

PROPOSED TECHNICAL SPECIFICATION CHANGES

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	6.5.1	MARKUP
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SPECIFICATIONS:	INDEX	RETYPED
	6.2.3.1	RETYPED
	6.5.1	RETYPED
	6.5.2	RETYPED
	6.5.3.1	RETYPED
	6.8.3	RETYPED

ADMINISTRATIVE CONTROLS6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)FUNCTION

6.2.3.1 The ISEG shall function to examine plant operating characteristics, NRC issuances, industry advisories, REPORTABLE EVENTS and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Manager, ~~Nuclear Safety and Emergency Preparedness~~ and the Manager, Callaway Plant.

Quality Assurance

DJW 10-10-95

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Manager, ~~Nuclear Safety and Emergency Preparedness~~ and the Manager, Callaway Plant.

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Quality Assurance

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor (STA)** shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

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

6.3.1.1 Shift Supervisors, 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.

6.3.1.2 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 1.8, September 1975, for a Radiation Protection Manager. The Radiation Protection Manager will be designated by the Plant Manager.

*Not responsible for sign-off function.

**The STA position shall be manned in MODES 1, 2, 3 and 4 unless the Shift Supervisor or the individual with a Senior Operator license meets the qualifications for the STA as required by the NRC.

ADMINISTRATIVE CONTROLS6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Superintendent, Training.

6.4.2 The training programs for Shift Supervisors, Operating Supervisors, Reactor Operators, and Shift Technical Advisors shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Rev. 2, with the same exceptions as contained in the current revision to the Operator Licensing Examiner Standards, MUREG-1021, ES-202, and 10 CFR Part 55.

6.4.3 All other training programs shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1978.

6.4.4 Training shall include familiarization with relevant industry operational experience identified by the ISEG.

6.5 REVIEW AND AUDIT6.5.1 ON-SITE REVIEW COMMITTEE (ORC)

(THIS SECTION DELETED)

RND
6-20-94FUNCTION

6.5.1.1 The ORC shall function to advise the Manager, Callaway Plant on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Manager, Callaway Plant shall be Chairman of the ORC. ORC membership shall include a minimum of six additional members appointed by the Chairman and an additional member appointed by the Manager, Quality Assurance. Selected members shall include, at a minimum, management responsible for the following areas of expertise: operations, maintenance, instrumentation and controls, chemistry, radwaste, health physics, nuclear engineering, and quality assurance. A single individual may cover multiple disciplines.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis.**

MEETING FREQUENCY

6.5.1.4 The ORC shall meet at least once per calendar month and as convened by the ORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the ORC necessary for the performance of the ORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members of which no more than two shall be alternates.

** Except for the alternate for Quality Assurance who is appointed by the Manager, Quality Assurance.

ORIGINAL

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ADMINISTRATIVE CONTROLS

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RESPONSIBILITIES

6.5.1.6 The ORC shall be responsible for:

- a. Review of all Administrative Procedures;
- b. Review of the safety evaluations for (1) procedures, (2) change to procedures, equipment, systems or facilities, and (3) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
- c. Review of proposed procedures and changes to procedures, equipment, systems or facilities which may involve an unreviewed safety question as defined in 10 CFR 50.59 or involves a change in Technical Specifications;
- d. Review of proposed test or experiments which may involve an unreviewed safety question as defined in 10 CFR 50.59 or requires a change in Technical Specifications;
- e. Review of proposed changes to Technical Specifications or the Operating License;
- f. Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President-Nuclear and to the NSRB;
- g. Review of reports of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety;
- h. Review of all REPORTABLE EVENTS;
- i. Review of the plant Security Plan and shall submit recommended changes to the NSRB;
- j. Review of the Radiological Emergency Response Plan and shall submit recommended changes to the NSRB;
- k. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems;
- l. Review of any accidental, unplanned or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Manager, Callaway Plant and to the NSRB;

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- m. Review of Unit operations to detect potential hazards to nuclear safety;
- n. Investigations or analysis of special subjects as requested by the Chairman of the NSRB;
- o. Review of Unit Turbine Overspeed Protection Reliability Program and revisions thereto; and
- p. Review of the Fire Protection Program and submitting recommended changes to the NSRB.

6.5.1.7 The ORC shall:

- a. Recommend in writing to the Manager, Callaway Plant approval or disapproval of items considered under Specifications 6.5.1.6a through e., i., j., k., l., o., and p. above.
- b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6b. through e., and m., above, constitutes an unreviewed safety question; and
- c. Provide written notification within 24 hours to the Senior Vice President-Nuclear and the Nuclear Safety Review Board of disagreement between the ORC and the Manager, Callaway Plant; however, the Manager, Callaway Plant shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1. above.

RECORDS

6.5.1.8 The ORC shall maintain written minutes of each ORC meeting that, at a minimum, document the results of all ORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Senior Vice President-Nuclear and the Nuclear Safety Review Board.

6.5.2 NUCLEAR SAFETY REVIEW BOARD (NSRB) (THIS SECTION DELETED)

FUNCTION

6.5.2.1 The NSRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The NSRB shall report to and advise the Senior Vice President-Nuclear on those areas of responsibility stated in Specifications 6.5.2.8 and 6.5.2.9.

DJW
10-10-95ADMINISTRATIVE CONTROLSCOMPOSITION

6.5.2.2 The NSRB shall be composed of at least the following members.

Chairman:	Manager, Licensing and Fuels
Member:	Manager, Nuclear Engineering
Member:	Manager, Nuclear Safety and Emergency Preparedness
Member:	Manager, Quality Assurance
Member:	Vice President, Nuclear Operations
Member:	Supervising Engineer, Nuclear Fuels

Additional members and Vice Chairman may be appointed by the Chairman.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the NSRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NSRB activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NSRB Chairman to provide expert advice to the NSRB.

