



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD
ARLINGTON, TX 76011-4511

April 6, 2015

Mr. Fadi Diya, Senior Vice President
and Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

**SUBJECT: CALLAWAY PLANT – NOTIFICATION OF INSPECTION (NRC INSPECTION
REPORT 05000483/2015003) AND REQUEST FOR INFORMATION**

Dear Mr. Diya:

From June 15 through June 19, 2015, inspectors from the Nuclear Regulatory Commission's (NRC) Region IV office will perform the baseline biennial requalification program inspection at the Callaway Plant, using NRC Inspection Procedure 71111.11, "Licensed Operator Requalification Program and Licensed Operator Performance." Experience has shown that this inspection is a resource intensive inspection, both for the NRC inspectors and your staff. In order to minimize the impact to your on-site resources and to ensure a productive inspection, we have enclosed a request for documents needed for this inspection. These documents have been divided into three groups. The first group (Section A of the enclosure) identifies information to be provided prior to the inspection to ensure that the inspectors are adequately prepared. The second group (Section B of the enclosure) identifies the information the inspectors will need upon arrival at the site. The third group (Section C of this enclosure) identifies the items which are necessary to close out the inspection and are usually sent a few weeks after the team has left the site. It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the on-site portions of the inspection.

We have discussed the schedule for these inspection activities with your staff and understand that our regulatory contact for this inspection will be Mr. Steve Petzel of your licensing organization. Our inspection dates are subject to change based on your updated schedule of examination activities. If there are any questions about this inspection or the material requested, please contact the lead inspector Mr. Sean Hedger at (817) 200-1556 (Sean.Hedger@nrc.gov), Mr. Michael Kennard at (817) 200-1244 (Michael.Kennard@nrc.gov), or Mr. Chris Cowdrey at (817) 200-1545 (Christian.Cowdrey@nrc.gov).

F. Diya

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This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, control number 3150-0018. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Vincent G. Gaddy, Chief
Operations Branch
Division of Reactor Safety

Docket No. 50-483
License No. NPF-30

Enclosure:
Biennial Requalification Program Inspection Document Request

cc w/enclosure:
Electronic Distribution for the Callaway Plant

F. Diya

- 2 -

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Distribution:
See next page

DOCUMENT NAME: R:_REACTORS\ WC\2014\WC2014005 BRQ RFI-sdh.docx
ADAMS ACCESSION NUMBER: ML15096A094

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OFFICE	OE:OB	C:OB			
NAME	SHedger/dch	VGaddy			
SIGNATURE	/RA/	/RA/			
DATE	4/6/2015	4/6/2015			

OFFICIAL RECORD COPY

Letter to Fadi Diya from Vincent G. Gaddy, dated April 6, 2015

SUBJECT: CALLAWAY PLANT – NOTIFICATION OF INSPECTION (NRC INSPECTION REPORT 05000483/2015003) AND REQUEST FOR INFORMATION

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RIV/ETA: OEDO (Michael.Waters@nrc.gov)

BIENNIAL REQUALIFICATION PROGRAM INSPECTION DOCUMENT REQUEST

FROM: Mr. Sean Hedger
Operations Engineer, NRC RIV
817-200-1556

TO: Mr. Daniel Harris
Senior Training Supervisor – Initial Training
Callaway Plant
573-239-0023

SUBJECT: INFORMATION REQUEST TO SUPPORT JUNE 15-19, 2015, LICENSED OPERATOR REQUALIFICATION PROGRAM INSPECTION (IP 71111.11B)

A. The following information is requested in order to support inspection preparation activities. These items are listed by section as they appear in the inspection module (i.e., 2.02, 2.04, etc.). Requested materials should be sent either electronically or hardcopy in order to arrive at the Region IV office no later than May 26, 2015.

