

October 27, 1988

Docket No. 50-483

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Mr. Donald F. Schnell  
Vice President - Nuclear  
Union Electric Company  
Post Office Box 149  
St. Louis, Missouri 63166

Dear Mr. Schnell:

The Commission has issued the enclosed Amendment No. 39 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. This amendment revises the Technical Specifications in response to your application dated June 28, 1988.

The amendment changes the TS to reflect recent organizational changes. All references regarding the "Vice President, Nuclear" are changed to the "Senior Vice President, Nuclear." The position of General Manager, Engineering (Nuclear) has been deleted from the Nuclear Safety Review Board (NSRB) and the Manager, Licensing and Fuels, has been appointed Chairman of the NSRB.

A copy of the Safety Evaluation is also enclosed. The notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

/s/

Thomas W. Alexion, Project Manager  
Project Directorate III-3  
Division of Reactor Projects - III,  
IV, V and Special Projects

Enclosures:

1. Amendment No.39 to License No. NPF-30
2. Safety Evaluation

cc w/enclosures:  
See next page

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Surname: PKreutzer  
Date: 10/3/88

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TAlexion  
9/30/88

PD/PDIII-3  
JHannon  
10/4/88

OGC-WF1  
10/7/88

See changes to SE-X (OGC)

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Union Electric Company

Callaway Plant  
Unit No. 1

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

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. STN 50-483

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 39  
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by Union Electric Company (UE, the licensee) dated June 28, 1988 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, 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 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:

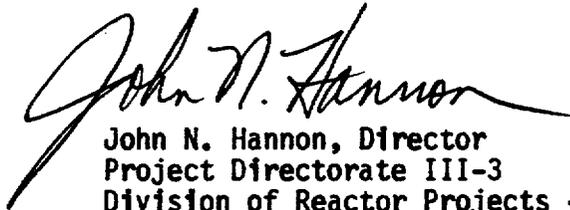
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P PNU

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 39, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into the license. UE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John N. Hannon, Director  
Project Directorate III-3  
Division of Reactor Projects - III,  
IV, V and Special Projects

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 27, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 39

OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. Corresponding overleaf pages are provided to maintain document completeness.

REMOVE

INSERT

6-1

6-1

6-8

6-8

6-9

6-9

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## 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 Senior Vice President-Nuclear 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 Senior Vice President, Nuclear 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

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### 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<sup>#</sup>, 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<sup>#</sup> 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 or the Assistant 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.

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<sup>#</sup>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

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### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Superintendent of Training and shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1978 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience identified by the ISEG.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 ON-SITE REVIEW COMMITTEE (ORC)

##### FUNCTION

6.5.1.1 The ORC shall function to advise the Manager, Callaway Plant on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The ORC shall be composed of the:

Chairman:	Manager, Callaway Plant
Member:	Asst Mgr, Oper and Maintenance
Member:	Asst Mgr, Tech Services
Member:	Manager, Operations Support
Member:	Supt, Health Physics
Member:	Supt, Operations Support, QA
Member:	Manager, Nuclear Engineering
Member:	Asst Mgr, Work Control

##### ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis.\*\*

##### MEETING FREQUENCY

6.5.1.4 The ORC shall meet at least once per calendar month and as convened by the ORC Chairman or his designated alternate.

##### QUORUM

6.5.1.5 The quorum of the ORC necessary for the performance of the ORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members of which no more than two shall be alternates.

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\*\*Except for the alternate for the Supt, Operations Support, QA, who is appointed by the Manager, Quality Assurance.

## ADMINISTRATIVE CONTROLS

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### RESPONSIBILITIES

6.5.1.6 The ORC shall be responsible for:

- a. Review of all Administrative Procedures;
- b. Review of the safety evaluations for (1) procedures, (2) change to procedures, equipment, systems or facilities, and (3) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
- c. Review of proposed procedures and changes to procedures, equipment, systems or facilities which may involve an unreviewed safety question as defined in 10 CFR 50.59 or involves a change in Technical Specifications;
- d. Review of proposed test or experiments which may involve an unreviewed safety question as defined in 10 CFR 50.59 or requires a change in Technical Specifications;
- e. Review of proposed changes to Technical Specifications or the 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-Nuclear and to the NSRB;
- g. Review of reports 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;

## ADMINISTRATIVE CONTROLS

### RESPONSIBILITIES (Continued)

- 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; and
- p. Review of the Fire Protection Program and submitting recommended changes to the NSRB.

#### 6.5.1.7 The ORC shall:

- a. Recommend in writing to the Manager, Callaway Plant approval or disapproval of items considered under Specifications 6.5.1.6a through e., i., j., k., l., o., and p. above.
- b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6b. through e., and m., above, constitutes an unreviewed safety question; and
- c. Provide written notification within 24 hours to the Senior Vice President-Nuclear and the Nuclear Safety Review Board of disagreement between the ORC and the Manager, Callaway Plant; however, the Manager, Callaway Plant shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above.

### RECORDS

6.5.1.8 The ORC shall maintain written minutes of each ORC meeting that, at a minimum, document the results of all ORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Senior Vice President-Nuclear and the Nuclear Safety Review Board.

### 6.5.2 NUCLEAR SAFETY REVIEW BOARD (NSRB)

#### FUNCTION

6.5.2.1 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.

