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August 27, 1982

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

ULNRC-577

Dear Mr. Denton:

DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
FINAL SAFETY ANALYSIS REPORT  
REVISED COMMITMENT FOR AUDIT OF THE CALLAWAY RADIATION  
PROTECTION PROGRAM

Reference: Union Electric Letter to the NRC (ULNRC-521)  
dated October 1, 1981, signed by D. F. Schnell  
Union Electric Letter to the NRC (ULNRC-531)  
dated December 10, 1981, signed by D. F. Schnell

This letter is being sent to inform you of a change in the designated group responsible for auditing the Callaway Radiation Protection Program. To provide continuity in the Plant's audit programs, the audit activities of the Radiation Protection Program have been placed under the jurisdiction of the Quality Assurance Department instead of Nuclear Engineering. The attachment gives the revised response from the original commitment as set forth in the referenced documents.

This revised response is hereby incorporated into the Callaway Application and will be incorporated into the next revision of the Callaway FSAR Site Addendum.

Very truly yours,

  
for D. F. Schnell

DJW/lw

Attachment

13001

## Attachment

Item 260.71C Section 17.1.2.2 of the standard format (Regulatory Guide 1.70) requires the identification of safety-related structures, systems, and components controlled by the QA program. You are requested to supplement and clarify Table 3.2-1 of the Callaway FSAR in accordance with the following:

a. The following items do not appear on FSAR Table 3.2-1. Add the appropriate items to the table and provide a commitment that the remaining items are subject the pertinent requirements of the FSAR operational quality assurance program or justify not doing so.

a.8 Radiation monitoring (fixed and portable)

Callaway Position:

It is Union Electric's position that items 8-16 of 260.71c(a) should not be included in Table 3.2-1, or be subject to the requirements of the operational quality assurance program. Union Electric does feel that NUREG 0761, "Radiation Protection Plans for Nuclear Power Reactor Licensees" Draft Report March 1981, which is presently in draft form and out for comments, provides the necessary guidance in formulating the Callaway Radiation Protection Plan. The Callaway Radiation Protection Manual (CRPM) and Radiation Protection (RP) procedures together will constitute the Callaway Radiation Protection Plan (CRPP). Attachment 1 outlines the proposed CRPM. The outline lists the major areas to be addressed in the manual. It is intended that the CRPM will be a concise statement of the Callaway Radiation Protection Plan that can be understood by all plant personnel. The manual will be written in general and brief terms with the specifics of the plan to be addressed in the implementing RP procedures.

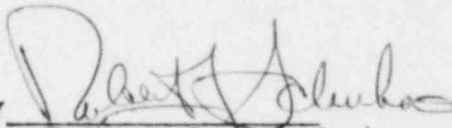
The Callaway Radiation Protection Plan will be developed in accordance with applicable regulatory requirements, regulatory guides, industry standards, and accepted industry practices, and will incorporate sufficient managerial and administrative control to ensure that a high level of radiation protection is provided. Attachment 2 outlines the implementing procedures.

These procedures have been broken down into areas as recommended by the NUREG. It is intended that administrative controls will be implemented via incorporation into administrative and programmatic level procedures which will receive Onsite Review Committee (Plant Review Group) review and approval. To verify that radiation protection functions are being performed as required and that a high level of radiological safety is maintained, periodic review and audit of the radiation protection program will be performed by the Quality Assurance Department. Periodic is to be interpreted as annual; however, when warranted by identified program deficiencies a more frequent review schedule of the deficient area may be implemented. The specified audit frequency is based on established industry auditing practice and the assumption that an audit of annual frequency in combination with regulatory, ANI and INPO inspections will provide adequate review and evaluation of program performance. The performance of audit and review of the areas identified in items 8-16 to assure program effectiveness is consistent with the position of NUREG 0761.

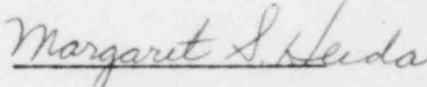
Additional quality assurance for items 8-16 of 260.71c(a) are built into RP procedures utilizing quality assurance provisions from regulatory guides. An example is the respiratory protection program. Quality assurance for procurement of respiratory equipment is maintained by the purchasing of only NIOSH certified equipment. In complying with Reg. Guide 8.15, additional quality assurance is established in the respiratory protection program.

STATE OF MISSOURI )  
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CITY OF ST. LOUIS )

Robert J. Schukai, of lawful age, being first duly sworn upon oath says that he is General Manager-Engineering (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   
Robert J. Schukai  
General Manager-Engineering  
Nuclear

SUBSCRIBED and sworn to before me this 27th day of August, 1982

  
MARGARET S. HEIDA  
NOTARY PUBLIC—STATE OF MISSOURI  
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MY COMMISSION EXPIRES JANUARY 2, 1986

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