Description and Justification for Changes

References:

1. Ameren Missouri Letter ULNRC-06777, "Operating Quality Assurance Manual (OQAM) Revision 36," dated November 16, 2022 (ADAMS Accession No. ML22327A207)

2. Regulatory Guide 1.8, Revision 4, *Qualification and Training of Personnel for Nuclear Power Plants*

3. ANSI/ANS 3.1-2014, *Selection, Qualification, and Training of Personnel for Nuclear Power Plants*

Summary of proposed change:

The proposed change to the Operating Quality Assurance Manual (OQAM) changes conformance from Regulatory Guide 1.8, Revision 2 to Regulatory Guide 1.8, Revision 4 but only for the Radiation Protection (RP) portion of the education and experience qualifications of ANSI/ANI 3.1-2014 as applicable to RP First Line Supervisors, Technicians, and Supplemental Personnel. This change requires revising OQAM section 2.10 (specifically subsection 2.10.3) and Appendix A as applicable to Regulatory Guide 1.8.

An evaluation of the proposed change against the criteria in 10 CFR 50.54(a)(3) concluded that a partial adoption, rather than a complete adoption, of the standard constitutes a reduction in commitment.

Attachment 2 to this letter provides the affected OQAM pages for the proposed change to Section 2 (subsection 2.10.3) of the OQAM. Attachment 3 provides the affected OQAM pages for the proposed Appendix A of the OQAM. As explained in the cover letter, these changes were inappropriately included in OQAM Revision 36, which was previously provided to the NRC via Reference 1.

Reason for Change:

Ameren Missouri is proposing to change the education and work experience requirements for RP First Line Supervisors, Technicians, and Supplemental Personnel to be consistent with industry standard ANSI/ANS 3.1-2014 as endorsed by Regulatory Guide 1.8, Revision 4.

Justification for the Proposed Change:

The proposed change to the Radiation Protection First Line Supervisors, Technicians, and Supplemental Personnel education and work experience requirements aligns the requirements with current industry standards by changing conformance from ANSI/ANS 3.1-1978 to ANSI/ANS 3.1-2014. For a Radiation Protection Supervisor, the required experience is changed from four years in applied radiation protection activities to three years, of which two years shall be nuclear power plant experience and 0.25-year on-site experience. The required education is changed from High School education or equivalent to a High School diploma. For a Radiation Protection Technician, the required experience is changed from three years of working experience in radiation protection, of which one year should be related technical training, to two years of working experience in radiation protection, of which one year shall be nuclear plant experience. The required education is changed from a High School diploma to High School education or equivalent. Education and work requirements for Supplemental Personnel will be the same as for the positions to which they are assigned. With these changes, Callaway Energy Center (Callaway Plant) should be able to select from a larger pool of qualified personnel.

The Radiation Protection Manager will continue to meet the requirements of Regulatory Guide (RG) 1.8, Revision 1 dated September 1975 as clarified by USNRC Health Physics Positions based on 10 CFR Part 20 (HPPOS-020).

Basis for continued compliance with the requirements of 10 CFR 50 Appendix B and previously accepted Quality Assurance program commitments:

The change from ANSI/ANS 3.1-1978 to ANSI/ANS 3.1-2014 (for Radiation Protection (RP) personnel ony) is a reduction in required education and experience but is consistent with the industry standard as endorsed by the NRC.

The RP First Line Supervisors, Technicians, and Supplemental Personnel will continue to have the necessary knowledge and skills to be effective in 1) protecting the health and safety of the public, 2) ensuring radiation protection practices keep radiation doses as low as reasonably achievable for plant activities, 3) provide radiological surveillance of plant conditions to monitor radiation, contamination, and airborne radioactivity in support of plant activities and implement methods to reduce dose to personnel, and 4) ensure compliance with regulatory requirements for radiation protection.