The NSRB shall report to and advise the Senior Vice President-Nuclear on those areas of responsibility stated in Specifications 6.5.2.8 and 6.5.2.9.

## ADMINISTRATIVE CONTROLS

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### COMPOSITION

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

Chairman:	Manager, Licensing and Fuels
Member:	Manager, Nuclear Engineering
Member:	Manager, Nuclear Safety and Emergency Preparedness
Member:	Manager, Quality Assurance
Member:	General Manager, Nuclear Operations
Member:	Supervising Engineer, Nuclear Fuels

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

### ALTERNATES

6.5.2.3 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.

### CONSULTANTS

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

### MEETING FREQUENCY

6.5.2.5 The NSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

### QUALIFICATIONS

6.5.2.6 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 Specification 6.5.2.1.

### QUORUM

6.5.2.7 The quorum of the NSRB necessary for the performance of the NSRB review and audit functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least two-thirds of the NSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit. For the purpose of a quorum, those considered to have line responsibility will include the General Manager, Nuclear Operations, and personnel reporting to the General Manager, Nuclear Operations.

## ADMINISTRATIVE CONTROLS

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### REVIEW

6.5.2.8 The NSRB shall be responsible for the review of:

- a. The safety evaluations for: (1) changes to procedures, equipment, systems or facilities; and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, systems or facilities which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
- d. Proposed changes to Technical Specifications or this 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 meetings minutes of the ORC.

### AUDITS

6.5.2.9 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of Unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months;

## ADMINISTRATIVE CONTROLS

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### AUDITS (Continued)

- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The Fire Protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing either qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- g. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months;
- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months;
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring, at least once per 12 months; and
- k. Any other area of unit operation considered appropriate by the NSRB or the Senior Vice President-Nuclear.

### RECORDS

6.5.2.10 Records of NSRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Senior Vice President-Nuclear within 14 days following each meeting;
- b. Reports of reviews encompassed by Specification 6.5.2.8 above, shall be prepared, approved and forwarded to the Senior Vice President-Nuclear within 14 days following completion of the review; and
- c. Audit reports encompassed by Specification 6.5.2.9 above, shall be forwarded to the management positions responsible for the areas audited and summaries of audits shall be prepared and forwarded to the Senior Vice President-Nuclear within 30 days after completion of the audit by the auditing organization.

## ADMINISTRATIVE CONTROLS

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### 6.5.3 TECHNICAL REVIEW AND CONTROL

#### ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Administrative Procedures shall be approved by the appropriate Department Head as designated in writing by the General Manager, Nuclear Operations. The Manager, Callaway Plant, shall approve Administrative Procedures and Radiological Emergency Response Plan implementing procedures. The Manager, Operations Support, shall approve the Security Plan implementing procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation;
- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Manager, Callaway Plant. Each such modification shall be reviewed by a qualified individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Manager, Callaway Plant;
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by a qualified individual/group other than the individual/group which prepared the proposed test or experiment. Proposed test and experiments shall be approved before implementation by the Manager, Callaway Plant;

## ADMINISTRATIVE CONTROLS

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### 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 requirements of Specifications 6.5.1.6 and 6.5.2.8 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 Senior Vice President-Nuclear.

### 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 Senior Vice President-Nuclear 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;

## ADMINISTRATIVE CONTROLS

### SAFETY LIMIT VIOLATION (Continued)

- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRB and the Senior Vice President-Nuclear 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;
- h. Turbine Overspeed Protection Reliability Program; and
- i. 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 Specification 6.5.1.6 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

## ADMINISTRATIVE CONTROLS

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### PROCEDURES AND PROGRAMS (Continued)

- 2) Integrated leak test requirements for each system at refueling cycle intervals or less.

#### b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- 1) Training of personnel,
- 2) Procedures for monitoring, and
- 3) Provisions for maintenance of sampling and analysis equipment.

#### c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- 1) Identification of a sampling schedule for the critical variables and control points for these variables,
- 2) Identification of the procedures used to measure the values of the critical variables,
- 3) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,
- 4) Procedures for the recording and management of data,
- 5) Procedures defining corrective action for all off-control point chemistry conditions, and
- 6) A procedure identifying: (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

#### d. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- 1) Training of personnel,
- 2) Procedures for sampling and analysis, and
- 3) Provisions for maintenance of sampling and analysis equipment.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 39 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. STN 50-483

1.0 INTRODUCTION

By letter dated June 28, 1988, Union Electric Company submitted a request for changes to the Technical Specifications (TS).

The amendment would change the TS to reflect recent organizational changes. All references regarding the "Vice President, Nuclear" would be changed to the "Senior Vice President, Nuclear." The position of General Manager, Engineering (Nuclear) would be deleted from the Nuclear Safety Review Board (NSRB) and the Manager, Licensing and Fuels, would be appointed Chairman of the NSRB.

2.0 EVALUATION

The minimum qualifications and basic organizational reporting requirements would be unchanged as a result of the upgrade in management assignments. Engineering expertise is currently represented on the NSRB through the membership of the Manager, Nuclear Engineering; the Manager, Licensing and Fuels, is currently an appointed member of the NSRB.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, this 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 this amendment.

4.0 CONCLUSION

The staff 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; and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ACKNOWLEDGEMENT

Principal Contributors: T. Alexion, PDIII-3

Dated: October 27, 1988