



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 24, 2021

Mr. Fadi Diya
Senior Vice President and
Chief Nuclear Officer
Ameren Missouri
Callaway Energy Center
8315 County Road 459
Steedman, MO 65077

SUBJECT: CALLAWAY PLANT, UNIT NO. 1 - ISSUANCE OF AMENDMENT NO. 225 - TO REVISE TECHNICAL SPECIFICATION ADMINISTRATIVE CONTROL 5.3.1 TO REMOVE DETAILS SPECIFIED FOR THE QUALIFICATION OF CERTAIN POSITIONS WITHIN THE UNIT STAFF (EPID L-2020-LLA-0046)

Dear Mr. Diya:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 225 to Renewed Facility Operating License No. NPF-30 for the Callaway Plant, Unit No. 1. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated March 10, 2020, as supplemented by letters dated September 2, 2020, and December 22, 2020.

The amendment revises TS Administrative Control (AC) 5.3.1, under TS 5.3, "Unit Staff Qualifications," and deletes TS AC 5.3.1.1 and TS AC 5.3.1.2 to remove details specified for the qualification of certain positions within the unit staff that are already specified in the Operating Quality Assurance Manual.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Mahesh L. Chawla, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosures:

1. Amendment No. 225 to NPF-30
2. Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT NO. 1

DOCKET NO. 50-483

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 225
License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Union Electric Company (UE, the licensee), dated March 10, 2020, as supplemented by letters dated September 2, 2020, and December 22, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-30 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan*

The Technical Specifications contained in Appendix A, as revised through Amendment No. 225 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective as of its date of issuance, and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennifer L. Dixon-Herrity, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-30 and
the Technical Specifications

Date of Issuance: March 24, 2021

ATTACHMENT TO LICENSE AMENDMENT NO. 225

CALLAWAY PLANT, UNIT NO. 1

RENEWED FACILITY OPERATING LICENSE NO. NPF-30

DOCKET NO. 50-483

Replace the following pages of Renewed Facility Operating License No. NPF-30 and the Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License

REMOVE

INSERT

-3-

-3-

Technical Specifications

REMOVE

INSERT

5.0-4

5.0-4

- (3) UE, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (4) UE, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source of special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) UE, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

UE is authorized to operate the facility at reactor core power levels not in excess of 3565 megawatts thermal (100% power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan*

The Technical Specifications contained in Appendix A, as revised through Amendment No. 225 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Environmental Qualification (Section 3.11, SSER #3)**

Deleted per Amendment No. 169.

* Amendments 133, 134, & 135 were effective as of April 30, 2000 however these amendments were implemented on April 1, 2000.

** The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications for the comparable position(s) addressed in the standard(s) that is referenced in the Callaway Plant Operating Quality Assurance Manual (OQAM), with exceptions specified in the OQAM.

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 225 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-30

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT NO. 1

DOCKET NO. 50-483

1.0 INTRODUCTION

By letter dated March 10, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20070R105), supplemented by letters dated September 2, 2020 and December 22, 2020 (ADAMS Accession Nos. ML20246G738 and ML20357A082, respectively), Union Electric Company, dba Ameren Missouri (the licensee), submitted a license amendment request (LAR) for Callaway Plant, Unit No. 1 (Callaway).

The amendment would revise Technical Specification (TS) Administrative Control (AC) 5.3.1, under TS 5.3, "Unit Staff Qualifications," and would delete TS AC 5.3.1.1 and TS AC 5.3.1.2 to remove details specified for the qualification of certain positions within the unit staff that are already specified in the Operating Quality Assurance Manual (OQAM).

Currently, TS 5.3 states in part:

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualification of [American National Standards Institute/American Nuclear Society] ANSI/ANS 3.1-1978 [Selection, Qualification, and Training of Personnel for Nuclear Power Plants], with the following exceptions:

- 5.3.1.1 Shift Managers, Operating Supervisors, Reactor Operators, and Shift Technical Advisors shall meet or exceed the qualifications of ANSI/ANS 3.1-1981 as endorsed by Reg. Guide 1.8, Revision 2, with the same exceptions as contained in the current revision to the Operator Licensing Examiner Standards, NUREG-1021, ES-202.
- 5.3.1.2 The Radiation Protection Manager shall be a supervisor with line responsibility for operational health physics who meets or exceeds the qualifications of USNRC [U.S. Nuclear

Regulatory Commission (NRC, the Commission)] Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager. The Radiation Protection manager will be designated by the plant manager.

