

From: Chawla, Mahesh
Sent: Tuesday, July 21, 2020 12:32 PM
To: Elwood, Thomas B
Subject: Draft Request for Additional Information - Callaway Plant, Unit 1 - License Amendment Request - Revision to Technical Specification (TS) 5.3.1 and Deletion of TS 5.3.1.1 and 5.3.1.2 - EPID L-2020-LLA-0046

Dear Mr. Elwood,

On March 10, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20070R105), Ameren Missouri (Union Electric Company) submitted a license amendment request (LAR) for Callaway Plant, Unit 1. The proposed amendment would revise Technical Specification (TS) Administrative Control (AC) 5.3.1, under TS 5.3, "Unit Staff Qualifications," and delete TS AC 5.3.1.1 and 5.3.1.2 in order to remove details specified for the qualifications of certain positions within the unit staff, since such details are already and appropriately specified in the Operating Quality Assurance Manual (OQAM). The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the application and has determined that the following additional information is required in order to complete the review of the subject OQAM.

REQUEST FOR ADDITIONAL INFORMATION

ARCB-RAI 1

Regulatory Basis

10 CFR 50.120(b)(2), requires, that the training program must be derived from a systems approach to training as defined in 10 CFR 55.4, and must provide for the training and qualification for numerous nuclear power plant positions, including radiation protection and chemistry technicians.

10 CFR 55.4, the definition of systems approach to training, states that the training program should include five elements, including a systematic analysis of the jobs to be performed and training design and implementation based on the learning objectives.

10 CFR 50.54(a)(4) requires that changes to the quality assurance program that reduce commitments, must be submitted to the NRC and receive NRC approval prior to implementation.

Background

In a letter dated March 10, 2020 (ML20070R105) the licensee proposes to revise technical specification (TS) 5.3.1 and delete TS 5.3.1.1 and 5.3.1.2. These TS specify the unit staff qualification requirements. The revised technical specification would refer to the Operating Quality Assurance Manual (OQAM) for the minimum qualification requirements of unit staff, which in turn references FSAR Section 13.1. In Section 3.2 of the LAR, "Deletion of Exceptions to ANSI/ANS 3.1-1978 from TS," it quotes the OQAM, which states that personnel responsible for directing or supervising the conduct of safety-related preoperational and startup tests and for

review and approval of safety-related preoperational and startup test procedures or results must meet the qualifications of Regulatory Guide 1.8. In addition, it states that supplemental Radiation Protection and I&C technicians and QC inspectors shall meet the education and experience requirements of ANSI/ANS 3.1-1978 when performing safety-related activities.

However, the term “safety-related” is normally associated with tasks that ensure reactor safety and protection of the public from significant radiological releases. For example, 10 CFR 50.2 indicates that safety-related SSCs are those associated with ensuring; 1) the integrity of the reactor coolant pressure boundary; 2) the capability to shut down the reactor and to maintain the reactor in safe shutdown and; 3) to prevent or mitigate the consequences of accidents which could result in offsite exposures comparable to the limits in 10 CFR 50.34(a)(1) and 10 CFR 100.11). Many of the tasks performed by radiation protection staff and technicians, such as radiological surveys, radioactive material control, and personnel monitoring, are often not directly associated with ensuring reactor safety or preventing significant releases associated with reactor accidents and therefore are not considered safety related. However, many of these tasks are required in order to meet radiation exposure and radioactivity control requirements and therefore must be performed by appropriately qualified staff.

ARCB-RAI-1A

Please provide additional information to clarify what is meant by safety-related tests and activities, as it relates to radiation protection and radwaste managers, supervisors, and technicians.

ARCB-RAI-1B

Please provide additional information to clarify what types of activities radiation protection and radwaste managers, supervisors, and technicians are required to be qualified to perform and what types of radiation protection and waste management activities, if any, can be performed by unqualified individuals. In addition, please specify if there are any changes to the qualification requirements for radiation protection staff and technicians from what was previously required by the technical specifications.

ARCB-RAI 2

Regulatory Basis

10 CFR 50.120(b)(2), requires that the training program must be derived from a systems approach to training as defined in 10 CFR 55.4, and must provide for the training and qualification for numerous nuclear power plant positions, including radiation protection and chemistry technicians.

10 CFR 55.4, the definition of systems approach to training, states that the training program should include five elements, including a systematic analysis of the jobs to be performed and training design and implementation based on the learning objectives.

