you have any questions, please contact me at 301-415-5136 or via e-mail at John.Klos@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. John Klos', written in a cursive style.

L. John Klos, Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR CHANGE TO THE OPERATING QUALITY ASSURANCE

MANUAL, REVISION 31, CHANGE NOTICE 15-002

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

1.0 INTRODUCTION

By letter dated October 7, 2015 (Reference 1), as supplemented by letter dated January 12, 2016 (Reference 2), Union Electric Company (dba, Ameren Missouri, the licensee) submitted a request to change the Operating Quality Assurance Program as described in the Operating Quality Assurance Manual (OQAM) for the Callaway Plant, Unit 1. The proposed change was deemed to constitute a reduction in commitment. OQAM Change Notice (OQAMCN) 15-002 proposed to incorporate the quality assurance (QA) program alternative of Nuclear Energy Institute (NEI) Technical Report NEI 14-05, Revision 1, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," August 2014 (Reference 3). The U.S. Nuclear Regulatory Commission (NRC) staff concluded, in a final safety evaluation dated February 9, 2015 (Reference 4), that NEI 14-05, Revision 1, provided an acceptable approach for licensees and suppliers subject to the QA requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR), for using laboratory accreditation by Accreditation Bodies that are signatories to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) in lieu of performing commercial-grade surveys as part of the commercial-grade dedication process for procurement of calibration and testing services performed by domestic and international laboratories accredited by signatories to the ILAC MRA.

During its review, the NRC staff determined that additional information was required to complete its review. On December 14, 2015 (Reference 5), the NRC requested clarification on how the licensee would meet all the template requirements of NEI 14-05, Revision 1, Paragraph 4 of Appendix A. By letter dated January 12, 2016, the licensee submitted a supplemental response and addressed the request for additional information (RAI).

2.0 REGULATORY BASIS

The Commission's regulatory requirements related to QA programs for operating nuclear power plants are set forth in Appendix B to 10 CFR Part 50." Appendix B requires, in part, that, "Every

Enclosure

applicant for an operating license is required to include, in its final safety analysis report, information pertaining to the managerial and administrative controls to be used to assure safe operation.”

Appendix B to 10 CFR Part 50 establishes the QA requirements for the design, manufacture, construction, and operation of structures, systems, and components. The pertinent requirements of this appendix apply to all activities affecting the safety-related functions of those structures, systems, and components. These activities include designing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, and modifying.

3.0 TECHNICAL EVALUATION

In evaluating the adequacy of OQAMCN 15-002, the NRC staff used the guidance contained in NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants,” Section 17.5, Revision 1, “Quality Assurance Program Description – Design Certification, Early Site Permit and New License Applicants,” August 2015 (Reference 6), hereafter referred to as Section 17.5, which provides acceptance criteria for QA program descriptions.

The NRC staff’s review verified that the licensee correctly implemented the requirements of NEI 14-05, Revision 1, in OQAM Revision 31, as described in OQAMCN 15-002. NEI 14-05, Revision 1, Section 4, “Purchaser’s Quality Assurance Program,” states, in part, that “A Template for describing the use of the ILAC process in lieu of a commercial grade survey in a Purchaser’s QA Program is provided in Appendix A. Although a purchaser is not required to use the Template in Appendix A, all of the actions and steps described in Appendix A need to be included in the Purchaser’s QA Program.”

The licensee’s request included the exact words from the template with respect to purchasing commercial grade calibration or testing services from a laboratory holding accreditation by an accrediting body recognized by the ILAC MRA, which is the primary purpose of NEI 14-05, Revision 1. However, the first four paragraphs of the template were not addressed in OQAMCN 15-002. Those paragraphs describe general commercial-grade dedication programmatic requirements that are detailed in implementing procedures and instructions.

Therefore, NRC staff electronically transmitted an RAI on December 14, 2015, to ask the licensee to clarify those template issues and the licensee responded via letter dated January 12, 2016. No additional changes were made to the OQAM as a result of the RAI and response.

Substantive changes (reductions in commitment) included in OQAMCN 15-002 were proposed for OQAM Sections 4.8, 4.9, 7.16.1, 18.10.1, and Appendix A. These changes involved adding and/or substituting the requirements of NEI 14-05, Revision 1, to those portions of the OQAM that relate to commercial-grade dedication of laboratory calibration and test services. The NRC staff verified that OQAMCN 15-002 accurately applies the requirements of NEI 14-05, Revision 1, by adding/substituting the exact words from the technical report where appropriate.

The NRC staff also reviewed additional minor changes included in OQAMCN 15-002 and determined that they were typographic in nature (including renumbering paragraphs) and did not result in a reduction to commitment.

The NRC staff used the acceptance criteria of NUREG-0800, Section 17.5, as the basis for evaluating the acceptability of the licensee's OQAMCN 15-002 to be in conformance with Appendix B to 10 CFR Part 50. The NRC staff also used the guidance in the safety evaluation for NEI 14-05, Revision 1. OQAMCN 15-002 adequately describes how the requirements of Appendix B will be implemented.

4.0 CONCLUSION

The NRC staff concludes that the proposed Revision 31, as described in OQAMCN 15-002, meets the acceptance criteria found in NUREG-0800, Section 17.5 and that the licensee correctly implemented the requirements of NEI 14-05, Revision 1, consistent with 10 CFR Part 50, Appendix B.

5.0 REFERENCES

1. Diya, F. M., Ameren Missouri, letter to U.S. Nuclear Regulatory Commission, "Callaway Plant Unit 1, Union Electric Company, Operating Quality Assurance Manual (OQAM) Revision 31, OQAM Change Notice 15-002," dated October 7, 2015 (ADAMS Accession No. ML15280A446).
2. Diya, F. M., Ameren Missouri, letter to U.S. Nuclear Regulatory Commission, "Callaway Plant Unit 1, Union Electric Company, Response to Request for Additional Information (RAI) Related to Operating Quality Assurance Manual (OQAM) Revision 31, OQAM Change Notice 15-002," dated January 12, 2016 (ADAMS Accession No. ML16014A026).
3. Nuclear Energy Institute, NEI 14-05, Revision 1, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," August 2014 (ADAMS Accession No. ML14245A392).
4. Colaccino, J., U.S. Nuclear Regulatory Commission, letter to Marcus R. Nichol, Nuclear Energy Institute, "Final Safety Evaluation for Technical Report NEI 14-05, 'Guidelines For the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services,' Revision 1," dated February 9, 2015 (ADAMS Accession No. ML14322A535).
5. Klos, L. J., U.S. Nuclear Regulatory Commission, e-mail to Thomas Elwood, Ameren Missouri, "Request for Additional Information: QA Plan Change – NEI 14-05A," dated December 14, 2015 (ADAMS Accession No. ML15348A191).

6. U.S. Nuclear Regulatory Commission, NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Section 17.5, Revision 1, "Quality Assurance Program Description – Design Certification, Early Site Permit and New License Applicants," August 2015 (ADAMS Accession No. ML15037A441).

Principal Contributor: Brent Clarke, NRO

Date: April 1, 2016

F. Diya

- 2 -

If you have any questions, please contact me at 301-415-5136 or via e-mail at John.Klos@nrc.gov.

Sincerely,

/RA/

L. John Klos, Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
Safety Evaluation

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ADAMS Accession No.: ML16089A167

*SE memo dated February 25, 2016

OFFICE	NRR/DORL/LPL4-1/PM	NRR/DORL/LPL4-1/LA	NRO/DCIP/QVIB-3
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NAME	RPascarelli	JKlos	
DATE	4/01/2016	4/01/2016	

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