These exceptions to ANSI/ANS 3.1-1978, that were identified in TS AC 5.3.1.1 and TS AC 5.3.1.2, were also identified in the OQAM Appendix A, which contained commitments to Regulatory Guide (RG) 1.8, Revision 2, "Qualification and Training of Personnel for Nuclear Power Plants," dated April 1987 (ADAMS Accession No. ML003739928). Given the regulatory burden of maintaining duplicate information in licensing documents that are subject to separate change processes (i.e., 10 CFR 50.90 for TSs and 10 CFR 50.54(a) for the OQAM), the licensee proposed to delete TS AC 5.3.1.1 and TS AC 5.3.1.2, and TS AC 5.3.1 would be modified to state:

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications for the comparable positions(s) addressed in the standard(s) that is referenced in the Callaway Plant Operating Quality Assurance Manual (OQAM), with exceptions specified in the OQAM.

The licensee provided a page markup reflecting the proposed change to TS AC 5.3.1 and deletion of TS AC 5.3.1.1 and TS AC 5.3.1.2.

Currently, the OQAM commitment states:

Ameren Missouri complies with the recommendations of this Regulatory Guide [Regulatory Guide 1.8, Revision 2] with the following clarifications and exceptions:

Revision 1, dated 9/75 [September, 1975], applies to the position of Radiation Protection Manager only, in accordance with the Callaway Plant Technical Specifications. For the position of Radiation Protection Manager only, Regulatory Guide 1.8, Revision 1, September, 1975 is clarified by U.S. NRC HPOS-020, Clarification of Regulatory Guide 1.8 on Qualification of Radiation Protection Manager.

The experience, training, and education requirements for the positions of Shift Manager, Operating Supervisor, and Reactor Operator, and personnel fulfilling the duties of Shift Technical Advisor shall meet or exceed the requirements and recommendations of ANSI/ANS 3.1-1981 as endorsed by the Regulatory Guide 1.8, Revision 2, with the same exceptions as contained in the current revision to the Operating Licensing Examiner Standards, NUREG-1021, ES-202.

For all other positions, qualifications and training shall comply with ANSI/ANS 3.1-1978 as clarified below:

Refer to Callaway SA FSAR [Site Addendum Final Safety Analysis Report] Section 13.1 for a discussion of the qualifications of personnel responsible for plant operation support.

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 met the qualifications of the Regulatory Guide, but were not required to be certified.

Ameren Missouri may use additional Ameren employees or contract personnel to augment the unit staff. These groups include, but are not limited to, Ameren personnel from outside Nuclear Generations as well as supplemental Radiation Protection and I&C [instrumentation and controls] technicians and QC [quality control] inspectors. When used to perform safety-related activities, these personnel shall meet the education and experience requirements of ANSI/ANS 3.1-1978 for equivalent positions or specified education and experience requirements for non-equivalent positions. As an alternative, these personnel can be qualified for assigned tasks either by Ameren Missouri through its systematic approach to training or by Vendors with Ameren Missouri approved training and qualification programs. Inspection, examination and testing personnel shall meet the requirements for certification as inspection, examination or testing personnel as set forth in Ameren Missouri's commitment to ANSI N45.2.6-1978 given elsewhere in this Appendix.

With regard to Section 5.6 of ANSI/ANS 3.1-1978 titled Documentation: Ameren Missouri shall maintain records in accordance with and to meet the requirements of OQAM Section 17 and ANSI N45.29.9 as specified herein.

The licensee also proposed a conforming change to the OQAM to remove the reference to TS AC 5.3.1, by deleting the phrase, "in accordance with the Callaway Technical Specifications." The paragraph in the OQAM containing the deleted phrase is reworded as follows:

Revision 1, dated 9/75 [September, 1975], applies to the position of Radiation Protection Manager only. For the position of Radiation Protection Manager only, Regulatory Guide 1.8, Revision 1, September, 1975 is clarified by USNRC HPOS-020, Clarification of Regulatory Guide 1.8 on Qualification of Radiation Protection Manager.

The supplemental letters dated September 2, 2020, and December 22, 2020, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on May 5, 2020 (85 FR 26731).

2.0 REGULATORY EVALUATION

The NRC's regulatory requirements related to TSs and nuclear power plant personnel training and qualifications are set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, "Technical specifications," and 10 CFR 50.120, "Training and qualification of nuclear power plant personnel." Specifically, 10 CFR 50.36(c)(5) provides the requirements for the content of the administrative controls necessary to ensure safe operation of the facility. The regulations in 10 CFR 50.120 require training and qualification for personnel to operate and maintain the facility in a safe manner in all modes of operation.

Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, provides the regulatory requirements for quality assurance programs. The regulations in 10 CFR 50.54, "Conditions of licenses," paragraph (a), provide the regulatory requirements regarding changes to quality assurance programs. Paragraph 50.54(a)(3) of 10 CFR states, in part, that:

Each licensee described in [10 CFR 50.54(a)(1)] may make a change to a previously accepted quality assurance program description included or referenced in the Safety Analysis Report without prior NRC approval, provided the change does not reduce the commitments in the program description as accepted by the NRC. Changes to the quality assurance program description that do not reduce the commitments must be submitted to the NRC in accordance with the requirements of [10 CFR] 50.71(e).

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

RG 1.8, Revision 2, describes an acceptable method for complying with those portions of the NRC's regulations regarding the training and qualification of nuclear power plant personnel.

NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995 (ADAMS Accession No. ML031110271), provides NRC guidance for relocating requirements in the administrative controls section of TSs in cases where adequate controls are provided by other methods. AL 95-06 states, in part, that "review of license amendments related to the relocation of the procedure review processes can be facilitated by licensee references to an existing quality assurance plan commitment. . . ." AL 95-06 notes that the quality assurance program is a logical candidate for such relocations due to the controls imposed on the quality assurance program by regulations (e.g., 10 CFR 50, Appendix B, and 10 CFR 50.54(a)), and the existence of NRC-approved quality assurance plans and commitments to industry quality assurance standards.

3.0 TECHNICAL EVALUATION

3.1 Quality Assurance Program Description and TS 5.3.1 Modifications Evaluation

The NRC staff evaluated the licensee's proposed TS deletions in accordance with the regulatory requirements in 10 CFR 50.36, 10 CFR 50.120, and the guidance contained in AL 95-06. The licensee does not consider the request to be a reduction in commitment. Since TS AC 5.3.1 is modified to require each member of the unit staff to meet or exceed the minimum qualifications for the comparable positions(s) addressed in the standard(s) referenced in the Callaway OQAM, and the OQAM contains the same requirements as the requirements that are deleted by the removal of TS AC 5.3.1.1 and 5.3.1.2, the NRC staff confirms that the requested modifications are not reductions in commitment.

Based on the above, the NRC staff concludes that the existing guidance in RG 1.8, Revision 2, and the requirements of 10 CFR 50.36 and 10 CFR 50.120 will continue to be met, and that the proposed changes are consistent with the guidance in AL 95-06. In addition, the proposed change to TS AC 5.3.1, to reference the OQAM, ensures that any future changes in commitment for requirements to unit staff qualification standards within the OQAM will need to

be reviewed and approved by the NRC staff in accordance with 10 CFR 50.54(a). Therefore, the NRC staff finds this change acceptable.

3.2 Radiation Protection Evaluation

The NRC staff reviewed the licensee's changes proposed in the LAR as they relate to the training and qualification of plant radiation protection positions in accordance with relevant requirements and guidance, as applicable, including 10 CFR 50.120 and RG 1.8, Revision 2. In the LAR, the licensee proposed to revise TS AC 5.3.1 to refer to the OQAM for qualification of unit staff. Prior to the LAR, TS AC 5.3.1 referred to ANSI/ANS 3.1-1978 for qualification requirements with a few specific exceptions referenced in the TS.

Although there are no regulatory requirements that would prohibit the TS from referring to the OQAM for the qualification of unit staff, the proposed changes described in the LAR would demonstrate that the training and qualification of plant staff will continue to comply with NRC requirements in 10 CFR 50.120. The regulations in 10 CFR 50.120 require, in part, that the training program must incorporate the instructional requirements necessary to provide qualified personnel to operate and maintain the facility in a safe manner in all modes of operation. Therefore, the NRC staff reviewed the LAR to ensure that with the changes, adequate training and qualification criteria remain in place for the positions of director of radiation protection (referred to as the radiation protection manager in RG 1.8, Revision 2), radiation protection and radwaste supervisors, and radiation protection technician and radwaste trainer operator.

In Section 3.2 of the LAR, "Deletion of Exceptions to ANSI/ANS 3.1-1978 from TS," the licensee provided text from the OQAM that indicates that RG 1.8, Revision 1, dated September 1975, as clarified by USNRC HPPOS-020, "Clarification of RG 1.8 on Qualification of Radiation Protection Manager" (ADAMS Accession No. ML103420211), provides the qualification criteria for the position of radiation protection manager. The NRC staff finds this text referenced from the OQAM to be consistent with the Callaway SA FSAR Section 13.1.3 for the position of radiation protection manager and consistent with HPPOS-020.

In Section 3.2 of the LAR, the licensee also stated 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 RG 1.8. In addition, the licensee stated 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. Many of the responsibilities 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, may not be considered to be "safety-related" activities. Nevertheless, many of these responsibilities are required in order to meet radiation exposure and radioactivity control requirements in accordance with 10 CFR Part 20, "Standards for Protection Against Radiation," and therefore, must be performed by appropriately qualified staff.