- Electronically: via IMS Certrec or email (to Sean.Hedger@nrc.gov, Michael.Kennard@nrc.gov, and Christian.Cowdrey@nrc.gov)
- Hardcopy to: U.S. Nuclear Regulatory Commission, Region IV
1600 E. Lamar Blvd
Arlington, TX 76011
ATTN: Sean D. Hedger

General Requests:

- List of licensed operators, both senior reactor operator (SRO) and reactor operator (RO), by crew (operating and staff).
- Training and Operations Department organization charts (with qualified licensed operator requalification (LOR) evaluators identified).
- Procedures that identify process for revising and maintaining licensed operator continuing training program up-to-date.
- List of outstanding LOR program changes.
- List of plant events and industry operating experience incorporated into LOR program since last biennial requalification (BRQ) inspection.
- Audits and/or self-assessment reports addressing the licensed operator requalification training program.
- Last two years of simulator review committee (or equivalent) meeting minutes.
- Last two years of curriculum review committee (or equivalent) meeting minutes.

Enclosure

02.03: Biennial Requalification Written Examination Quality

- The current and approved biennial written examination schedule.
- The current requalification cycle written examination results for both SRO and RO that have already been administered up to the week prior to the inspection team arrival on-site.
- **All** written examinations that have been approved for administration up to and including the week before the inspection team is on site. (This will need to have adequate password protection if e-mailed or double envelope protection if mailed via regular mail per NUREG-1021.)
- The current requalification cycle examination methodology (sample plan).

02.04: Annual Requalification Operating Test Quality

- The schedule for the operating tests (job performance measures (JPMs) and scenarios) to be given the week of June 15, 2015 (week team is on-site).
- The operating tests (JPMs & scenarios) (password protected and provide separately via telephone at later date) to be given the week of June 15, 2015 (week team is on-site).
- Current requalification cycle operating tests (SRO and RO) and results up to the week prior to the inspection team arrival on-site.
- **All** of the previous year's NRC required annual operating tests.
- Current requalification cycle operating test methodology (sample plan).
- All portions of the Updated Final Safety Analysis Report that identify operator response times for time critical operator actions.

02.05: Licensee Admin of Requalification Exams

- All procedures used to administer the annual operating test.
- All procedures used to assess operator performance.
- All procedures that describe conduct of simulator training.
- All procedures used to test, operate, and maintain the simulator.

02.06: Requalification Examination Security

- Submit any tracking tools that you use as a means to prevent excessive overlap on the written examinations and also meet the intent of sampling all required topics on a periodic basis.
- Submit any tracking tools that you use as a means to prevent excessive overlap on the operating tests and also meet the intent of sampling all required malfunctions (including major events, instrument/component malfunctions, technical specification calls, etc.) on a periodic basis.
- All procedures that describe examination security, including procedures used to develop the examinations that include guidelines on overlap between examinations in current exam cycle tests and prior year examinations.
- List of all condition reports since the last biennial requalification inspection related to examination security and overlap.

02.07: Licensee Remedial Training Program

- List of remedial training conducted or planned since last requalification exams (includes training provided to operators to enable passing requalification exams and training provided to correct generic or individual weaknesses observed during previous requalification exam cycle).
- Remediation plans (lesson plans, reference materials, and attendance documentation).

02.08: Conformance with Operator License Conditions

- All procedures and program documentation for maintaining active operator licenses, tracking training attendance, and ensuring medical fitness of licensed operators.
- All procedures and associated documentation that supports reactivation of any SRO/RO license (operating or staff crew) since the last biennial inspection.

