

ATTACHMENT 1
TECHNICAL SPECIFICATION CHANGES

ADMINISTRATIVE CONTROLS

6.2 ORGANIZATION (Continued)

UNIT STAFF

6.2.2 The Unit organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Operator shall be in the control room;
- c. An individual from the Health Physics organization[#], qualified in radiation protection procedures, shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. A site Fire Brigade of at least five members[#] shall be maintained onsite at all times. The Fire Brigade shall not include the Shift Supervisor, and the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency;
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, health physics personnel, equipment operators, and key maintenance personnel.

The amount of overtime worked by Unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12); and
- g. The Superintendent, Operations, ~~or the Assistant Superintendent, Operations,~~ Shift Supervisors, and Operating Supervisors shall hold a senior reactor operator license. The Unit Reactor Operator shall hold a reactor operator license or a senior reactor operator license.

[#]May be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

ADMINISTRATIVE CONTROLS

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- g. The Superintendent, Operations, Shift Supervisors, and Operating Supervisors shall hold a senior reactor operator license. The Unit Reactor Operator shall hold a reactor operator license or a senior reactor operator license.

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ATTACHMENT 2
SAFETY EVALUATION

SAFETY EVALUATION

This amendment application requests a revision to Technical Specification 6.2.2.g to delete the phrase "or the Assistant Superintendent, Operations." The Assistant Superintendent, Operations position has been eliminated.

The proposed change has been evaluated and determined to have no adverse impact on the ability of plant personnel to perform their responsibilities.

The proposed change to Technical Specification Section 6 does not involve an unreviewed safety question because operation of the Callaway Plant with this change would not:

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

The proposed change does not affect accident initiators or assumptions. The radiological consequences of any accident previously evaluated remain unchanged.

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

The proposed change does not create any new accident initiators nor involve any modifications or changes in the plant.

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

The proposed change does affect any safety limits or boundary or system performance.

The proposed change does not reduce the overall base of experience at the Callaway Plant nor the commitment to minimum qualifications. The duties, reporting relationships, and approval responsibilities are not altered. 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.

Given the above discussions, as well as those presented in the Significant Hazards Consideration, the proposed change does not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard.

ATTACHMENT 3
SIGNIFICANT HAZARDS EVALUATION

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This amendment application requests a revision to Technical Specification 6.2.2.g to delete the phrase "or the Assistant Superintendent, Operations." The Assistant Superintendent, Operations position has been eliminated.

The proposed change has been evaluated and determined to have no adverse impact on the ability of plant personnel to perform their responsibilities.

The proposed change to Technical Specification Table 6.2-1 does not involve a significant hazards consideration because operation of the Callaway Plant with this change would not:

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

The change does not affect accident initiators or assumptions. The radiological consequences of any accident previously evaluated remain unchanged.

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

The proposed change does not create any new accident initiators nor involve any modifications or changes in the plant.

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

The proposed change will not affect any safety limits or boundary or system performance.

The proposed change does not reduce the overall base of experience at the Callaway Plant nor the commitment to minimum qualifications. The duties, reporting relationships, and approval responsibilities are not altered. 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.

As discussed above, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any previously evaluated, or result in a significant reduction in a margin of safety. Therefore, it has been determined that the proposed change does not involve a significant hazards consideration.

ATTACHMENT 4
ENVIRONMENTAL CONSIDERATION

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This amendment application requests a revision to Technical Specification 6.2.2.g to delete the phrase "or the Assistant Superintendent, Operations." The Assistant Superintendent, Operations position has been eliminated.

The proposed amendment involves a change to the administrative controls on plant personnel located within the restricted area as defined in 10 CFR 20. Union Electric has determined that the proposed amendment does not involve:

- 1) A significant hazard consideration, as discussed in Attachment 3 of this amendment application;
- 2) A significant change in the types or significant increase in the amounts of any effluents that may be released offsite;
- 3) A significant increase in individual or cumulative occupational radiation exposure.

Accordingly the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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.