

Enclosure to ULNRC-06335

Attachment 1

Page 1 of 2

ATTACHMENT 1

TECHNICAL SPECIFICATION PAGE MARKUP

LDCN 18-0013

Unit Staff Qualifications

5.3

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

for the comparable position(s) addressed in the standard(s) that is referenced in the Callaway Plant Operating Quality Assurance Manual (OQAM), with exceptions specified in the OQAM.

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, with the following exceptions:

- 5.3.1.1 Shift Managers, Operating Supervisors, Reactor Operators, and Shift Technical Advisors shall meet or exceed the qualifications of ANSI/ANS 3.1-1981 as endorsed by Reg. Guide 1.8, Revision 2, with the same exceptions as contained in the current revision to the Operator Licensing Examiner Standards, NUREG-1021, ES-202.
- 5.3.1.2 The Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds the qualifications of USNRC Regulatory Guide 4.8, September 1975, for a Radiation Protection Manager. The Radiation Protection Manager will be designated by the plant manager.

- 5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).


Enclosure to ULNRC-06335

Attachment 2

Page 1 of 3

ATTACHMENT 2

OPERATING QUALITY ASSURANCE MANUAL EXCEPTIONS TO ANSI/ANS 3.1-1978
(for information only)

 CALLAWAY ENERGY CENTER OPERATING QUALITY ASSURANCE MANUAL	APPENDIX A	
	REVISION:	033a
	DATE:	06/19

OQAM CONFORMANCE TO APPLICABLE NRC REGULATORY GUIDES

This Appendix briefly discusses the extent to which Ameren Missouri's Operating Quality Assurance Program (OQAP) conforms to NRC published Regulatory Guides for the Callaway Plant. All statements within the Regulatory Position Section (C) of the Regulatory Guides are considered requirements unless a specific exception or clarification has been proposed by Ameren Missouri and accepted by the NRC. This is true regardless of the qualifier (i.e., "shall" or "should") which prefaces the statement. Unless further qualified by a statement within the corresponding Regulatory Guide, ANSI/ANS Standards "shall" statements denote requirements while "should" statements denote recommendations. Clarifications, alternatives, and exceptions to these Regulatory Guides are identified herein. Ameren Missouri's position on other Regulatory Guides is given in Appendix 3A of the Callaway-SA and Callaway-SP Final Safety Analysis Reports (FSARs).

In each of the ANSI standards referenced by one of the listed Regulatory Guides, other documents (i.e. other standards, codes, regulations or appendices) required to be included as a part of the standard are either identified at the point of reference or are described in a special section of the standard. The specific applicability or acceptability of these listed standards, codes regulations or appendices is either covered in other specific areas in the FSAR or this Operating QA Manual (OQAM), including tables, or such documents are not considered as requirements, although they may be used as guidance. When sections are referenced within a standard, it is understood that Ameren Missouri shall comply with the referenced section as clarified.

REGULATORY GUIDE 1.8

REVISION 2

DATED 4/87

Qualification and Training of personnel for Nuclear Power Plants (Endorses ANSI/ANS 3.1-1981 for Shift Supervisor (Section 4.3.1.1), Senior Operator (Section 4.3.1.2), Licensed Operators (Section 4.5.1.2), Shift Technical Advisor (Section 4.4.8), and Radiation Protection (Section 4.4.4) only, and ANSI/ANS N18.1-1971 for all other positions).

DISCUSSION:


Ameren Missouri complies with the recommendations of this Regulatory Guide with the following clarifications and exceptions:

Revision 1, dated 9/75, applies to the position of Radiation Protection Manager only, in accordance with the Callaway Plant Technical Specifications. For the position of Radiation Protection Manager only, Regulatory Guide 1.8, Revision 1, September, 1975 is clarified by USNRC HPPOS-020, Clarification of Regulatory Guide 1.8 on Qualification of Radiation Protection Manager.

The experience, training, and education requirements for the positions of Shift Manager, 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, Revision 2, with the same exceptions as contained in the current revision to the Operating Licensing Examiner Standards, NUREG-1021, ES-202.

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.

 CALLAWAY ENERGY CENTER OPERATING QUALITY ASSURANCE MANUAL	APPENDIX A
	REVISION: 033a
	DATE: 06/19

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.

Ameren Missouri may use additional Ameren employees or contract personnel to augment the unit staff. These groups include, but are not limited to, Ameren personnel from outside Nuclear Generation as well as supplemental Radiation Protection 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 can be qualified for assigned tasks either by Ameren Missouri through its systematic approach to training or by Vendors with Ameren Missouri 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 Ameren Missouri's commitment to ANSI N45.2.6-1978 given elsewhere in this Appendix.

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

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).

REGULATORY GUIDE 1.30

INITIAL ISSUE

DATED 8/72

Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electronic Equipment (Safety Guide 30) (Endorses ANSI N45.2.4-1972/IEEE 336-1971)

DISCUSSION:

Ameren Missouri complies with the recommendations of this Regulatory Guide with the following clarifications:

For maintenance and modification activities Ameren Missouri shall comply with the Regulatory Position established in this Regulatory Guide in that QA programmatic/administrative requirements included therein (subject to the clarifications below) shall apply to these maintenance and modification activities even though such requirements may not have been in effect originally. Technical requirements associated with the maintenance and modifications shall be equal to or better than the original requirements (e.g., code requirements, material properties, design margins, manufacturing processes, and inspection requirements), or as required to preclude repetition of defects.

Specific clarifications for ANSI N45.2.4 - 1972 are indicated below by sections.

Section 1.4 - Definitions in this Standard which are not included in ANSI N45.2.10 shall be used; definitions which are included in ANSI N45.2.10 shall be used as clarified in Ameren Missouri's commitment to Regulatory Guide 1.74.

Enclosure to ULNRC-06335

Attachment 3

Page 1 of 2

ATTACHMENT 3

RETYPE TECHNICAL SPECIFICATION PAGE

Unit Staff Qualifications
5.3

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications referenced for the comparable position(s) addressed in the standard(s) that is referenced in the Callaway Nuclear Plant Operating Quality Assurance Manual (OQAM), with exceptions specified in the OQAM.
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
-