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FROM: Gordon E. Edison, Project Manager  
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Attached is a draft of the NRR input of the SALP for Union Electric Company. This draft report is based partly upon input solicited from selected staff personnel who have had substantial contact and involvement with Union Electric Company's licensing material. Please review the draft evaluation and provide any comments you feel appropriate. All comments received by November 4, 1982 will be considered in the final report.

To assist you with review and comment, the following persons were contacted for input: J.Knox, PSB; R. Stevens, ICSB; S. Block, RAB; R. Meyer, CPB; F. Anderson, SSPB; R. Wright, EQB; J. Ma, SEB.

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Enclosure:  
Input for SALP Report

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INPUT TO SELF EVALUATION FOR CALLAWAY (CONSTRUCTION PHASE)

COVERING PERIOD FROM

10/1/81 TO 10/1/82: LICENSING ACTIVITIES

1. Management Involvement in Assuring Quality

Frequent discussions with Union Electric (Callaway) top management indicates they are aware of details of licensing activities and personally review various licensing submittals in a timely manner. The utility has initiated a self-evaluation of its quality assurance procedures using INPO guidelines developed for this purpose. The management has a technical knowledge of engineering which gives a good perspective on the need for quality assurance. (Rating: Category 1)

2. Approach to Resolution of Technical Issues from a Safety Standpoint

During this period the NRC staff published the Callaway Safety Evaluation Report and the utility underwent ACRS review. The results of these activities were that an unusually small number of open technical issues remain to be resolved, and the ACRS praised the licensing performance of both the utility and the staff. Union Electric generally has an understanding of issues and exhibits conservatism; their approach is generally sound with timely resolution of issues. Taken by themselves, Union Electric would deserve a category 2 rating because they do not excel in knowledge of the effects of systems interactions from an overall risk/safety viewpoint. However, with the assistance of the technically knowledgeable SNUPPS staff (NPI) and technical interchange with Kansas Gas and Electric Co., a significant improvement in this area is obtained and under contract. In several areas, such as structural systems and electric power, as well as their overall approach and attitude, their performance has been outstanding. (Rating: Category 1)

3. Responsiveness to NRC Initiatives

Union Electric rates superior in this area. Prompt responses have been received when needed with acceptable resolution of issues proposed initially in most cases. The utility, with the assistance of the SNUPPS staff, has been very cooperative, and in certain areas outstanding. (Rating: Category 1)

4. Enforcement History

Not applicable to licensing review in NRR during construction phase.

5. Reporting and Analysis of Reportable Events

This area is generally not applicable to licensing review activities in NRR during construction phase. However, it is noted that there does not yet appear to be a well-organized effort to evaluate operating experience at other similar plants and feed it back to Callaway operations and preventive maintenance/testing. (Rating: Category 2)

6. Staffing (Including Management)

Vacant key positions are being filled promptly with quality staff. Staffing is adequate. Union Electric has committed to adding additional advisory staff to assist the plant superintendent, to assist operators at startup and for one year after fuel load, and to serve as shift technical advisors. The SNUPPS staff which is committed to assisting Union Electric continues to strengthen itself technically. Responsibilities are well defined. (Rating: Category 1)

7. Training and Qualification Effectiveness

In the area of operator training, Union Electric has hired a supervisor staff with substantial nuclear experience which should serve them well. Callaway's commitment to a high quality training and retraining program appears to be satisfactorily in progress. (Rating: Category 2)

Overall Rating: Category 1