

**From:** Mahesh Chawla  
**Sent:** Wednesday, July 19, 2023 3:39 PM  
**To:** Elwood, Thomas B  
**Cc:** Yiu Law; David Garmon; Kerri Kavanagh; Jennifer Dixon-Herrity  
**Subject:** Callaway Plant, Unit 1 - Final Request for Additional Information (RAI) - Request for Approval of OQAM, Revision 36a - EPID L-2023-LLQ-0000

Dear Mr. Elwood,

By letters dated June 5, 2023 and June 14, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23156A669 and ML23165A241), Ameren Missouri Union Electric Company (Ameren) submitted to the U.S. Nuclear Regulatory Commission (NRC) for review and approval a revision to the Operating Quality Assurance Manual (OQAM) for the Callaway Plant that contains change that is a reduction in commitment in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.54(a)(4). The NRC staff has reviewed Ameren's proposed change to its OQAM and has determined that following additional information is required to complete its review.

### **Request for Additional Information**

#### **RAI-1**

Criterion II "Quality Assurance Program," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," states, in part, that "Quality Assurance Program shall provide the indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Ameren proposed to change the education and experience qualifications for the positions of Radiation Protection (RP) First Line Supervisors, Technicians, and Supplemental Personnel from Revision 2 of Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," to Revision 4 of RG 1.8. Revision 2 of RG 1.8 endorses the American National Standards Institute/American Nuclear Society (ANSI/ANS) 3.1-1978 standard, while Revision 4 of RG 1.8 endorses the ANSI/ANS 3.1-2014, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants," standard for these positions.

Attachment 3 of the submittal letter, dated June 5, 2023, included a markup to Appendix A of the OQAM. The markup states that "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."

Ameren is requested to clarify the statement "specified education and experience requirements for non-equivalent positions." It is unclear to the NRC staff what non-equivalent positions are referenced in this sentence, and how education and experience requirements for positions that are not equivalent to RP can be used for RP personnel.

During a clarification call held today between Ameren staff and the NRC staff, you agreed to provide the official response to the RAI on the docket within 30 days. Thanks

Sincerely,

Mahesh Chawla, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
ph: 301-415-8371  
Docket No. 50-483

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