MEETING FREQUENCY

6.5.2.5 The NSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUALIFICATIONS

6.5.2.6 The NSRB members shall hold a Bachelor's degree in an engineering or physical science field, or equivalent experience, and a minimum of 5 years of technical experience of which a minimum of 3 years shall be in one or more of the disciplines of Specification 6.5.2.1.

QUORUM

6.5.2.7 The quorum of the NSRB necessary for the performance of the NSRB review and audit functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least two-thirds of the NSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit. For the purpose of a quorum, those considered to have line responsibility will include the Vice President, Nuclear Operations, and personnel reporting to the Vice President, Nuclear Operations.

REVISION 1

ADMINISTRATIVE CONTROLSRMD
6-20-94REVIEW

6.5.2.8 The NSRB shall be responsible for the review of:

- a. The safety evaluations for: (1) changes to procedures, equipment, systems or facilities; and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, systems or facilities which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meetings minutes of the ORC.

AUDITS

6.5.2.9 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of Unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months;

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AUDITS (Continued)

- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The Fire Protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee OR personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing either qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- g. The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months;
- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months;
- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months;
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring, at least once per 12 months; and
- k. Any other area of unit operation considered appropriate by the NSRB or the Senior Vice President-Nuclear.

RECORDS

6.5.2.10 Records of NSRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Senior Vice President-Nuclear within 14 days following each meeting;
- b. Reports of reviews encompassed by Specification 6.5.2.8 above, shall be prepared, approved and forwarded to the Senior Vice President-Nuclear within 14 days following completion of the review; and
- c. Audit reports encompassed by Specification 6.5.2.9 above, shall be forwarded to the management positions responsible for the areas audited and summaries of audits shall be prepared and forwarded to the Senior Vice President-Nuclear within 30 days after completion of the audit by the auditing organization.

ADMINISTRATIVE CONTROLS6.5.3 TECHNICAL REVIEW AND CONTROLACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Administrative Procedures shall be approved by the appropriate Department Head as designated in writing by the Vice President, Nuclear Operations. The Manager, Callaway Plant, shall approve Administrative Procedures and Radiological Emergency Response Plan implementing procedures. The Manager, Operations Support, shall approve the Security Plan implementing procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation;
- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Manager, Callaway Plant. Each such modification shall be reviewed by a qualified individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Manager, Callaway Plant;
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by a qualified individual/group other than the individual/group which prepared the proposed test or experiment. Proposed tests and experiments shall be approved before implementation by the Manager, Callaway Plant;

ADMINISTRATIVE CONTROLSACTIVITIES (Continued)

- d. Individuals responsible for reviews performed in accordance with Specifications 6.5.3.1a., 6.5.3.1b., and 6.5.3.1c., shall be members of the management staff previously designated by the Manager, Operations Support. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline;
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. Pursuant to Section 50.59, 10 CFR, NRC approval of items involving unreviewed safety questions shall be obtained prior to the Manager, Callaway Plant, approval for implementation; and
- f. The Plant Security Plan and Radiological Emergency Response Plan, and implementing procedures, shall be reviewed at least once per 12 months. Recommended changes to the implementing procedures shall be approved in accordance with 6.5.3.1.a. Recommended changes to the Plans shall be reviewed pursuant to ~~the requirements of Specifications 6.5.1.6 and 6.5.2.8~~ and approved by the Manager, Callaway Plant. NRC approval shall be obtained as appropriate.

RECORDS

6.5.3.2 Records of the above activities shall be provided to the Manager, Callaway Plant, ORC and/or NSRB as necessary for required reviews.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 of 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the ORC and submitted to the NSRB and the Senior Vice President-Nuclear.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Senior Vice President-Nuclear and the NSRB shall be notified within 24 hours;
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the ORC. This report shall describe: (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems or structures; and (3) corrective action taken to prevent recurrence;

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THE FINAL SAFETY ANALYSIS REPORT SECTION 13.4
OPERATIONAL Quality Assurance Manual.

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRB and the Senior Vice President-Nuclear within 14 days of the violation; and
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter No. 82-33;
- c. Plant Security Plan implementation;
- d. Radiological Emergency Response Plan implementation;
- e. PROCESS CONTROL PROGRAM implementation;
- f. OFFSITE DOSE CALCULATION MANUAL implementation;
- g. Quality Assurance Program implementation for effluent and environmental monitoring;
- h. Turbine Overspeed Protection Reliability Program; and
- i. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 ~~THE PLANT SAFETY ANALYSIS REPORT SECTION 13.4~~
The plant Administrative Procedures and changes thereto shall be reviewed in accordance with ~~Specification 6.5.3.1.6~~ and approved in accordance with Specification 6.5.3.1. The associated implementing procedures and changes thereto shall be reviewed and approved in accordance with Specification 6.5.3.1.

6.8.4 The following programs shall be established, implemented and maintained:

- a. Reactor Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation portion of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, and RHR System. The program shall include the following:

- 1) Preventive maintenance and periodic visual inspection requirements, and

the Operational
Quality Assurance
Manual

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6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine plant operating characteristics, NRC issuances, industry advisories, REPORTABLE EVENTS and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Manager, Quality Assurance and the Manager, Callaway Plant.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Manager, Quality Assurance and the Manager, Callaway Plant.

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The Shift Technical Advisor (STA)** shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

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

6.3.1.1 Shift Supervisors, 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.

6.3.1.2 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 1.8, September 1975, for a Radiation Protection Manager. The Radiation Protection Manager will be designated by the Plant Manager.

*Not responsible for sign-off function.

**The STA position shall be manned in MODES 1, 2, 3 and 4 unless the Shift Supervisor or the individual with a Senior Operator license meets the qualifications for the STA as required by the NRC.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Superintendent, Training.

6.4.2 The Training programs for Shift Supervisors, Operating Supervisors, Reactor Operators, and Shift Technical Advisors shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Rev. 2, with the same exceptions as contained in the current revision to the Operator Licensing Examiner Standards, NUREG-1021, ES-202, and 10 CFR Part 55.

