

A T T A C H M E N T 1

//

OQAM, CHANGE NOTICE 94-03

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IDENTIFICATION OF CHANGES

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2483 10.6 An inspection personnel qualification program shall  
 2484 be established to assure inspection activities are  
 2485 being performed by personnel trained and qualified  
 to a capability necessary for performance of the  
 activity. Plant procedures shall prescribe the  
 qualification requirements of inspection personnel.  
 The Superintendent, Training shall be responsible  
 for providing related technical and quality  
 training appropriate to the certification/qualifi-  
 cation of UE personnel.

1851 10.7 Quality Control inspection personnel or other unit  
 2263 staff organizations who perform "inspection"  
 2479 activities shall be qualified within their respec-  
 2480 tive areas of responsibility. The qualification of  
 2481 QC inspection personnel shall be defined in three  
 2482 levels of capability as described in ANSI N45.2.6.  
 2483 Other members of the unit staff performing "inspec-  
 2484 tion" activities shall have appropriate experience,  
 2485 training, and retraining to assure competence in  
 2994 accordance with ANSI/ANS-3.1. Inspection assign-  
 ments shall be consistent with the qualification of  
 an individual. In instances where the education and  
 experience recommendations are not met by QC  
 inspection personnel who are to be certified to  
 ANSI N45.2.6, UE shall demonstrate by documented  
 results of written examinations and evaluations of  
 actual work proficiency that individuals possess  
 comparable or equivalent competence.

2263 10.8 Personnel from outside organizations performing QC  
 2480 inspection activities associated with safety-  
 2482 related items at the Callaway Plant shall be certi-  
 2483 fied as required by ANSI N45.2.6. ~~Personnel from~~  
 2484 ~~outside organizations or UE personnel who are not~~  
 2485 ~~members of the unit staff who perform other activ-~~  
 2994 ~~ities associated with safety-related items at the~~  
~~Callaway Plant shall either be certified as~~  
~~required by ANSI N45.2.6 or they shall meet the~~  
~~education and experience requirements applicable to~~  
~~the equivalent position on the unit staff for the~~  
~~activities which they are performing.~~

CN# 94-03

INSERT  
ATTACHMENT A

2482 10.9 When contractors or vendors are retained to perform  
 2484 work activities or to provide services associated  
 2485 with safety-related items at the Callaway Plant,  
 the qualification of inspection personnel and the  
 conduct of inspections associated with that  
 contracted work activity or service shall meet the  
 requirements stipulated in the applicable procure-  
 ment documents. As an example, if a vendor was  
 contracted to conduct eddy current examinations of  
 the Callaway Plant steam generators, then the  
 persons performing the examination would be qual-

OQAM  
CN # 94-03



Attachment A

Personnel from outside organizations or UE personnel who are not members of the unit staff selected to perform other activities associated with safety-related items at the Callaway Plant shall either be certified as required by ANSI N45.2.6, meet the education and experience requirements applicable to the position for the activities which they are performing, be qualified through UEs "systematic approach to training," or be qualified through a vendor's training and qualification program, which has been approved by UE.

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personnel shall be under the direction and control of the Vice President, Nuclear Operations. The qualification of QC testing personnel shall be defined in three levels of capability as described in ANSI N45.2.6. Other members of the unit staff performing "testing" activities shall have appropriate experience, training, and retraining to assure competence in accordance with ANSI/ANS-3.1. Testing assignments shall be consistent with the qualification of an individual. In instances where the education and experience recommendations are not met by QC testing personnel who are to be certified to ANSI N45.2.6, UE shall demonstrate by documented results of written examinations and evaluations of actual work proficiency that individuals possess comparable or equivalent competence.

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CN# 94-03

Insert Attachment C

Personnel from outside organizations or UE personnel who are not members of the unit staff who perform other testing activities associated with safety-related items at the Callaway Plant shall either be certified as required by ANSI N45.2.6 or they shall meet the education and experience requirements applicable to the equivalent position on the unit staff for the activities which they are performing.

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When contractors or vendors are retained to perform work activities or to provide services associated with safety-related items at the Callaway Plant, the qualification of testing personnel and the conduct of tests associated with that contracted work activity or service shall meet the requirements stipulated in the applicable procurement documents. As an example, if a vendor were contracted to conduct testing of the main steam line safety valves at the Callaway Plant, then the persons performing the testing/valve settings would be qualified as required by the vendor's quality assurance program unless otherwise specified in the applicable procurement documents.

OQAM  
CN # 94-03



Attachment C

Personnel from outside organizations or UE personnel who are not members of the unit staff selected to perform other testing activities associated with safety-related items at the Callaway Plant shall either be certified as required by ANSI N45.2.6, meet the education and experience requirements applicable to the position for the activities which they are performing, be qualified through UEs "systematic approach to training," or be qualified through a vendor's training and qualification program, which has been approved by UE.

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APPENDIX A

OQAM  
CN#9370  
CN#9403  
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9/23/8

REGULATORY GUIDE 1.8 (cont.)

The experience, training, and education requirements for the positions of Shift Supervisor, Operating Supervisor, and Reactor Operator, and personnel fulfilling the duties of Shift Technical Advisor shall meet or exceed the requirements and recommendations of ANSI/ANS 3.1-1981 as endorsed by the Regulatory Guide 1.8.

For all other positions, qualification and training shall comply with ANSI/ANS 3.1-1978 as clarified below:

Refer to Callaway-SA FSAR Section 13.1 for a discussion of the qualifications of personnel responsible for plant operation and support.

Personnel responsible for directing or supervising the conduct of safety-related preoperational and startup tests and for review and approval of safety-related preoperational and startup test procedures or results met the qualifications of the Regulatory Guide, but were not required to be certified.

With regard to Section 5.6 of ANSI/ANS 3.1 - 1978 titled Documentation: UE shall maintain records in accordance with and to meet the requirements of OQAM Section 17 and ANSI N45.2.9 as specified herein.

~~UE may use additional non-Callaway employees or contract personnel to augment the unit staff. These persons may or may not report to the Manager-Callaway Plant. These groups include, but are not limited to, UE personnel from other plants as well as supplemental HP and I&C technicians and QC inspectors. When used to perform safety-related activities, these personnel shall meet the education and experience requirements of ANSI/ANS 3.1 - 1978 for equivalent UE staff positions. If no equivalent positions exist, these personnel may be qualified for assigned tasks either by Union Electric or by Vendors with Union Electric approved training and qualification programs. Inspection, examination and testing personnel shall meet the requirements for certification as inspection, examination and testing personnel as set forth in UE's commitment to ANSI N45.2.6-1978 given elsewhere in this Appendix.~~

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CN#9370

REPLACE WITH ATTACHMENT B CN#9403

REGULATORY GUIDE 1.28

REVISION 2

DATED 2/79

Quality Assurance Program Requirements (Design and Construction) (Endorses ANSI N45.2-1977)

DISCUSSION:

This Regulatory Guide is not applicable to the operating phase. However, ANSI N45.2-1977 will be applied to suppliers of safety related items, components or services, as appropriate, as described under Regulatory Guide 1.123 (ANSI N45.2.13-1976).

OQAM  
CN #94-03



Attachment B

UE may use additional Union Electric employees or contract personnel to augment the unit staff. These groups include, but are not limited to, UE personnel from outside the Nuclear Division as well as supplemental HP and I&C technicians and QC inspectors. When used to perform safety-related activities, these personnel shall meet the education and experience requirements of ANSI/ANS 3.1-1978 for equivalent positions or specified education and experience requirements for non-equivalent positions. As an alternative, these personnel may be qualified for assigned tasks either by UE through its systematic approach to training or by Vendors with UE approved training and qualification programs. Inspection, examination and testing personnel shall meet the requirements for certification as inspection, examination or testing personnel as set forth in UEs commitment to ANSI N45.2.6-1978 given elsewhere in this Appendix.

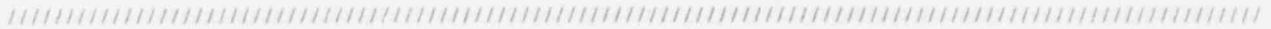
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OQAM, CHANGE NOTICE 94-03

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EXPLANATIONS OF AND  
JUSTIFICATIONS FOR PROPOSED  
CHANGES TO THE OQAM







- Be qualified by vendors with UE approved training and qualification programs.

This change will provide added assurance that only qualified personnel will be performing work on safety-related equipment at Callaway. This level of confidence will result from the fact that contract/vendor personnel will meet the training and qualification requirements of ANS 3.1 or will receive task specific training and will be evaluated on their retention of this training either by UE or a UE approved vendor training and qualification program.