

March 28, 2006

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop P1-137  
Washington, DC 20555-0001

Ladies and Gentlemen:

ULNRC-05267



**DOCKET NUMBER 50-483  
CALLAWAY PLANT  
UNION ELECTRIC COMPANY  
PROPOSED REVISION TO TECHNICAL SPECIFICATION 5.0  
"ADMINISTRATIVE CONTROLS"  
(LICENSE AMENDMENT REQUEST OL 1267)**

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Pursuant to 10 CFR 50.90, AmerenUE hereby requests an amendment to the Facility Operating License No. NPF-30 for Callaway Plant. The requested amendment would incorporate the attached changes into the Callaway Plant Technical Specifications. Specifically, the requested amendment revises Technical Specification (TS) 5.0, "Administrative Controls", by removing references to the specific position title "Shift Supervisor" and replacing it with a new position title "Shift Manager". In addition, TS 5.0 is revised to change references to "health physics technician(s)" and "Health Physics Supervision" to "Radiation Protection Department technician(s)" and "Radiation Protection Department Supervision".

Essential information is provided in the attachments to this letter. Attachment 1 provides a detailed description and technical evaluation of the proposed changes, including AmerenUE's determination that the proposed changes involve no significant hazards consideration. Attachment 2 provides the existing TS pages marked-up to show the proposed changes. Attachment 3 provides a copy of the revised TS pages with the proposed changes incorporated (if approved).

This letter identifies actions committed to by AmerenUE in this submittal. Other statements are provided for information purposes and are not considered to be commitments. A summary of the regulatory commitments included in this submittal is provided in Attachment 4.

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The Callaway Plant Review Committee and a subcommittee of the Nuclear Safety Review Board have reviewed and approved this amendment application. In addition, it has been determined that this amendment application involves no significant hazards consideration as determined per 10 CFR 50.92, and that pursuant to 10 CFR 51.22(b) no environmental assessment should be required to be prepared in connection with the issuance of this amendment.

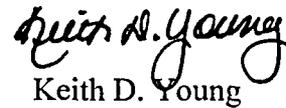
The title change to "Shift Manager" and the Health Physics Department name change to "Radiation Protection Department" have been implemented. The changes will be confirmed upon notice from the NRC that the proposed plant TS changes are acceptable. AmerenUE is requesting NRC approval by November 30, 2006.

Pursuant to 10 CFR 50.91(b)(1), AmerenUE is providing the State of Missouri with a copy of this proposed amendment.

If you should have any questions on the above or attached, please contact Dave Shafer at (314) 554-3104 or Dwyla Walker at (314) 554-2126.

Sincerely,

Executed on: March 28, 2006



Keith D. Young  
Manager-Regulatory Affairs

DJW/jdg

- Attachments:
- 1) Evaluation
  - 2) Markup of Technical Specification pages
  - 3) Retyped Technical Specification pages
  - 4) Summary of Regulatory Commitments

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cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)  
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**ULNRC-05267**

**ATTACHMENT 1**

**EVALUATION**

## EVALUATION

### 1.0 INTRODUCTION

This letter is a request to amend Operating License NPF-30 for Callaway Plant. The amendment application would revise Technical Specification (TS) 5.0, "Administrative Controls", by removing references to the specific position title "Shift Supervisor" and replacing it with a new position title "Shift Manager". In addition, TS 5.0 is revised to change the designation of "health physics technician(s)" and "Health Physics Supervision" to the designation of "Radiation Protection Department technician(s)" and "Radiation Protection Department Supervision".

The proposed changes are administrative in nature and do not alter plant design bases or technical requirements.

### 2.0 DESCRIPTION OF PROPOSED AMENDMENT

This amendment request proposes to revise TS Chapter 5.0, "Administrative Controls," to change the specific position title "Shift Supervisor" to a new position title "Shift Manager". In addition, references to the "Health Physics Department" are changed to "Radiation Protection Department". The amendment request proposes the following specific changes:

The plant specific position title "Shift Supervisor" in Specifications 5.1.2, 5.2.2f., 5.3.1.1, and 5.7.2.a1. is revised to the position title "Shift Manager".

