



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

November 3, 2000

Garry L. Randolph, Senior Vice
President and Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, Missouri 65251

Dear Mr. Randolph:

This refers to the meeting conducted in the Region IV office on October 31, 2000. This meeting related to security and emergency preparedness (EP).

The presentation included the following topics: Annual audit requirements; biometrics (iris scanning) implementation status; modifications to main access facility; security plan/regulations/inspection guides; EP green finding; EP facility improvements; notification system improvements; response time change submittal; and NRC performance indicator overview.

The attendance list and presentation are enclosed with this summary (Enclosures 1 and 2).

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Reading Room).

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

Gail M. Good, Chief
Plant Support Branch
Division of Reactor Safety

Docket No.: 50-483
License No.: NPF-30

Enclosures:

1. Attendance List
2. Licensee Presentation

Union Electric Company

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cc w/enclosures:

Professional Nuclear Consulting, Inc.
19041 Raines Drive
Derwood, Maryland 20855

John O'Neill, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Mark A. Reidmeyer, Regional
Regulatory Affairs Supervisor
Quality Assurance
Union Electric Company
P.O. Box 620
Fulton, Missouri 65251

Manager - Electric Department
Missouri Public Service Commission
301 W. High
P.O. Box 360
Jefferson City, Missouri 65102

Ronald A. Kucera, Director
of Intergovernmental Cooperation
P.O. Box 176
Jefferson City, Missouri 65102

Otto L. Maynard, President and
Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, Kansas 66839

Dan I. Bolef, President
Kay Drey, Representative
Board of Directors Coalition
for the Environment
6267 Delmar Boulevard
University City, Missouri 63130

Lee Fritz, Presiding Commissioner
Callaway County Court House
10 East Fifth Street
Fulton, Missouri 65151

Union Electric Company

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Alan C. Passwater, Manager
Licensing and Fuels
AmerenUE
One Ameren Plaza
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, Missouri 63166-6149

J. V. Laux, Manager
Quality Assurance
Union Electric Company
P.O. Box 620
Fulton, Missouri 65251

Jerry Uhlmann, Director
State Emergency Management Agency
P.O. Box 116
Jefferson City, Missouri 65101

Security and Emergency Preparedness
NRC Region IV Update Meeting
October 31, 2000 10:00 – 12:00 AM

Agenda

Emergency Preparedness:

- EP Green Finding EAL Revision Status
SGTR Revised Source Term
- Facility Improvements
FTS 2001 Alternative
Dedicated Phone Upgrade
- SENTRY Improvements
- RERP Plan Changes (Working)
Response Time Change Submittal
Status Board Log Keepers – Remove requirement
in 2001.

Security:

- Annual Audit Requirement / Criteria – ERO
Members of Audit Team
Security
Emergency Preparedness
- Iris Scanning Implementation Status
- MAF Modification Status
- Security Plan vs. Regulations vs. Inspection Guides

NRC Performance Indicator Overview

Miscellaneous / Other

- Questions?

Security and Emergency Preparedness NRC Region IV Update Meeting

EP Green Finding – EAL Revision

- **NRC INSP. REPORT NO. 50-483/00-11 Finding:**

"The licensee's emergency preparedness staff identified errors in a calculation of site area and general emergency classification indicators for Effluent Monitor RE-21 B. Calculational Index EPCI 98-01, approved March 1998, corrected the calculation."

"This violation is being treated as a noncited violation (50-483/00011-03), consistent with Section VI.A.1 of the NRC Enforcement Policy. This noncited violation was determined to have very low safety significance (Green) because, although it was a failure to meet a regulatory requirement, it did not represent a failure to continue to meet risk-significant planning standard 10 CFR Part 50.47(b)(4) regarding emergency action levels. The licensee entered the issue into its corrective action program as Suggestion-OccurrenceSolution Report 00-0108."
- **Screening and SDP Determination:** Discussion and use of screening questions and Significant Determination Process.
- **SGTR Source Term Changes: OL Amendment 139:**
 - Revised FSAR Source Term for SGTR event to include revised short-lived isotopes.
 - RERP Change Notice for EALs completed and awaiting ORC approval.
 - Default Values for S/G PORVs from/to 148/146 and 1480/1460 mR/hr.
 - Default Values for AFWPT Exhaust from/to 865/850 and 8650/8500 mR/hr.
 - NRC Approval September 27, 2000.
 - ORC Approval scheduled for November 16, 2000.

Security and Emergency Preparedness NRC Region IV Update Meeting

Emergency Response Facility Improvements

- **FTS 2001:**

NRC EMERGENCY TELECOMMUNICATIONS SYSTEM

Reference: NRC RIS 2000-11 dated 6/30/2000

The referenced Regulatory Issue Summary addressed the plans to transition to FTS 2001 for emergency telecommunication systems (ETS) in the second half of 2000. AmerenUE will implement the option of using our communication network to provide long distance ETS circuits for our Callaway Plant. This will allow us to bypass the local telephone system and provide a more reliable and maintainable system. We prefer the cutover be done in parallel to maintain communication capabilities during the transition time period.

- Responded to RIS in July 2000.
- Installation begins in November 2000, complete by end of year.
- Parallel Cutover will be performed.

- **Dedicated Phone System Replacement:**

- Adverse Trend from past performance due to antiquated equipment.
- Replacement with state of the art Lucent Technologies PBX.
- Incorporates cordless features in all facilities.
- Combines existing Technical Assessment (TAL) and Operations Support (OSL) Lines into Plant Assessment Line (PAL).
- Installation of new system is underway.
- Parallel Cutover will be performed.
- Expected completion is January 2001.

Security and Emergency Preparedness NRC Region IV Update Meeting

SENTRY Notification System Status

- Initial evaluation for replacement with fax machines.
- Root Cause Analysis (RCA) completed in May 2000.
- Redirected SENTRY Task Team upon review of RCA.
 - Hardware recommendations implemented in July 2000:
Reliability improved.
August and September 2000 approx. 98%.
 - Software recommendations implemented October 2000.
Reliability and stability of application decreased.
Returned to previous version in November 2000.
- Decision has been made to immediately go out for RFQ:
Functional Specifications Drafted.
RFQ due out in November 2000.

RERP Changes

- **Change Notice 00-01, Response Time Submittal**
 - Requests increase in response time for Rapid Responders from 30-45 minutes to 75 minutes with additional 15 minutes for ERF activation.
 - Submitted in July 2000.
 - Similar in scope to Grand Gulf Submittal.
 - NRR currently reviewing and has submitted first round of questions.
 - Callaway response due to NRR in November 2000.
 - Anticipate approval in early 2001.
- **2001 Proposed Revision:**
 - Remove position of status board log keepers from Table 5, ERO.
 - Projected status boards have now been in use for approximately 2 years.