By supplemental letter dated September 2, 2020, in response to the NRC staff's request for additional information (RAI), the licensee explained that when they refer to "safety-related" activities in the LAR, the characterization is simply an extension of the language used in RG 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, dated

February 1978 (ADAMS Accession No. ML003739995). The licensee stated that this clarification also applies to "Procedures for Control of Radioactivity (for limiting materials released to the environment and limiting personnel exposure)," including "Radiation Protection Procedures," in Appendix A of RG 1.33. The response also provided a list of activities that would be required to be performed or supervised by a qualified individual, which includes radiation protection activities, such as radiation surveys and personnel monitoring, and the sampling and monitoring of radioactive material. Since the licensee clarified that radiation protection related activities and procedures for control of radioactivity need to be performed by individuals appropriately qualified in radiation protection (or individuals being instructed and qualified under the supervision of a qualified individual), the NRC staff finds the response to be acceptable.

In Section 3.2 of the LAR, for the positions of radiation protection supervisor, radwaste supervisor, radiation protection technician, and radwaste trainer operator, the licensee copied text from the OQAM, which, in part, refers to the Callaway SA FSAR, Section 13.1. The NRC staff found that FSAR Section 13.1 appears to provide different qualification requirements than those required by the current TS. The current TS AC 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 4 years of experience in the craft or discipline they supervise. ANSI/ANS 3.1-1981 distinguishes between chemistry (including radiochemistry) and radiation protection, both of which have different supervisors and management qualification requirements. However, FSAR Section 13.1.3.1.18 specifies that the radiation protection supervisor and radwaste operations supervisor must have a minimum of 4 years of experience in applied health physics, chemistry, radiochemistry, or radwaste activities. The NRC staff determined that without distinguishing between the 4 years of work experience requirements for chemistry and radiation protection in the FSAR, it appears to imply that 4 years of experience working in chemistry would be sufficient qualification to be radiation protection supervisor or radwaste operations supervisor and vice versa. Therefore, the proposed change appears to change the qualification requirements from what was originally required by the TS. It was also unclear how the proposed change meets the requirements of 10 CFR 50.120, which requires that the training program must incorporate the instructional requirements necessary to provide qualified personnel to operate and maintain the facility in a safe manner in all modes of operation.

Similarly, the original TS AC 5.3.1 requires 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 3 years of working experience in their specialty, of which 1 year should be related to technical training. ANSI/ANS 3.1-1978 listed chemistry (and radiochemistry) and radiation protection separately. However, FSAR Section 13.1.3.1.19 specifies that the radiation protection technician and the radwaste trainer operator must have 3 years of radiation or chemistry experience. This appears to imply that 3 years of chemistry experience is sufficient qualification for a radiation protection technician and radwaste trainer operator and vice versa. In addition, FSAR Section 13.1.3.1.19 does not mention requirements for 1 year of related technical training. Since 10 CFR 50.120(b)(2) specifies radiological protection technician and chemistry technician separately in the categories of personnel that need to be trained, the NRC staff determines that the acceptability of these two positions to having interchangeable training criteria needs to be distinguished in the FSAR.

In response to an NRC staff RAI by supplemental letter dated December 22, 2020, the licensee proposed to revise FSAR Sections 13.1.3.1.18 and 13.1.3.1.19 to list the individual qualification criteria for all of the positions (i.e., chemistry supervisor, radiation protection supervisor, and

radwaste operations supervisor, chemistry technician, radiation protection technician, and radwaste trainer operator) separately. Since the proposed change clarifies that experience and technical training must be appropriate for each of the specified positions, the NRC staff finds that it is consistent with ANSI/ANS 3.1-1978.

Based on the above evaluation, the NRC staff finds that the proposed revision to TS AC 5.3.1 to be acceptable in meeting the training and qualification requirements in 10 CFR 50.120. In addition, revised TS AC 5.3.1 continues to meet 10 CFR 50.36(c)(5) by providing controls necessary to assure operation of the facility in a safe manner.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Missouri State official was notified of the proposed issuance of the amendment on February 16, 2020. On March 4, 2021, the State official confirmed that the State of Missouri had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the 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 the amendment.

6.0 CONCLUSION

The Commission 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, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: D. Zhang
E. Stutzcage

Date: March 24, 2021

SUBJECT: CALLAWAY PLANT, UNIT NO. 1 - ISSUANCE OF AMENDMENT NO. 225 - TO REVISE TECHNICAL SPECIFICATION ADMINISTRATIVE CONTROL 5.3.1 TO REMOVE DETAILS SPECIFIED FOR THE QUALIFICATION OF CERTAIN POSITIONS WITHIN THE UNIT STAFF (EPID L-2020-LLA-0046) DATED MARCH 24, 2021

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