

50-483



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

WASHINGTON, D.C. 20555-0001

March 23, 1998

Mr. Garry L. Randolph  
Vice President and Chief Nuclear Officer  
Union Electric Company  
Post Office Box 620  
Fulton, Missouri 65251

**SUBJECT: CALLAWAY PLANT - AMENDMENT NO. 122 TO FACILITY  
OPERATING LICENSE NO. NPF-30 (TAC NO. M98445)**

Dear Mr. Randolph:

The Commission has issued the enclosed Amendment No. 122 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated April 24, 1997, as supplemented by letters dated June 6, 1997, and June 27, 1997.

The amendment revises the title "Senior Vice President, Nuclear" to "Vice President and Chief Nuclear Officer." The change was necessary following a reorganization that took place on May 1, 1997, in which the position of Vice President, Nuclear Operations was eliminated. The staff that reported directly to that position now reports to the Vice President and Chief Nuclear Officer.

Your letter of April 24, 1997, characterized these changes as a title change only. You indicated that other than the title change, the position remained unchanged in the Union Electric management structure and that there would be no reduction in the level of management oversight in the operation of Callaway Plant. Our May 2, 1997, letter indicated that because Union Electric had eliminated the Vice President, Nuclear Operations position, the NRC staff considered this a reorganization and requested that Union Electric supplement their amendment application to provide information of their management structure before and after the reorganization and provide justification that sufficient management oversight remains subsequent to the elimination of a single level of oversight. Further, in the May 2 letter, the staff indicated that in an April 22, 1997, telephone call that Union Electric did not plan to request an amendment to their technical specifications, but instead planned to issue a letter informing us of this change. We informed you that this was not consistent with 10 CFR 50.59. In response to this call, you subsequently submitted the subject technical specification amendment.

We are concerned that Union Electric did not recognize the need to submit the required technical specification amendment request for this reorganization and that your original submittal was inadequate to address the requested technical specification amendment. Please ensure that when changes are made that affect technical specifications, Union Electric evaluates the need to request a technical specification amendment and that those submittals accurately characterize the changes being made.

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**NRC FILE CENTER COPY**

Mr. Garry L. Randolph

- 2 -

March 23, 1998

A copy of our related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Original Signed By

Barry C. Westreich, Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosures: 1. Amendment No. 122 to NPF-42  
2. Safety Evaluation

cc w/encls: See next page

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NAME	EPeyton	BWestreich	WJohnson	WABateman
DATE	2/20/98	2/27/98	2/3/98	3/16/99

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

UNION ELECTRIC COMPANY

CALLAWAY PLANT UNIT 1

DOCKET NO. 50-483

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 122  
License No. NPF-30

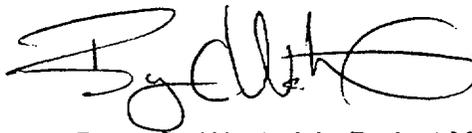
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Callaway Plant Unit 1 (the facility) Facility Operating License No. NPF-30 filed by the Union Electric Company (the Company), dated April 24, 1997, as supplemented by letters dated June 6, 1997, and June 27, 1997, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-30 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 122 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Barry C. Westreich, Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: March 23, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 122

FACILITY OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change. The overleaf pages are provided to maintain document completeness.

REMOVE

6-1  
6-14  
6-15

INSERT

6-1  
6-14  
6-15

## ADMINISTRATIVE CONTROLS

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### 6.1 RESPONSIBILITY

6.1.1 The Manager, Callaway Plant, shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President and Chief Nuclear Officer shall be reissued to all station personnel on an annual basis.

### 6.2 ORGANIZATION

#### 6.2.1 Onsite and Offsite Organization

An onsite and offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or equivalent forms of documentation. These requirements shall be documented in the FSAR and updated in accordance with 10 CFR 50.71(e).
- b. The Manager, Callaway Plant shall have responsibility for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President and Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out the health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

## ADMINISTRATIVE CONTROLS

### 6.2 ORGANIZATION (Continued)

#### UNIT STAFF

6.2.2 The Unit organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Operator shall be in the control room;
- c. An individual from the Health Physics organization#, qualified in radiation protection procedures, shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. A site Fire Brigade of at least five members# shall be maintained onsite at all times. The Fire Brigade shall not include the Shift Supervisor, and the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency;
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, health physics personnel, equipment operators, and key maintenance personnel.

The amount of overtime worked by Unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12); and

- g. The Superintendent, Operations, Shift Supervisors, and Operating Supervisors shall hold a senior reactor operator license. The Unit Reactor Operator shall hold a reactor operator license or a senior reactor operator license.

