



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 32 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 December 15, 1987, Union Electric Company (the licensee) submitted a request for changes to Section 6 of the plant Technical Specifications.

2.0 EVALUATION

2.1 Figure 6.2-1, Offsite Organization, would be revised to:

- (1) Consolidate the Licensing and Fuels Department under the newly created position, Manager, Licensing and Fuels. This consolidated department reports directly to the General Manager, Engineering.
- (2) The Manager, Nuclear Engineering, position is now located at the Callaway Site.
- (3) The Assistant Manager, Nuclear Engineering, position is eliminated and the Superintendent, Design Control, and the Superintendent, Systems Engineering, report directly to the Manager, Nuclear Engineering.
- (4) A new position, Superintendent, Project Engineering, is established which will report directly to the Manager, Nuclear Engineering.
- (5) Quality Control (QC) inspectors, responsible for Non-Destructive Examination (NDE) and In-Service Inspection (ISI), will report through the Supervisor, Performance and ISI, to the Superintendent, Systems Engineering.
- (6) The Superintendent, Administration Services, will no longer report to the Assistant to the Vice President, but will report to the Manager, Operations Support. This change is also shown on revised Figure 6.2-2.

The licensee states that these changes are designed to improve interdepartmental responsiveness and efficiency by providing better coordination of the engineering staff and enhancing the engineering support of Callaway Plant. These changes do not reduce the overall experience base nor reduce commitments to minimum qualifications.

The staff finds that these changes will not reduce the level of engineering support or the experience base; however, they should provide for improved coordination of engineering support of plant operations. The revised offsite organization is in accordance with the guidance in Section 13.1.1 of the Standard Review Plan, NUREG-0800, and is acceptable.

2.2 Figure 6.2-2, Unit Organization, is revised to:

- (1) Establish the position of Assistant Manager, Work Control, which reports to the Manager, Callaway Plant. Reporting to the Assistant Manager, Work Control, is the Superintendent, Planning and Scheduling, the Supervisor, Quality Control (QC), and the Supervisor, Outages. Consolidation of Planning and Scheduling with the Outages Department provides for enhanced coordination of plant testing and modification activities. The QC Department is being reassigned from the Compliance Department which is addressed below.
- (2) Consolidate the Chemistry and Radwaste organization under the Superintendent, Chemistry and Radwaste, which will continue to report to the Assistant Manager, Technical Services.
- (3) Establish the position of Supervisor, Safety, which reports to the Assistant Manager, Technical Services. This group addresses occupational safety and health issues, which were previously a responsibility of the Compliance Department.
- (4) The Assistant Manager, Support Services, position is eliminated and the Superintendent, Training, and the Superintendent, Security, report directly to the Manager, Operations Support.
- (5) As previously discussed regarding Figure 6.2-1, the Superintendent, Administration Services, reports to the Manager, Operations Support, rather than the Assistant to the Vice President.
- (6) The Compliance Department is eliminated, and its responsibilities are reassigned as follows:
 - (a) The Compliance Group reports to the Manager, Licensing and Fuels, as a Site Licensing Group.
 - (b) The Quality Control group, responsible for plant modification/maintenance work, reports to the Assistant Manager, Work Control.
 - (c) The Quality Control personnel, responsible for NDE/ISI, report to Nuclear Engineering as discussed regarding Figure 6.2-1.

- (d) Surveillance Tracking is performed within Nuclear Operations.
- (e) Fire Protection reports to Nuclear Engineering.
- (f) Personnel Safety reports to the Assistant Manager, Technical Services, as previously discussed.

The licensee states that these changes are designed to improve interdepartmental responsiveness and efficiency by providing better coordination and communication. These changes do not reduce the overall experience base nor reduce commitments to minimum qualifications.

The staff finds that these changes will not reduce the level of operations, technical and maintenance support for the operation of Callaway plant. These changes should, however, improve interdepartmental responsiveness and efficiency. The revised unit organization is in accordance with the guidance in Sections 13.1.2-13.1.3 of the Standard Review Plan, NUREG-0800, and is acceptable.

2.3 Technical Specification 6.5.1 is revised to include the Manager, Nuclear Engineering, and the newly created position, Assistant Manager, Work Control, as members of the On-Site Review Committee. The licensee states that the addition of the Manager, Nuclear Engineering, provides a higher level of management attention and engineering perspective to the On-Site Review Committee. The Assistant Manager, Work Control, is responsible for planning and scheduling of outages, surveillance testing, and plant modifications and therefore provides a valuable role in reviews conducted by the On-Site Review Committee.

The staff finds that these changes are consistent with the revisions to the organization and should provide the On-Site Review Committee with enhanced technical expertise and management oversight. The revised committee membership is consistent with the guidance in Section 13.4 of the Standard Review Plan, NUREG-0800, and is acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes an inspection or surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously published a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this 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.

4.0 CONCLUSION

The staff has concluded, based on the considerations 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.

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Dated: January 29, 1988