The acronym "SS" based on the position title "Shift Supervisor" in Specification 5.1.2 is revised in several places to the acronym "SM" based on "Shift Manager".

The plant specific designation "health physics technician" in Specification 5.2.2.c is revised to the designation "Radiation Protection Department technician". The plant specific designation "health physics technicians" in Specification 5.2.2.d is revised to the designation "Radiation Protection Department technicians".

The plant specific designation "Health Physics Supervision" in Specification 5.7.2.a1. is revised to the designation "Radiation Protection Department Supervision".

The position title of Shift Supervisor is being revised to Shift Manager to more accurately reflect the management functions and responsibilities being performed by these individuals. The title change is administrative in nature and does not result in a change in reporting relationships, job responsibilities, or overall organizational changes.

The change to replace references to the Health Physics Department with references to the Radiation Protection Department aligns the Callaway organization with the nuclear industry and better reflects the job and function of the department. Specific responsibilities, job functions, and organizational commitments remain unchanged by the revision of the department designation.

### **3.0 BACKGROUND**

Union Electric exists as a legal entity that holds the Callaway Plant Operating License, NPF-30. Union Electric Company is a wholly-owned subsidiary of Ameren Corporation and conducts business under the name AmerenUE. Ameren Corporation is ultimately responsible for execution of all activities and functions for all AmerenUE power generating plants.

AmerenUE is responsible for all plant operations at the Callaway Plant and provides a staff of Nuclear Division personnel that either conduct these operations or provide support services for operation.

As described in the Callaway Plant Technical Specifications (TS) and the Callaway Final Safety Analysis Report (FSAR), the Senior Vice President and Chief Nuclear Officer is the individual whose job position corresponds to the specified corporate officer with direct responsibility for the Callaway Plant. The Vice President, Nuclear reports to the Senior Vice President and Chief Nuclear Officer and is the site vice president. The Vice President, Nuclear has overall responsibility for site administrative and business activities, training, and general overall responsibility for maintenance, operations, outages, performance improvement, and radiation protection personnel. The Director Plant Operations reports to the Vice President, Nuclear and directly supervises the Manager, Maintenance, the Manager, Nuclear Operations, the Manager, Planning, Scheduling, and Outages, the Radiation Protection Manager, and the Superintendent, Performance Improvement.

The Director Plant Operations is the individual whose job position corresponds to that identified as "plant manager" in TS Section 5.1 and in ANSI/ANS-3.1-1978. The Manager, Nuclear Operations directly supervises Assistant Operations Managers. The Shift Assistant Operations Manager and the Support Assistant Operations Manager assist in directing the day-to-day operation of all systems associated with the production of electrical power. The Manager, Nuclear Operations or an Assistant Operations Manager is the individual whose job position corresponds to that identified in TS 5.1 as the "operations manager" and in ANSI/ANS-3.1-1978.

A staff of personnel with the position title of Shift Supervisor reports to Assistant Operations Managers and the Manager, Nuclear Operations. The Manager, Nuclear Operations or an Assistant Operations Manager must hold a current NRC senior reactor

operator (SRO) License. Shift Supervisors who perform license activities shall have a SRO license. Shift Supervisors, who are licensed as a SRO, carry on-shift management responsibility for safe operation of the Callaway Plant. A staff of Operating Supervisors, each licensed as an SRO if performing license activities reports to the Shift Supervisor. The Shift Supervisor is the SRO who normally is in charge of the Unit Reactor Operators on shift. Normally, the Shift Supervisor stands watch in the control room; however, he may leave the control room provided the requirements of the TS for control room manning are met. In the absence of higher management or their designated alternates, the Shift Supervisor may be responsible for all site activities. In this regard, the Shift Supervisors represent the site vice president, engineering vice president, and plant manager and are truly managers of nuclear safety. The Shift Supervisor shall meet the education, experience, training, and certification requirements set forth in ANSI/ANS 3.1, 1981 as endorsed by Regulatory Guide 1.8.