Security and Emergency Preparedness NRC Region IV Update Meeting

Annual Audit Requirements / Criteria

– **Emergency Preparedness:**

- RERP Section 8.4, "NSRB is responsible for independent review..."
- 10CFR50.54(t) "reviewed by persons with no direct responsibility for implementation...."
 - The annual audit is performed by the QA organization.
 - QA personnel are currently assigned positions in the Emergency Response Organization (ERO) – Callaway interpretation is that this is not considered "direct responsibility."

– **Security:**

- Security Plan, Chapter 14, Union Electric Quality Assurance department will perform...
- 10CFR50.54(p) and 10CFR73, App.C, Audit and Review "reviewed by individuals independent of both security program management and personnel who have direct responsibility for implementation...."
- 10CFR73.55(g)(4) "by individuals who have no direct responsibility for the security program..."
 - The annual audit is performed by the QA organization.
 - Protective Services Evaluator may participate in audits of the Security area – Callaway interpretation is that the individual is independent of both management and personnel who have direct responsibility.

Security and Emergency Preparedness NRC Region IV Update Meeting

Iris Scan Implementation Status

- Iris Scan Technology Statistics:
 - Error Rate is less than 1 in 1.2 million attempts.
 - Failure to Acquire is < 1%.
 - Average time to scan is 2 seconds.
- Partial implementation to Protected Area began early October 2000:
 - Training issues experienced for first week.
 - Implemented on all PA doors after first week of operation.
 - Delays experiencing are approximately 3-5 seconds per person.
- Full implementation scheduled for December 2000.

Main Access Facility Modification

- Wall / Badge Rack being added to MAF.
 - Allows for storage and retrieval of Badges by plant staff.
 - Will physically separate the Entrance and Exit paths to and from the PA.
- Construction to start in late November 2000.
- Completion scheduled for December 2000.

Security Plan / Regulations / Inspection Guides

- **Compliance with Regulations**
 - Per NRR, exemption not applicable to 10CFR73.55, specifically 73.55a.
 - Reference generic exemption request submitted on behalf of the industry from the NEI SWG.
 - NRR/OGC response – If we comply with approved portions of plan, then by definition we are complying with the regulations and providing "high assurance."
- **Attachment 3 Inspection / Intrusion Detection System:**
 - Methods relative to ACD listed strategies.
 - Tours – insider / contractor.
 - No Force on Force.

Security and Emergency Preparedness NRC Region IV Update Meeting

NRC RROP Performance Indicator Review

Security:

- No concerns noted.

Emergency Preparedness

- DEP PI
 - Concerned with decreasing trend.
 - Corrective Action Document written to evaluate specific areas needing attention.
 - PI values based on past drills currently impacting:
 - Conducted 4 – 5 Rapid Responder Drill sessions per year in 1999.
 - Currently requiring 2 Rapid Responder Drill sessions per year with 3 Team Drills.
 - Implemented evaluation of operating crews during requalification during non-RERP (as found) scenarios.
- ALERT and NOTIFICATION PI
 - Reliability difficult to predict.
 - Perform Monthly Siren Tests (actual siren activation).
 - Graded testing frequency will be used.
 - Evaluating upgrade of system in 2001 - 2002.

Questions

ATTACHMENT 0609.02

INITIAL ASSESSMENT OF
INSPECTION OBSERVATIONS FOR SDP ENTRY

Issues that have an insignificant effect on plant risk or otherwise do not merit documentation in an NRC inspection report are classified as minor issues. Classifying issues as minor requires inspector judgement. The guidance in IMC 0610 Appendix H is the most recent information and best examples of what constitutes minor issues. However, in general the inspector can use the questions listed below as a filter to determine if an issue can be considered minor.

Minor Issues	Group 1 Questions
	Does the issue have an actual or credible impact on safety?
	Does the issue suggest a programmatic problem that has a credible potential to impact safety and is more than an isolated case?
	Could the issue be viewed as a precursor to a significant event?
	If left uncorrected would the same issue become a more significant safety concern ?
	Are there any associated circumstances that add regulatory or safety concerns. (eg. apparent willfulness, licensee refusal to comply)?
	Does the issue relate solely to NRC limits and not licensee administrative limits?
	Does the issue relate to performance indicators and causes a threshold to be exceeded?

If the answer to all the above questions is "No", the issue may be considered minor. The issue should be discussed with the licensee but not documented in the report.

The group 2 questions should be used to determine whether an issue affects a Cornerstone. If the answer to any single question is "yes", the issue should be analyzed by the SDP process and documented in the inspection report. If the answers to all group 2 (Cornerstone questions) are "no" Then the inspector should determine whether there are extenuating circumstances by asking the Group 3 questions.

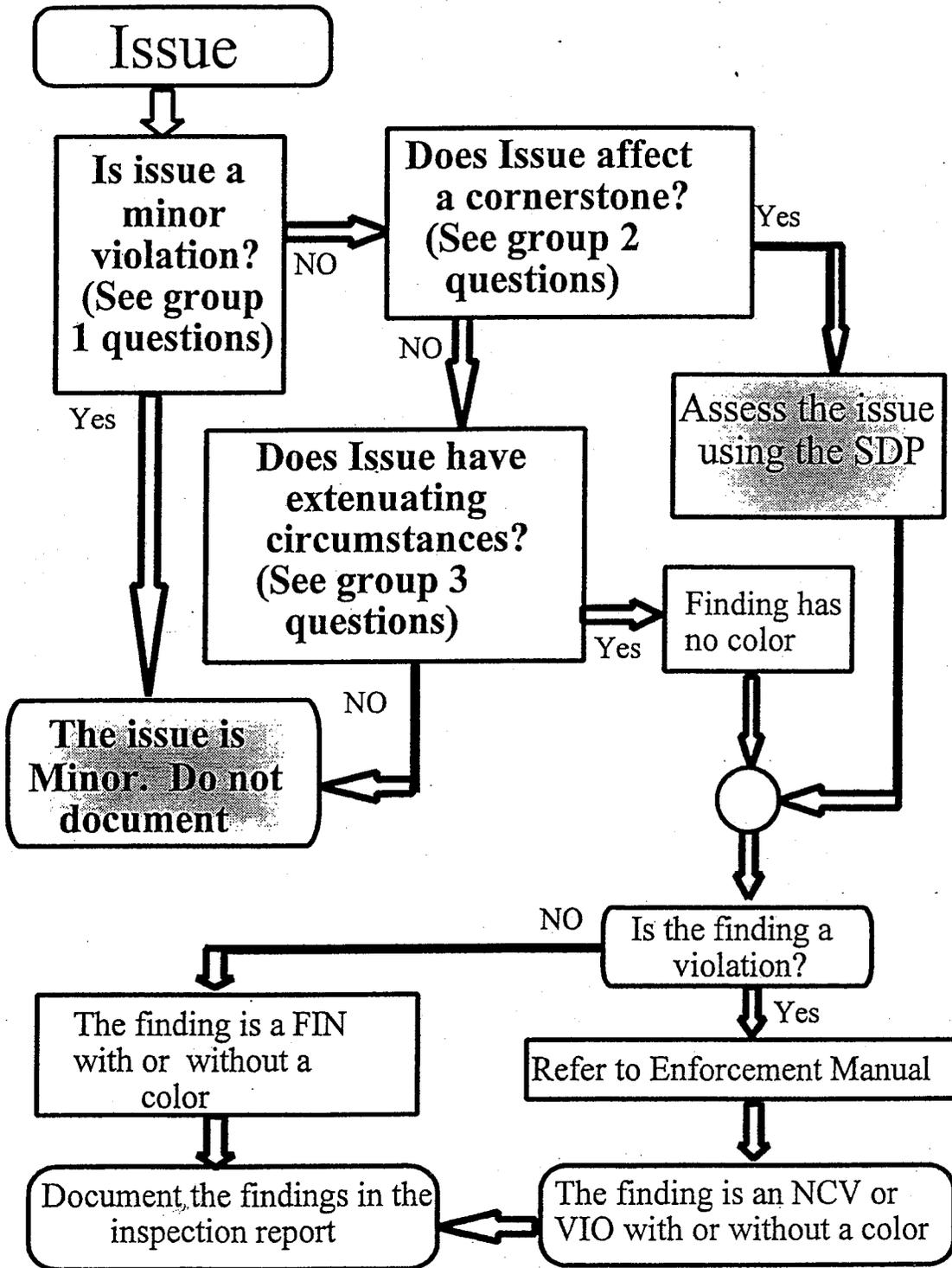
Cornerstones	Group 2 Questions
<u>Reactor Safety - Initiating Events, Mitigating Systems, & Barrier Integrity</u>	
Could it cause or increase the frequency of an initiating event?	
Could it affect the operability, availability, reliability or function of a system or train in a mitigating system?	
Could it affect the integrity of fuel cladding, the reactor coolant system, and/or reactor containment?	
Could it involve degraded conditions that concurrently influence any mitigation equipment and/or initiating event?	
<u>Reactor Safety - Emergency Planning</u>	
Does it involve a failure to meet or implement a planning standard (10CFR50.47(b) and Appendix E to Part 50) or other regulatory requirement?	
<u>Radiation Safety - Occupational</u>	
For ALARA issues: (a) Does the actual job dose exceed the projected dose by >50%. AND (b) is the 3 year rolling average collective dose exceed 135 person-rem/unit for a PWR or 240 person-rem/unit for a BWR. AND (c) is the actual job dose > 5 person-rem?	
Does it involve a failure of one or more radiation barriers that result in, or could result in, a significant unintended or unplanned dose ?	
<u>Radiation Safety - Public</u>	
Does it involve an occurrence in the licensee's radiological <i>effluent monitoring</i> program that is contrary to NRC regulations or the licensee's TS, ODCM, or procedures?	
Does it involve an occurrence in the licensee's radiological <i>environmental monitoring</i> program that is contrary to NRC regulations or the licensee's TS, ODCM, or procedures?	
Does it involve an occurrence in the licensee's radioactive <i>material control</i> program that is contrary to NRC regulations or the licensee's procedures?	
Does it involve an occurrence in the licensee's radioactive material transportation program that is contrary to NRC or DOT regulations or licensee procedures?	
<u>Physical Protection</u>	

Does it involve a nonconformance with safeguards requirements?
<u>Fire Protection</u>
Does it involve impairment or degradation of a fire protection feature or defense-in-depth?

If the answer to any question is "Yes", the issue affects a cornerstone and should be analyzed by the associated SDP.

Extenuating Circumstances	Group 3 Questions
Does the issue involve willfulness, including discrimination?	
Does the issue have potential for impacting the NRC's ability to perform its regulatory function?	
Is documenting this issue necessary to close an open item, licensee event report or allegation?	
Does the associated technical information relate directly to an issue of agency-wide concern, i.e. a generic safety issue?	
Does the issue provide substantive information regarding cross cutting issues?	
Is the finding a violation?	

If all the answers to the above questions are "No", the issue does not have extenuating circumstances and would not normally be documented.



Appendix B

Emergency Preparedness Significance Determination Process

1. Introduction

The Emergency Preparedness Cornerstone Objective is to ensure that the licensee is capable of implementing adequate measures to protect the public health and safety in the event of a radiological emergency.

The Objective is supported by a Performance Expectation to demonstrate that reasonable assurance exists that the licensee can effectively implement its emergency plan to adequately protect the public health and safety in the event of a radiological emergency.

Licensee performance in this cornerstone is assessed by considering the relationship of performance indicators (PIs) with regard to thresholds and the significance of inspection findings. The SDP provides a method to place inspection observations in context for risk significance in a manner that allows them to be combined with PI results. This information is used to determine the level of NRC engagement IAW the Reactor Oversight and Assessment Process Action Matrix.

The SDP consists of flow chart logic to disposition inspection findings into one of the following categories: "green - licensee response band," "white - increased regulatory response band," "yellow - required regulatory response band," or "red - unacceptable performance band."

During the development of EP PIs, the most risk significant areas were identified as distinct from other important program elements. These development efforts were performed by a group of EP subject matter experts with input from members of the public. The SDP methodology recognizes failures in the identified risk significant areas as more significant than findings in other program areas.

Emergency Preparedness regulations codify a set of emergency planning standards in 10 CFR 50.47(b) and requirements in Appendix E to Part 50. The more risk significant areas of EP align with a subset of the planning standards and requirements. The SDP logic uses failure to meet or implement risk significant planning standards, planning standards and other regulatory requirements as criteria for decisions. Failure to meet or implement the more risk significant planning standards results in greater significance (e.g., a white finding as opposed to a green finding.) Inspection Procedure 71114, Reactor Safety -

Emergency Preparedness, provides guidance for the prioritization of inspector effort. That guidance and the SDP is based on stratification of EP requirements to emphasize the most risk significant areas of EP. The stratification is as follows:

- the most risk significant planning standards (RSPS); 10 CFR 50.47(b)(4), (5), (9) and (10) and Appendix E, section IV B, C, D(1) and D(2),
- the other planning standards (PS); 10 CFR 50.47(b)(1), (2), (3), (6), (7), (8), (11), (12), (13), (14), (15), and (16) and the parts of Appendix E not associated with the RSPS, and
- other EP related regulations, applicable orders and the commitments of the Emergency Plan (Plan).

A finding that is assessed as green does not mean that the performance associated with the finding is acceptable. The finding may represent a violation of 10 CFR. However, the safety significance of the finding is not great enough to warrant further NRC intervention and it is considered to be within the "licensee response band." Licensees are still required to return to compliance with the regulations and their commitments. However, the licensees are given the latitude to correct these findings because they are of low safety significance.

Finally, it must be noted that the design of the EP SDP ensures no false negative results, but can result in false positive results, i.e., a finding placed in context through SDP can result in a risk significance level (color) that exceeds the actual impact on public health and safety. This being the case, the use of an SDP panel to examine all findings above green is expected. Input from the licensee regarding risk significance perspective may be solicited. Risk significance perspective information may assist NRC in placing licensee performance in context with respect to the structure of EP program elements that protect the public health and safety. Additional information may support downgrading findings that do not impact the licensee's ability to meet the EP Cornerstone Performance Expectation. This final check recognizes that the EP SDP may, in some cases, characterize the risk-significance of findings in an overly conservative manner. It would be inappropriate to issue a risk significant finding due to a non-compliance that appears to meet criteria but has little impact on the Cornerstone Performance Expectation or public health and safety. However, it is expected that such cases will be rare and that in general the guidance provided herein will be implemented as written.

1. Guidance

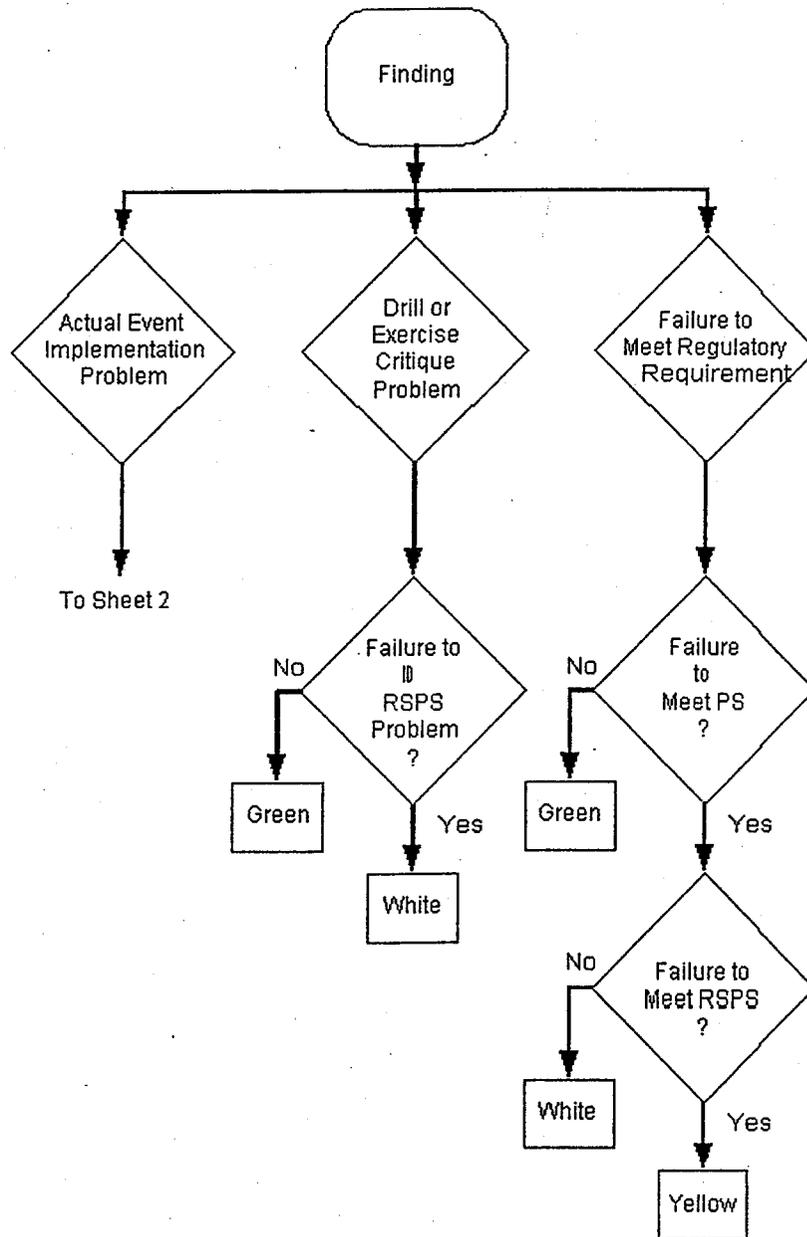
The following general guidance is provided to assist in using the EP SDP.

- a. RSPS means 10 CFR 50.47(b)(4), (5), (9) and (10) and Appendix E, section IV B, C, D(1) and D(2).
- b. PS means the planning standards of 10 CFR 50.47(b) and the associated requirements of Appendix E to 10 CFR 50, including the RSPS.
- c. NUREG-0654 provided guidance for licensees to use in developing a program to meet EP related regulations. NUREG-0654 is organized by PS. The Plan was assessed for adequacy against NUREG-0654 and other guidance, orders and regulations and approved by NRC. The Plan is the licensee's commitment for meeting the regulations. The Plan may have been approved with processes that differ from the guidance of NUREG-0654, but which appeared to meet the regulatory requirements.
- d. Failure to implement a PS means that Plan commitments that implement a PS were not fulfilled during an actual event. Failure to implement such commitments during a drill is a performance problem that should be corrected, but is not a *failure to implement a PS* as the term is used in this SDP. Generally, failure to implement a PS is the result of personnel errors. The associated program elements are adequate and would have met the Plan commitments if they had been implemented. Guidance is given in Manual Chapter 610*.
- e. Failure to meet a PS means that program elements are not in compliance with the PS of 10 CFR 50.47(b) and/or the supporting requirements of Appendix E. It may be that the Plan commitments are not met, that the Plan is inadequate, that implementing procedures are inadequate, that program design is inadequate, etc. However, the measure of program compliance is the PS and its articulation in NUREG-0654, taking into consideration any deviations from NUREG-0654 (and the compensating program elements) that were approved by NRC. Detailed guidance is given in Manual Chapter 610*.
- f. A regulatory requirement, as it is used in this SDP, is any EP related requirement of 10 CFR (other than the PS and the supporting requirements of Appendix E), applicable orders and commitments in the Plan.
- g. Critique of drills and exercises is meant to include any aspect of the licensee processes that contribute to the formal critique process mandated by Appendix E. This may include Quality Assurance organization reports, self assessment reports, drill and exercise critiques, etc.
- h. There are three paths through the EP SDP, *Actual Event Implementation Problem*, *Drill or Exercise Critique Problem* and *Failure to Meet Regulatory Requirement*. Findings should be assessed through all paths

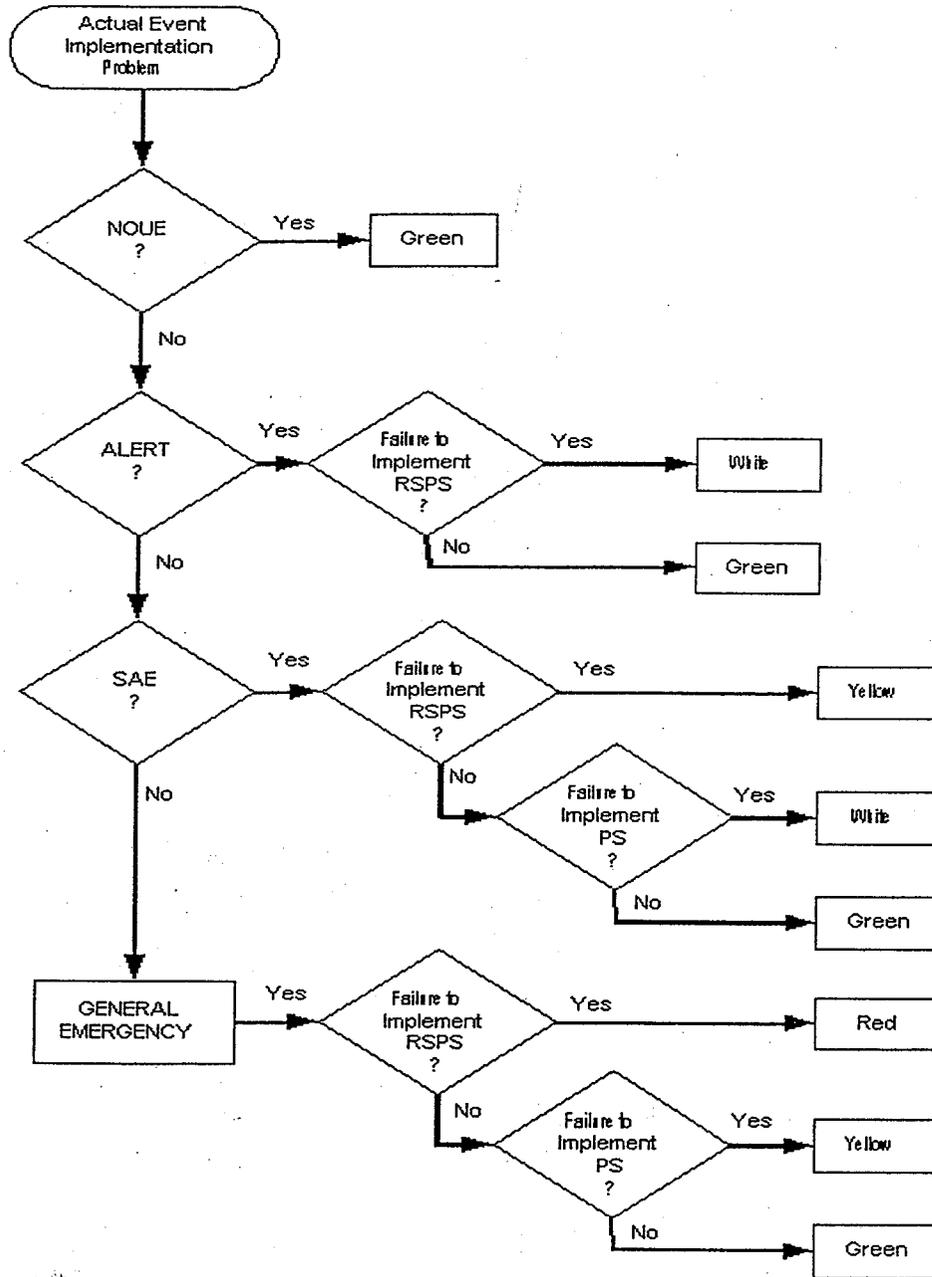
that are applicable and the most significant finding issued. Parallel findings may be noted in the inspection report, but only the most significant finding should be issued. For example, an implementation problem during an actual event may also involve a failure to meet a regulatory requirement. The finding of a failure to meet a regulatory requirement may be the more significant and would be the color of the issued finding.

- i. Failure to correct weaknesses and deficiencies should be analyzed against compliance with 50.47(b)(14). If weakness involves a RSPS, it may represent a failure to meet the PS. Detailed guidance is provided in Manual Chapter 610*. Additionally, findings in this area should be provided to the inspection team responsible for the conduct of Inspection Procedure 71152, *Identification and Resolution of Problems*, for review during the next inspection.

Emergency Preparedness Significance Determination Process



Emergency Preparedness Significance Determination Process

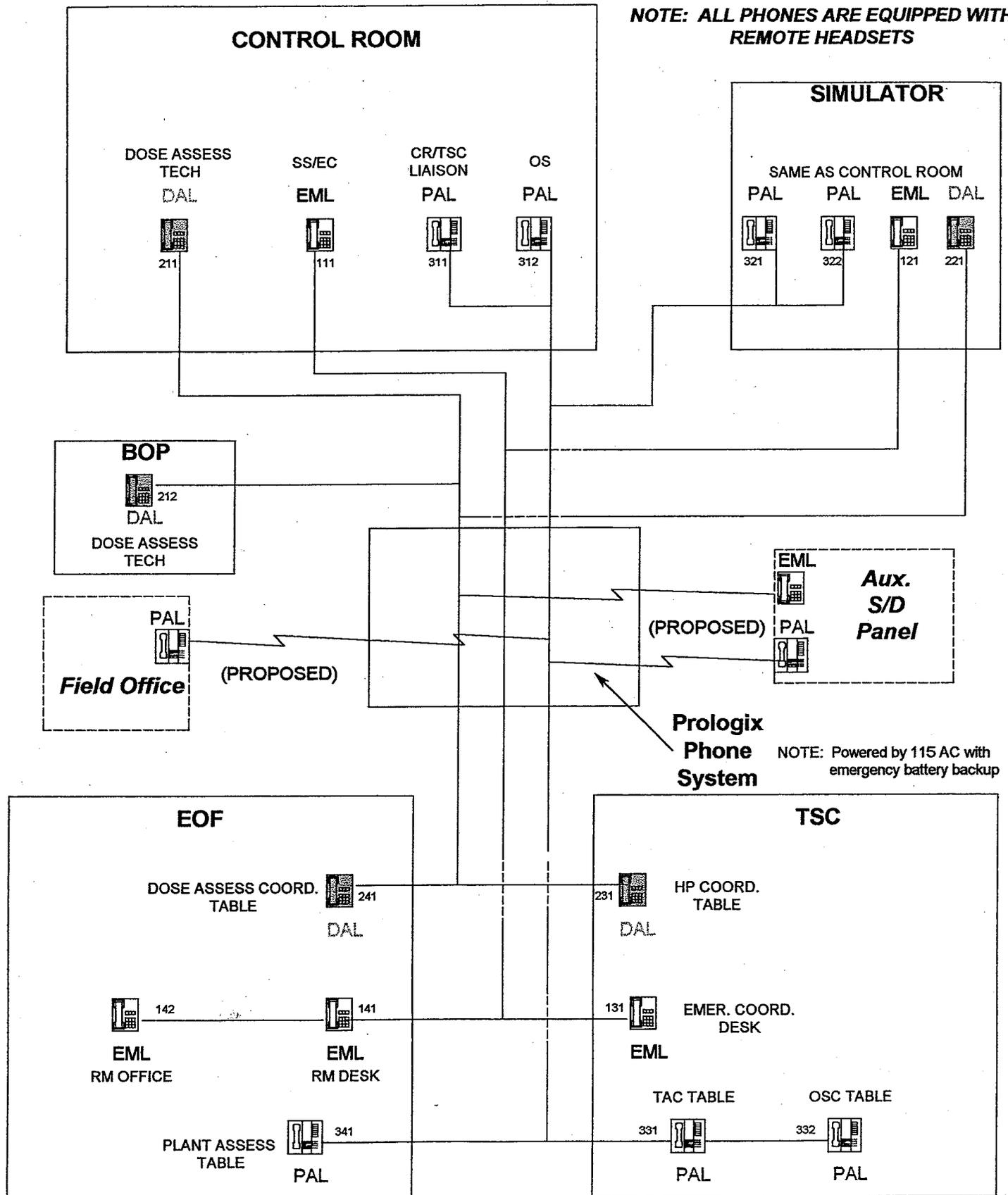


Sheet 2

2/18/00

PROPOSED DEDICATED EMERGENCY PHONES

NOTE: ALL PHONES ARE EQUIPPED WITH REMOTE HEADSETS



CALLAWAY RERP RESPONSE TIME GOAL CHANGE

QUESTIONS ON THE PLAN CHANGE

In responding to the questions below about the proposed RERP changes submitted in the application dated July 18, 2000, please make references to any relevant RERP sections or to Attachment 1 of the application that contain the requested information:

1. Discuss the reference to "Alert (or higher) emergency declaration" in RERP Section 5.2, page 5-7, in the first sentence of that section that states the mobilization of the emergency response organization (Figure 5-2) is initiated at the Alert (or higher) emergency declaration. RERP Table 5-2 lists the Alert as the response level for the TSC and EOF. Does the statement in RERP Section 5.2 mean that the initiation of mobilization of the TSC and EOF could wait until the declaration of an emergency classification higher than an Alert?
2. In the proposed change to footnote + of RERP Table 5-2, the emergency response facilities (ERFs) are to be activated 15 minutes "from arrival at the facility." The staff interprets the word activated to be when the TSC and EOF become operational during the emergency and take over the emergency work from the control room. The definition of facility activation, in Enclosure 1 (page 1 of 8) of the application and proposed footnote # to RERP Table 5-2, is that the facility would be considered activated when the minimum staffing requirements have been met and these positions are ready to assume responsibilities. Discuss if these are the only conditions that must be met for activation of the TSC and EOF. Where in the RERP (besides Table 5-2) is the activation of the TSC and EOF and the conditions for activation discussed? Is this addressed in an emergency plan implementing procedure?
3. The proposed footnote # to RERP Table 5-2 identifies six emergency positions as the "Minimum positions needed for facility activation." Except for the TSC communicator, these positions appear to be manager or coordinator positions for directing emergency work. Except for three other emergency positions, they also appear to be all of the responders in the current RERP Table 5-2 with the response goal of 30-45 minutes, instead of the later response goal of 60-75 minutes. For the proposed footnote, discuss the transition from the control room directing and the on-shift staff performing the emergency response to the ERF staffing and activation, including the release of on-shift staff listed in RERP Table 5-1 to the ERFs and the arrival of the staffing listed in RERP Table 5-2 that is not considered part of the minimum positions needed for facility activation. Include in this discussion what is meant by the desired numbers listed in RERP Table 5-2 for each emergency position. Explain why the emergency positions of four Rad/Chem support staff, protective measures coordinator, and field monitoring

teams which also have the current response goal of 30-45 minutes, but were not included in the minimum positions needed for facility activation. Discuss the changes to ERF staffing and activation of the current RERP due to the proposed footnote #.

4. For the current RERP Table 5-2, discuss what the response goals of 30-45 and 60-75 minutes in the table mean in terms of the initiation of ERF mobilization, emergency response organization (ERO) personnel driving to the TSC or EOF in response to an emergency, and ERF activation. Explain the effect of footnote + to the table, which states that the response times may vary due to inclement weather and/or road conditions, on the response goals? Are the response goals addressed elsewhere in the RERP (i.e., in addition to the footnote to Table 5-2)? Explain how this part of footnote + affects the proposed response goals.
5. What assistance, if any, is provided by the State to ERO personnel driving to the site in response to an emergency? Is there any assistance so that personnel would arrive sooner at the site? Discuss if adding such assistance to the RERP was considered in the development of the proposed response goals.
6. Discuss the change in the ERF activation goals because of the proposed changes to the response goals in RERP Table 5-2?
7. Explain what was meant by the statement in the change description in Enclosure 1 (page 1 of 8) to the application that "... this revision will give greater assurance that ERO members will arrive safely to their assigned emergency response facilities."
8. Provide the definitions of the following terms in the revised RERP Table 5-2: normal hours and off hours? Would there be personnel driving to the TSC or EOF in an emergency during normal hours? Assuming normal hours for the response goals in RERP Table 5-2 means the responders are on shift, should not the response goal be immediate (instead of the proposed 15 minutes) as it is in RERP Table 5-1?
9. Why should not the definitions of normal hours, off hours, and facility activation be added to RERP Chapter I?
10. Discuss what is the overall percentage of the plant staff that is currently available to be the 30-45 and 60-75 minute responders, and what will be the percentage available for the proposed 75-minute response goal?
11. Can personnel in the two emergency positions of Rad/Chem Technician in RERP Table 5-1, for the two functions of health physics operation and technical support, perform the tasks of each function? Discuss if the RERP allows the emergency coordinator to direct these technicians to assist the other in performing the tasks needed to be done in these two functions. Would this also be true for the emergency position of

Rad/Chem Technician of the chemistry function (i.e., does this Rad/Chem Technician have health physics training to perform the two health physics functions)?

12. Discuss how the on shift staffing in RERP Table 5-1 would perform the functions of onsite surveys, health physics coverage and inplant surveys, access control, personnel monitoring, dosimetry, offsite surveys, and offsite dose assessment during the additional time until the proposed activation of the ERFs. Discuss any RERP drills or licensee observations in drills, and their documentation, which indicate these health physics functions could be performed by the on-shift emergency staff for the additional time.
13. There is a reference in Enclosure 1 (page 8 of 8) of the application to Callaway operating crews being evaluated in conjunction with the Emergency Preparedness Program, 82701 Inspection, and that operating crews responded for a period of 90-120 minutes without assistance from the TSC and EOF. Discuss the evaluations made of the operating crews and provide references to any documentation of the evaluations. The evaluations were stated to include the control room classifying and declaring the emergency, and notifying offsite agencies. Did the evaluations include other work that would have been preformed by the TSC or EOF staff if the ERFs had been activated earlier (e.g., emergency team support tasks)? How does the period 90-120 minutes compare to the proposed ERF activation goal.
14. Compare the personnel access control to the radiological controlled area during an emergency to that control during normal operations. Explain what is meant by the references to electronic dosimetry and electronic dosimeter application in Enclosure 1 (page 6 of 18) of the application. In that ERO personnel report to the TSC (after TSC mobilization is initiated) before responding to the emergency, is there equipment staged at the TSC to minimize the time for personnel access control to the radiological controlled area?
15. When would the data from the year 2000 census be available? Explain the projections on the 1990 census data using the Landview III software and the basis for using this software for population projections. Discuss if a significant increase in the 1990 data for the 5-to-10-mile zone should be expected.
16. For the proposed RERP Table 5-2, page 3 of 6, the reference to the emergency position of on-shift emergency response (RERP Table 5-1) has the proposed response goals of 15 minutes and immediate for normal and off hours, respectively. Explain why the response goals for the normal and off hours should not be both immediate because the personnel involved in both cases are on shift?
17. For the proposed RERP Table 5-2, page 3 of 6, the reference to the general emergency position of support area personnel has the response goal of 15 minutes for normal hours and no response goal listed for off hours. The specific technical areas for the support area personnel are listed below this reference and have response goals listed for both normal

and off hours. Explain why there should be a response goal listed for normal hours for the general emergency position of support area personnel.

18. Are the changes to footnotes + and # the only proposed changes to page 6 of 6 of RERP Table 5-2?

ENGINEERING CHANGE NOTICE

Union Electric - Callaway Plant

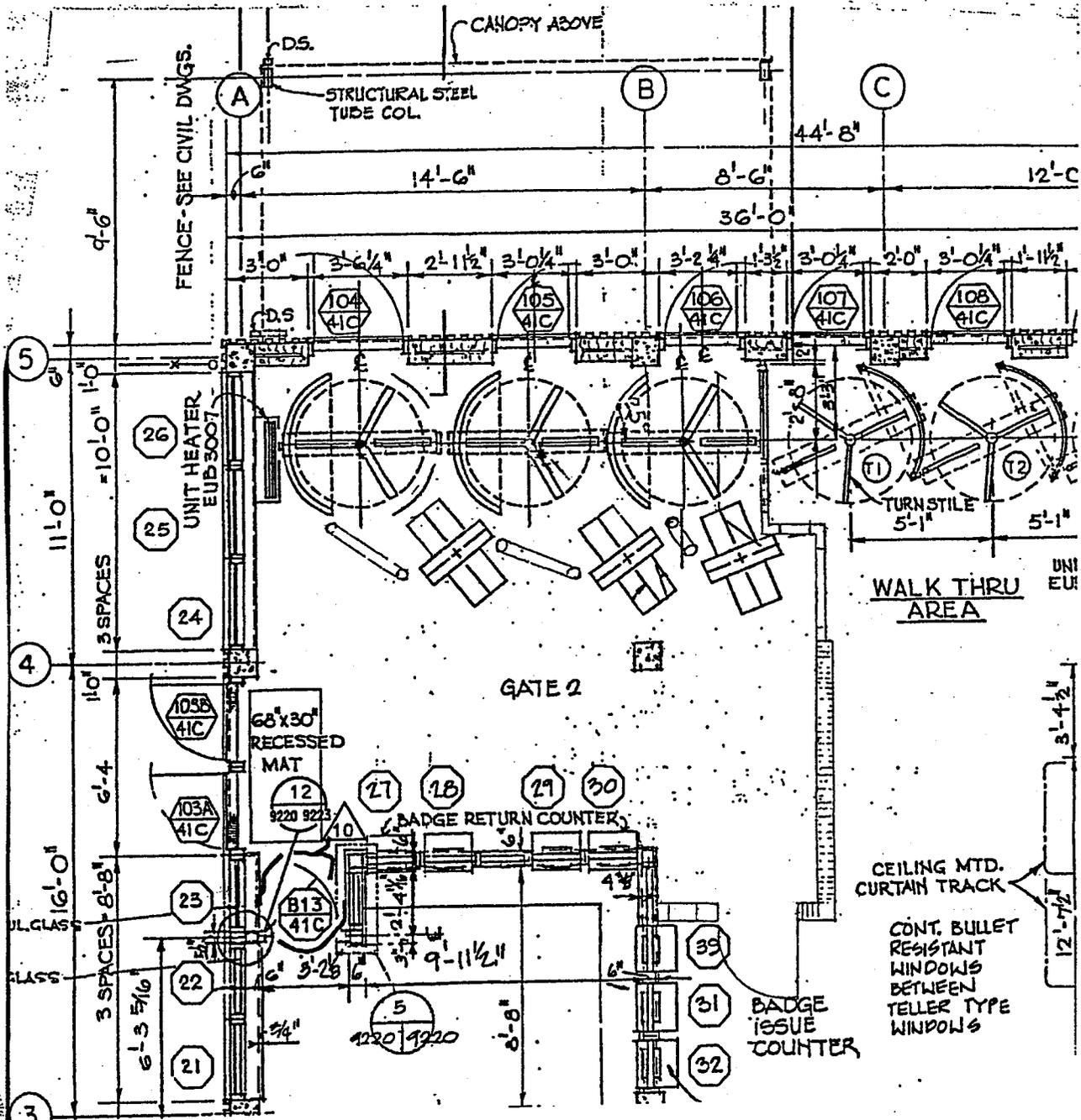
DCC-1

CLASS I DOCUMENT AFFECTED? Yes No

ECN NO	MP NO.: RMP 97-2007 B	DOCUMENT NO.: 8600-X-89220	SHEET NO.: —	REVISION: 10	SEQUENCE: —
DRAWN / DATE:	CHECKED/REVIEWED / DATE:	APPROVAL / DATE:	PAGE:		
HWN 1 9/20/00	DZ 1 9-21-00	DLB 1 9/22/00	1 OF 2		

DESCRIPTION OF CHANGE:

Replace partition wall with a badge rack
MAF Lobby



THIS ECN SUPERSEDES PREVIOUS SEQUENCE UNLESS OTHERWISE NOTED

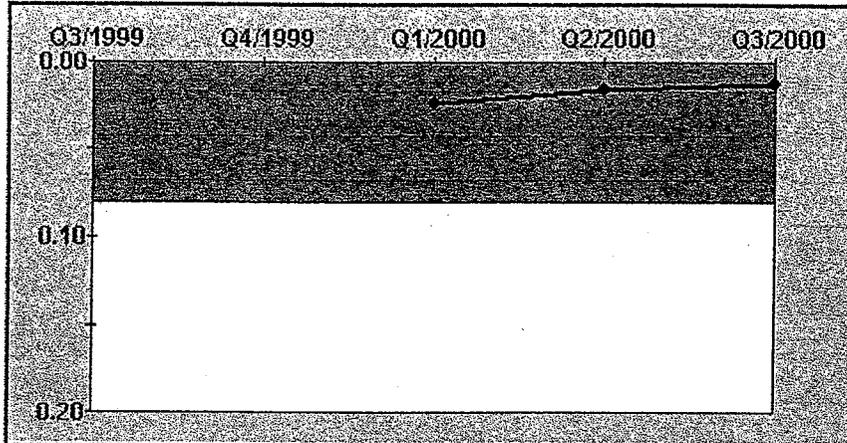
CA1566

01/14/98

EDP-ZZ-04024

PI Data Summary Report Q3/2000

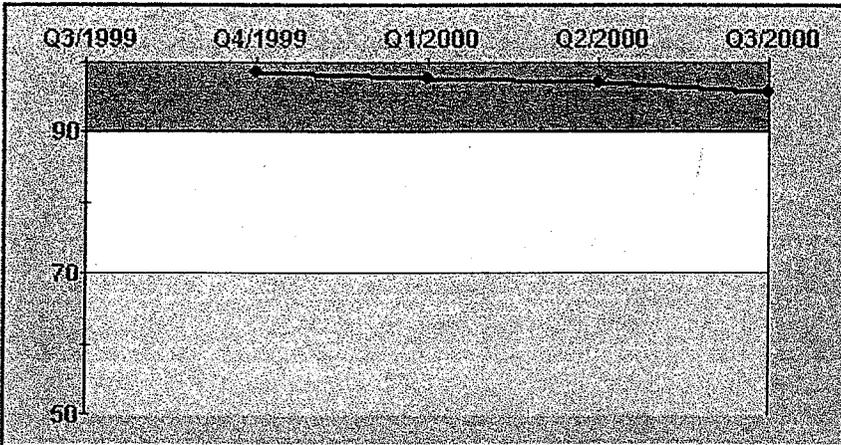
Plant Callaway
 Cornerstone Physical Protection
 PI Protected Area (PA) Security Equipment
 Thresholds White > 0.080



Quarter	Q3/1999	Q4/1999	Q1/2000	Q2/2000	Q3/2000
IDS Compensatory Hours during the quarter	124.30	21.90	93.70	46.60	60.20
IDS Compensatory Hours during the last 4 quarters			474.30	286.50	222.40
CCTV Compensatory Hours during the quarter	24.30	0.00	53.20	0.00	7.20
CCTV Compensatory Hours during the last 4 quarters			77.50	77.50	60.40
IDS Unavailability Index			0.039	0.023	0.018
CCTV Unavailability Index			0.009	0.009	0.007
Performance Indicator			0.024	0.016	0.013
Q3/2000 Comment					

PI Data Summary Report Q3/2000

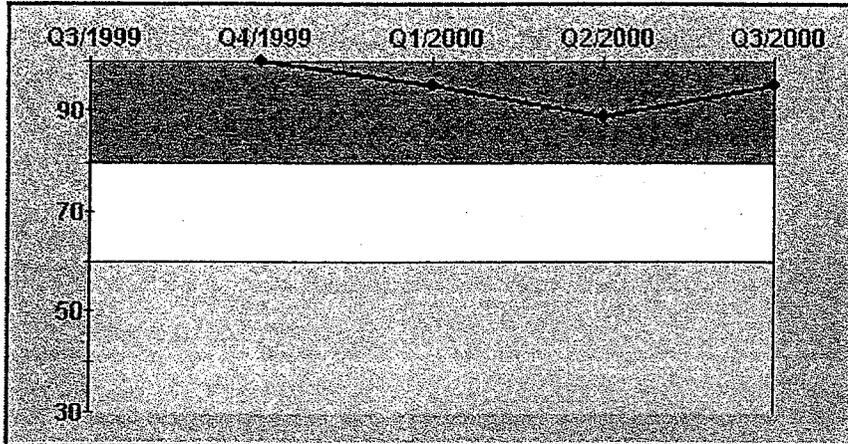
Plant Callaway
 Cornerstone Emergency Preparedness
 PI Emergency Response Organization (ERO) Drill / Exercise Performance
 Thresholds White < 90.0 | Yellow < 70.0



Quarter	Q3/1999	Q4/1999	Q1/2000	Q2/2000	Q3/2000
Number of drill, exercise and actual event opportunities performed timely and accurately during the quarter	19	26	20	22	20
Number of drill, exercise and actual event opportunities performed timely and accurately during the last 8 quarters		394	370	335	270
Number of drill, exercise and actual event opportunities during the quarter	22	27	23	24	22
Number of drill, exercise and actual event opportunities during the last 8 quarters		400	379	345	282
Performance Indicator		98.5	97.6	97.1	95.7
Q3/2000 Comment					

PI Data Summary Report Q3/2000

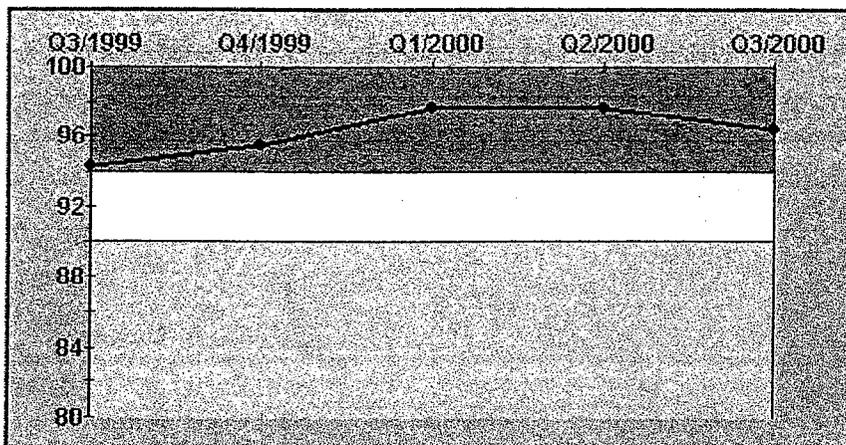
Plant Callaway
 Cornerstone Emergency Preparedness
 PI Emergency Response Organization (ERO) Drill Participation
 Thresholds White < 80.0 | Yellow < 60.0



Quarter	Q3/1999	Q4/1999	Q1/2000	Q2/2000	Q3/2000
Performance Indicator		100.0	95.3	88.9	95.2
Q3/2000 Comment					

PI Data Summary Report Q3/2000

Plant Callaway
 Cornerstone Emergency Preparedness
 PI Alert and Notification System (ANS) Reliability
 Thresholds White < 94.0 | Yellow < 90.0



Quarter	Q3/1999	Q4/1999	Q1/2000	Q2/2000	Q3/2000
Number of successful ANS siren tests during the quarter	82	83	79	83	79
Number of successful ANS siren tests during the last 4 quarters	302	313	323	327	324
Number of ANS sirens tested during the quarter	83	84	84	84	84
Number of ANS sirens tested during the last 4 quarters	320	328	331	335	336
Performance Indicator	94.4	95.4	97.6	97.6	96.4
Q3/2000 Comment					