

Callaway Plant

June 9, 2021

ULNRC-06667

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

> 10 CFR 50.54 10 CFR 50.71 10 CFR Part 72

Ladies and Gentlemen:

DOCKET NUMBER 50-483 and 72-1045 CALLAWAY PLANT UNIT 1 UNION ELECTRIC CO. RENEWED FACILITY OPERATING LICENSE NPF-30 OPERATING QUALITY ASSURANCE MANUAL (OQAM) REVISION 35

References:

- 1. Ameren Missouri Letter ULNRC-06539, "Operating Quality Assurance Manual (OQAM) Revision 34," dated October 24, 2019.
- 2. Ameren Missouri Letter ULNRC-06562, "Operating Quality Assurance Manual (OQAM) Interim Revision 34a," dated January 23, 2020.
- 3. Ameren Missouri Letter ULNRC-06588, "Operating Quality Assurance Manual (OQAM) Interim Revision 34b," dated July 8, 2020.

Furnished herewith is OQAM Revision 35 pursuant to the requirements of 10 CFR 50.54, 10 CFR 50.71, and 10 CFR Part 72. The OQAM has been revised to incorporate changes since the last docketed revision transmitted via Reference 1.

The following are provided as attachments to this letter:

- 1. Description and Justification for Changes to the OQAM
- 2. OQAM Interim Revision 34c mark-up, identifying changes through the use of strikeovers and inserts
- 3. Updated pages which constitute OQAM Revision 35

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Revision 35 incorporates OQAM Change Notices (CNs) 18-001, 20-001, 20-002 and 21-001. The changes in this revision include:

- OQAMCN 18-001 removed the list of specific conditions that are examples of Significant Conditions Adverse to Quality (SCAQs) and adopted a definition of a SCAQ from the American Society of Mechanical Engineers (ASME) NQA-1-2008, "Quality Assurance Requirements for Nuclear Facility Applications."
- OQAMCN 20-001 allows a 25% grace period to audit and survey expiration dates during national emergencies provided the justification for the extension is documented.
- OQAMCN 20-002 incorporates an administrative change that removes the words "in accordance with the CEC Technical Specifications" from the description regarding Callaway Energy Center's (CEC's) compliance with RG 1.8, Qualification and Training of Personnel for Nuclear Power Plants, Rev 2. This is a conforming change due to Technical Specification Amendment 225 approved March 24, 2021.
- OQAMCN 21-001 incorporated NEI 14-05A, Rev 1 for use of the ILAC process based on ISO/IEC 17025:2017.

OQAMCN 18-001 was submitted to the NRC for approval as it involved a reduction in commitment (Reference 2, ADAMS Accession No. ML20028E064). This OQAMCN was approved by the NRC on June 8, 2020 (ref. ADAMS Accession No. ML20141L745).

OQAMCN 20-001 was submitted to the NRC for approval as it involved a reduction in commitment (Reference 3, ADAMS Accession No. ML20190A195). This OQAMCN was approved by the NRC on August 6, 2020 (ref. ADAMS Accession No. ML20216A681).

Change Notices 20-002 and 21-001 were reviewed internally and determined to not represent reductions in commitment to the Operating Quality Assurance Program as previously accepted by the NRC. The OQAM continues to maintain focus on activities affecting quality, consistent with importance to safety, including compliance to 10 CFR 50 Appendix B requirements.

All of the above OQAMCNs are reflected in the Interim OQAM Rev 34c provided in Attachment 2.

This letter does not convey any new commitments.

If there are any questions, please contact Hrach Minassian at 573-220-9213.

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I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

F. M. Diya Senior Vice President and Chief Nuclear Officer

Executed on: <u>6/9/2021</u>

HKM/MNF/mlp

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cc:

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Director

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