Recently, the title Superintendent, Health Physics and the organizational unit called the Health Physics Department were renamed to the title Radiation Protection Manager and the organizational unit renamed the Radiation Protection Department. The changes align the Callaway organization with the nuclear industry and better reflect the job and function of the department. Specific responsibilities, job functions, and organizational commitments remain unchanged by the title and department name change. As stated above, the Radiation Protection Manager reports directly to the Director Plant Operations. The Radiation Protection Manager supervises programs and personnel to assure the radiological health and safety of the plant staff and the public. As discussed in TS 5.3.1.2 and in the FSAR, the Radiation Protection Manager is the position with line responsibility for operational health physics and the individual who meets or exceeds the qualifications of USNRC Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager.

#### **4.0 TECHNICAL ANALYSIS**

The position title of Shift Supervisor is being revised to Shift Manager. Changing this title to Shift Manager more accurately reflects the management functions and responsibilities currently being performed by these individuals. The title change is administrative in nature and does not represent any change in the reporting relationships, job responsibilities, or overall organizational structure or commitments.

Regulation 10 CFR 50.54 (1) states: "The licensee shall designate individuals to be responsible for directing the licensed activities of licensed operators. These individuals shall be licensed as senior operators pursuant to part 55 of this chapter." The regulation implies that the Shift Supervisors are required to report to an individual licensed as a SRO. The Shift Managers will continue to report to a licensed SRO (currently an Assistant Operations Manager or the Manager, Nuclear Operations).

In an additional change, the Superintendent, Health Physics and the Health Physics Department are renamed to the Radiation Protection Manager and the Radiation Protection Department. The changes better align the Callaway organization with the nuclear industry and better reflect the functions performed by this organizational unit. The name changes are administrative in nature and do not represent any change in reporting relationships, job responsibilities, or overall organizational structure or commitments.

In summary, the proposed changes are not technical in nature and represent administrative changes that do not alter plant design, operation, or technical requirements.

## **5.0 REGULATORY SAFETY ANALYSIS**

This amendment request proposes to revise TS Chapter 5.0, "Administrative Controls," to change the specific position title "Shift Supervisor" to a new position title "Shift Manager". In addition, references to the "Health Physics Department" are changed to "Radiation Protection Department".

### **5.1 No Significant Hazards Consideration**

AmerenUE has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10 CFR 50.92(c) as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed changes do not affect accident initiators or assumptions. The radiological consequences of accidents previously evaluated remain unchanged. These changes involve administrative changes concerning designations for position titles and department names. The changes do not affect responsibilities, functions, organizational commitments, or the qualification requirements of plant personnel.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed changes are administrative in nature. The overall operating philosophy of Callaway Plant is unchanged. As such, there are no hardware changes nor are there any changes in the method by which any safety-related plant system performs its safety function. This amendment will not affect the normal method of plant operation or change any operating parameters. No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result of this amendment. There will be no adverse effects or challenges imposed on any safety-related system as a result of this amendment.

Therefore, the proposed changes do not create a new or different kind of accident from any accident previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No

There will be no effect on the manner in which safety limits or limiting safety system settings are determined nor will there be any effect on those plant systems necessary to assure the accomplishment of protection functions. The changes do not involve any change in overall organizational commitments. The changes to personnel titles and department designations are administrative and will not reduce any margin of safety.

Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Based on the above evaluations, AmerenUE concludes that the activities associated with the above described changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92 and accordingly, a finding of "no significant hazards consideration" is justified.

## **5.2 Applicable Regulatory Requirements/Criteria**

The regulatory bases and guidance documents include:

10CFR50.34(b)(6)(i) of 10CFR Part 50, "Licensing of Production and Utilization Facilities," requires that applications for a license to operate a nuclear power plant include information concerning organizational structure, personnel qualifications, and related matters.

10CFR50.36(c)(5) requires administrative controls related to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner to be in the Technical Specifications. The Technical Specifications list requirements regarding the organization for the safe operation of the facility, including listing titles of positions within the organization structure. The details of the organization and management that are required to be in the Technical Specifications were delineated in Generic Letter 88-06, "Removal of Organization Charts from Technical Specifications Administrative Control Requirements," dated March 22, 1988. These details include the "Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license."

