



June 21, 1994

Donald F. Schnell
Senior Vice President
Nuclear

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

ULNRC-3033

DOCKET NUMBER 50-483
CALLAWAY PLANT
REVISION TO TECHNICAL SPECIFICATION 6.0
ADMINISTRATIVE CONTROLS


Union Electric Company herewith transmits an application for amendment to Facility Operating License No. NPF-30 for Callaway Plant.

This amendment application deletes the sections describing the On-Site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB) from the Technical Specifications. All of the information contained in these sections is also contained in Chapter 13 of the Callaway Plant Final Safety Analysis Report. This change was suggested in an NRC letter to the Technical Specification Committee Chairmen of the four owners groups dated October 25, 1993, "Content of Standard Technical Specifications, Section 5.0, Administrative Controls."

Attachments 1, 2, 3, and 4 contain the Safety Evaluation, the Significant Hazards Evaluation, the Environmental Evaluation, and the Proposed Technical Specification Changes in support of this amendment request.

This change request has been approved by the Callaway Onsite Review Committee and the Nuclear Safety Review Board.

Very truly yours,


for Donald F. Schnell

RMD/kea
Attachments

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ADD

Attachments
ULNRC-3033

- Attachment 1 - Safety Evaluation
- Attachment 2 - Significant Hazards Evaluation
- Attachment 3 - Environmental Consideration
- Attachment 4 - Proposed Technical Specification Changes

STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Alan C. Passwater, of lawful age, being first duly sworn upon oath says that he is Manager, Licensing and Fuels (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 *Alan C. Passwater*
Alan C. Passwater
Manager, Licensing and Fuels
Nuclear

SUBSCRIBED and sworn to before me this 21st day
of June, 1994.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC — STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
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SAFETY EVALUATION

Background

Effective July 1, 1994 the Manager, Nuclear Safety and Emergency Preparedness (a member of the Nuclear Safety Review Board) will retire. That position will no longer exist, and the responsibilities will be divided between the Manager, Quality Assurance and the Manager, Emergency Preparedness and Organizational Support.

Rather than making a Technical Specification change of narrow scope now, and making subsequent changes upon each title or organizational change, we request a Technical Specification revision of the Administrative Controls section based on the latest proposed revision of the Standardized Technical Specifications.

Proposed Changes

The proposed technical specification changes delete the sections describing the On-Site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB). All of the information contained in these sections is also contained in Chapter 13 of the Callaway Plant Final Safety Analysis Report (FSAR).

In addition, references to the Independent Safety Engineering Group (ISEG) will reflect that it now reports to the Manager, Quality Assurance, who is also a member of the NSRB, instead of the Manager, Nuclear Safety and Emergency Preparedness. All references to the Manager, Nuclear Safety and Emergency Preparedness will be removed as that position no longer exists.

The affected Technical Specification Sections are 6.2.3, 6.5.1, 6.5.2, 6.5.3, and the Index.

Evaluation

The sections being deleted describe the function, composition, alternate membership, meeting frequency, quorum, responsibilities, and records of the On-Site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB). These topics are covered in equivalent detail in the Callaway Plant Final Safety Analysis Report (FSAR) and plant administrative procedures as required by our commitment to ANSI N18.7-1976. Changes to the FSAR are controlled based on 10CFR50.59 and updated in accordance with the requirements of 10CFR50.71(e). No change is made to the ORC or the NSRB, except for the retirement of the Manager, Nuclear Safety and Emergency Preparedness, and no change is made to the manner in which they function.

The audit and review function requirements of 10 CFR 50.36(c)(5) continue to be described in Technical Specification section 6.5.3 and is controlled by the Operating Quality Assurance Manual (OQAM).

The proposed changes are administrative in nature. No change is required to plant facilities, components, or systems. The changes do not significantly reduce the overall base of experience at the Callaway Plant nor the commitment to minimum qualifications. Callaway Plant personnel will continue to have the training, experience, and expertise necessary to recognize, analyze, assess, evaluate, and effectively respond to plant transients or other abnormal events.

The proposed changes to the Technical Specifications do not involve an unreviewed safety question because operation of the Callaway Plant with these changes would not:

1. Increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report.

The proposed changes do not affect accident initiators or assumptions. The radiological consequences of any accident previously evaluated remain unchanged. The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in FSAR Section 13.4.

2. Create the possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report.

The proposed changes do not create any new accident initiators nor involve any modifications or changes in the plant. The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in FSAR Section 13.4.

3. Reduce the margin of safety as defined in the basis for any technical specifications.

The proposed changes do not affect any safety limits or boundary or system performance. The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in FSAR Section 13.4.

On the basis of the above discussions and the considerations presented in the Significant Hazards Evaluation, the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

SIGNIFICANT HAZARDS EVALUATION

The proposed technical specification changes delete the sections defining the composition and responsibilities of the On-Site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB). All of the information contained in these sections is also contained in Chapter 13 of the Callaway Plant Final Safety Analysis Report (FSAR).

In addition, references to the Independent Safety Engineering Group (ISEG) will reflect that it now reports to the Manager, Quality Assurance instead of the Manager, Nuclear Safety and Emergency Preparedness. The Manager, Quality Assurance is also a member of the NSRB. All references to the Manager, Nuclear Safety and Emergency Preparedness will be removed as that position no longer exists.

The affected Technical Specification Sections are 6.2.3, 6.5.1, 6.5.2, 6.5.3, and the Index.

The proposed changes do not involve a significant hazards consideration because operation of Callaway Plant with these changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in FSAR Section 13.4.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

These changes do not involve any physical alterations to the plant. There is no new type of accident or malfunction created and the method and manner of plant operation will not change. The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in FSAR Section 13.4.

3. Involve a significant reduction in a margin of safety.

The margin of safety remains unaffected since no design change is made and plant operation remains the same. The changes are administrative and equivalent descriptions and requirements for these oversight committees are contained in FSAR Section 13.4.

As discussed above, the proposed changes are strictly administrative in nature and have no effect on plant operations. They do not involve a significant increase in the probability or consequences of an accident previously evaluated or create the possibility of a new or different kind of accident from any previously evaluated. These changes do not result in a significant reduction in a margin of safety. Therefore, it has been determined that the proposed changes do not involve a significant hazards consideration.

ENVIRONMENTAL CONSIDERATION

This amendment application requests revisions to Technical Specification Sections 6.2.3., 6.5.1, 6.5.2, 6.5.3, and the Index. The proposed changes delete the sections describing the On Site Review Committee (ORC) and the Nuclear Safety Review Board (NSRB). All of the information contained in these sections is also contained in Chapter 13 of the Callaway Plant Final Safety Analysis Report (FSAR).

In addition, references to the Independent Safety Engineering Group (ISEG) will reflect that it now reports to the Manager, Quality Assurance instead of the Manager, Nuclear Safety and Emergency Preparedness.

Union Electric has determined that the proposed amendment involves changes in record keeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared in connection with the issuance of this amendment.