UNION ELECTRIC COMPANY
1901 GRATIOT STREET
ST. LOUIS MISSOURI

JOHN K. BRYAN
VIGE PRESIDENT

August 19, 1981

MAILING ADDRESS:
P. O. BOX 149
ST. LOUIS. MISSOURI CSTEE

Mr. Harold R. Denton Director of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Denton:

ULNRC-481

DOCKET NUMBERS 50-483 AND 50-486 CALLAWAY PLANT, UNITS 1 & 2 FINAL SAFETY ANALYSIS REPORT

Reference: Union Electric Letters to the NRC (ULNRC 477 and 478), dated August 14, 1981, signed by J. K. Bryan

The referenced letters refer to the submittal of our responses to items generated from the NRC Management Review of July 14, 15, 16, 1981, and the submittal of Chapter 18 of the FSAR Site Addendum which contains the Callaway specific responses to NUREG 0737.

Transmitted herewith are additional items of information to be included with the referenced Management Review Responses. Also enclosed is a copy of the Management Directive on Shift Supervisor Responsibility and Duties. This information is hereby incorporated into the Callaway Application and will also be incorporated into a future revision to the FSAR as applicable.

Per request of Jim Peschel, Region III NRC Office, a copy of Chapter 18 of the FSAR Site Addendum is being sent to him.

ers truly yours,

John K. Pryan

DJW/afg Enclosures 3001

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John K. Bryan, of lawful age, being first duly sworn upon cath says that he is Vice President-Nuclear and an officer of Union Electric Company; that he has said 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.

SUBSCRIBED and sworn to before me this 19th day of August, 1981

Margaret & ikida MOTREY PURIS - STATE OF MISSOURI MY COMMISSION EXPERTS INVURRY 2, 1982

cc: Glenn L. Koester
Vice President
Operations
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Jim Peschel, NRC - Inspector U.S. Nuclear Regulatory Commission Region III 7999 Roosevelt Rcad Glen Ellen, Illinois 60137

UOEDM-81-46

To: D. Walker

Additional Questions from NRC on UE Response to the NRC Management Review Items

Per your request of 8/18/81, the additional comments are provided:

 Item 5 - Additional Clarifications of Union Electric Response to Nukeg 0737 (I.C.5)

Comment: The activities set forth in response to item I.C.5 will be governed by procedures on which QA will audit or perform surveillances annually.

7. Item 20 - Clarification of Union Electric Fire Protection Program and Description in the FSAR

Modify proposed FSAR 9.5.1.8.1.4

9.5.1.8.1.4 Drills

Pire brigade drills are conducted on a quarterly basis at Callaway Plant. Each Fire Brigade number shall participate in at least two drills per year. Drills will be of two types: announced and unannounced. At least one unannounced drill per year will be held for each fire brigade. Training objectives are established prior to the drill by the Safety Supervisor. Afterwards to determine how well the training objectives have been met the drill is critiqued on the following points:

Add 9.5.1.8.1.5 Meetings

Regular planned meetings shall be held quarterly for fire brigade members to review changes in the fire protection program and other subjects as necessary.

3. Add to FSAR clarifications

Radiation - Chemical Technician

- 1. High school education or equivalent.
- 2. 3 years experience in Health Physics or chemistry of which one year should be related Technical Training.

Radiation - Chemical Technicians

Performs chemistry, health physics, and environmental monitoring related work at Callaway. He assists in the development of plant procedures. He reports to the Radiation - Chemical Foreman.

Savy & Randolph Garry L. Randolph

GLR/jae

cc: ACP

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APN

SHIFT SUPERVISOR RESPONSIBILITY AND DUTIES CALLAWAY PLANT

In accordance with Nuclear Regulatory Commission quidance, this directive is to emphasize the primary management responsibility of the Shift Supervisor for safe operation of the plant. Callaway Plant Administrative Procedure AP-A-25 will provide a more detailed explanation of the Shift Supervisor duties, responsib lity and authority.

The Shift Supervisor is responsible to maintain a broad perspective of conditions affecting the safety of the plant as a matter of highest priority at all times. He should not become totally involved in any single operation in times of emergency when multiple operations are required. He shall utilize his authority to insure that he can maintain an overview of the situation, to make decisions, and to direct operations. During accident situations, the Shift Supervisor should remain in the control room to direct activities.

The Shift Supervisor may be relieved of his duties by the Superintendent of Operations or an Assistant Superintendent of Operations, if his deportment warrants such action.

The Operating Supervisor assumes the duties and responsibilities of the Shift Supervisor if he is incapacitated.

Administrative duties assigned to the Shift Supervisor shall be limited to avoid loss of the ability to provide direct command oversight of corations that are important to safety. To support this policy, a periodic review of administrative duties shall be conducted by the Plant Superintendent and the Vice President-Nuclear. This review shall include direct input from the Shift Supervisors.

It is emphasized that the Shift Supervisor is responsible for the safe op ration of the plant and all related activities. He has the authority to take actions as necessary to maintain the plant in a safe condition. He is responsible for insuring that plant and corporate management are informed of all conditions that could affect the safety of the general public, or plant personnel, or the protection of plant equipment.

The line of authority within the Callaway Plant staff for anduct of operations shall be as follows:

- 1. Plant Superintendent
- 4. Asst. Superintendent, Operations
- 2. Assistant Plant Superintendent 5. Shift Supervisor (on shift)
- 3. Superintendent, Operations

In the event the Plant Superintendent is unavailable, the above members of the plant staff assume his responsibilities, duties, and authorities in the order of availability listed.