



June 27, 1997

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555-0001

Gentlemen:

ULNRC-3607

DOCKET NUMBER 50-483  
CALLAWAY PLANT  
TECHNICAL SPECIFICATION CHANGE - SECTION 6.0

- Reference: 1) ULNRC-3565 dated April 24, 1997  
2) ULNRC-3594 dated June 6, 1997

By letter dated April 24, 1997 (Reference 1) Union Electric requested an amendment to Facility Operating License NPF-30 for Callaway Plant that provides revisions to reflect necessary changes due to Donald F. Schnell's retirement and his replacement by Garry L. Randolph. As part of the amendment, parts of the Technical Specifications, Section 6.0, are revised to show that the title Senior Vice-President, Nuclear is replaced by the title, Vice-President and Chief Nuclear Officer.

Attachment 2 to Reference 1 provided a Significant Hazards Evaluation. The evaluation concluded that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration. This conclusion is based largely on the fact that the overall reporting of management positions remains the same within the Union Electric management structure and that there is no reduction in the level of management oversight in the operation of Callaway Plant.

As further discussed in Reference 2, Mr. Schnell's retirement and replacement involved an organization change that minimizes impact on the Union Electric management structure and ensures no reductions in the level of management oversight in the operation of Callaway Plant. This is supported by the fact that all of the managers who reported to Mr. Randolph continue to do so.

A001/1



June 27, 1997

Page 2

The Manager Quality Assurance, the Manager Nuclear Engineering, the Manager Licensing and Fuels, and the Manager Nuclear Services, however, continue to report to the senior executive in the Nuclear Function. Previously these managers reported to Mr. Schnell as Senior Vice-President, Nuclear, who in turn reported to the President and Chief Executive Officer of Union Electric. Now they report to Mr. Randolph, the Vice President and Chief Nuclear Officer, who in turn reports to the President and Chief Executive Officer of Union Electric.

Because these managers continue to report under the same overall management scheme and philosophy, the original conclusion of the Significant Hazards Evaluation remains valid. However, on page 2 of the Significant Hazards Evaluation (Attachment 2 to Reference 1), the paragraphs under items 1 and 2 make reference to "...the chain of authority and reporting.....remains unchanged". Because, in fact, the chain of authority is altered (VP Operations eliminated), these paragraphs are revised to state that "Within the Union Electric organizational structure, the departments reporting to the former Senior Vice-President, Nuclear now report to the Vice-President and Chief Nuclear Officer. The position of Vice-President and Chief Nuclear Officer now reports to the President & Chief Executive Officer of Union Electric, which is the same management level of reporting as the previous title, Senior Vice-President, Nuclear."

Finally, a correction is required in respect to Reference 2. On page 2 of the letter, at the end of the first paragraph, there is an incorrect reference to the Vice President and Chief Nuclear Officer who reports to the President & Chief Nuclear Officer of Union Electric. The corrected reference is to the Vice President and Chief Nuclear Officer who reports to the President & Chief Executive Officer of Union Electric.

In summary the amendment request and supporting evaluations address the areas of the Technical Specifications which are being revised. Hopefully, this additional information will be helpful in processing the amendment request. Please contact us with any further questions.

Very truly yours,



A. C. Passwater

Manager, Licensing & Fuels

DJW/jdg

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

Alan C. Passwater, of lawful age, being first duly sworn upon oath says that he is Manager, Licensing and Fuels (Nuclear) for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Alan C. Passwater  
Alan C. Passwater  
Manager, Licensing and Fuels  
Nuclear

SUBSCRIBED and sworn to before me this 27th day  
of June, 1997.

Patricia A. Reynolds



PATRICIA L. REYNOLDS  
NOTARY PUBLIC—STATE OF MISSOURI  
ST. LOUIS COUNTY  
MY COMMISSION EXPIRES DEC. 22, 2000

cc: M. H. Fletcher  
Professional Nuclear Consulting, Inc.  
19041 Raines Drive  
Derwood, MD 20855-2432

Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive  
Suite 400  
Arlington, TX 76011-8064

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Kristine M. Thomas (2)  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
1 White Flint, North, Mail Stop 13E16  
11555 Rockville Pike  
Rockville, MD 20852-2738

Manager, Electric Department  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Ron Kucera  
Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102

Don Woodlan  
TU Electric  
1601 Bryan Street  
Dallas, TX 75201-3411

Pat Nugent  
Pacific Gas & Electric  
Regulatory Services  
P.O. Box 56  
Avila Beach, CA 93424