

ENCLOSURE 10

License Amendment Request

**Callaway Unit No. 1
Renewed Facility Operating License NPF-30
NRC Docket No. 50-483**

**Revise Technical Specifications to Adopt Risk-Informed
Completion Times TSTF-505, Revision 2, "Provide Risk-Informed
Extended Completion Times – RITSTF Initiative 4b"**

Program Implementation

1.0 INTRODUCTION

Section 4.0, Item 11 of the NRC Final Safety Evaluation (Reference 1) for NEI 06-09-A, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines", Revision 0 (Reference 2), requires that the license amendment request (LAR) provide a description of the implementing programs and procedures regarding plant staff responsibilities for the Risk Managed Technical Specifications (RMTS) Implementation, and specifically discuss the decision process for Risk Management Actions (RMA) implementation during a Risk-Informed Completion Time (RICT). Several procedures and processes are detailed in other enclosures that are not repeated in this enclosure addressing Probabilistic Risk Assessment (PRA) Model Update (Enclosure 7), Cumulative Risk Assessment Monitoring Program (Enclosure 11) and Risk Management Actions (Enclosure 12).

This enclosure provides a description of the implementing programs and the administrative controls and procedures regarding the plant staff responsibilities for the RICT Program, including training of plant personnel, and specifically discusses the decision process for RMA implementation during extended Completion Times (CT).

2.0 RICT PROGRAM AND PROCEDURES

A program description and implementing procedures will be developed by Ameren Missouri for the RICT Program. This program description will serve to establish management responsibilities and general requirements for training, implementation, and monitoring of the RICT Program, including development and maintenance of the Configuration Risk Management Program (CRMP) software tool and model reflecting the as-built, as-operated plant.

The RICT program will be implemented by site procedures which fully address all aspects of the guidance in NEI 06-09-A (Reference 2). The program will be integrated with online work control processes, which identify the need to enter a Limiting Condition of Operation Action Statement. Operations, specifically the control Room staff, is responsible for compliance with Technical Specifications (TS). With RICT Program implementation, Operations will additionally be responsible for implementation of a RICT and any RMAs determined to be appropriate for the plant configuration. Entry into a RICT will require management approval prior to planned maintenance activities and as soon as practical following emergent conditions.

The procedures developed for the RICT Program will address the following attributes consistent with NEI 06-09-A:

- Plant management positions with authority to approve entry into the RICT Program.
- Important definitions related to the RICT Program.
- Departmental and positional responsibilities for activities in the RICT Program.
- Plant conditions for which the RICT Program is applicable.

- Limitations on implementing RICTs under voluntary and emergent conditions.
- Implementation of the RICT Program's 30-day back-stop limit.
- Use of the CRMP software tool with the RICT Program.
- Implementation of the RICT and risk management action time (RMAT) within 12 hours or within the most limiting front-stop CT after a plant configuration change.
- Requirements to identify and implement Risk Management Actions (RMAs) when the RMAT is exceeded or is anticipated to be exceeded and to consider common cause failure potential in emergent RICTs.
- Guidance on the use of RMAs including the conditions under which they may be credited in RICT calculations.
- Conditions for exiting a RICT.
- Requirements for training on the RICT Program.
- Documentation requirements as they relate to individual RICT calculations, implementation of extended CT's, and accumulated annual risk.

3.0 RICT PROGRAM TRAINING

The scope for training for the RICT Program will include rules for the new TS program, CRMP tool, TS actions included in the RICT Program, and the implementing procedures. Training will be conducted for the following Ameren Missouri personnel, as applicable:

Site Personnel

- Operations Director
- Operations Managers (Shift, Support, Training)
- Operations Personnel (licensed and non-licensed)
- Senior Director, Nuclear Operations
- Operations Work Control Personnel
- Work Week Managers
- Operations Training
- Outage Manager
- Engineering
- Regulatory Personnel
- Selected Maintenance Personnel
- Site Resident Inspector
- Licensing/Regulatory Affairs Management and Personnel
- Probabilistic Risk Assessment Management and Personnel
- Training Management and Personnel
- Other Selected Management

Training will be carried out in accordance with Callaway training procedures and processes. These procedures are written based on the Institute of Nuclear Power Operations (INPO) Accreditation (ACAD) requirements, as developed and maintained by the National Academy for Nuclear Training. Callaway has planned three levels of training for implementation of the RICT Program. They are described below.

3.1 Level 1 Training – User Training

This the most detailed training. It is intended for the individual who will be directly involved in the implementation of the RICT Program. This level of training includes the following attributes:

- Specific training on the revised TS
- Record keeping requirements
- Case studies
- Hands-on experience with the CRMP tool for calculating RMA and RICT
- Identifying appropriate RMAs
- Common cause failure RMA considerations in emergent RICTs
- Other detailed aspects of the RICT Program

3.2 Level 2 Training – Management Training

This training is applicable to plant management positions with authority to approve entry into the RICT Program, as well as supervisors, managers, and other personnel who will closely support RICT implementation. These individuals need a broad understanding of the purpose, concepts, and limitations of the RICT Program. Level 2 training is more detailed than Level 3 training (described below), but it is different from Level 1 training in that hands-on time with the Real Time Risk tool, case studies, and other specifics are not required.

3.3 Level 3 Training – Site Awareness Training

This training is intended for the remaining personnel who require an awareness of the RICT Program. These employees need basic knowledge of RICT Program requirements and procedures. This training will cover RICT Program concepts that are important to disseminate throughout the organization.

All of the above training will be conducted within the procedural guidance set forth in Callaway's training and qualification procedures, unless otherwise noted.

4.0 REFERENCES

1. U.S. Nuclear Regulatory Commission (NRC) letter from Jennifer M. Golder to Biff Bradley (Nuclear Energy Institute [NEI]), "Final Safety Evaluation for Nuclear Energy Institute (NEI) Topical Report (TR) NEI 06-09, 'Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines'," May 17, 2007 (ADAMS Accession No. ML071200238).
2. Nuclear Energy Institute Topical Report NEI 06-09-A, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines," Revision 0, October 12, 2012 (ADAMS Accession No. ML12286A322).