

## OQAM Appendix A Markup

The following presents the contents of OQAM Appendix A for Regulatory Guide 1.8. 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. No content was deleted, and no existing text was revised.

Appendix A provides a compilation of how the Callaway Plant Operating Quality Assurance program (OQAP) conforms to the NRC Regulatory Guides to which the program is committed. This Appendix provides clarifications, captures exceptions, and lists ANSI standards to which the program is committed. This change to Appendix A is a conforming change that affects a portion of the description regarding compliance with Regulatory Guide 1.8, *Qualification and Training of Personnel for Nuclear Power Plants*, Revision 2 dated April 1987.

The proposed OQAM request is to change conformance from Regulatory Guide 1.8, Revision 2 to Regulatory Guide 1.8, Revision 4 to adopt ANSI/ANS 3.1-2014 only for the Radiation Protection personnel of First Line Supervisor, Technicians, and Supplemental Personnel. This revision would be reflected in Appendix A.

### REGULATORY GUIDE 1.8

### REVISION 2

DATED 4/87

Qualification and Training of personnel for Nuclear Power Plants (Endorses ANSI/ANS 3.1-1981 for Shift Supervisor (Section 4.3.1.1), Senior Operator (Section 4.3.1.2), Licensed Operators (Section 4.5.1.2), Shift Technical Advisor (Section 4.4.8), and Radiation Protection (Section 4.4.4) only, and ANSI/ANS N18.1-1971 for all other positions).

#### DISCUSSION:

Ameren Missouri complies with the recommendations of this Regulatory Guide with the following clarifications and exceptions:

Revision 1, dated 9/75, applies to the position of Radiation Protection Manager only. For the position of Radiation Protection Manager only, Regulatory Guide 1.8, Revision 1, September, 1975 is clarified by USNRC HPPOS-020, Clarification of Regulatory Guide 1.8 on Qualification of Radiation Protection Manager. [Regulatory Guide 1.8, Rev 4 issued June 2019 which endorses ANSI/ANS 3.1 2014, applies to equivalent positions within the Radiation Protection organization except for the Radiation Protection Manager.](#)

The experience, training, and education requirements for the positions of Shift Manager, Operating Supervisor, and Reactor Operator, and personnel fulfilling the duties of Shift Technical Advisor shall meet or exceed the requirements and recommendations of ANSI/ANS 3.1-1981 as endorsed by the Regulatory Guide 1.8, Revision 2, with the same exceptions as contained in the current revision to the Operating Licensing Examiner Standards, NUREG-1021, ES-202.

For all other positions, qualification and training shall comply with ANSI/ANS 3.1-1978 as clarified below:

Refer to Callaway-SA FSAR Section 13.1 for a discussion of the qualifications of personnel responsible for plant operation and support.

Personnel responsible for directing or supervising the conduct of safety-related preoperational and startup tests and for review and approval of safety-related preoperational and startup test procedures or results met the qualifications of the Regulatory Guide but were not required to be certified.

Ameren Missouri may use additional Ameren employees or contract personnel to augment the unit staff. These groups include, but are not limited to, Ameren personnel from outside Nuclear Generation as well as supplemental Radiation Protection and I&C technicians and QC inspectors. [Except for Radiation Protection](#), when used to perform safety-related activities, these personnel shall meet the education and experience requirements of ANSI/ANS 3.1-1978 for equivalent positions or specified education and experience requirements for non-equivalent positions. [When supplemental contract Radiation Protection personnel are used to perform safety-related activities, these personnel shall meet the education and experience requirements of ANSI/ANS 3.1-2014 for equivalent positions or specified education and experience requirements for non-equivalent positions](#). As an alternative, these personnel can be qualified for assigned tasks either by Ameren Missouri through its systematic approach to training or by Vendors with Ameren Missouri approved training and qualification programs. Inspection, examination and testing personnel shall meet the requirements for certification as inspection, examination or testing personnel as set forth in Ameren Missouri's commitment to ANSI N45.2.6-1978 given elsewhere in this Appendix.

With regard to Section 5.6 of ANSI/ANS 3.1 - 1978 titled [Documentation](#): Ameren Missouri shall maintain records in accordance with and to meet the requirements of OQAM Section 17 and ANSI N45.2.9 as specified herein.