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A	CNOT	02-004	OQAM			C	1			OQAM	

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DATE:

2004



CALLAWAY PLANT
OQAM
CHANGE FORM

Document OQAM /# 02-004

1. Originator: Gary A Hughes Date: 3/5/02
2. Document and sections(s): OQAM sections iii, 1.2, 1.3, 1.5, 1.7, 1.9, 1.10, 1.11, 1.11.1, 1.13, 1.15, 1.18, 1.24, 1.25, 1.26.1.6, 1.26.1.7, 1.26.1.8, 1.26.2.1, 1.26.2.9, 2.1, 2.2, 2.6, 2.12, 4.13, 11.11, 18.5, 18.15.1
due to title changes and responsibility changes from January 1 and March, 2002 organization changes.

3. References: Organizations related to Sr Vice President Nuclear to Sr Vice President, Generation.
Organization changes related to rotation of several Managers on 3-8-2002. Training and Performance
Improvement moving to Regulatory Affairs on 3-8-2002.

4. Type of Change:
 Licensing Document Only Hidden Text Only Both

5. Is this change evaluated under an existing Licensing Impact Review (LIR) (APA-ZZ-00140)? Yes No
If 'yes', attach a copy of the LIR or provide reference (CMP, RFR, etc)

If 'no', a LIR should be performed and attached or provide sufficient information for completion of the LIR by the responsible department (not required for hidden text change).

6. Description of Change: Promotion of Senior Vice President Nuclear to Senior Vice President
Generation. This promotion change responsibilities of the Senior Vice President and some of his staff on
January 1, 2002. An organization change on March 8, 2002 is being reflected in the OQAM in which
several Managers changed responsibilities and the Training Department and Performance Department
were moved to Regulatory Affairs. Attach additional page(s) Yes

7. Justification: This organizational change does not reduce the specified responsibility or commitment
to the Quality Assurance Manual or NRC commitments.

Attach additional page(s) Yes

8. Originating Department Head Approval: *Joe Lantz* 3/6/02

9. Concurrence with Need for Change:

Approved: Yes No Rejected: Yes No

Joe Lantz
Manager, Quality Assurance

Date: 3/6/02



CALLAWAY PLANT
OQAM
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OQAM REV/CN # 02-004

Additional Justification:

Recent rotations in Managers have also included changes in responsibilities. The Manager Operation Support had responsibilities for Training and Performance Improvement and this was transferred to Manager, Regulatory Affairs. NRC OQAM commitments were not reduced.

Superintendent, BP&D was given more responsibilities for the Generation function but still maintains his OQAM 1.15 responsibilities.

Superintendent Personnel is Callaway's designated representative for dealing with all three bargaining units. NRC OQAM commitments were not reduced.

Commitment 2184 on Section 1.9 and 2293 on Section 1.13 were deleted as references. These commitments were specific requirements, which are addressed in other more appropriate sections. These commitments have not been deleted or reduced.



Ameren UE

CALLAWAY NUCLEAR PLANT

OPERATING QUALITY ASSURANCE MANUAL

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The OQAP shall comply with 10 CFR 50, Appendix B - "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants" and follow the guidance of the Regulatory Position of Regulatory Guide 1.33. Clarifications, alternatives, and exceptions to this Regulatory Position are described in Appendix A of the OQAM. An eighteen (18) section format is employed with a discussion of how corresponding criteria of 10 CFR 50, Appendix B are satisfied. (COMN 1879, 1111)

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The responsibility for formulating, authorizing, and assuring implementation of the AmerenUE¹ OQAP rests with the Senior Vice President Generation and Chief Nuclear Officer. The policy and resultant QA Program are mandatory for Callaway Plant operational phase activities. Accordingly, personnel shall be made cognizant of QA Program requirements and responsibilities applicable to their individual activities and interfaces. (COMN 1799)

By the signatures of the undersigned, this OQAM is approved and those Ameren¹ personnel whose activities are within the purview of the OQAP are responsible for its implementation in accordance with the requirements described herein.

CN 02-004

Garry L. Randolph
Senior Vice President Generation and
Chief Nuclear Officer

Date

CN 02-004

Mike E. Taylor
Manager, Quality Assurance

Date



CALLAWAY NUCLEAR PLANT

OPERATING QUALITY ASSURANCE MANUAL

SECTION NO. 1

REVISION: 022

DATE: 11/01

1. ORGANIZATION

1.1 AmerenUE has established an organization for Quality Assurance activities. This Section identifies the organizational structure; management positions and responsibilities; and delegation of authority for the development, implementation and maintenance of the Operating Quality Assurance Program (OQAP). AmerenUE shall retain responsibility for the establishment and execution of the OQAP, although certain Program activities may be delegated to others. The organization responsible for implementing appropriate portions of the OQAP is shown in Section 13 of the FSAR. The Callaway Plant operating organization is also shown in Section 13 of the FSAR.

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1.2 The Senior Vice President Generation and Chief Nuclear Officer is responsible for initiating the Quality Assurance Program, formulating the policy, and authorizing and assuring Program implementation. He is responsible for directing activities within the Nuclear Division which support the engineering, construction, testing, and operation of the Callaway Plant and coordinating support activities performed by others who are not under his direct administrative control. He has corporate responsibility for the operation and physical control of the Callaway Plant. He reports to the President and Chief Operating Officer, who in turn reports to the President Chairman and Chief Executive Officer. The Chief Executive Officer has ultimate responsibility for the Callaway Plant. (COMN 371)

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1.3 The Manager, Quality Assurance reports to the Senior Vice President Generation and Chief Nuclear Officer on Quality Assurance Program and administrative matters. QA Program matters are reported to the President and Chief Operating Officer through the Senior Vice President Generation and Chief Nuclear Officer. The Manager, Quality Assurance is responsible to the Senior Vice President Generation and Chief Nuclear Officer for assuring the OQAP is being effectively implemented for operating activities; directing the overall Quality Assurance Program for AmerenUE including Program development, maintenance, and verification of implementation; and providing a constant independent overview of nuclear plant safety. The Manager, Quality Assurance has sufficient authority, organizational freedom, and independence to effectively assure compliance with OQAP requirements as they control Callaway Plant and offsite quality activities; and shall bear no cost, schedule, or production responsibilities which unduly influence attention to quality matters. A communication path shall exist between the Manager, Quality Assurance and the Senior Vice President Generation and Chief Nuclear Officer, as well as the other Nuclear Division management, thus providing a direct path to inform management regarding conditions affecting quality and nuclear plant safety. The qualifications of the Manager, Quality Assurance are at least equivalent to those specified in ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel," Sections 4.2.4 and 4.4.5. If the QA Manager does not meet the ANSI/ANS 3.1-1978 standards, one of the Supervising Engineers, QA must meet the standard. The Manager, Quality Assurance is located at Callaway Plant and provides technical direction and administrative guidance, to the Quality Assurance staff. (COMN 1790, 1799)

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1.4 The Manager, QA directs Supervising Engineers who have primary duties for assuring implementation of the OQAP and who devote full attention to this effort. They provide for maintenance of the Operating Quality Assurance Manual (OQAM); for audit, surveillance, and evaluation of nuclear supplier quality activities; and for performing those procurement document reviews assigned to their personnel. The activities of the QA staff assure implementation of the OQAP. The Manager, Quality Assurance is responsible to evaluate Callaway Plant operations from a safety perspective.



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1.5 The Manager and Supervising Engineers in the Quality Assurance Department are authorized by the Senior Vice President Generation and Chief Nuclear Officer to stop work on ongoing quality activities in accordance with approved procedures. During the operating phase they have the authority to stop unsatisfactory work during repair, maintenance, and refueling activities and the authority to recommend to the Manager, Callaway Plant stop work affecting the continuation of Plant operation. Other stop work authority shall be delineated in procedures. The continuance of an activity which would cover up a deficiency and preclude identification and correction, or increase the extent of the deficiency is subject to stop work action by the Quality Assurance Department. The Manager, Quality Assurance has no duties or responsibilities unrelated to QA that would prevent his full attention to QA matters.

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1.6 The authorities and duties of persons and organizations performing quality assurance functions shall be clearly established. Such persons have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to evaluate corrective action. Assurance of quality by checking, auditing, inspecting, or otherwise verifying Program activities shall be by personnel other than the individual or group performing the specific activity. (COMN 1790, 2255)

1.7 The Vice President, Nuclear reports directly to the Senior Vice President Generation and Chief Nuclear Officer and has overall responsibility for site activities and supervision of plant operations, engineering, and operations support personnel.

1.8 The Manager, Nuclear Engineering reports directly to the Vice President, Nuclear and directs a staff of superintendents, supervisors, supervising engineers, and quality control inspectors whose primary function is to provide technical support to the operation of Callaway Plant. This support includes, but is not necessarily limited to design; modification; configuration control; system and equipment performance; reliability, and testing; technical programs administration; incore fuel management; reactor design and radiological engineering; and contract support. He controls those activities and implements the OQAP through the Superintendents, Design Engineering, System Engineering, Technical Support Engineering, and Replacement/Accident Analysis. Within the Technical Support Engineering organization, QC Inspectors (ISI/NDE) report to the Supervising Engineer Performance and ISI, and perform inspection and nondestructive examinations. These inspectors do not perform inspections or examinations which provide quality verification of Nuclear Engineering work activities. (COMN 2184)

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1.9 The Manager, Regulatory Affairs reports directly to the ~~Senior Vice President and Chief Nuclear Officer~~ and has overall responsibility for coordination of licensing activities for Callaway Plant; and direction of the Nuclear Division General Offices clerical activities. He controls plant support activities and implements the OQAP through the Superintendent, Training and the Superintendent, Performance Improvement. (COMN 21842293)

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1.10 ~~The Senior Vice President and Chief Nuclear Officer~~ The Manager, Regulatory Affairs directs the Supervising Engineer, Strategic Programs Group who serves as Principal Health Physicist. As Principal Health Physicist, he provides a corporate level overview and guidance in the formulation and implementation of applied radiation protection programs and reviews the radiological safety programs for compliance with Federal and State standards and regulations.



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- 1.11 The Senior Vice President Generation and Chief Nuclear Officer reports to the President and Chief Executive Operating Officer and is responsible for the activities of all Nuclear Function departments. This responsibility includes:
- assuring a high level of quality is achieved in the Plant operations and support activities,
 - the execution of the administrative controls and quality assurance program,
 - the safe, legal and efficient operation and maintenance of the Plant,
 - protecting the health and safety of the public and Plant personnel
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- 1.11.1 The Senior Vice President Generation and Chief Nuclear Officer also directs the Supervising Engineer, Fuel Cycle Management who is responsible for aspects of the nuclear fuel cycle including procurement, enrichment, fabrication, reprocessing, high level waste management, and fuel economics studies.
- 1.12 The Manager, Callaway Plant reports directly to the Vice President, Nuclear, and is responsible for the safe, legal, and efficient operation and maintenance of the Callaway Plant. He has overall responsibility for the execution of administrative controls and the quality assurance program to assure safety. He controls Plant functions and implements the OQAP through the Superintendent, Work Control; the Superintendent, Chemistry and Radwaste; the Superintendent, Health Physics; the Superintendent, Operations; and the Superintendent, I&C. (see Section 13 of the FSAR). He has the primary responsibility for reactor operation and safety. (COMN 1799)
- 1.12.1 The Quality Control group reports to the General Supervisor, Work Control Support, who in turn reports to the Superintendent, Work Control. They are responsible for work activity inspections, receipt inspection as described in Section 7.0, and nondestructive examinations.
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- 1.13 The Manager, Operations Support reports to the Vice President, Nuclear, and is responsible for Plant support activities including training, materials management, security, safety, emergency preparedness, and administration services activities required to support the Callaway Operating License. He is also responsible for providing the analysis, programming, operations, hardware support, files, reports, and capabilities necessary to maintain the nuclear information system and network in support of the plant; and for fitness for duty. He controls Plant support activities and implements the OQAP through the Superintendent, Materials, ~~the Superintendent, Training;~~ the Superintendent, Protective Services; the Superintendent, Administration; ~~the Superintendent, Performance Improvement;~~ and the Superintendent, Nuclear Information Services. (COMN 2293)
- 1.14 General quality assurance indoctrination and training for the Nuclear Division is the responsibility of the Training Department. The Quality Assurance Department is responsible for specific QA training as requested by Nuclear Division organizations.
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- 1.15 The Superintendent, Business Planning and Development reports directly to the Senior Vice President Generation and Chief Nuclear Officer and is responsible for organizational support, personnel development, and process re-engineering, and cost forecasting, status reporting and budget matters.
- 1.16 The Superintendent, Performance Improvement is responsible for review of Operating Experience, Corrective Action Program Administration, and other activities as assigned.



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- 1.17 The Superintendent, Protective Services is responsible for security, emergency preparedness, fire marshal monitoring and industrial safety program. The Emergency Preparedness staff have overall responsibility for the development and maintenance of the Emergency Preparedness Program. This includes onsite and offsite emergency preparedness, coordination of the Plant Radiological Emergency Response Plan with State and local emergency plans, and the planning and execution of emergency drills and emergency plan exercises. (COMN 43030)
- 1.17.1 The Assistant Superintendent, Security, who reports to the Superintendent, Protective Services, supervises the Security staff and has overall responsibility for development, maintenance, and implementation of the Security Plan.
- 1.18 ~~The Superintendent, Personnel (Local 148 local union affairs) reports to the Vice President, Nuclear, and The Superintendents, Materials (responsible for Local 1439) and Administration (responsible for Local 1455) report directly to the Senior Vice President and Chief Nuclear Officer and the Manager, Operations Support, respectively and is are responsible for assisting in the areas of industrial relations and other matters under the guidance of AmerenUE policies. In addition, The Superintendent, Administration is responsible for the Fitness for Duty, Access Authorization and medical physical programs.~~
- 1.19 The Manager, Purchasing reports directly to the Ameren Services Vice President-Supply Service who in turn reports to the Ameren Services Senior Vice President-Ameren Services. The Manager, Purchasing is responsible for commercial aspects involved in procurement of materials, systems, components, and services (excluding engineering services and certain nuclear fuel cycle-related procurements) not delegated to others which are employed in support of Callaway Plant. (COMN 43026)
- 1.20 The Manager, Generation Projects reports to the Vice President-Generation Projects. The Manager, Generation Projects provides technical support, as necessary, to the Nuclear Engineering staff. (COMN 2184)
- 1.21 (Deleted in Change Notice #00-08.)
- 1.22 The Manager, System Relay Services reports to the Ameren Services Vice President-Energy Delivery Technical Services who in turn reports to the Ameren Services Senior Vice President-Customer Services and is responsible for providing qualified engineers, technicians and equipment to maintain Callaway Plant relays. (COMN 43027)
- 1.23 The Manager, Distribution Operating Department reports to the Ameren Services Vice President-Regional and Distribution Services Support who in turn reports to the Ameren Services Senior Vice President – Customer Services and is responsible for providing qualified engineers, technicians and equipment for Callaway Plant battery testing and technical support. (COMN 43027)
- 1.24 The Manager, Electrical Engineering and Transmission Planning reports to the Ameren Services Vice President-Energy Delivery Technical Services and is responsible for directing all activities related to the Planning of transmission facilities. The Manager, Energy Supply Operations reports to the Vice President-Energy Delivery Technical Services who in turn reports to the Ameren Services Senior Vice President-Customer Services. The Manager, Energy Supply Operations is responsible for directing all activities related to the Operation of transmission facilities. The Ameren Services Vice President-Energy Delivery Technical Services also provides engineering and other support services when requested by the Senior Vice President Generation and Chief Nuclear Officer. (COMN 43027, 43025)

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- 1.25 Other Ameren Services or AmerenUE divisions may provide safety-related services which augment and support selected Program activities. These organizations shall be required to implement controls consistent with the OQAP requirements applicable to their scope of activities. The coordination of these activities is the responsibility of the Senior Vice President Generation and Chief Nuclear Officer.
- 1.26 Safety review committees shall be established to provide an independent review of those items required below. These committees are the Onsite Review Committee (ORC -- refer to Section 1.26.1) and the Nuclear Safety Review Board (NSRB -- refer to Section 1.26.2)
- 1.26.1 The ORC shall function to advise the Manager, Callaway Plant on all matters related to nuclear safety. The Manager, Callaway Plant shall be Chairman of the ORC.
- 1.26.1.1 ORC membership shall include a minimum of six additional members appointed by the Chairman and an additional member appointed by the Manager, Quality Assurance. Selected members shall include, at a minimum, management responsible for the following areas of expertise:
- a) Operations
 - b) Work Control
 - c) Instrumentation and Controls
 - d) Chemistry
 - e) Radwaste
 - f) Health Physics
 - g) Nuclear Engineering
 - h) Quality Assurance
- 1.26.1.2 All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis.
- 1.26.1.3 The alternate for Quality Assurance is appointed by the Manager, Quality Assurance.
- 1.26.1.4 The ORC shall meet at least once per calendar month and as convened by the ORC Chairman or his designated alternate.
- 1.26.1.5 The quorum of the ORC necessary for the performance of the ORC responsibility and authority provisions shall consist of the Chairman or his designated alternate and four members of which no more than two shall be alternates.
- 1.26.1.6 The ORC shall maintain written minutes of each ORC meeting that, at a minimum, document the results of all ORC activities. Copies shall be provided to the Senior Vice President Generation and Chief Nuclear Officer and the NSRB.

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1.26.1.7 The ORC shall be responsible for:

- a) Review of all Administrative Procedures;
- b) Review of 10CFR50.59 evaluations for:
 - procedures,
 - change to procedures, equipment, systems or facilities, and
 - tests or experiments completed under the provision of 10CFR50.59 to verify that such actions did not require a license amendment.
- c) Review of proposed procedures and changes to procedure, equipment, systems or facilities which may involve a license amendment as defined in 10CFR50.59 or involves a change in Technical Specifications;
- d) Review of proposed test or experiments which may involve a license amendment as defined in 10CFR50.59 or requires a change in Technical Specifications;
- e) Review of proposed changes to Technical Specifications or Operating License;
- f) Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President Generation and Chief Nuclear Officer and to the NSRB;
- g) Review of report of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety;
- h) Review of all REPORTABLE EVENTS;
- i) Review of the plant Security Plan and shall submit recommended changes to the NSRB;
- j) Review of the Radiological Emergency Response Plan and shall submit recommended changes to the NSRB;
- k) Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems;
- l) Review of any accidental, unplanned or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Manager, Callaway Plant and to the NSRB;
- m) Review of Unit operations to detect potential hazards to nuclear safety;
- n) Investigations or analysis of special subjects as requested by the Chairman of the NSRB;
- o) Review of Unit Turbine Overspeed Protection Reliability Program and revisions thereto;
- p) Review of the Fire Protection Program and submitting recommended changes to the NSRB.

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1.26.1.8 The ORC shall:

- a) Recommend in writing to the Manager, Callaway Plant approval or disapproval of items considered under Sections 1.26.1.7.a through 1.26.1.7.e, 1.26.1.7.i, 1.26.1.7.j, 1.26.1.7.k, 1.26.1.7.l, 1.26.1.7.o, and 1.26.1.7.p above.
- b) Render determinations in writing with regard to whether or not each item considered under Sections 1.26.1.7.b through 1.26.1.7.e, and 1.26.1.7.m, above, require a license amendment per 10 CFR 50.59; and
- c) Provide written notification within 24 hours to the Senior Vice President Generation and Chief Nuclear Officer and the NSRB of disagreement between ORC and the Manager, Callaway Plant; however, the Manager Callaway Plant shall have responsibility for resolution of such disagreements.
- d) Each REPORTABLE EVENT shall be reviewed by the ORC and submitted to the NSRB and the Senior Vice President Generation and Chief Nuclear Officer.

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1.26.2 The NSRB shall function to provide independent review and audit of designated activities in the areas of:

- a) Nuclear power plant operations,
- b) Nuclear engineering,
- c) Chemistry and radiochemistry,
- d) Metallurgy,
- e) Instrumentation and control,
- f) Radiological safety,
- g) Mechanical and electrical engineering, and
- h) Quality assurance practices

1.26.2.1 The NSRB shall report to and advise the Senior Vice President Generation and Chief Nuclear Officer on those areas of responsibility stated in OQAM Sections 1.26.2.10 and 18.8.

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

Chairman:	Manager, Regulatory Affairs
Member:	Manager, Nuclear Engineering
Member:	Manager, Quality Assurance
Member:	Manager, Operations Support
Member:	Reactor Engineering Manager, Texas Utilities

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

1.26.2.4 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 Section 1.26.2.

1.26.2.5 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.

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



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1.26.2.7 The NSRB shall meet at least once every 6 months.

1.26.2.8 The quorum of the NSRB necessary for the performance of the NSRB review and audit functions herein, shall consist of the no less than half of the membership including the Chairman or his designated alternate and duly appointed alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

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1.26.2.9 Minutes of each NSRB meeting, including reports of reviews encompassed by Section 1.26.2.10, shall be prepared, approved and forwarded to the Senior Vice President Generation and Chief Nuclear Officer within 15 working days following each meeting.

1.26.2.10 The NSRB shall be responsible for the review of:

- a) The 10 CFR 50.59 evaluations for:
 - changes to procedures, equipment, systems or facilities; and
 - tests or experiments completed under the provision of Section 10 CFR 50.59, to verify that such actions did not require a license amendment;
- b) Proposed changes to procedures, equipment, systems or facilities which involve a license amendment as defined in 10 CFR 50.59;
- c) Proposed tests or experiments which involve a license amendment as defined in 10 CFR 50.59,
- d) Proposed changes to Technical Specifications or the Operating License;
- e) Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f) Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g) ALL REPORTABLE EVENTS;
- h) All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems or components that could affect nuclear safety; and
- i) Reports and meeting minutes of the ORC.



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1.27 INDEPENDENT TECHNICAL REVIEW

1.27.1 Independent technical reviews shall be used to examine plant operating characteristics, NRC issuances, industry advisories, REPORTABLE EVENTS and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety.

1.27.2 Several personnel performing independent technical reviews will be required to have a degree in engineering or related science and at least 2 years of professional level experience in their field.

1.27.3 Independent technical reviews shall be used to observe and verify that activities are performed correctly and that human errors are reduced as much as practical. Personnel performing independent technical reviews should be independent of performance function, signoff function, and the plant management chain while performing this oversight activity.

1.27.4 The results of independent technical reviews will be periodically transmitted to appropriate line and senior management, the Nuclear Safety Review Board, and the Senior Vice President Generation and Chief Nuclear Officer for review and/or action and advise management on the overall quality and safety of operations.

1.27.5 Conditions adverse to quality and recommendations identified during the performance of independent technical reviews shall be subject to the requirements of OQAM Section 15 and 16.

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2. QUALITY ASSURANCE PROGRAM

2.1 AmerenUE has established an OQAP which controls activities affecting quality. The Program encompasses those quality activities necessary to support the operating phase of the Callaway Plant and shall comply with 10CFR50, Appendix B - "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants" as described herein and with the Regulatory Position of Regulatory Guide 1.33. Commitments, clarifications, alternatives, and exceptions to the Regulatory Position of Regulatory Guide 1.33 are stated in Appendix A of this OQAM. In addition, the OQAP has incorporated the commitments made in responding to applicable NRC questions. The text of the NRC questions applicable to the OQAP, along with the responses, are maintained as a QA Record separate from the OQAM. The Senior Vice President Generation and Chief Nuclear Officer has reviewed the Program and formulated the policy in addition to authorizing Program implementation. This responsibility has been established by the President Chairman and Chief Executive Officer of AmerenUE for establishing and implementing the Quality Assurance Program requirements. (COMN 1799, 2974)

2.2 Lines of authority and responsibility have been established from the President Chairman and Chief Executive Officer to the Senior Vice President Generation and Chief Nuclear Officer and the onsite operating organization. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities, and position guides for key personnel having direct operating, support, or audit responsibility. Where specific responsibilities are assigned within the OQAP, the prescribed individual shall retain the overall responsibility; however, subject to applicable regulatory constraints, authority may be delegated to subordinates. Considering these same regulatory constraints, the authority of a subordinate may always be assumed by a superior. (COMN 1788)

2.3 Updating and revision of the OQAP as described in this OQAM shall be in accordance with the applicable requirements of 10 CFR 50.54 (a) and 10 CFR 50.71.

2.4 The pertinent requirements of the OQAP apply to all activities affecting the safety-related functions of those structures, systems, and components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The safety-related structures, systems and components identified in Table 3.2-1 of the Callaway-SP Final Safety Analysis Report (FSAR). This list includes structures, systems, and components identified during the design and construction phase and may be modified as required during operations consistent with their importance to safety. Modifications to this list require the approval of the Manager, Quality Assurance and the Manager, Nuclear Engineering and shall be issued and controlled in accordance with Section 6. The development, control, and use of computer programs to be used in safety-related activities are within the scope of the OQAP. The degree of controls applicable to each computer program shall be consistent with the program's importance to safety-related activities. Consumables which could affect the form, fit or function of safety-related structures, systems, and components, although not listed in Table 3.2-1 of the Callaway-SP FSAR, are also under the control of the OQAP. (COMN 1824, 1853, 20200)

2.5 The OQAP shall be implemented throughout the operating life of the Callaway Plant. Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, such as adequate cleanness; and assurance that all prerequisites for the given activity have been satisfied. (COMN 1879, 1947)



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- 2.6 Consistent with the schedule for accomplishing quality activities, the OQAP shall be established and documented by written policy, program manual, and procedure manuals. Persons conducting safety-related activities shall be responsible to implement approved procedures. The OQAP shall utilize the following document types to describe Program objectives: (COMN 1788, 1879)
- 1) Operating Quality Assurance Program Policy/ Introduction Statement

The Operating Quality Assurance Program Policy statement establishes governing principles in accordance with the requirements of 10 CFR 50, Appendix B.

The Operating Quality Assurance Program Policy statement and any revisions thereto shall be approved by the Senior Vice President Generation and Chief Nuclear Officer.
 - 2) Operating Quality Assurance Manual (OQAM)

The OQAM contains a delineation of the Policy statement, quality assurance requirements, assignment of responsibilities, and a definition of organizational interfaces. The OQAM is the written description of the OQAP. Approval of the OQAM is by the Senior Vice President Generation and Chief Nuclear Officer and the Manager, Quality Assurance. (COMN 1823)
 - 3) Callaway Plant Operating Procedures

The Callaway Plant Operating Procedures consist of a multi-volume set of Plant operating procedures prepared or reviewed by the staff with the aid of other SNUPPS utilities, Nuclear Engineering, the Lead A/E, the NSSS Supplier, and Fuel Fabricator. These procedures are controlled, approved, and issued in accordance with Administrative Procedures. These Operating Procedures include administrative controls consistent with those required by Regulatory Guide 1.33. (COMN 1947)

Administrative procedures which apply to the entire staff, and revisions thereto, shall be reviewed by the Callaway Plant Onsite Review Committee (ORC). The final approval of Administrative Procedures and revisions thereto shall be by the Manager, Callaway Plant. The review and approval of other procedures and revisions thereto shall be in accordance with approved Administrative Procedures which implement the requirements of the Technical Specifications, and this OQAM.
- 2.7 AmerenUE may employ the safety-related services of architect engineers, NSSS suppliers, fuel fabricators, constructors, and others, which provide or augment AmerenUE efforts during the operating phase. These organizations shall be required to work under a quality assurance program whose controls are consistent with the scope of their effort. This does not preclude any organization from working under the AmerenUE OQAP. The quality assurance program of outside organizations shall be subject to review, evaluation and acceptance by the Quality Assurance Department prior to the initiation of safety-related work. Vendor programs and procedures shall also meet AmerenUE's commitment to USNRC Generic Letter 83-28. (COMN 679, 1746, 1787, 2293, 2460)
- 2.8 Disputes which may arise between QA or QC personnel and personnel in other Ameren organizations which cannot be resolved shall be referred to the next higher level of management for resolution. Disputes which cannot be resolved through these levels, shall be resolved ultimately by the Chief Executive Officer.
- 2.9 Preservice (PSI) and Inservice (ISI) inspection, testing, and examination activities may be performed by outside organizations. These inspections and other operating phase "code" activities shall comply with the requirements of the applicable Code Edition and Addenda of the ASME Boiler and Pressure Vessel Code. This compliance includes the independent third-party inspection coverage of "code" items by an Authorized Nuclear Inspector.



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- 2.12 The Senior Vice President Generation and Chief Nuclear Officer provides for an independent assessment of the scope, implementation, and effectiveness of the OQAP to assure compliance with policy, commitments, and the requirements of 10 CFR 50, Appendix B as set forth in this OQAM. This assessment shall be conducted biennially with a scheduling allowance of plus three months for each assessment and a combined time interval for any three consecutive assessment intervals not to exceed 6.25 years. This assessment may be by representatives of other utilities, outside consultants, or AmerenUE management representatives. In addition, various reports are issued to the Senior Vice President Generation and Chief Nuclear Officer on a periodic basis to assist his independent assessment of the OQAP (e.g., semiannual trend analysis, and periodic QA audit reports).
(COMN 1799, 1800)
- 2.13 Implementation of OQAP controls over activities affecting quality assures achieving the objective of the AmerenUE OQAP to provide management with adequate confidence that activities affecting quality regarding the design, installation, modification, and operation of the Callaway Plant are performed consistent with policy. Documentation of the accomplishment of OQAP objectives is maintained in the form of records of data and other information as necessary to support operation, maintenance, repair, modification, refueling, and inservice inspection.
- 2.14 AmerenUE Management has established standards of performance, which exceed those set forth by the Regulatory Agencies. As a management initiative in this area, AmerenUE has defined the word "must" to impose management directed performance standards in excess of and in addition to established Regulatory directed performance. From the viewpoint of AmerenUE employees and contractors, there is no difference in the degree of compliance mandated by use of the words "shall" or "must." Compliance with actions initiated by use of either "shall" or "must" is audited and surveilled by the QA Department. Failure to implement a "must" mandated activity requires corrective action in the same way as failure to implement a "shall" mandated activity. However, from an external viewpoint, internally imposed "must" requirements (i.e., those in excess of Regulatory requirements) are not intended to be subject to enforcement action. "Must" is defined in Appendix A of this OQAM under Regulatory Guide 1.74.



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- 4.11 Bids or proposals with alternates or exceptions identified in Section 4.10 by the Purchasing Department shall also be evaluated by the originating organization to provide additional assurance that no unacceptable conditions result from such changes. Unacceptable conditions identified in bid or proposal evaluations shall be resolved prior to purchase award. (COMN 3560, 3561, 3567, 3568, 3570)
- 4.12 Letters of intent may be utilized with suppliers of materials, parts, components, and services for the purpose of reserving schedule space prior to the resolution of the commercial requirements to be included in a purchase order, contract, or ESA. If employed, letters of intent must normally specify that no safety-related activities may begin until an approved purchase order, contract, or ESA is executed. Letters of intent shall be prepared, approved and issued by Purchasing for those suppliers to be covered by purchase order, by the originating organization for ESA's, or by the Fuel Cycle Management Department for contracts for nuclear fuel cycle-related goods and/or services. However in the event a letter of intent is issued for the purpose of securing an agreement and thereby allow safety-related work to begin prior to the issuance of such documents, it shall include the applicable quality and technical requirements, as specified by the originating organization.
- 4.13 The Purchasing Department is responsible for reviewing purchase orders to verify that the technical and quality requirements have been accurately transferred from the requisition to the purchase order. Approval of the purchase requisition, letter of intent, ESA, or contract shall be by an individual who has approval authority and signifies that the technical and quality review of the document has been completed. Contracts initiated for nuclear fuel cycle-related goods and/or services shall be the responsibility of the Senior Vice President Generation and Chief Nuclear Officer with preparation and negotiation by the Fuel Cycle Management Department. Nuclear fuel cycle-related contracts and ESAs for professional services shall be executed by the Senior Vice President Generation and Chief Nuclear Officer or another company officer in accordance with Nuclear Division and corporate procedures related to agreements or contracts for services. (COMN 3563)
- 4.14 Additions, modifications, exceptions, and other changes to procurement document quality and technical requirements shall require a review equivalent to that of the original document and approval by the originator or the originating department approval authority. Commercial consideration changes shall not require review and concurrence by the originator. Conditions specified on the Qualified Suppliers List (QSL) that apply to a vendor may be revised without concurrence from the originating organization since they are imposed without the knowledge of the originator. (COMN 975, 3543, 3548, 3563, 3575, 42587)



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- 11.9 Review and approval of tests and experiments not described in the FSAR shall be conducted as specified in the OQAM Section 5 and 10 CFR 50.59.
- 11.10 A program shall be established to assure testing activities are performed by personnel trained and qualified to a capability necessary for performance of the activity. Plant procedures and procurement documents shall prescribe the qualification requirements for testing personnel. Provisions may be made for on-the-job training of individuals not qualified to the program provided they are supervised or overseen by qualified individuals for the activities being performed. The Superintendent, Training shall be responsible for providing related technical and quality training for AmerenUE personnel who perform testing. (COMN 2039, 2481, 2482, 2483, 2484, 2485)
- 11.11 Personnel within the various Ameren organizations may perform testing activities including implementing test procedures and the evaluation and reporting of test results. The assignment of Plant testing personnel shall be under the direction and control of the Senior Vice President Generation and Chief Nuclear Officer. The qualification of QC testing personnel shall be defined in three levels of capability as described in ANSI N45.2.6. Other members of the unit staff performing "testing" activities shall have appropriate experience, training, and retraining to assure competence in accordance with ANSI/ANS-3.1. Testing assignments shall be consistent with the qualification of an individual. In instances where the education and experience recommendations are not met by QC testing personnel who are to be certified to ANSI N45.2.6, AmerenUE shall demonstrate by documented results of written examinations and evaluations of actual work proficiency that individuals possess comparable or equivalent competence. (COMN 2263, 2479, 2480, 2482, 2483, 2484, 2485)
- 11.12 Personnel from outside organizations or Ameren personnel who are not members of the unit staff selected to perform other testing activities associated with safety-related items at the Callaway Plant shall meet one or more of the following for the activities which they are performing: (COMN 2263, 2480, 2482, 2483, 2484, 2485)
- be certified as required by ANSI N45.2.6,
 - meet the education and experience requirements applicable to the position,
 - be qualified through AmerenUEs "systematic approach to training,"
 - be qualified through a vendor's training and qualification program, which has been approved by AmerenUE.
- 11.13 When contractors or vendors are retained to perform work activities or to provide services associated with safety-related items at the Callaway Plant, the qualification of testing personnel and the conduct of tests associated with that contracted work activity or service shall meet the requirements stipulated in the applicable procurement documents. As an example, if a vendor were contracted to conduct testing of the main steam line safety valves at the Callaway Plant, then the persons performing the testing/valve settings would be qualified as required by the vendor's quality assurance program unless otherwise specified in the applicable procurement documents. (COMN 2483, 2484, 2485)

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18.4 QA Department personnel who perform audit and surveillance activities shall be qualified in accordance with the requirements prescribed in QA Department procedures. Lead Auditor qualification requirements shall include education or professional status, previous work experience or training, training received through AmerenUE, on-the-job performance and participation in surveillances or audits as an auditor, a qualification examination, and other factors applicable to auditing not defined by procedure. The qualification certification of Lead Auditors shall be based on an evaluation of these factors by the Manager, Quality Assurance. The maintenance of proficiency by Lead Auditors shall be accomplished by active participation in the audit process; a review of program, codes, standards, procedures and other document revisions related to the OQAP; or participation in training programs. The Manager, Quality Assurance shall provide for annual assessments of each Lead Auditor to determine proficiency. As long as a Lead Auditor is performing satisfactorily and is maintaining proficiency, there is no limit on the period of certification. However if at anytime the Lead Auditor's performance is evaluated as being unacceptable, Lead Auditor certification shall be rescinded. In addition the failure to maintain proficiency for a period of two years or more shall be basis for Lead Auditor certification revocation. If certification is rescinded or revoked, requalification shall be required prior to recertification.
(COMN 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2257, 2259, 2969, 3866, 40862)

18.5 The Manager, Quality Assurance shall be responsible for assuring the implementation of a comprehensive system of planned audits to verify compliance with the OQAP. The Manager, Quality Assurance has sufficient authority and organizational freedom to schedule and perform both internal and external audits. He has the organizational responsibility to measure and assure the overall effectiveness of the OQAP and is independent of the economic pressures of production when opposed to safety or quality. The Manager, Quality Assurance has direct access to the Senior Vice President Generation and Chief Nuclear Officer.
(COMN 3865, 1790)

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18.6 The audit system shall include internal and external audits. The system shall be planned, documented, and conducted to assure coverage of the applicable elements of the OQAP, and overall coordination and scheduling of audit activities. Audit results shall be periodically reviewed by the QA Department for quality trends and results reported to the appropriate management. The Manager, Quality Assurance shall monitor the OQAP audit program to assure audits are being accomplished in accordance with the requirements described herein and for overall Program effectiveness. The NSRB shall selectively review audit reports of onsite audits. The NSRB shall also periodically review the onsite audit program as developed by the QA Department, to assure that audits are being performed in accordance with the OQAP. Appropriate levels of management shall be provided copies of internal and external audit reports.
(COMN 1790, 1799, 1800, 3871)

18.7 Internal audits shall be conducted by the QA Department and shall be performed with a frequency commensurate with their safety significance. An audit of safety-related functions shall be completed in accordance with formal audit schedules within a period of two (2) years. A grace period of 90 days may be applied to performance of internal audits provided the two (2) year frequency for the following audit performance is not set forward. Each element of the OQAP, such as design control and document control, and each area of Plant operations shall be audited.
(COMN 1792, 1816, 2188, 3873)

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18.8 Supplementary to the biennial requirements to audit safety-related functions, audits of Unit activities (listed below) SHALL be: (COMN 2666, 2681, 2847, 3873, 41777)

- performed under the cognizance of the NSRB, and
- conducted on a performance based frequency by the QA Department, not to exceed 24 months *
 - a) The conformance of Unit operation to provisions contained within the Technical Specifications and applicable license conditions;
 - b) The performance, training and qualifications of the entire Unit staff;
 - c) The results of actions taken to correct deficiencies occurring in Unit equipment, structures, systems or method of operation that affect nuclear safety;
 - d) The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10CFR Part 50;
 - e) The Fire Protection equipment, programmatic controls, and implementing procedures utilizing either a qualified offsite non-AmerenUE Fire Protection Engineer or an outside independent Fire Protection Consultant (non-Ameren). However, an outside independent Fire Protection Consultant (non-Ameren) SHALL be used at least every third year.
 - f) The Radiological Environmental Monitoring Program and the results thereof;
 - g) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures;
 - h) The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes;
 - i) The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring; and
 - j) Any other area of Unit operation considered appropriate by the NSRB or the Senior Vice President Generation and Chief Nuclear Officer.

* A grace period of 90 days may be applied to the 24 month frequency for internal audits excluding the third year Fire Protection Consultant audit, provided the 24 month frequency for the following audit performance is not set forward.

18.8.1 In addition to audits conducted under the cognizance of the NSRB, the following areas shall be reviewed or audited per the frequency specified in applicable regulations:

- ⇒ Special Nuclear Material Accountability program
- ⇒ Radiological Protection program
- ⇒ Security program
- ⇒ Fitness-For-Duty program
- ⇒ Radiological Emergency Response Plan

18.9 During Plant modifications or other major unique activities, audits shall be scheduled as required to assure that Quality Assurance Program requirements are properly implemented. (COMN 1799, 1800, 3873)

18.10 External audits shall be conducted by or for the QA Department as a method for the evaluation of procurement sources and as a post-award source verification of conformance to procurement documents. Audits conducted by other organizations (with similar orders with the same supplier), including other utilities or A/E's, may be employed as a means of post-award source verification in lieu of AmerenUE performed audits and may not necessarily audit specific items furnished to AmerenUE. These audits and surveillances shall utilize personnel qualified in accordance with this OQAM and shall be conducted in accordance with this OQAM and QA Department procedures. Commercial grade items do not require pre-or post-award audits. Similarly, items which are relatively simple and standard in design and manufacture may not require supplier qualification or post-award audits to assure their quality. (COMN 3577, 3584, 3596)



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- 18.11 Applicable elements of suppliers' quality assurance programs shall be audited (post-award) on a triennial basis. Audits generally should be initiated when sufficient work is in progress to determine whether the organization is complying with the established quality assurance provisions. Subsequent contracts or contract modifications which significantly enlarge the scope of activities by the same supplier shall be considered in establishing audit requirements. In addition, the need for a triennial audit may be precluded upon evaluation and documentation by the QA Department that the results of mini-audits performed during source verification and source surveillance activities confirm the adequacy and implementation of the supplier's QA Program. (COMN 1780, 3565, 3596, 3878, 3872)
- 18.12 Supplementary to audits, annual evaluations of suppliers shall be performed which take into account, as applicable: 1) the review of supplier furnished documents such as certificates of conformance, nonconformance notices, and corrective actions; 2) results of previous source verifications, audits, and receiving inspections; 3) operating experience of identical or similar products furnished by the same supplier; and 4) results of audits from other sources. (COMN 3565, 3566, 3596)
- 18.13 Audits shall also be conducted when: 1) significant changes are made in functional areas of the Quality Assurance Program such as significant reorganization or procedure revisions; or 2) when it is suspected that the quality of the item is in jeopardy due to deficiencies in the Quality Assurance Program; or 3) when a systematic, independent assessment of Program effectiveness is considered necessary; or 4) when it is necessary to verify implementation of required corrective action. (COMN 3565, 3872, 3874, 3883)
- 18.14 Audits shall be conducted using written plans in accordance with QA Department procedures. The procedures require evaluation of work areas, activities, processes, goods, services, and the review of documents and records for quality-related practices, procedures, and instructions to determine the effectiveness of the implementation of the OQAP and compliance with 10 CFR 50, Appendix B. The audit plan shall identify the audit scope, the requirements, the activities to be audited, organizations to be notified, the applicable documents, the schedule, and the written procedures or checklists as appropriate. The audit plan and any necessary reference documents shall be available to the audit team members. (COMN 3876, 3878, 3881, 3889)
- 18.15 An audit team consists of one or more auditors. A Lead Auditor shall be appointed Audit Team Leader. The Audit Team Leader shall be responsible for the written plans, checklists, team orientation, audit notification, pre-audit conference, audit performance, post-audit conference, reporting, records, and follow-up activity to assure corrective action. (COMN 3877, 3889)
- The audited organization should be informed of adverse findings. Agreement or disagreement with a finding may be expressed in the response from the audited organization. (refer to Appendix A, Subsection 4.3.2.5 of ANSI N45.2.12)
- Any adverse findings shall be reported in a post-audit conference with team members and the audited organization, unless the post-audit conference is waived by the management of the audited organization. (refer to Appendix A, Section 4.3.3 of ANSI N45.2.12)
- 18.15.1 Formal audit reports shall be prepared and submitted within 30 days after the post-audit conference (or last day of the audit, whichever is later) to:
- the audited organization for internal audits conducted in accordance with the Sections described herein, and
 - specifically, the Senior Vice President Generation and Chief Nuclear Officer for audits conducted under the cognizance of the NSRB in accordance with Section 18.8.