



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 37 TO FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY  
CALLAWAY PLANT, UNIT 1  
DOCKET NO. STN 50-483

1.0 INTRODUCTION

By letter dated September 9, 1987, as supplemented by letter dated April 13, 1988, Union Electric Company (the licensee) submitted a request for changes to the Technical Specifications (TS). The amendment deletes the offsite and unit organizational charts and adds the essential aspects of organizational structure which were previously defined by the organizational charts.

In the September 9, 1987 application, the licensee initially proposed to only delete the organizational charts. However, in order to remain consistent with the Shearon Harris lead plant application for organizational charts deletion and the resultant NRC Generic Letter 88-06, "Removal of Organizational Charts from Technical Specification Administrative Control Requirements," the licensee supplemented the original application to add the essential aspects of organizational structure which were previously defined by the organizational charts.

2.0 DISCUSSION

The benefit of this proposal is that it would permit a licensee to implement changes to the structure of the offsite or onsite organizations without first having to obtain NRC approval through the issuance of a license amendment to update organization charts in TS. The following discussion is from Generic Letter 88-06.

The staff examined the regulatory requirements for administrative controls in TS provided in 10 CFR 50.36. This regulation states that administrative controls are the provisions relating to organization and management necessary to ensure operation of the facility in a safe manner. It has been the staff's experience that organization charts by themselves have been of little help in ensuring that the objectives of administrative control requirements are met. Specific operational requirements are required elsewhere in TS that bear more directly on operational safety than organization charts. As examples, the organizational element responsible for the control room command function is identified separately in TS, as are the requirements for minimum staffing under various operating conditions. The organizational management functions for independent reviews and audits, unit review and independent safety engineering groups, and shift technical advisors are specified in other TS.

In summary, many of the details shown on the onsite and offsite organization charts are not essential to the safe operation of the facility. Over the years, the staff experience with changes in the details of operating organizations has shown that organization charts can be modified in many ways while maintaining adequate operational safety. This experience has enabled the staff to distill those organizational characteristics which are important to safety. The staff finds that the only aspects of organization charts which are important to safety, are not covered by other specifications, and must remain in TS, are those conditions listed below.

- (1) A requirement that lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation.
- (2) Designation of an executive position that has corporate responsibility for overall plant nuclear safety and authority to take such measures as may be needed to ensure acceptable performance of staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- (3) Designation of a management position in the onsite organization that is responsible for overall unit operation and has control over those onsite activities necessary for safe operation and maintenance of the plant.
- (4) Designation of those positions in the onsite organization that require a senior reactor operator (SRO) or reactor operator (RO) license.
- (5) Provisions of sufficient organizational freedom to be independent of operational pressures to those individuals who perform the functions of health physics, quality assurance, and training of the operating staff.

Since the above conditions will be maintained in the TS, removal of the organization charts represents no reduction in current safety requirements. These changes will simply allow licensees to implement changes in their organization structure without obtaining NRC approval.

The licensee must ensure that the organizational information described in (1) above is incorporated in a document (Final Safety Analysis Report, Quality Assurance Plan, or other appropriate document) to be referenced in the revised TS before the amendment to remove the organization charts is proposed.

The qualifications for certain positions are currently designated by organization charts as requiring an SRO or RO license. If these requirements are not currently specified in TS outside of the organization charts (such as the minimum shift crew composition), they should be added to an appropriate specification.

Finally, the plant TS should be examined for additional references to the organization charts. Where such references are included in administrative control requirements, they must be replaced by an appropriate functional description of the requirement that was defined by the organization charts.

### 3.0 EVALUATION

The licensee's application has been reviewed by the staff. The staff finds that the licensee's application is fully consistent with the guidance provided in Generic Letter 88-06 and is, therefore, acceptable.

### 4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, this 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 impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### 5.0 CONCLUSION

The staff has concluded, based on the consideration discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

### 6.0 ACKNOWLEDGEMENT

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Dated: June 21, 1988