#May be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

## ADMINISTRATIVE CONTROLS

### ACTIVITIES (Continued)

- d. Individuals responsible for reviews performed in accordance with Specifications 6.5.3.1a., 6.5.3.1b., and 6.5.3.1c., shall be members of the management staff previously designated by the Manager, Operations Support. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline;
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. Pursuant to Section 50.59, 10 CFR, NRC approval of items involving unreviewed safety questions shall be obtained prior to the Manager, Callaway Plant, approval for implementation; and
- f. The Plant Security Plan and Radiological Emergency Response Plan, and implementing procedures, shall be reviewed at least once per 12 months. Recommended changes to the implementing procedures shall be approved in accordance with 6.5.3.1.a. Recommended changes to the Plans shall be reviewed pursuant to the Operational Quality Assurance Manual and approved by the Manager, Callaway Plant. NRC approval shall be obtained as appropriate.

### RECORDS

6.5.3.2 Records of the above activities shall be provided to the Manager, Callaway Plant, ORC and/or NSRB as necessary for required reviews.

### 6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 of 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the ORC and submitted to the NSRB and the Vice President and Chief Nuclear Officer.

### 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President and Chief Nuclear Officer and the NSRB shall be notified within 24 hours;
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the ORC. This report shall describe:  
(1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems or structures; and (3) corrective action taken to prevent recurrence;

SAFETY LIMIT VIOLATION (Continued)

- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRB and the Vice President and Chief Nuclear Officer within 14 days of the violation; and
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A, of Regulatory Guide 1.33, Revision 2, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter No. 82-33;
- c. Plant Security Plan implementation;
- d. Radiological Emergency Response Plan implementation;
- e. PROCESS CONTROL PROGRAM implementation,
- f. OFFSITE DOSE CALCULATION MANUAL implementation,
- g. Quality Assurance Program implementation for effluent and environmental monitoring, and
- h. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 The plant Administrative Procedures and changes thereto shall be reviewed in accordance with the Operational Quality Assurance Manual and approved in accordance with Specification 6.5.3.1. The associated implementing procedures and changes thereto shall be reviewed and approved in accordance with Specification 6.5.3.1.

6.8.4 The following programs shall be established, implemented, and maintained:

- a. Reactor Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation portion of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, and RHR System. The program shall include the following:

- 1) Preventive maintenance and periodic visual inspection requirements, and



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 122 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

1.0 INTRODUCTION

By letter dated April 24, 1997, and supplemented by letters dated June 6, 1997, and June 27, 1997, Union Electric Company (UE) proposed changes to the Administrative Controls section of the Technical Specifications (TS) for the Callaway Plant, Unit 1. These changes would delete the title of Senior Vice-President, Nuclear (SVPN) and replace it with Vice President and Chief Nuclear Officer (VP&CNO). Although not addressed in the TS, the title of Vice President Nuclear Operations (VPNO) would be eliminated and the four managers previously reporting to the VPNO would now report to the VP&CNO. These include the Manager Callaway Plant, Manager Operations Support, Manager Emergency Preparedness and Organizational Support, and Manager Nuclear Information Services. In addition and also not addressed in the TS, the Manager Quality Assurance, Manager Nuclear Engineering, Manager Licensing & Fuels, and Manager Nuclear Services that previously reported to the SVPN will also report to the VP&CNO.

2.0 EVALUATION

In Section 6.0, "Administrative Controls," of the TS, the title "Senior Vice President, Nuclear" is changed to "Vice President and Chief Nuclear Officer" in five places (Sections 6.1.2, 6.2.1 c, 6.6.1 b, 6.7.1 a, and 6.7.1 c). The organizational change results in the eight functional managers identified above now reporting to the VP&CNO who in turn reports to the CEO and President of Union Electric. Charts showing the new organizational arrangement have been included in Chapter 13 (Figures 13.1-1, 13.1-2, and 13.1-3) of Revision OL-9 of the Updated Final Safety Analysis Report (UFSAR) submitted by letter dated May 9, 1997. The Quality Assurance Manager and associated staff groups remain in the same relative arrangement as before the organizational change with the same degree of independence and access to upper management consistent with the requirements of Appendix B of 10 CFR Part 50.

3.0 CONCLUSION

Based on this analysis and evaluation, the staff finds the licensee's organizational changes to be acceptable. The revised organization continues to satisfy the acceptance criteria in Standard Review Plan (SRP) Chapters 17.1 and 13.1 of NUREG-0800.

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#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Missouri State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: W. P. Haass

Date: March 23, 1998