Amendment 155 to the Callaway Operating License (dated June 3, 2003) revised TS Chapter 5.0, Administrative Controls", to allow the use of generic personnel titles as provided by ANSI/ANS 3.1-1978, in lieu of plant specific personnel titles and to describe the relationships between the generic titles in ANSI/ANS 3.1-1978 and the plant specific personnel titles in the updated Callaway Plant Final Safety Analysis Report (FSAR).

ANSI/ANS 3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," provides criteria for the selection and training of personnel for stationary nuclear power plants. The standard addresses the qualifications, responsibilities, and training of personnel in operating and support organizations appropriate for the safe and efficient operation of nuclear power plants. In TS 5.3.1, AmerenUE commits that each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, with exceptions for Shift Supervisors, Operating Supervisors, Reactor Operators, Shift Technical Advisors, and the Radiation Protection Manager.

ANSI/ANS 3.1-1981, "American National Standard for Selection, Qualification, and Training of Personnel for Nuclear Power Plants," provides criteria for the selection, qualification, and training of personnel for stationary nuclear power plants. In TS 5.3.1.1, AmerenUE commits that Shift Supervisors, Operating Supervisors, Reactor Operators, and Shift Technical Advisors shall meet or exceed the qualifications of this Standard as endorsed by Regulatory Guide 1.8, Revision 2, with the same exceptions as contained in the current revision to the Operator Licensing Examiner Standards, NUREG-1021, ES-202.

Regulatory Guide 1.8, September 1975 and Revision 2 (April 1987), describes a method acceptable to the NRC staff for implementing 10CFR50.34(b)(6)(i) of the Commission's regulations with regard to personnel qualifications. In TS 5.3.1.2, AmerenUE commits that the Radiation Protection Manager shall be responsible for operational health physics and shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 for a Radiation Protection Manager.

NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," establishes the policies, procedures, and practices for examining licensees and applicants for reactor operator and senior reactor operator licenses at power reactor facilities pursuant to 10 CFR Part 55. Amendment 60, dated December 7, 1990, incorporated NUREG-1021, Section ES-202, into the Callaway Technical Specifications.

The applicable regulatory requirements and organizational commitments must remain satisfied for the proposed changes to personnel and department designations. The proposed changes are administrative only in nature and do not represent changes in any organizational commitments, job functions or responsibilities, or personnel minimum qualifications. As evaluated in the sections above, the proposed changes do not impact the applicable regulatory requirements or organizational commitments.

Based on the considerations discussed above, 1) there is reasonable assurance that the health and safety of the public will not be endangered by plant operation with the proposed changes, 2) the proposed changes remain compliant with the Commission's regulations, and 3) the issuance of the proposed amendment will not be inimical to the common defense and security or to the health and safety of the public.

## **6.0 ENVIRONMENTAL CONSIDERATION**

AmerenUE has determined that the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational gamma radiation exposure. As demonstrated above the amendment involves "no significant hazards consideration". The requested amendment does not change the facility and does not involve any change in manner of operation of any plant systems. The requested amendment does not increase the gamma radiation dose resulting from the operation of any plant system. Furthermore, implementation of the proposed change does not contribute to occupational gamma radiation exposure.

As discussed above, the proposed changes do not involve a significant hazards consideration and the consequences from design bases accidents remain bounded by the FSAR analysis. The proposed changes are administrative only. There is no increase in occupational radiation exposure related to the changes. 10 CFR 51.22(b) specifies the criteria for categorical exclusion from the requirements for a specific environmental assessment per 10 CFR 51.21. Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9).

Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

**8.0 REFERENCES**

- 8.1 ANSI/ANS 3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," January 17, 1978.
- 8.2 ANSI/ANS 3.1-1981, "American National Standard for Selection, Qualification and Training of Personnel for Nuclear Power Plants," December 17, 1981.
- 8.3 FSAR, Section 13.1
- 8.4 Regulatory Guide 1.8, Revision 2, "Personnel Selection, Qualification and Training," April 1987.
- 8.5 Regulatory Guide 1.8, Revision 1-R, "Personnel Selection and Training," September 1975.

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**ATTACHMENT 2**

**MARKUP OF TECHNICAL SPECIFICATION PAGES**

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

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5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety and are not addressed in the Final Safety Analysis Report (FSAR) or Technical Specifications.

5.1.2 The ~~Shift Supervisor (SS)~~ shall be responsible for the control room command function. During any absence of the ~~SS~~ from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the ~~SS~~ from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

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SM

Shift Manager (SM)

OL-1267

5.2 Organization

5.2.2 Unit Staff (continued)

exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

- c. A ~~health physics~~ technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- d. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), ~~health physics~~ technicians, equipment operators, and key maintenance personnel).

Radiation  
Protection  
Department

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime. Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

- e. The operations manager or assistant operations manager shall hold an SRO license.
- f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This position shall be assigned when the unit is in MODE 1, 2, 3, or 4, unless the ~~Shift Supervisor~~ or the Operating Supervisor meet the qualifications as required by the NRC.

Shift Manager

OL-1267

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

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5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANS/ANS 3.1-1978, with the following exceptions:

5.3.1.1 ~~Shift Supervisors~~, Operating Supervisors, Reactor Operators, and Shift Technical Advisors shall meet or exceed the qualifications of ANS/ANS 3.1-1981 as endorsed by Reg. Guide 1.8, Revision 2, with the same exceptions as contained in the current revision to the Operator Licensing Examiner Standards, NUREG-1021, ES-202.

Shift Managers

OL-1267

5.3.1.2 The Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds the qualifications of USNRC Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager. The Radiation Protection Manager will be designated by the plant manager.

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).

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5.7 High Area Radiation Area

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation: (continued)

- (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
  - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
- e. Except for individuals qualified in radiation protection procedures, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation:

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:
1. All such door and gate keys shall be maintained under the administrative control of the ~~Shift Supervisor~~ Operating Supervisor or ~~Health Physics~~ Supervision, or his or her designee.
  2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

Shift Manager

OL-1267

Radiation Protection Department

(continued)

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**ATTACHMENT 3**

**RETYPE MARKUP OF TECHNICAL SPECIFICATION PAGES**

## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

---

5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety and are not addressed in the Final Safety Analysis Report (FSAR) or Technical Specifications.

5.1.2 The Shift Manager (SM) shall be responsible for the control room command function. During any absence of the SM from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SM from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

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5.2. Organization

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5.2.2 Unit Staff (continued)

exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

- c. A Radiation Protection Department technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- d. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), Radiation Protection Department technicians, equipment operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime. Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

- e. The operations manager or assistant operations manager shall hold an SRO license.
  - f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This position shall be assigned when the unit is in MODE 1, 2, 3, or 4, unless the Shift Manager or the Operating Supervisor meet the qualifications as required by the NRC.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

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- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, with the following exceptions:
- 5.3.1.1 Shift Managers, Operating Supervisors, Reactor Operators, and Shift Technical Advisors shall meet or exceed the qualifications of ANSI/ANS 3.1-1981 as endorsed by Reg. Guide 1.8, Revision 2, with the same exceptions as contained in the current revision to the Operator Licensing Examiner Standards, NUREG-1021, ES-202.
  - 5.3.1.2 The Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds the qualifications of USNRC Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager. The Radiation Protection Manager will be designated by the plant manager.
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
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5.7 High Area Radiation Area

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5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation: (continued)

- (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
  - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
- e. Except for individuals qualified in radiation protection procedures, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation:

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:
  - 1. All such door and gate keys shall be maintained under the administrative control of the Shift Manager/Operating Supervisor or Radiation Protection Department Supervision, or his or her designee.
  - 2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

(continued)

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**ATTACHMENT 4**

**SUMMARY OF REGULATORY COMMITMENTS**

## SUMMARY OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by AmerenUE, Callaway Plant in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Dave E. Shafer, Superintendent, Licensing at AmerenUE, Callaway Plant, and (314) 554-3104.

COMMITMENT	Due Date/Event
The implementation of the proposed amendment will be confirmed within 90 days after approval.	90 days following NRC approval
Identified Callaway FSAR changes will be incorporated into the next FSAR update.	Next FSAR update