6.4.3 All other training programs shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1978.

6.4.4 Training shall include familiarization with relevant industry operational experience identified by the ISEG.

6.5 REVIEW AND AUDIT

6.5.1 ON-SITE REVIEW COMMITTEE (ORC)

(This section deleted.)

6.5.2 NUCLEAR SAFETY REVIEW BOARD (NSRB)

(This section deleted.)

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ADMINISTRATIVE CONTROLS

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. Procedures other than Administrative Procedures shall be approved by the appropriate Department Head as designated in writing by the Vice President, Nuclear Operations. The Manager, Callaway Plant, shall approve Administrative Procedures and Radiological Emergency Response Plan implementing procedures. The Manager, Operations Support, shall approve the Security Plan implementing procedures. Temporary changes to procedures which do not change the intent of the approved procedures shall be approved for implementation by two members of the plant staff, at least one of whom holds a Senior Operator license, and documented. The temporary changes shall be approved by the original approval authority within 14 days of implementation. For changes to procedures which may involve a change in intent of the approved procedures, the person authorized above to approve the procedure shall approve the change prior to implementation;
- b. Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Manager, Callaway Plant. Each such modification shall be reviewed by a qualified individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved prior to implementation by the Manager, Callaway Plant;
- c. Proposed tests and experiments which affect plant nuclear safety and are not addressed in the Final Safety Analysis Report or Technical Specifications shall be prepared, reviewed, and approved. Each such test or experiment shall be reviewed by a qualified individual/group other than the individual/group which prepared the proposed test or experiment. Proposed test and experiments shall be approved before implementation by the Manager, Callaway Plant.

ADMINISTRATIVE CONTROLS

ACTIVITIES (Continued)

- d. Individuals responsible for reviews performed in accordance with Specifications 6.5.3.1a., 6.5.3.1b., and 6.5.3.1c., shall be members of the management staff previously designated by the Manager, Operations Support. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline;
- e. Each review shall include a determination of whether or not an unreviewed safety question is involved. Pursuant to Section 50.59, 10 CFR, NRC approval of items involving unreviewed safety questions shall be obtained prior to the Manager, Callaway Plant, approval for implementation; and
- f. The plant Security Plan and Radiological Emergency Response Plan, and implementing procedures, shall be reviewed at least once per 12 months. Recommended changes to the implementing procedures shall be approved in accordance with 6.5.3.1.a. Recommended changes to the Plans shall be reviewed pursuant to the Operations Quality Assurance Manual and approved by the Manager, Callaway Plant. NRC approval shall be obtained as appropriate.

RECORDS

6.5.3.2 Records of the above activities shall be provided to the Manager, Callaway Plant, ORC and/or NSRB as necessary for required reviews.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 of 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the ORC and submitted to the NSRB and the Senior Vice President-Nuclear.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Senior Vice President-Nuclear and the NSRB shall be notified within 24 hours;
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the ORC. This report shall describe: (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems or structures; and (3) corrective action taken to prevent recurrence;

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRB and the Senior Vice President-Nuclear within 14 days of the violation; and
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter No. 82-33;
- c. Plant Security Plan implementation;
- d. Radiological Emergency Response Plan implementation;
- e. PROCESS CONTROL PROGRAM implementation;
- f. OFFSITE DOSE CALCULATION MANUAL implementation;
- g. Quality Assurance Program implementation for effluent and environmental monitoring;
- h. Turbine Overspeed Protection Reliability Program; and
- i. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes shall be reviewed prior to implementation as set forth in Specification 6.5 above.

6.8.3 The plant Administration Procedures and changes thereto shall be reviewed in accordance with the Operational Quality Assurance Manual and approved in accordance with Specification 6.5.3.1. The associated implementing procedures and changes thereto shall be reviewed and approved in accordance with Specification 6.5.3.1.

6.8.4 The following programs shall be established, implemented and maintained;

- a. Reactor Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation portion of the Containment Spray System, Safety Injection System, Chemical and Volume Control System and RHR System. The program shall include the following:

- 1) Preventive maintenance and periodic visual inspection requirements, and

PROPOSED OPERATIONAL QUALITY ASSURANCE MANUAL REVISIONS

- 43027 1.26 The Manager, Transmission, Transmission Planning reports to the Vice-President Corporate Planning and is responsible for directing all activities related to the Planning of transmission facilities. The Vice-President Corporate Planning also provides engineering and other support services when requested by the Senior Vice-President Nuclear.
- 1.27 Other UE divisions may provide safety-related services which augment and support selected Program activities. These organizations shall be required to implement controls consistent with the OQAP requirements applicable to their scope of activities. The coordination of these activities is the responsibility of the Senior Vice President-Nuclear.
- 1.28 ~~Safety review committees shall be established to provide an independent review of those items required by the Callaway Plant Technical Specifications. These committees, the Safety Review Committee (SRC) and the Nuclear Safety Review Board (NSRB), are described in the Administrative Controls Section of the Callaway Plant Technical Specifications.~~

INSERT 'NEW' SECTION 1.28 AND
SUBSEQUENT SECTIONS - REFER TO
PAGES 1-7a THRU 1-7e.

