OQAM Section 2 Markup

The following presents the contents of OQAM section 2, *Quality Assurance Program*. This text is reflected in OQAM Revision 36 which was previously provided via Reference 1 of Attachment 1. The proposed changes are denoted using blue color and underlined text for new, inserted material. There is no deleted content.

2. QUALITY ASSURANCE PROGRAM

2.1 Ameren Missouri has established an OQAP which controls activities affecting quality. The Program encompasses those quality activities necessary to support the operating phase of the CEC and shall comply with 10 CFR 50, Appendix B - "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants" as described herein and with the Regulatory Position of Regulatory Guide 1.33. This Manual also complies with requirements of 10 CFR 72, Subpart G "Quality Assurance", as applicable to the scope of work being performed and described in Appendix B of this OQAM. Commitments, clarifications, alternatives, and exceptions to the Regulatory Position of Regulatory Guide 1.33 are stated in Appendix A of this OQAM. In addition, the OQAP has incorporated the commitments made in responding to applicable NRC questions. The text of the NRC questions applicable to the OQAP, along with the responses, are maintained as a QA Record separate from the OQAM. The Senior Vice President and Chief Nuclear Officer has reviewed the Program and formulated the policy in addition to authorizing Program implementation. This responsibility has been established by the Chairman and Chief Executive Officer of Ameren Missouri for establishing and implementing the Quality Assurance Program requirements.

2.2 Lines of authority and responsibility have been established from the Chairman and Chief Executive Officer to the Senior Vice President and Chief Nuclear Officer and the onsite operating organization. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities, and job descriptions for key personnel having direct operating, support or audit responsibility. Where specific responsibilities are assigned within the OQAP, the prescribed individual shall retain the overall responsibility; however, subject to applicable regulatory constraints, authority may be delegated to subordinates. Considering these same regulatory constraints, the authority of a subordinate may always be assumed by a superior.

2.3 Updating and revision of the OQAP as described in this OQAM shall be in accordance with the applicable requirements of 10 CFR 50.54 (a), 10 CFR 50.71 and 10 CFR 72.

2.4 The pertinent requirements of the OQAP apply to all activities affecting the safety-related functions of those structures, systems, and components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The safety-related structures, systems and components identified in Table 3.2-1 of the Callaway-SP Final Safety Analysis Report (FSAR). This list includes structures, systems, and components identified during the design and construction phase and may be modified as required during operations consistent with their importance to safety. Modifications to this list require the approval of the Manager, Nuclear Oversight and the Director, Engineering Design & Projects and shall be issued and controlled in accordance with Section 6. The development, control, and use of computer programs to be used in safety-related activities are within the scope of the OQAP. The degree of controls applicable to each computer program shall be consistent with the program's importance to safety-related activities. Consumables which could affect the form, fit or function of safety-related structures, systems, and components, although not listed in Table 3.2-1 of the Callaway-SP FSAR, are also under the control of the OQAP.

2.5 The OQAP shall be implemented throughout the operating life of the CEC. Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, such as adequate cleanness; and assurance that all prerequisites for the given activity have been satisfied.

2.6 Consistent with the schedule for accomplishing quality activities, the OQAP shall be established and documented by written policy, program manual, and procedure manuals. Persons conducting safety- related activities shall be responsible to implement approved procedures. The OQAP shall utilize the following document types to describe Program objectives:

1) Operating Quality Assurance Program Policy/ Introduction Statement

The Operating Quality Assurance Program Policy statement establishes governing principles in accordance with the requirements of 10 CFR 50, Appendix B and 10 CFR 72, Subpart G.

The Operating Quality Assurance Program Policy statement and any revisions thereto shall be approved by the Senior Vice President and Chief Nuclear Officer.

2) Operating Quality Assurance Manual (OQAM)

The OQAM contains a delineation of the Policy statement, quality assurance requirements, assignment of responsibilities, and a definition of organizational interfaces. The OQAM is the written description of the OQAP. Approval of the OQAM is by the Senior Vice President and Chief Nuclear Officer and the Manager, Nuclear Oversight.

3) CEC Operating Procedures

The CEC Operating Procedures consist of a multi-volume set of Plant operating procedures prepared or reviewed by the staff with the aid of other SNUPPS utilities, Nuclear Engineering, the Lead A/E, the NSSS Supplier, and Fuel Fabricator. These procedures are controlled, reviewed, approved, and issued in accordance with Administrative Procedures which implement the requirements of the Technical Specifications and this OQAM. These Operating Procedures include administrative controls consistent with those required by Regulatory Guide 1.33.

The final approval of the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL, and revisions thereto shall be by the Senior Director, Nuclear Operations. The final approval of other Administrative Procedures and revisions thereto shall be by the Senior Director Nuclear Operations.

4) Other Instructions

The review and approval of policies, manuals, work authorizing documents and revisions thereto shall be in accordance with approved Administrative Procedures.

2.7 Ameren Missouri may employ the safety-related services of architect engineers, NSSS suppliers, fuel fabricators, constructors, and others, which provide or augment Ameren Missouri efforts during the operating phase. These organizations shall be required to work under a quality assurance program whose controls are consistent with the scope of their effort. This does not preclude any organization from working under the Ameren Missouri OQAP. The quality assurance program of outside organizations shall be subject to review, evaluation and acceptance by the Nuclear Oversight Department prior to the initiation of safety-related work. Vendor programs and procedures shall also meet Ameren Missouri's commitment to USNRC Generic Letter 83-28.

2.8 Disputes which may arise between NOS or QC personnel and personnel in other Ameren organizations which cannot be resolved shall be referred to the next higher level of management for resolution. Disputes which cannot be resolved through these levels shall be resolved ultimately by the Chief Executive Officer.

2.9 Preservice (PSI) and Inservice (ISI) inspection, testing, and examination activities may be performed by outside organizations. These inspections and other operating phase "code" activities shall comply with the requirements of the applicable Code Edition and Addenda of the ASME Boiler and Pressure Vessel Code. This compliance includes the independent third-party inspection coverage of "code" items by an Authorized Nuclear Inspector.

2.10 General indoctrination and training programs shall be developed for personnel performing safety-related activities to assure that responsible functions, departments, and individuals are knowledgeable regarding quality policy and requirements of applicable manuals and procedures. The requirements for training of CEC personnel are described in Section 13.2 of the Callaway-SA FSAR. The training of permanent Plant personnel is the responsibility of the Director, Training. Personnel performing complex, unusual, or hazardous work shall be instructed in special indoctrination or briefing sessions. Emphasis shall be on special requirements for safety of personnel, radiation control and protection, unique features of equipment and systems, operating constraints, and control requirements in effect during performance of work. Training shall be conducted as required to, as a minimum, meet the requirements of Ameren Missouri's commitment to Regulatory Guide 1.8 (ANSI/ANS 3.1), Regulatory Guide 1.33 (ANSI N18.7), other Regulatory Guides as endorsed in OQAM Appendix A, and other regulatory requirements. Records of training shall be maintained as described in Section 17. Where required by code or standard, personnel are trained or qualified according to written procedures in the principles and techniques of performing specific activities. Special equipment, environmental conditions, skills, or processes shall be provided as necessary for the effective implementation of the OQAP.

2.10.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Director, Training.

2.10.2 The training programs for Shift Managers, Operating Supervisors, Reactor Operators, and Shift Technical Advisors shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Rev. 2, with the same exceptions as contained in the current revision to the Operator Licensing Examiner Standards, NUREG-1021, ES-202, and 10 CFR Part 55.

2.10.3 All other training programs with the exception of the Radiation Protection program shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1978. Radiation Protection program shall meet the requirements of ANSI/ANS 3.1-2014 as endorsed by Regulatory Guide 1.8, Rev. 4 with the exception of the Radiation Protection Manager which shall continue to meet the requirements of Regulatory Guide 1.8, Rev. 1, September, 1975 as clarified by USNRC HPPOS-020.

2.10.4 Training shall include familiarization with relevant industry operational experience identified by the Performance Improvement Department.

2.11 An audit system shall be established to assure management is advised of Program effectiveness. The implementation and effectiveness of the OQAP shall be assessed through an audit program of quality activities which includes design, procurement, modification, and operation. The Manager, Nuclear Oversight is responsible for a system of planned audits to assure OQAP compliance, with a frequency commensurate with the Program aspect's safety significance and in accordance with the requirements of Section 18. This individual is responsible for conducting audits of offsite and onsite activities. Deficiencies identified during the audit process are reported to responsible management of the organization involved in the resolution and follow-up to assure corrective action.

2.12 The Senior Vice President and Chief Nuclear Officer provides for an independent assessment of the scope, implementation, and effectiveness of the OQAP to assure compliance with policy, commitments, and the requirements of 10 CFR 50, Appendix B and 10 CFR 72, Subpart G as set forth in this OQAM. This assessment shall be conducted biennially with a scheduling allowance of plus three months for each assessment and a combined time interval for any three consecutive assessment intervals not to exceed 6.25 years. This assessment may be by representatives of other utilities, outside consultants, or Ameren Missouri management representatives. In addition, various reports are issued to the Senior Vice President and Chief Nuclear Officer on a periodic basis to assist this individual's independent assessment of the OQAP (e.g., semiannual trend analysis, and periodic NOS audit reports).

2.13 Implementation of OQAP controls over activities affecting quality assures achieving the objective of the Ameren Missouri OQAP to provide management with adequate confidence that activities affecting quality regarding the design, installation, modification, and operation of the CEC are performed consistent with policy. Documentation of the accomplishment of OQAP objectives is maintained in the form of records of data and other information as necessary to support operation, maintenance, repair, modification, refueling, and inservice inspection.

2.14 Ameren Missouri Management has established standards of performance, which exceed those set forth by the Regulatory Agencies. As a management initiative in this area, Ameren Missouri has defined the word "must" to impose management directed performance standards in excess of and in addition to established Regulatory directed performance. From the viewpoint of Ameren Missouri employees and contractors, there is no difference in the degree of compliance mandated by use of the words "shall" or "must." Compliance with actions initiated by use of either "shall" or "must" is audited and surveilled by the NOS Department. Failure to implement a "must" mandated activity requires corrective action in the same way as failure to implement a "shall" mandated activity. However, from an external viewpoint, internally imposed "must" requirements (i.e., those in excess of Regulatory requirements) are not intended to be subject to enforcement action. "Must" is defined in Appendix A of this OQAM under Regulatory Guide 1.74.