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**UNION
ELECTRIC**

92 April 11, 1990

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Gentlemen:

ULNRC-2194

DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC'S RESPONSE TO GENERIC LETTER 90-01
NRC REGULATORY IMPACT SURVEYS

Please find attached Union Electric's responses to Generic Letter 90-01, Request for Voluntary Participation in NRC Regulatory Impact Survey. The various responses are attached and are compiled using a separate questionnaire sheet per type of survey. If Callaway has had no inspection, or audit visit from a particular agency, that particular questionnaire sheet has been omitted. Finally the "self-assessment" questionnaire has also been omitted since this is a routine activity at Callaway and not amenable to the itemization nature of the survey.

If there are additional questions, please contact Dave Shafer (314-554-3104) of my staff.

Yours very truly,

Donald F. Schnell
Donald F. Schnell

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Attachments

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NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

NRC TEAM INSPECTIONS

2. Based on actual experience over the past several years, about how often is this activity conducted?

Seldom, approximately 2 to 3 per year

3. Operations/Construction areas covered:

- a. Emergency Operating Procedures
- b. Regulatory Effectiveness Review (Security)
- c. Radiological Environmental Response Plan - annual drill
- d. Hot license examination

4. Extent of the activity (how many people, for how long)

- a. Four inspectors, 12 days on-site
- b. Approximately seven inspectors, 4 days on-site
- c. Four-eight inspectors for typically 3 days on-site per year
- d. Four inspectors, 5 days on-site per year
(note: none in 1988, two exams in 1989)

5. Approximate manhours of time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- a. Plant Department Heads 390 (number involved) 15
- b. Plant Manager 52
- c. Corporate Department Heads 46 (number involved) 2
- d. General Manager, Nuclear Operations 20 (number involved) 1
- e. Chief Nuclear Officer 10
- f. Management/Supervision 926 (number involved) 29

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

**OTHER NRC RESIDENT, REGIONAL, HEADQUARTERS
INSPECTIONS/AUDITS**

2. Based on actual experience over the past several years, about how often is this activity conducted?

- a. Approximately 8 resident inspections per year
- b. Approximately 10-12 regional inspections per year
- c. NRC license requalification exams

3. Operations/Construction areas covered:

Not applicable per Generic Letter Instructions

4. Extent of the activity (how many people, for how long)

- a. Resident inspections, two inspectors, 1.5 months per inspection
- b. Regional inspections, typically 1-4 inspectors, for 4-5 days per inspection
- c. License requalification (Jan-Feb 1990)
Preparation for exam: 4 inspectors, for 5 days
(note: less than 8 hours per day)
Actual exam: 4 inspectors, for 6 days, 14-18 hours per day

5. Approximate manhours of time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- a. Plant Department Heads 498 (number involved) 12
- b. Plant Manager 62
- c. Corporate Department Heads 170 (number involved) 3
- d. General Manager, Nuclear
Operations 60 (number involved) 1
- e. Chief Nuclear Officer 15
- f. Management/Supervision 800 (number involved) 30

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

INPO EVALUATIONS

2. Based on actual experience over the past several years, about how often is this activity conducted?

Every 18 months

3. Operations/Construction areas covered:

Normal Plant Evaluations

4. Extent of the activity (how many people, for how long)

INPO Team 12-15 members for two weeks

5. Approximate manhours of time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads	<u>1000</u>	(number involved)	<u>20</u>
b. Plant Manager	<u>80</u>		
c. Corporate Department Heads	<u>20</u>	(number involved)	<u>1</u>
d. General Manager, Nuclear Operations	<u>16</u>	(number involved)	<u>1</u>
e. Chief Nuclear Officer	<u>16</u>		
f. Management/Supervision	<u>400</u>	(number involved)	<u>20</u>

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

INSURERS (ANI)

2. Based on actual experience over the past several years, about how often is this activity conducted?

- a. Annual inspections and reports
- b. Ongoing inspections, quarterly reports
- c. Intermittent inspections, triennial reports

3. Operations/Construction areas covered:

- a. 1989: RPV head studs, health physics, radioactive effluent monitoring, on-site safety review
- b. Systems availability inspections, system inspections, object inspections
- c. Site buildings and selected portions of the power block

4. Extent of the activity (how many people, for how long)

- a. Facility engineer and account engineer on-site for three and one working days, respectively
- b. Inservice inspector on-site a half week per month
- c. Inspector on-site for six days per year