02.09: Simulator Performance

- For the following cases, send the most recent transient test packages, which may be electronic or in paper single test packages and shall be complete with test procedures for each test, the acceptance criteria, and results. For each transient test, the reference chart should be included or an equivalent subject matter expert review versus the simulator results with a write-up for any differences beyond the American National Standards Institute (ANSI) 3.5 standard requirements. Based on the input that the licensee implements simulator testing standards per ANSI/ANS-3.5-2009, provide this information for the following Transient and Steady State tests:
 - Transient test 2, Simultaneous trip of all feedwater pumps.
 - Transient test 6, Main turbine trip from maximum power level which does not result in immediate reactor trip.
 - Transient test 10, Slow primary system depressurization to saturated condition with pressurizer relief or safety valve stuck open (inhibit activation of high pressure emergency core cooling system).
 - Steady State tests for medium power test.
- All simulator management and configuration procedures if not already provided for Section 02.05 above.
- Simulator Discrepancy Report (DR) **summary** list for all open DRs. For closed DRs, **summary** list for those items closed between June 2013 and May 2015.
- Malfunction tests for loss of condenser vacuum and loss of normal feedwater normal feedwater system failure. If these are in a scenario based training package then the review of that package would be acceptable.
- Primary parameters tested in order to verify core physics parameters [such as moderator temperature coefficient (MTC), integral rod worth (IRW)]. The applicable reference graphs from the Plant physics data book (electronic or other means as available) should also be included as well as the test procedures used and the acceptance criteria with results.

02.10: Problem Identification and Resolution

- A summary report of all condition reports related to operator actions/errors in the control room.
- Any revised requalification training that was based on licensed operator performance issues.
- Copies of Callaway Action Requests 2013-01940, 2013-06740, 2014-09327, and 2015-02152.
- Simulator Information Formal Tracking (SIFT) Number 20140094
- Copies of condition reports related to Licensee Event Reports (LERs) 2014-002-00 and 2014-005-00.
- Any other corrective action documentation resulting from the review of the 2014 simulator issue dealing with a Safety Injection (SI) signal during an anticipated transient without scram (ATWS) scenario identified during the that year's initial licensing examination.

B. The following information is requested in order to support the on-site inspection activities. Requested materials should be available to the inspection team, either electronically or hardcopy, upon site arrival on June 15, 2015.

02.02: Exam Results / 02.03 and 02.04: Written Exam and Op Test Quality

- All Operating tests (JPMs & scenarios) to be given in all subsequent weeks after on-site week.
- All results up to the day the team leaves the site.

02.08: Conformance with Operator License Conditions

- Access to licensed operators' records (operating and staff crews).
- Access to licensed operators' training attendance records.
- Access to licensed operators' medical records.

02.09: Simulator Performance

- Simulator discrepancies from June 2013 to June 2015. This should include all open DRs and DRs that have been closed, including the documentation/justification for closure.
- Acceptance test documentation, including hardware and software model revisions at the time of acceptance (as available).
- Documentation that validates current models, including the thermal-hydraulics and neutronics models, to the actual plant.
- All current model deficiencies, including Final Safety Analysis Report vs. Design differences in the simulator (any documentation on this).
- Summary list of modifications from June 2013 to June 2015.
- Plant Modifications (both hardware and software) completed on the Simulator by due date from June 2013 to June 2015.
- Simulator Differences Lesson plan used in training (current to June 15, 2015).
- The complete book of all Simulator annual performance test packages (usually in a single book, but may be electronic or in single test packages), complete with all transient tests, steady state tests, and malfunction tests. This should also include the test procedures for each test, the acceptance criteria, and results. For each transient test, the reference chart should be included or an equivalent subject matter

- expert review versus the simulator results with a write-up for any differences beyond the ANSI standard requirements.
- All test packages used to verify core physics parameters (such as MTC, IRW). The applicable reference graphs from the Plant physics data book (electronic or other means as available) should also be included as well as the test procedures used and the acceptance criteria with results.
 - All simulator test, configuration management, and related documents available in the room for inspectors to review. This includes training needs analysis packages, simulator review committee meeting minutes, etc.
 - Current copy of ANSI/ANS-3.5 standard you are committed to for simulator testing.

02.10: Problem Identification and Resolution

- All condition reports related to operator actions/errors in the control room.

C. Callaway Plant is required to send the final results summary and any remaining exams and operating tests that have not been reviewed to the regional office lead inspector for this inspection for final review and comparison against the Significance Determination Tools in order to communicate the exit results for the inspection.