10 CFR 50.54(a)(4) requires that changes to the quality assurance program that reduce commitments, must be submitted to the NRC and receive NRC approval prior to implementation.

Background

In a letter dated March 10, 2020 (ML ML20070R105) the licensee proposes to revise technical specification (TS) 5.3.1 and delete TS 5.3.1.1 and 5.3.1.2. The current TS specify unit staff qualification requirements, by referring to ANSI/ANS 3.1-1978 and referring to exceptions. The revised technical specification would refer to the Operating Quality Assurance Manual (OQAM) for the minimum qualification requirements of unit staff. The licensee indicates that the reason for the change is to reduce the regulatory burden associated with maintaining duplicate information in licensing documents that are subject to separate change processes. In Section 3.2 of the LAR, "Deletion of Exceptions to ANSI/ANS 3.1-1978 from TS," it copies text from the OQAM. The text, in part, refers to FSAR Section 13.1. FSAR Section 13.1 appears to provide different qualification requirements than are required by the current TS, as described as follows;

TS 5.3.1.1 specifies that operating supervisors should be qualified to ANSI/ANS 3.1-1981, as endorsed by RG 1.8, Revision 2, with the exceptions listed in the TS. ANSI/ANS 3.1-1981, specifies that the supervisors should have four years of experience in the craft or discipline they supervise. Elsewhere in ANSI/ANS 3.1-1981, it distinguishes between chemistry (including radiochemistry) and radiation protection, both of which have different supervisors and management qualification requirements. Yet FSAR Section 13.1, Section 13.1.3.1.18, specifies that the radiation protection supervisor and radwaste operations supervisor must have a minimum of four years of experience in applied health physics, chemistry, radiochemistry, or radwaste activities. This implies that four years of experience working in chemistry is sufficient qualification to be radiation protection supervisor or radwaste operations supervisor and vice versa.

Similarly, the original TS 5.3.1 required that radiation protection technicians be qualified in accordance with ANSI/ANS 3.1-1978. ANSI/ANS 3.1-1978, Section 4.5.2, indicates that technicians shall have three years of working experience in their specialty of which one year should be related technical training. Elsewhere in ANSI/ANS 3.1-1978, it distinguishes differences between chemistry (and radiochemistry) and radiation protection, both of which have different supervisors and management qualification requirements. However, in FSAR Section 13.1.3.1.19 it specifies that radiation protection technicians and radwaste trainer operator must have three years of radiation or chemistry experience. This implies that three years of chemistry experience is sufficient qualification for a radiation protection technician and radwaste trainer operator and vice versa. In addition, there is no mention of one year of related technical training in Section 13.1.3.1.19.

In Section 13.1.3.1 of the FSAR, other unique specialty qualifications are provided individually and not grouped together like radiation protection and chemistry.

As described in the examples above, revising TS 5.3.1, deleting TS 5.3.1.1 and 5.3.1.2, appear to not only eliminate duplicative requirements, but also appear to alter the qualification requirements for the positions described above.

ARCB-RAI-2A

Please provide additional information to clarify if there are any changes to qualification requirements from the current TS for the positions of radwaste supervisor and radwaste technicians.

ARCB-RAI-2B

As described above, Sections 13.1.3.1.18 and 13.1.3.1.19 appear to indicate that experience in chemistry can be credited for radiation protection qualifications and that radiation protection experience can be credited for chemistry qualification. Please clarify if this is the intent. If so, please provide additional information as to how experience in the area of chemistry is adequate to qualify for radiation protection positions and vice versa.

Please let us know if you would like to have a clarification call with the NRC staff. If no clarification call is needed, please provide your response to the requested information on docket within 30 days of the receipt of this email. Thanks

Sincerely,

Mahesh Chawla, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
ph: 301-415-8371
Docket No. 50-483

DORL/LPL4/PM	DORL/LPL4/BC
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7/20/20	7/21/20

Hearing Identifier: NRR_DRMA
Email Number: 686

Mail Envelope Properties (MN2PR09MB5355F3FD183A6B4F992D9D01F1780)

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Sent Date: 7/21/2020 12:32:02 PM

Received Date: 7/21/2020 12:32:02 PM

From: Chawla, Mahesh

Created By: Mahesh.Chawla@nrc.gov

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Tracking Status: None

Post Office: MN2PR09MB5355.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	9830	7/21/2020 12:32:02 PM

Options

Priority: Normal

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date: