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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. 37 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 September 9, 1987 as supplemented by letter dated April 13, 1988.

The amendment deletes the offsite and unit organizational charts from the Technical Specifications. The amendment also adds to the Technical Specifications the essential aspects of the organizational structure which were previously defined by the organizational charts.

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. 37 to License No. NPF-30
2. Safety Evaluation

cc w/enclosures:
See next page

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Office: LA/PDIII-3
Surname: PKreutzer
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noticed

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. 37
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 September 9, 1987, as supplemented by letter dated April 13, 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:

Finally, the plant TS should be examined for additional references to the organization charts. Where such references are included in administrative control requirements, they must be replaced by an appropriate functional description of the requirement that was defined by the organization charts.

3.0 EVALUATION

The licensee's application has been reviewed by the staff. The staff finds that the licensee's application is fully consistent with the guidance provided in Generic Letter 88-06 and is, therefore, acceptable.

4.0 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.

5.0 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.

6.0 ACKNOWLEDGEMENT

Principal Contributor: T. Alexion, PDIII-3

Dated: June 21, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 37

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

XIX
6-1
6-2
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INSERT

XIX
6-1
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Mr. D. F. Schnell
Union Electric Company

cc:

Dr. J. O. Cermack
CFA Inc.
4 Professional Dr., Suite 110
Gaithersburg, MD 20879

Gerald Charnoff, Esq.
Thomas A. Baxter, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N. W.
Washington, D. C. 20037

Mr. T. P. Sharkey
Supervising Engineer,
Site Licensing
Union Electric Company
Post Office Box 620
Fulton, Missouri 65251

U. S. Nuclear Regulatory Commission
Resident Inspectors Office
RR#1
Steedman, Missouri 65077

Mr. Alan C. Passwater, Manager
Licensing and Fuels
Union Electric Company
Post Office Box 149
St. Louis, Missouri 63166

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

Regional Administrator
U. S. NRC, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Mr. Ronald A. Kucera, Deputy Director
Department of Natural Resources
P. O. Box 176
Jefferson City, Missouri 65102

Callaway Plant
Unit No. 1

Mr. Bart D. Withers
President and Chief
Executive Officer
Wolf Creek Nuclear Operating
Corporation
P. O. Box 411
Burlington, Kansas 66839

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

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ADMINISTRATIVE CONTROLS

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-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 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

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 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.

[#]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.

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In summary, many of the details shown on the onsite and offsite organization charts are not essential to the safe operation of the facility. Over the years, the staff experience with changes in the details of operating organizations has shown that organization charts can be modified in many ways while maintaining adequate operational safety. This experience has enabled the staff to distill those organizational characteristics which are important to safety. The staff finds that the only aspects of organization charts which are important to safety, are not covered by other specifications, and must remain in TS, are those conditions listed below.

- (1) A requirement that lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation.
- (2) Designation of an executive position that has corporate responsibility for overall plant nuclear safety and authority to take such measures as may be needed to ensure acceptable performance of staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- (3) Designation of a management position in the onsite organization that is responsible for overall unit operation and has control over those onsite activities necessary for safe operation and maintenance of the plant.
- (4) Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license.
- (5) Provisions of sufficient organizational freedom to be independent of operational pressures to those individuals who perform the functions of health physics, quality assurance, and training of the operating staff.

Since the above conditions will be maintained in the TS, removal of the organization charts represents no reduction in current safety requirements. These changes will simply allow licensees to implement changes in their organization structure without obtaining NRC approval.

The licensee must ensure that the organizational information described in (1) above is incorporated in a document (Final Safety Analysis Report, Quality Assurance Plan, or other appropriate document) to be referenced in the revised TS before the amendment to remove the organization charts is proposed.

The qualifications for certain positions are currently designated by organization charts as requiring an SRO or RO license. If these requirements are not currently specified in TS outside of the organization charts (such as the minimum shift crew composition), they should be added to an appropriate specification.

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



SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 37 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 September 9, 1987, as supplemented by letter dated April 13, 1988, Union Electric Company (the licensee) submitted a request for changes to the Technical Specifications (TS). The amendment deletes the offsite and unit organizational charts and adds the essential aspects of organizational structure which were previously defined by the organizational charts.

In the September 9, 1987 application, the licensee initially proposed to only delete the organizational charts. However, in order to remain consistent with the Shearon Harris lead plant application for organizational charts deletion and the resultant NRC Generic Letter 88-06, "Removal of Organizational Charts from Technical Specification Administrative Control Requirements," the licensee supplemented the original application to add the essential aspects of organizational structure which were previously defined by the organizational charts.

2.0 DISCUSSION

The benefit of this proposal is that it would permit a licensee to implement changes to the structure of the offsite or onsite organizations without first having to obtain NRC approval through the issuance of a license amendment to update organization charts in TS. The following discussion is from Generic Letter 88-06.

The staff examined the regulatory requirements for administrative controls in TS provided in 10 CFR 50.36. This regulation states that administrative controls are the provisions relating to organization and management necessary to ensure operation of the facility in a safe manner. It has been the staff's experience that organization charts by themselves have been of little help in ensuring that the objectives of administrative control requirements are met. Specific operational requirements are required elsewhere in TS that bear more directly on operational safety than organization charts. As examples, the organizational element responsible for the control room command function is identified separately in TS, as are the requirements for minimum staffing under various operating conditions. The organizational management functions for independent reviews and audits, unit review and independent safety engineering groups, and shift technical advisors are specified in other TS.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 37, 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



Kenneth E. Perkins, Director
Project Directorate III-3
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 21, 1988