

January 29, 1988

Docket No. 50-483

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

Dear Mr. Schnell:

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The Commission has issued the enclosed Amendment No.32 to Facility Operating License No. NPF-30 for the Callaway Plant, Unit 1. This amendment is in response to your application dated December 15, 1987.

The amendment revises Technical Specification Figures 6.2-1 and 6.6-2 and Section 6.5.1 to reflect nuclear function organizational changes associated with the establishment of the positions of Manager, Licensing and Fuels, and Assistant Manager, Work Control, and the elimination of the Assistant Manager, Support Services, position and the resulting changes in the operating organization, engineering organization and On-Site Review Committee.

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,

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Thomas W. Alexion, Project Manager
Project Directorate III-3
Division of Reactor Projects

Enclosures:

1. Amendment No.32 to License No. NPF-30
2. Safety Evaluation

cc w/enclosures:
See next page

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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.32
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by Union Electric Company (the licensee) dated December 15, 1987 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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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 32, 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


for Kenneth E. Perkins, Director
Project Directorate III-3
Division of Reactor Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 29, 1988

ATTACHMENT TO LICENSE AMENDMENT NO.32

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.

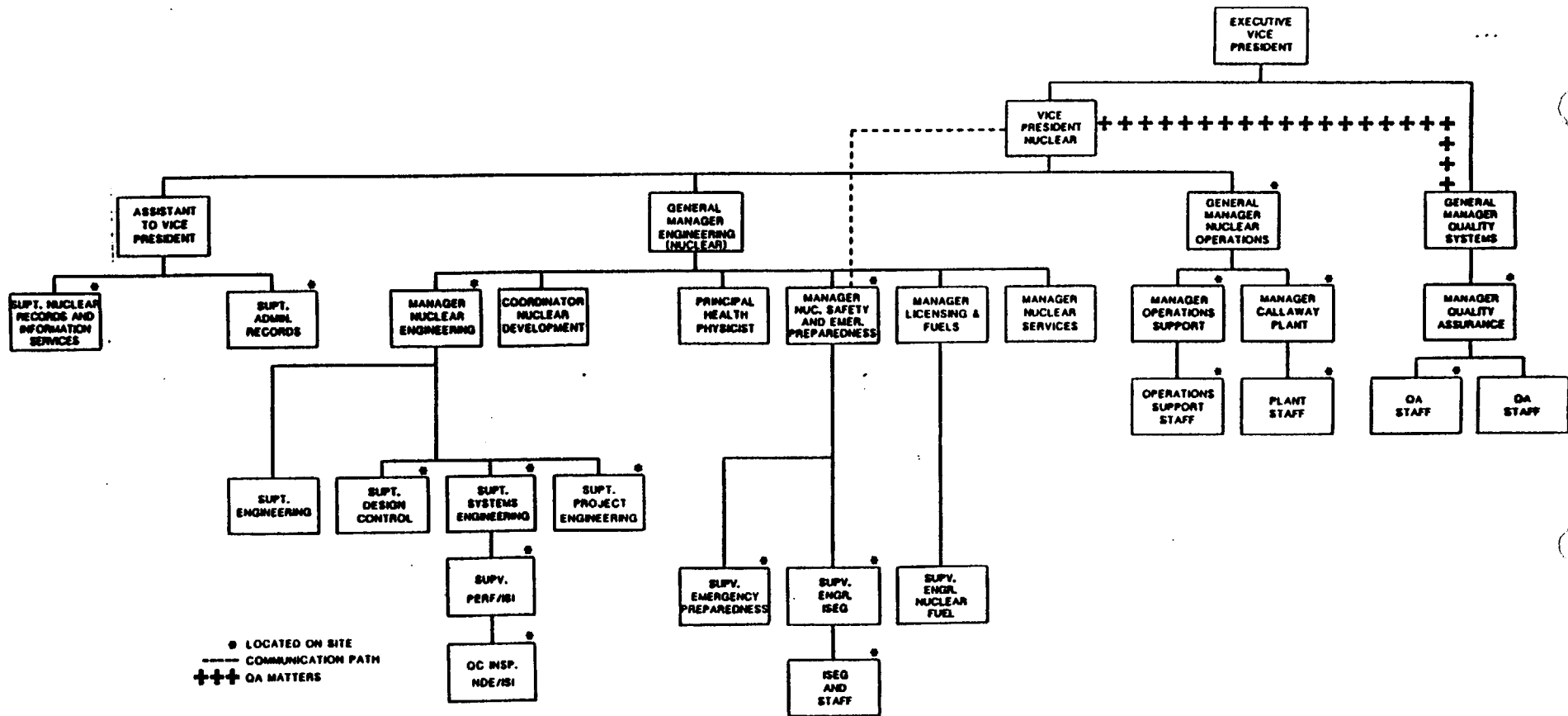
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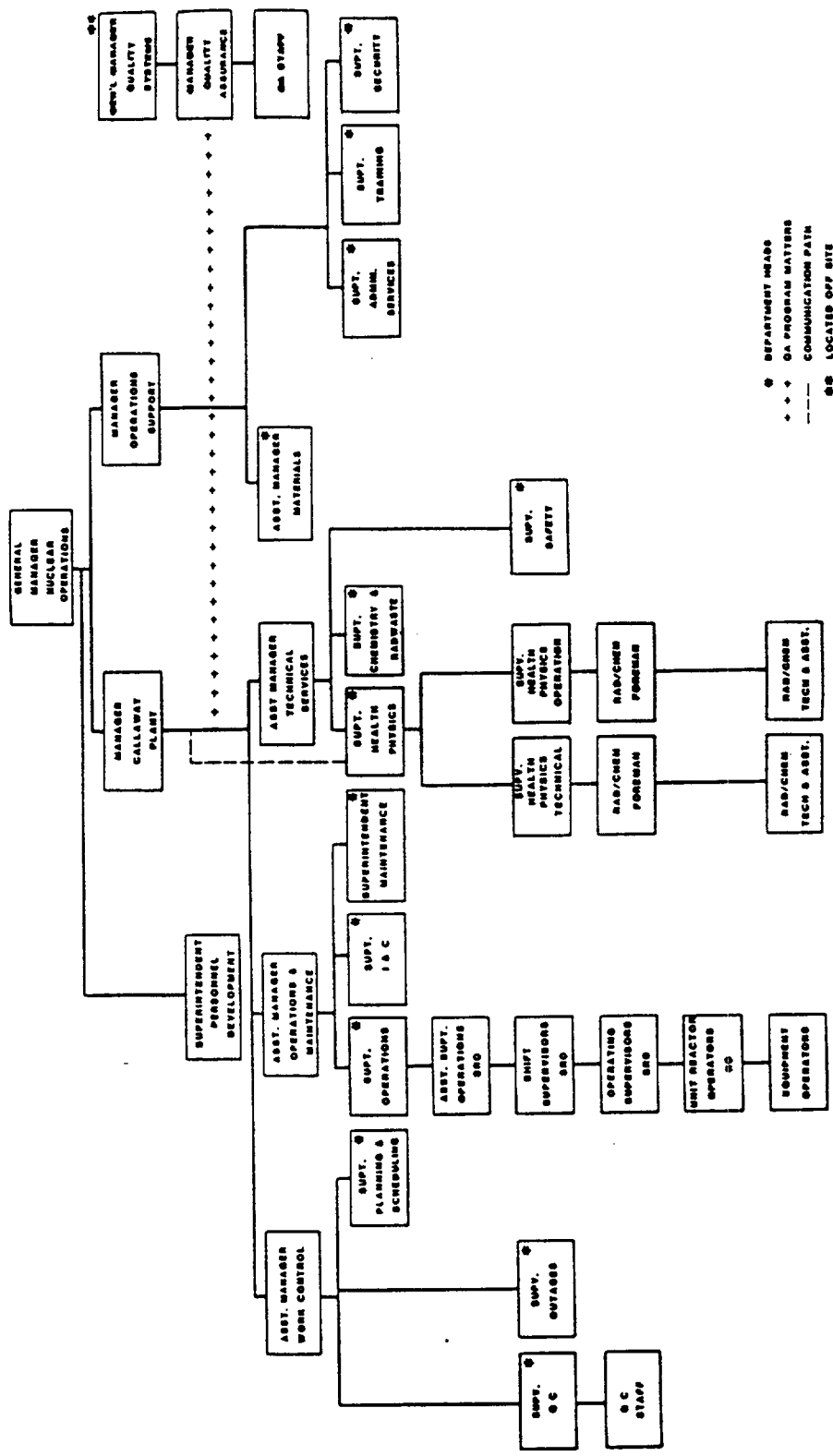
6-3
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INSERT

6-3
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FIGURE 6.2-1
OFFSITE ORGANIZATION





* DEPARTMENT HEADS
 + PROGRAM MATTERS
 - COMMUNICATION PATH
 # LOCATED OFF SITE

FIGURE 6.2-2
UNIT ORGANIZATION

ADMINISTRATIVE CONTROLS

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.

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

ADMINISTRATIVE CONTROLS

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 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;



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 32 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 December 15, 1987, Union Electric Company (the licensee) submitted a request for changes to Section 6 of the plant Technical Specifications.