5. Approximate manhours of time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- a. Plant Department Heads 24 (number involved) 6
- b. Plant Manager 2
- c. Corporate Department Heads 11 (number involved) 2
- d. General Manager, Nuclear Operations (number involved)
- e. Chief Nuclear Officer
- f. Management/Supervision 653 (number involved) 13

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

OSHA

2. Based on actual experience over the past several years, about how often is this activity conducted?

Osha has arrived only once on-site as the result of
an anonymous contractor employee complaint

3. Operations/Construction areas covered:

One ladder was allegedly not in compliance with
OSHA regulations

4. Extent of the activity (how many people, for how long)

Two OSHA representatives for four hours

5. Approximate manhours of time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

Not applicable since not an annual occurrence

- | | |
|---|-------------------|
| a. Plant Department Heads | (number involved) |
| b. Plant Manager | |
| c. Corporate Department Heads | (number involved) |
| d. General Manager, Nuclear
Operations | (number involved) |
| e. Chief Nuclear Officer | |
| f. Management/Supervision | (number involved) |

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

DOT

2. Based on actual experience over the past several years, about how often is this activity conducted?

Annually

3. Operations/Construction areas covered:

Compliance with 49CFR, 10CFR71, and 10CFR61
regulations pertaining to packaging, transportation,
and disposal of radioactive wastes

4. Extent of the activity (how many people, for how long)

Three people (Radchem Foreman, Radwaste Supervisor,
Superintendent, Chemistry and Radwaste) for 2-5 hours
each, including entrance and exit meetings

5. Approximate manhours of time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- a. Plant Department Heads 2 (number involved) 1
- b. Plant Manager 1
- c. Corporate Department Heads (number involved)
- d. General Manager, Nuclear Operations (number involved)
- e. Chief Nuclear Officer
- f. Management/Supervision 5 (number involved) 1

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

STATE/LOCAL AUTHORITIES (NPDES)

2. Based on actual experience over the past several years, about how often is this activity conducted?

Annually

3. Operations/Construction areas covered:

Non-radiological liquid discharges

4. Extent of the activity (how many people, for how long)

One to two people 2 -3 days

5. Approximate manhours of time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads <u>100</u>	(number involved) <u>1</u>
b. Plant Manager <u>25</u>	
c. Corporate Department Heads	(number involved)
d. General Manager, Nuclear Operations	(number involved)
e. Chief Nuclear Officer	
f. Management/Supervision <u>200</u>	(number involved) <u>2</u>

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

NRC REQUIRED QA AUDITS

2. Based on actual experience over the past several years, about how often is this activity conducted?

Approximately 29 audits per year

3. Operations/Construction areas covered:

Not applicable per Generic Letter instructions

4. Extent of the activity (how many people, for how long)

Approximately 4.4 auditors per audit. Audit duration typically 5-10 workdays. (Note: This does not include time spent preparing for the audit or time spent writing the audit report)

5. Approximate manhours of time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads	<u>722</u>	(number involved)	<u>12</u>
b. Plant Manager	<u>81</u>		
c. Corporate Department Heads	<u>492</u>	(number involved)	<u>3</u>
d. General Manager, Nuclear Operations	<u>53</u>	(number involved)	<u>1</u>
e. Chief Nuclear Officer	<u>38</u>		
f. Management/Supervision	<u>3900</u>	(number involved)	<u>32</u>

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

**OTHER- NRC BP INSPECTIONS AND RERP
DRILL FOR SCORE**

(Note: Some data may overlap the survey for
NRC Team Inspections)

2. Based on actual experience over the past several years,
about how often is this activity conducted?

Annual

3. Operations/Construction areas covered:

Emergency Preparedness

4. Extent of the activity (how many people, for how long)

Three man inspection team for one week

5. Approximate manhours of time (on an annual basis) which
the following managers must spend in direct involvement
before, during, and in response to the activity described in
Item #1.

a. Plant Department Heads	<u>80</u>	(number involved)	<u>3</u>
b. Plant Manager	<u>2</u>		
c. Corporate Department Heads		(number involved)	
d. General Manager, Nuclear Operations	<u>2</u>	(number involved)	<u>1</u>
e. Chief Nuclear Officer	<u>2</u>		
f. Management/Supervision	<u>100</u>	(number involved)	<u>20</u>