



June 5, 2023

ULNRC-06815

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

10 CFR 50.54(a)(4)

Ladies and Gentlemen:

**DOCKET NUMBERS 50-483 and 72-1045  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
REQUEST FOR NRC APPROVAL OF  
OPERATING QUALITY ASSURANCE MANUAL (OQAM) REVISION 36a**

Pursuant to 10 CFR 50.54(a)(4), Ameren Missouri (Union Electric Company) herewith transmits a request to approve a change to the Operating Quality Assurance Program (OQAP) as described in the Operating Quality Assurance Manual (OQAM) for the Callaway Plant. The proposed change is deemed to constitute a reduction in commitment, which requires approval by the Nuclear Regulatory Commission prior to implementation. This proposed change was previously reviewed internally at Callaway Energy Center as OQAM Change Notice (OQAMCN) 21-003 and was deemed not to be a reduction in commitment. The change was therefore not submitted to the NRC for approval prior to changing the OQAM.

Callaway submitted a periodic OQAM update to the NRC in November 2022 in accordance with 10 CFR 50.54(a)(3) and 10 CFR 50.71(e). The periodic update included OQAMCN 21-003. In December 2022, a subsequent review of OQAMCN 21-003 and discussion with the NRC QA Branch determined that OQAMCN 21-003 does constitute a reduction in commitment since only a portion of ANSI/ANI 3.1-2014 was adopted in lieu of adopting the entire standard. Thus, NRC approval should have been sought per 10 CFR 50.54(a)(4). This condition, i.e., the incorrect 10 CFR 50.54(a) evaluation for OQAMCN 21-003, was entered into Callaway Plant's Corrective Action Program.

The change(s) intended per OQAMCN 21-003 is still desired, and therefore, Ameren Missouri is hereby requesting NRC approval of the change(s). Specifically, per Callaway OQAM Change Notice (OQAMCN) 23-001, OQAM section 2.10 and OQAM Appendix A (where conformance to NRC Regulatory Guide 1.8 is described) will be revised to change the commitment from Regulatory Guide 1.8 Revision 2 to Regulatory Guide 1.8 Revision 4 in order to specifically adopt the Radiation Protection portion of the education and experience qualifications of ANSI/ANI 3.1-2014 for RP First Line Supervisors, Technicians, and Supplemental Personnel.

The following documents are enclosed pursuant to 10 CFR 50.54(a)(4):

1. Attachment 1, "Description and Justification for Changes," explains the proposed changes to the OQAM, provides the reason for the changes, and provides the basis for concluding that the OQAM, as revised, will continue to meet the requirements of 10 CFR 50 Appendix B. Because the same text is used to support the quality assurance program for the Dry Cask Storage System (DCSS) and Independent Spent Fuel Storage Facility (ISFSI) at the Callaway site, this justification also supports the conclusion that the requirements of Subpart G of 10 CFR Part 72 will continue to be met.
2. Attachment 2, "OQAM Section 2 Markup," provides the affected OQAM pages for section 2.10 of the OQAM and identifies the changes through the use of text inserts.
3. Attachment 3, "OQAM Appendix A Markup," provides the affected OQAM Appendix A pages and identifies changes through the use of text inserts.

NRC review and approval of the proposed change to the OQAP is requested pursuant to the provisions of 10 CFR 50.54(a)(4)(iv). The regulation specifies that such a proposed change shall be regarded as accepted by the Commission upon receipt of a letter to that effect from the appropriate reviewing office of the Commission or 60 days after submittal to the Commission, whichever occurs first. In this case, approval of the requested change is respectfully requested to be approved on or by July 31, 2023.

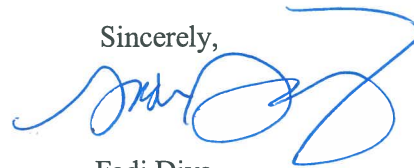
The requested approval date supports the timeline for training and badging activities leading into RF26, particularly for badging supplemental Radiation Technicians for RF26.

It should be noted that this submittal does not contain any new commitments (subject to control under the Commitment Management Program for Callaway).

If there are any questions, please contact Hrach Minassian, Nuclear Oversight Audit Supervisor, at (573) 220-9213.

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

Sincerely,



Fadi Diya  
Sr. Vice President &  
Chief Nuclear Officer

Executed on: 06-05-23

Attachments:

1. Description and Justification for Changes
2. OQAM Section 2 Markup
3. OQAM Appendix A Markup

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