

November 14, 1989

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, D.C. 20555

Gentlemen:

ULNRC-2108

DOCKET NUMBER 50-483
CALLAWAY PLANT
DELETION OF SUPERCEDED TRAINING REQUIREMENTS
TECHNICAL SPECIFICATION 6.4.1

Union Electric Company herewith transmits an application for Amendment to Facility Operating License No. NPF-30 for the Callaway Plant.

This amendment request proposes to revise Technical Specification 6.4.1, Training, to delete the references to superceded requirements. When the revised rule, Title 10, Code of Federal Regulations, Part 55, (10 CFR 55) on Operator's Licenses, was issued, it superceded all requirements current at the time and less restrictive than the new rule. Based upon this and the guidance set forth in NUREG 1262, Answers to Questions at Public Meetings Regarding Implementation of Title 10, CFR, Part 55 on Operator's Licenses, Union Electric proposes to delete references to the old rule; to the H. R. Denton Letter dated March 28, 1980; and to sections A and C of the letter's Enclosure.

At the request of the NRC reviewers, Union Electric references section 6.2.2.g of the Callaway Technical Specifications and sections 13.1.3.1.5 and 13.1.3.1.6 of the Final Safety Analysis Report to confirm that both Shift Supervisors and Operating Supervisors hold SRO licenses.

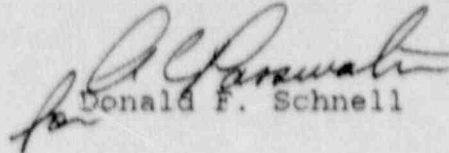
The Callaway Plant On-Site Review Committee and the Nuclear Safety Review Board have reviewed and approved this amendment request. Attachments 1, 2, and 3 provide the Safety Evaluation, the Significant Hazard Evaluation, and the proposed Technical Specification change.

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The proposed amendment request will be implemented upon approval by the NRC.

Very truly yours,


Donald F. Schnell

DJW/jal

Attachments: 1. Safety Evaluation
2. Significant Hazard Evaluation
3. Proposed Technical Specification
Change

STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Alan C. Passwater, of lawful age, being first duly sworn upon oath says that he is Manager, Licensing and Fuels (Nuclear) for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By *Alan C. Passwater*
Alan C. Passwater
Manager, Licensing and Fuels
Nuclear

SUBSCRIBED and sworn to before me this 14th day of November, 1989

Barbara J. Pfaff
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Safety Evaluation

This Technical Specification change request revises Section 6.4.1, Training, by deleting references to requirements which were superceded upon the issuance of the revised regulation Title 10, CFR, Part 55; the guidance of Regulatory Guide 1.8, Revision 2, which endorses ANSI/ANS 3.1-1981; and the Operator Licensing Examiner Standards, NUREG-1021, ES-202.

The requirements of the new regulations and these documents are more restrictive than Sections A and C of Enclosure 1 of the March 28, 1980 NRC Denton Letter to all licensees.

This request does not impact components, systems, or plant equipment, but revises Sections of the Technical Specifications by deleting outdated references.

This change request does not adversely affect or endanger the health or the safety of the general public, nor involve an unreviewed safety question.

Significant Hazards Evaluation

The Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an Operating License for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Union Electric has reviewed the proposed change and determined that:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because the change merely deletes references to requirements superceded by the issuance of the revised regulation Title 10, CFR, Part 55; Regulatory Guide 1.8, Revision 2, and the Operator Licensing Examiner Standards, NUREG-1021, ES-202. The Union Electric Training Program remains in compliance and the proposed change constitutes an administrative revision.
2. The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed change is administrative in nature, and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.
3. The proposed amendment involves an administrative type change and does not involve a significant reduction in a margin of safety.

Based on the above reasoning, Union Electric has determined that the proposed amendment does not involve a significant hazards consideration.