2.0 EVALUATION

2.1 Figure 6.2-1, Offsite Organization, would be revised to:

- (1) Consolidate the Licensing and Fuels Department under the newly created position, Manager, Licensing and Fuels. This consolidated department reports directly to the General Manager, Engineering.
- (2) The Manager, Nuclear Engineering, position is now located at the Callaway Site.
- (3) The Assistant Manager, Nuclear Engineering, position is eliminated and the Superintendent, Design Control, and the Superintendent, Systems Engineering, report directly to the Manager, Nuclear Engineering.
- (4) A new position, Superintendent, Project Engineering, is established which will report directly to the Manager, Nuclear Engineering.
- (5) Quality Control (QC) inspectors, responsible for Non-Destructive Examination (NDE) and In-Service Inspection (ISI), will report through the Supervisor, Performance and ISI, to the Superintendent, Systems Engineering.
- (6) The Superintendent, Administration Services, will no longer report to the Assistant to the Vice President, but will report to the Manager, Operations Support. This change is also shown on revised Figure 6.2-2.

The licensee states that these changes are designed to improve interdepartmental responsiveness and efficiency by providing better coordination of the engineering staff and enhancing the engineering support of Callaway Plant. These changes do not reduce the overall experience base nor reduce commitments to minimum qualifications.

The staff finds that these changes will not reduce the level of engineering support or the experience base; however, they should provide for improved coordination of engineering support of plant operations. The revised offsite organization is in accordance with the guidance in Section 13.1.1 of the Standard Review Plan, NUREG-0800, and is acceptable.

2.2 Figure 6.2-2, Unit Organization, is revised to:

- (1) Establish the position of Assistant Manager, Work Control, which reports to the Manager, Callaway Plant. Reporting to the Assistant Manager, Work Control, is the Superintendent, Planning and Scheduling, the Supervisor, Quality Control (QC), and the Supervisor, Outages. Consolidation of Planning and Scheduling with the Outages Department provides for enhanced coordination of plant testing and modification activities. The QC Department is being reassigned from the Compliance Department which is addressed below.
- (2) Consolidate the Chemistry and Radwaste organization under the Superintendent, Chemistry and Radwaste, which will continue to report to the Assistant Manager, Technical Services.
- (3) Establish the position of Supervisor, Safety, which reports to the Assistant Manager, Technical Services. This group addresses occupational safety and health issues, which were previously a responsibility of the Compliance Department.
- (4) The Assistant Manager, Support Services, position is eliminated and the Superintendent, Training, and the Superintendent, Security, report directly to the Manager, Operations Support.
- (5) As previously discussed regarding Figure 6.2-1, the Superintendent, Administration Services, reports to the Manager, Operations Support, rather than the Assistant to the Vice President.
- (6) The Compliance Department is eliminated, and its responsibilities are reassigned as follows:
 - (a) The Compliance Group reports to the Manager, Licensing and Fuels, as a Site Licensing Group.
 - (b) The Quality Control group, responsible for plant modification/maintenance work, reports to the Assistant Manager, Work Control.
 - (c) The Quality Control personnel, responsible for NDE/ISI, report to Nuclear Engineering as discussed regarding Figure 6.2-1.

- (d) Surveillance Tracking is performed within Nuclear Operations.
- (e) Fire Protection reports to Nuclear Engineering.
- (f) Personnel Safety reports to the Assistant Manager, Technical Services, as previously discussed.

The licensee states that these changes are designed to improve interdepartmental responsiveness and efficiency by providing better coordination and communication. These changes do not reduce the overall experience base nor reduce commitments to minimum qualifications.

The staff finds that these changes will not reduce the level of operations, technical and maintenance support for the operation of Callaway plant. These changes should, however, improve interdepartmental responsiveness and efficiency. The revised unit organization is in accordance with the guidance in Sections 13.1.2-13.1.3 of the Standard Review Plan, NUREG-0800, and is acceptable.

2.3 Technical Specification 6.5.1 is revised to include the Manager, Nuclear Engineering, and the newly created position, Assistant Manager, Work Control, as members of the On-Site Review Committee. The licensee states that the addition of the Manager, Nuclear Engineering, provides a higher level of management attention and engineering perspective to the On-Site Review Committee. The Assistant Manager, Work Control, is responsible for planning and scheduling of outages, surveillance testing, and plant modifications and therefore provides a valuable role in reviews conducted by the On-Site Review Committee.

The staff finds that these changes are consistent with the revisions to the organization and should provide the On-Site Review Committee with enhanced technical expertise and management oversight. The revised committee membership is consistent with the guidance in Section 13.4 of the Standard Review Plan, NUREG-0800, and is acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes an inspection or surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously published a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(9). 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.

Principal Contributor: T. Alexion.

Dated: January 29, 1988