-
- 1.28 Safety review committees shall be established to provide an independent review of those items required below. These committees are the Onsite Review Committee (ORC -- refer to Section 1.28.1) and the Nuclear Safety Review Board (NSRB -- refer to Section 1.28.2)
- 1.28.1 The ORC shall function to advise the Manager, Callaway Plant on all matters related to nuclear safety. The Manager, Callaway Plant shall be Chairman of the ORC.
- 1.28.1.1 ORC membership shall include a minimum of six additional members appointed by the Chairman and an additional member appointed by the Manager, Quality Assurance. Selected members shall include, at a minimum, management responsible for the following areas of expertise:
- a) Operations
 - b) Maintenance
 - c) Instrumentation and Controls
 - d) Chemistry
 - e) Radwaste
 - f) Health Physics
 - g) Nuclear Engineering
 - h) Quality Assurance
- 1.28.1.2 All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis.
- 1.28.1.3 The alternate for Quality Assurance is appointed by the Manager, Quality Assurance.
- 1.28.1.4 The ORC shall meet at least once per calendar month and as convened by the ORC Chairman or his designated alternate.
- 1.28.1.5 The quorum of the ORC necessary for the performance of the ORC responsibility and authority provisions shall consist of the Chairman or his designated alternate and four members of which no more than two shall be alternates.
- 1.28.1.6 The ORC shall maintain written minutes of each ORC meeting that, at a minimum, document the results of all ORC activities. Copies shall be provided to the Senior Vice President-Nuclear and the NSRB.

1.28.1.7

The ORC shall be responsible for:

- a) Review of all Administrative Procedures;
- b) Review of safety evaluations for:
 - procedures,
 - change to procedures, equipment, systems or facilities, and
 - tests or experiments completed under the provision of 10CFR50.59 to verify that such actions did not constitute an unreviewed safety question;
- c) Review of proposed procedures and changes to procedure, equipment, systems or facilities which may involve an unreviewed safety question as defined in 10CFR50.59 or involves a change in Technical Specifications;
- d) Review of proposed test or experiments which may involve an unreviewed safety question as defined in 10CFR50.59 or requires a change in Technical Specifications;
- e) Review of proposed changes to Technical Specifications or Operating License;
- f) Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President-Nuclear and to the NSRB;
- g) Review of report of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety;
- h) Review of all REPORTABLE EVENTS;
- i) Review of the plant Security Plan and shall submit recommended changes to the NSRB;
- j) Review of the Radiological Emergency Response Plan and shall submit recommended changes to the NSRB;
- k) Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems;
- l) Review of any accidental, unplanned or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Manager, Callaway Plant and to the NSRB;
- m) Review of Unit operations to detect potential hazards to nuclear safety;
- n) Investigations or analysis of special subjects as requested by the Chairman of the NSRB;
- o) Review of Unit Turbine Overspeed Protection Reliability Program and revisions thereto;
- p) Review of the Fire Protection Program and submitting recommended changes to the NSRB.

1.28.1.8 The ORC shall:

- a) Recommend in writing in the Manager, Callaway Plant approval or disapproval of items considered under Sections 1.28.1.7.a through 1.28.1.7.e, 1.28.1.7.i, 1.28.1.7.j, 1.28.1.7.k, 1.28.1.7.l, 1.28.1.7.o, and 1.28.1.7.p above.
- b) Render determinations in writing with regard to whether or not each item considered under Sections 1.28.1.7.b through 1.28.1.7.e, and 1.28.1.7.m, above, constitutes an unreviewed safety question; and
- c) Provide written notification within 24 hours to the Senior Vice President-Nuclear and the NSRB of disagreement between ORC and the Manager, Callaway Plant; however, the Manager Callaway Plant shall have responsibility for resolution of such disagreements.

1.28.2 The NSRB shall function to provide independent review and audit of designated activities in the areas of:

- a) Nuclear power plant operations,
- b) Nuclear engineering,
- c) Chemistry and radiochemistry,
- d) Metallurgy,
- e) Instrumentation and control,
- f) Radiological safety,
- g) Mechanical and electrical engineering, and
- h) Quality assurance practices.

1.28.2.1 The NSRB shall report to and advise the Senior Vice President-Nuclear on those areas of responsibility stated in OQAM Sections 1.28.2.3 and 18.8.1.

1.28.2.2 The NSRB shall be composed of at least the following members:

Chairman:	Manager, Licensing and Fuel
Member:	Manager, Nuclear Engineering
Member:	Manager, Quality Assurance
Member:	Vice President, Nuclear Operations
Member:	Supervising Engineer, Nuclear Fuels

- 1.28.2.3 Additional members and Vice Chairman may be appointed by the Chairman.
- 1.28.2.4 The NSRB members shall hold a Bachelor's degree in an engineering or physical science field, or equivalent experience, and a minimum of 5 years of technical experience of which a minimum of 3 years shall be in one or more of the disciplines of Section 1.28.2.
- 1.28.2.4 All alternate members shall be appointed in writing by the NSRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NSRB activities at any one time.
- 1.28.2.5 Consultants shall be utilized as determined by the NSRB Chairman to provide expert advice to the NSRB.
- 1.28.2.6 The NSRB shall meet at least once, every 6 months.
- 1.28.2.7 The quorum of the NSRB necessary for the performance of the NSRB review and audit functions herein, shall consist of the Chairman or his designated alternate and at least two-thirds of the NSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit. For the purpose of a quorum, those considered to have line responsibility will include the Vice President-Nuclear Operations, and personnel reporting to the Vice President-Nuclear Operations.
- 1.28.2.8 Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Senior Vice President-Nuclear within 14 days following each meeting.

- 1.28.2.9 The NSRB shall be responsible for the review of:
- a) The safety evaluations for:
 - changes to procedures, equipment, systems or facilities; and
 - tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question;
 - b) Proposed changes to procedures, equipment, systems or facilities which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
 - c) Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR;
 - d) Proposed changes to Technical Specifications or the Operating License;
 - e) Violations of Codes, regulations, order, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
 - f) Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
 - g) ALL REPORTABLE EVENTS;
 - h) All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems or components that could affect nuclear safety; and
 - i) Reports and meetings minutes of the ORC.

1823

2. Operating Quality Assurance Manual (OQAM)

The OQAM contains a delineation of the Policy statement, quality assurance requirements, assignment of responsibilities, and a definition of organizational interfaces. The OQAM is the written description of the OQAP. Approval of the OQAM is by the Senior Vice President-Nuclear and the Manager, Quality Assurance.

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3. Callaway Plant Operating Manual

The Callaway Plant Operating Manual consists of a multi-volume set of Plant operating procedures prepared or reviewed by the staff with the aid of other SNUPPS utilities, Nuclear Engineering, the Lead A/E, the NSSS Supplier, and Fuel Fabricator. These procedures are controlled, approved, and issued in accordance with Administrative Procedures contained within the Manual. This Manual includes administrative controls consistent with those required by Regulatory Guide 1.33.

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Administrative procedures which apply to the entire staff, and revisions thereto, shall be reviewed by the Callaway Plant Onsite Review Committee (ORC) and the Quality Assurance Department. The final approval of Administrative Procedures and revisions thereto shall be by the Manager, Callaway Plant. The review and approval of other procedures and revisions thereto shall be in accordance with approved Administrative Procedures which implement the requirements of the Technical Specifications and this OQAM.

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UE may employ the safety-related services of architect engineers, NSSS suppliers, fuel fabricators, constructors, and others which provide or augment UE efforts during the operating phase. These organizations shall be required to work under a quality assurance program whose controls are consistent with the scope of their effort. This does not preclude any organization from working under the UE OQAP. The quality assurance program of outside organizations shall be subject to review, evaluation and acceptance by the UE Quality Assurance Department prior to the initiation of safety-related work. Vendor programs and procedures shall also meet UE's commitment to USNRC Generic Letter 83-28.

2.8

Disputes which may arise between QA or QC personnel and personnel in other UE organizations which

OQAM

tion would become irreversible (i.e., require extensive demolition and rework). The design verification shall be complete prior to relying upon the component, system, or structure to perform its safety-related function.

2188 3.16 Action shall be initiated to correct errors found in the design process. Errors and deficiencies identified in approved design documents shall be documented and the process of their correction (i.e., review and approval) shall be controlled. These actions shall assure that changes to design or installed components are controlled.

3.17 Requests for design changes affecting safety-related structures, systems, and components may be originated by the unit staff, Licensing and Fuels or Nuclear Engineering. Design changes shall be processed by Nuclear Engineering. Design changes engineered by Nuclear Engineering shall be the responsibility of the Manager, Nuclear Engineering. Design changes engineered by Licensing and Fuels shall be the responsibility of Licensing and Fuels.

3.18 Independent of the responsibilities of the design organization, the requirements of the Onsite Review Committee (ORC) and the Nuclear Safety Review Board (NSRB) as defined in the ~~Technical Specifications~~ OQAM, Section 1.0

shall be satisfied. Design changes require a safety evaluation which shall be reviewed by the ORC and approved by the Manager, Callaway Plant. In addition, changes in the facility as described in the FSAR which involve a change in the Callaway Plant Technical Specifications incorporated in the license or an unreviewed safety question require review and approval by the NSRB and the Nuclear Regulatory Commission prior to implementation. When design is performed by an outside organization, UE shall perform or coordinate a review of the design for operability, maintainability, inspectability, FSAR commitment compatibility, test and inspection acceptance criteria acceptability, and design requirements imposed by Plant generating equipment.

3.19 Safety evaluations which consider the effect of the design as described in the design documents, shall be performed by the responsible UE engineering organization or outside organization(s). These evaluations shall include the basis for the determination that the design change does not involve an unreviewed safety question. As deemed necessary by the evaluating organization, detailed analyses shall be performed to support the bases of safety evaluations. All nuclear safety evaluations are

OQAM

submitted to the ORC. Changes involving the substitution of equivalent hardware require safety evaluations to assure that the design requirement changes are consistent with and do not alter the design criteria specified in existing design documents. When design documents and safety evaluations are prepared by an outside organization under its QA program, review and approval per ANSI N45.2.11 will be included. UE will approve all outside organizations' design documents and safety evaluations, and will perform appropriate reviews necessary for final approval.

3.20

~~The ORC shall review design change safety evaluations to recommend final approval of design changes. Design changes which involve an unresolved safety question or a change in the Technical Specifications shall be forwarded to the NRSB for review. In application for amendment of the license shall be submitted to the Nuclear Regulatory Commission for approval pursuant to 10 CFR 50.36.~~

3.21

~~The NRSB shall review safety evaluations to verify that changes did not involve unresolved safety questions.~~

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Procedures and instructions related to equipment or systems that are modified shall be reviewed and updated to reflect the modification prior to placing the equipment or systems in operation to perform safety-related functions. Plant personnel shall be made aware of changes affecting the performance of their duties through procedure revisions, or specific training in the operation of modified equipment or systems, or other appropriate means.

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Records shall be maintained which reflect current design including safety analyses, safety evaluations, design change installation procedures, material identification documents, procurement documents, special process documents, equipment and installation specifications, and as-built drawings.

3.24

Drawings shall be prepared under a drawing control system which provides for checking methods and review and approval requirements. Drawings shall be subject to reviews by the responsible design organization for correctness, conformance to design criteria, and compliance with applicable codes and standards.

INSERT 'NEW' SECTIONS 3.20, 3.20.1 & 3.21
ON ATTACHED PAGE 3-6a.

- 3.20 The ORC and NSRB shall review design changes pursuant to the requirements of OQAM, Section 1.0
- 3.20.1 Design changes which require an amendment of the license, shall be submitted on an application to the Nuclear Regulatory Commission for approval in accordance with 10 CFR 50.90.
- 3.21 DELETED.

OQAM

- 16.2 Conditions adverse to quality which are classified as nonconformances shall be controlled in accordance with the additional requirements described in OQAM, Section 15.
- 16.3 Conditions adverse to quality which impede the implementation or reduce the effectiveness of the Operating QA Program shall be considered significant conditions adverse to quality. Significant conditions adverse to quality may include, but are not limited to, noncompliance with procedural requirements which impact nuclear or personnel safety; reportable occurrences required by regulations; adverse nonconformance trends; deficiencies identified in the OQAP; recurring conditions for which past corrective action has been ineffective; and managerial controls which could result in the failure of a plant system to perform its intended function. Examples of such conditions include those which match the descriptions in ~~Callaway Plant Technical Specification 5.5.2.12, 5.5.2.13, 5.5.2.14 (potential hazards to nuclear safety) and NPPRC violations.~~
- 16.4 Conditions adverse to quality which involve defects in basic components or deviations from technical requirements in procurement documents shall be reviewed for reporting applicability under 10CFR21 and other Federal reporting requirements. Reportable conditions adverse to quality are classified as significant.
- 16.5 The nature of the condition adverse to quality may be such that remedial actions must be taken immediately, whereas development and implementation of corrective action to preclude recurrence may take substantially longer.
- 1871 16.6 Nuclear Engineering personnel shall review conditions adverse to quality which involve design deficiencies or which involve recommending design changes as corrective action. Licensing and Fuels should review conditions adverse to quality for fuel-related issues. The ORC shall review significant conditions adverse to quality.
- 16.7 Corrective action documents shall be closed by verifying the implementation and adequacy of corrective action. The closure of corrective action documents shall be accomplished as promptly as practicable after the corrective action taken has been verified. Verification may be accomplished through direct observations, written communications, re-audit, surveillances, or other appropriate means.

INSERT "A"
ON PG. 16-2a

OQAM
Callaway Plant

Change Notice #95-04

INSERT A

... Sections 1.28.1.7.f, g, h, l, m (potential hazards to nuclear safety) of this OQAM and NPDES violations.

17.0 QUALITY ASSURANCE RECORDS

1851 17.1 Quality assurance record systems governing the
2126 collection, storage, and maintenance of records
2127 shall be established by UE. They shall apply to
2130 records associated with startup testing, operation,
2173 maintenance, repair, refueling, and modification of
safety-related structures, systems, and components
at the Callaway Plant.

1851 17.2 During the operating phase, quality assurance
2128 records shall be maintained to furnish documentary
2132 evidence of the quality of items and activities
2133 affecting quality. Applicable design specifica-
2137 tions, procurement documents, test procedures,
2138 operational procedures or other documents shall
2173 specify the quality assurance records to be gener-
ated by, supplied to, or held by UE. Documents
shall be considered quality assurance records when
completed. Records may be maintained for varying
periods and shall be identified as lifetime or
nonpermanent records in that a lifetime or finite
retention period shall be specified. Records shall
provide sufficient information to permit identifi-
cation to the item or activity to which it applies,
and be retrievable.

2337 17.3 Quality assurance records include, but are not
2364 limited to, operating logs; maintenance and modifi-
cation procedures and inspection results; report-
able occurrences; results of reviews; inspections,
tests, audits and material analyses; qualification
of personnel, procedures, and equipment; and other
documentation including drawings, specifications,
procurement documents, nonconformance documenta-
tion, corrective action documents, calibration
procedures and results, and the results of moni-
toring work performance (e.g., surveillance).

OKC MEETING MINUTES;

1936 17.4 Inspection and test records shall contain the
following as a minimum:

1. A description of the type of observation
2. The date and results of the inspection or test
3. Identification of the inspector or data recorder
4. Evaluation of the acceptability of the results
5. Action taken in connection with any deficiencies noted

OQAM

- 3865 18.5 The Manager, Quality Assurance shall be responsible for assuring the implementation of a comprehensive system of planned audits to verify compliance with the OQAP. The Manager, Quality Assurance has sufficient authority and organizational freedom to schedule and perform both internal and external audits. He has the organizational responsibility to measure and assure the overall effectiveness of the OQAP and is independent of the economic pressures of production when opposed to safety or quality. The Manager, Quality Assurance has direct access to the Senior Vice President-Nuclear.
- 1790 18.6 The audit system shall include internal and
1799 external audits. The system shall be planned,
1800 documented, and conducted to assure coverage of
3871 the applicable elements of the OQAP, and overall coordination and scheduling of audit activities. Audit results shall be periodically reviewed by the QA Department for quality trends and results reported to the appropriate management. The Manager, Quality Assurance shall monitor the OQAP audit program to assure audits are being accomplished in accordance with the requirements described herein and for overall Program effectiveness. The NSRB shall selectively review audit reports of onsite audits. The NSRB shall also periodically review the onsite audit program as developed by the QA Department, to assure that audits are being performed in accordance with ~~Seaway Plant Technical Specification requirements and the OQAP~~. Appropriate levels of management shall be provided copies of internal and external audit reports. ~~The audits described in the Seaway Plant Technical Specifications which are performed under the cognizance of the NSRB shall be conducted by the QA Department.~~
- 1792 18.7 Internal audits shall be conducted by the QA
1816 Department and shall be performed with a frequency
2188 commensurate with their safety significance. An
3873 audit of safety-related functions shall be completed in accordance with formal audit schedules within a period of two (2) years. Each element of the OQAP, such as design control and document control, and each area of Plant operations shall be audited.
- 2666 18.8 ~~Supplementary to the biennial requirement to audit~~
2681 ~~safety related functions, other activities shall be~~
2847 ~~audited under the cognizance of the NSRB at the~~
3873 ~~frequencies indicated in Section 6.5.2.9 of the~~
41777 ~~Technical Specifications and the Radiological Emergency Response Plan. In addition to audits conducted under the cognizance of the NSRB, the~~

INSERT 'NEW' SECTION 18.8 AND
SECTION 18.8.1 - REFER PAGES

18-3

Rev. 17
6/94

18-3a & 18-3b. NOTE: COMMITMENT NUMBERS ABOVE ARE
APPLICABLE TO BOTH 'INSERTED' SECTIONS.

SEE
ABOVE

~~following areas shall be audited per the frequency specified in applicable regulations:~~

~~• Special Nuclear Material Accountability program~~

~~• Radiological Protection program~~

~~• Security program~~

~~• Fitness For Duty program~~

1800 18.9 During Plant modifications or other major unique
3873 activities, audits shall be scheduled as required to assure that Quality Assurance Program requirements are properly implemented.

3577 18.10 External audits shall be conducted by or for the QA
3584 Department as a method for the evaluation of
3596 procurement sources and as a post-award source verification of conformance to procurement documents. Audits conducted by other organizations (with similar orders with the same supplier), including other utilities or A/E's, may be employed as a means of post-award source verification in lieu of UE performed audits and may not necessarily audit specific items furnished to UE. These audits and surveillances shall utilize personnel qualified in accordance with this OQAM and shall be conducted in accordance with this OQAM and QA Department procedures. Commercial grade items do not require pre- or post-award audits. Similarly, items which are relatively simple and standard in design and manufacture may not require supplier qualification or post-award audits to assure their quality.

1780 18.11 Applicable elements of suppliers' quality assurance
3565 programs shall be audited (post-award) on a
3596 triennial basis. Audits generally should be
3878 initiated when sufficient work is in progress to
3872 determine whether the organization is complying with the established quality assurance provisions. Subsequent contracts or contract modifications which significantly enlarge the scope of activities by the same supplier shall be considered in establishing audit requirements. In addition, the need for a triennial audit may be precluded upon evaluation and documentation by the QA Department that the results of mini-audits performed during source verification and source surveillance activities confirm the adequacy and implementation of the supplier's QA Program.

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18.8

Supplementary to the biennial requirement to audit safety-related functions, audits of Unit activities (listed below) and Radiological Emergency Response Plan SHALL be:

- performed under the cognizance of the NSRB, and
 - conducted on a performance based frequency by the QA Department, not to exceed 24 months
- a) The conformance of Unit operation to provisions contained within the Technical Specifications and applicable license conditions;
 - b) The performance, training and qualifications of the entire Unit staff;
 - c) The results of actions taken to correct deficiencies occurring in Unit equipment, structures, systems or method of operation that affect nuclear safety;
 - d) The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50;
 - e) The Fire Protection equipment, programmatic controls, and implementing procedures utilizing either a qualified offsite licensee Fire Protection Engineer or an outside independent Fire Protection Consultant (non-Union Electric). However, an outside independent Fire Protection Consultant (non-Union Electric) SHALL be used at least every third year.
 - f) The Radiological Environmental Monitoring Program and the results thereof;
 - g) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures;
 - h) The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes;
 - i) The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring; and
 - j) Any other area of Unit operation considered appropriate by the NSRB or the Senior Vice President-Nuclear.

18.8.1 In addition to audits conducted under the cognizance of the NSRB, the following areas shall be audited per the frequency specified in applicable regulations:

- ⇒ Special Nuclear Material Accountability program
- ⇒ Radiological Protection program
- ⇒ Security program
- ⇒ Fitness-For-Duty program

OQAM

- 3565 18.12 Supplementary to audits, annual evaluations of
3566 suppliers shall be performed which take into
3596 account, as applicable: 1) the review of supplier
furnished documents such as certificates of confor-
mance, nonconformance notices, and corrective
actions; 2) results of previous source verifica-
tions, audits, and receiving inspections; 3) oper-
ating experience of identical or similar products
furnished by the same supplier; and 4) results of
audits from other sources.
- 3565 18.13 Audits shall also be conducted when: 1) significant
3872 changes are made in functional areas of the Quality
3874 Assurance Program such as significant reorganiza-
3883 tion or procedure revisions; or 2) when it is
suspected that the quality of the item is in
jeopardy due to deficiencies in the Quality Assur-
ance Program; or 3) when a systematic, independent
assessment of Program effectiveness is considered
necessary; or 4) when it is necessary to verify
implementation of required corrective action.
- 3876 18.14 Audits shall be conducted using written plans in
3878 accordance with QA Department procedures. The
3881 procedures require evaluation of work areas, activ-
ities, processes, goods, services, and the review
of documents and records for quality-related prac-
tices, procedures, and instructions to determine
the effectiveness of the implementation of the OQAP
and compliance with 10 CFR 50, Appendix B, ~~and the
Callaway Plant Technical Specifications~~. The audit
plan shall identify the audit scope, the require-
ments, the activities to be audited, organizations
to be notified, the applicable documents, the
schedule, and the written procedures or checklists
as appropriate. The audit plan and any necessary
reference documents shall be available to the audit
team members.
- 3877 18.15 An audit team consists of one or more auditors. A
Lead Auditor shall be appointed Audit Team Leader.
The Audit Team Leader shall be responsible for the
written plans, checklists, team orientation, audit
notification, pre-audit conference, audit perfor-
mance, post-audit conference, reporting, records,
and follow-up activity to assure corrective action.
Any adverse findings shall be reported in a post-
audit conference with team members and the audited
organization subject to the clarification of
Section 4.3.3 of ANSI N45.2.12 in Appendix A. When
a post-audit conference is held it shall be, to
discuss items and arrive at a general agreement on
the identification of the findings. ~~Formal audit
reports shall be prepared and submitted to the
audited organization within thirty days after the
post audit conference or last day of the audit,
whichever is later.~~

INSERT SECTION 18.15.1 -
REFER TO PAGE 18.15a

18.15.1 Formal audit reports shall be prepared and submitted within 30 days after the post-audit conference (or last day of the audit, whichever is later) to:

- the audited organization for internal audits conducted in accordance with Section 18.7, or
- the Senior Vice President-Nuclear for audits conducted under the cognizance of the NSRB in accordance with Section 18.8.

Reference 2
ULNRC-03281

LETTER FROM NRC DATED SEPTEMBER 1, 1995



UNITED STATES
NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D.C. 20540-0001

September 1, 1995

Mr. Donald F. Schnell
 Senior Vice President - Nuclear
 Union Electric Company
 Post Office Box 149
 St. Louis, MO 63166

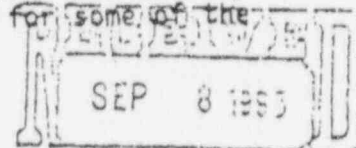
SUBJECT: CALLAWAY PLANT - TECHNICAL SPECIFICATION AMENDMENT REQUEST RELATED
 TO THE RELOCATION OF REVIEW AND AUDIT REQUIREMENTS (TAL. NO. M90017)

Dear Mr. Schnell:

By your application dated June 21, 1994, Union Electric Company requested to amend the Callaway Technical Specifications to relocate the review and audit requirements of the On-site Review Committee (ORC) and Nuclear Safety Review Board (NSRB). The specific contention that prevents the staff from issuing the requested amendment is your proposed relocation of the review and audit requirements to the Callaway Plant Final Safety Analysis Report (FSAR) and control of subsequent changes to those requirements in accordance with 10 CFR 50.59, "Changes, Tests and Experiments." The NRC staff and Union Electric have had several discussions regarding this issue and this letter documents the staff's positions.

The staff has found that the relocation of some technical specification requirements is acceptable provided that they are placed into an appropriate licensee controlled program. The requirements must be relocated to programs with adequate controls regarding future changes and provisions for NRC review if an applicable regulatory threshold is exceeded. Guidance related to the possible relocation of requirements contained in limiting conditions for operation (LCOs) was provided by the Commission's Final Policy Statement on Technical Specifications Improvements and was subsequently incorporated into a revision of 10 CFR 50.36. The staff has discussed the acceptability of relocating the existing technical specification administrative controls related to review and audit requirements in several meetings and documents, including the October 25, 1993, letter from W. Russell to the four owners group. Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans," the January 17, 1995, letter from C. Grimes to the four owners groups, and technical specification amendments issued to other licensees.

While relocated LCOs have usually depended on 10 CFR 50.59 for control of subsequent changes, the relocation of some administrative controls has relied upon regulatory requirements other than 10 CFR 50.59 in order to control changes and initiate possible NRC review. The October 25, 1993, letter to the owners groups specifically requested that they develop details for the relocation of the affected administrative controls, including the identification of the licensee-controlled documents which would receive the requirements and the associated process for change control. The Quality Assurance (QA) Plan was mentioned as a possible location for some of the



A. C. PASSWATER

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D. F. Schnell

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relocated administrative controls. Following the October 25, 1993, letter, the staff has worked with the owners groups and reached a general consensus that the review and audit requirements may be relocated to the QA Plan and changes controlled in accordance with 10 CFR 50.54(a). A letter from C. Grimes to the owners groups dated January 17, 1995, provided additional details regarding the relocation of audit functions to the QA program. This letter specifically addressed the relocation of fire protection audits and instructed the owners groups to retain current audit frequencies pending future changes to the fire protection regulations.

In related activities initiated by the staff and industry to reduce unnecessary regulatory burdens, Nuclear Energy Institute (NEI) has petitioned the NRC to revise 10 CFR 50.54(a). The petition requests that the 10 CFR 50.54(a) change control process used to determine the need for NRC review be replaced with the criteria given in 10 CFR 50.59. The petition would establish the same controls for the quality assurance program as your amendment request has proposed for the relocated review and audit frequencies. However, the NEI petition is in an early stage of the rulemaking process and the staff cannot foresee the final changes that will be incorporated into 10 CFR 50.54(a).

With respect to your application dated June 21, 1994, the staff requests that you revise your application as follows:

1. The destination of the relocated review and audit requirements should be the Callaway QA Program, FSAR Chapter 17.
2. Your revised QA Program description should be included in the supplemental submittal.
3. As part of the QA Program provided in your supplemental submittal, the audit frequency requirements of existing TS 6.5.2.9 may be conducted on a performance based frequency, not to exceed 24 months, except for the following:
 - a. Audit frequencies contained in regulations (e.g., security and emergency plans as discussed in Generic Letter 93-07)
 - b. Fire protection equipment and program implementation at least once per 12 months utilizing either qualified offsite licensee fire protection engineer or an outside independent fire protection consultant (non-Union Electric). An outside independent fire protection consultant (non-Union Electric) shall be used at least every third year (Current requirements of TS 6.5.2.9.f).

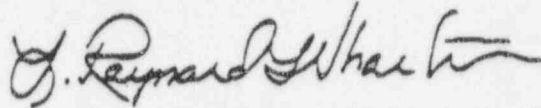
Should you choose to supplement your June 21, 1994, application and incorporate the above changes, the staff will be able to complete its review. Any changes to the relocated review and audit requirements following issuance of the amendment would be performed in accordance with 10 CFR 50.54(a), including any revisions that result from the NEI petition for rulemaking.

D. F. Schnell

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If Union Electric does not wish to incorporate these changes, please submit a letter withdrawing all or portions of the original application. If a supplement or a letter of withdrawal is not received within 45 days of receipt of this letter, the staff plans to issue an amendment addressing the administrative changes contained in the June 21, 1994, application and deny the portion related to the relocation of review and audit requirements.

Sincerely,



L. Raynard Wharton, Project Manager
Project Directorate III-3
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: See next page

Reference 3
ULNRC- 03281

MEMORANDUM OF TELECONFERENCE WITH THE NRC
DATED OCTOBER 10, 1995

TELECON

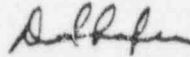
R. Wharton - NRC-PM

D. Shafer - UE

Date: 10/10/95

Subject: TS Section 6. Amendment Request (OL 1156)

Ray informed me that he had gotten a message from the technical reviewer for this change (Bill Reckley) that the NRC fire protection group has revised its position on audit frequency. Instead of the 12 month frequency for fire protection equipment and program implementation, they will now accept a 24 month performance based audit frequency. They still require the triennial outside independent fire protection consultant (non-Union Electric) audit. Ray wanted to get this information to us prior to our responding to the September 1, 1995 letter from NRC.



D. Shafer