OQAM REVISION 37a, 37b, 37c, AND 37d DESCRIPTION AND JUSTIFICATIONS

This attachment provides a summarization of changes made to the Ameren Missouri Operating Quality Assurance Manual (OQAM) for the Callaway Plant and the onsite independent spent fuel storage facility. Each OQAM Change Notice (OQAMCN) is separately described, and a basis and justification provided. These changes are also depicted in Attachment 2 by identifying the changes through the use of strikeovers and inserts.

OQAMCNs 23-005, 23-004, 24-002, 24-003, and 25-001 were previously reviewed internally and determined to not constitute a reduction in commitment.

Note: In the tables to follow, the deleted text is depicted in red strikethrough text, and inserted text is depicted in blue underlined text.

Summary of OQAMCN 23-005 (OQAM Rev. 37a)

This change extended the internal audit grace period from 90 days to a maximum grace period of 25 percent of the audit interval. The justification for this change was made using the NRC Safety Evaluation provided in Reference 2 of this letter and completing a site evaluation in accordance with 10 CFR 50.54(a)(3)(ii). The evaluation concluded this change is applicable to Callaway Plant and therefore can be adopted.

OQAM Section	Current Description	Revised Description
18.7	Internal audits shall be conducted by the NOS Department and shall be performed with a frequency commensurate with their safety significance. An audit of safety-related functions shall be completed in accordance with formal audit schedules within a period of two (2) years. A grace period of 90 days may be applied to performance of internal audits provided the two (2) year frequency for the following audit performance is not set forward. Each element of the OQAP, such as design control and document control, and each area of Plant operations shall be audited.	Internal audits shall be conducted by the NOS Department and shall be performed with a frequency commensurate with their safety significance. An audit of safety-related functions shall be completed in accordance with formal audit schedules within a period of two (2) years. A maximum grace period of 25 percent of the audit interval ~~90 days~~ may be applied to performance of internal audits provided the two (2) year frequency for the following audit performance is not set forward. Each element of the OQAP, such as design control and document control, and each area of Plant operations shall be audited.
18.8	Supplementary to the biennial requirements to audit safety-related functions: • Audits of Unit activities (listed below) SHALL be conducted on a performance based frequency by the NOS Department, not to exceed 24 months * a) The conformance of Unit operation to provisions contained within the Technical Specifications and applicable license conditions; b) The performance, training and qualifications of the entire Unit staff; c) The results of actions taken to correct deficiencies occurring in Unit equipment, structures, systems or method of operation that affect nuclear safety; d) The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, e) The Radiological Environmental Monitoring Program and the results thereof; f) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures;	Supplementary to the biennial requirements to audit safety-related functions: • Audits of Unit activities (listed below) SHALL be conducted on a performance based frequency by the NOS Department, not to exceed 24 months * a) The conformance of Unit operation to provisions contained within the Technical Specifications and applicable license conditions; b) The performance, training and qualifications of the entire Unit staff; c) The results of actions taken to correct deficiencies occurring in Unit equipment, structures, systems or method of operation that affect nuclear safety; d) The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, e) The Radiological Environmental Monitoring Program and the results thereof; f) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures;

	g) The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes; h) The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring; and i) Any other area of Unit operation considered appropriate by the Senior Vice President and Chief Nuclear Officer. *A grace period of 90 days may be applied to the 24 month frequency for internal audits, provided the 24 month frequency for the following audit performance is not set forward.	g) The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes; h) The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring; and i) Any other area of Unit operation considered appropriate by the Senior Vice President and Chief Nuclear Officer. *A grace period of ~~90 days~~ a maximum of 25 percent of the audit interval may be applied to the 24 month frequency for internal audits, provided the 24 month frequency for the following audit performance is not set forward.

End of OQAMCN 23-005

Summary of OQAMCN 23-004 (OQAM Rev. 37b)

This change extended the 24-month internal audit frequency to a 36-month internal audit frequency. The justification for this change was made using the NRC Safety Evaluation provided in Reference 3 of this letter and completing a site evaluation in accordance with 10 CFR 50.54(a)(3)(ii). The evaluation concluded this change is applicable to Callaway Plant and therefore can be adopted.

OQAM Section	Current Description	Revised Description
18.7	Internal audits shall be conducted by the NOS Department and shall be performed with a frequency commensurate with their safety significance. An audit of safety-related functions shall be completed in accordance with formal audit schedules within a period of two (2) years. A maximum grace period of 25 percent of the audit interval may be applied to performance of internal audits provided the two (2) year frequency for the following audit performance is not set forward. Each element of the OQAP, such as design control and document control, and each area of Plant operations shall be audited.	Internal audits shall be conducted by the NOS Department and shall be performed with a frequency commensurate with their safety significance. ~~An audit~~ Audits of safety-related functions shall be completed in accordance with formal audit schedules ~~within a period of two (2) years~~ which are separated into three cycles covering a period of 36 months. Each cycle includes a set of audits and 24-month reviews. Results of the completed audits will be reviewed to determine if additional audit activities are necessary prior to their next scheduled performance. Each functional area will receive an additional performance analysis (24-month review) within two years of the last performed audit based on internal and external data; functional area changes in responsibility, resources, or management; and consideration of the impacts, as applicable, to determine if additional audit activities are necessary prior to the 36-month scheduled performance. A maximum grace period of 25 percent of the audit interval may be applied to performance of internal audits provided the ~~two (2) year~~ 36 month frequency for the following audit performance is not set forward. Each element of the OQAP, such as design control and document control, and each area of Plant operations shall be audited.
18.8	Supplementary to the biennial requirements to audit safety-related functions: • Audits of Unit activities (listed below) SHALL be conducted on a performance based frequency by the NOS Department, not to exceed 24 months * a) The conformance of Unit operation to provisions contained within the Technical Specifications and applicable license conditions; b) The performance, training and qualifications of the entire Unit staff; c) The results of actions taken to correct deficiencies occurring in Unit equipment,	Supplementary to the biennial requirements to audit safety-related functions: • Audits of Unit activities (listed below) SHALL be conducted on a performance based frequency by the NOS Department, not to exceed ~~24~~ 36 months * a) The conformance of Unit operation to provisions contained within the Technical Specifications and applicable license conditions; b) The performance, training and qualifications of the entire Unit staff; c) The results of actions taken to correct deficiencies occurring in Unit equipment,

	structures, systems or method of operation that affect nuclear safety; d) The performance of activities required by the Operating Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, e) The Radiological Environmental Monitoring Program and the results thereof; f) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures; g) The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes; h) The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring; and i) Any other area of Unit operation considered appropriate by the Senior Vice President and Chief Nuclear Officer.	structures, systems or method of operation that affect nuclear safety; d) The performance of activities required by the Operating Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, e) The Radiological Environmental Monitoring Program and the results thereof; f) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures; g) The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes; h) The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring; and i) Any other area of Unit operation considered appropriate by the Senior Vice President and Chief Nuclear Officer.

End of OQAMCN 23-004

Summary of OQAMCN 24-002 (OQAM Rev. 37b)

Sections 1.7.6 and 16.6
The Onsite Review Committee (ORC) responsibility to review Significant Conditions Adverse to Quality was moved from Section 16.0, "Corrective Action" to Section 1.0, "Organization" which contains all other ORC responsibilities. Therefore, this change was administrative.

Section 2.4
The "Director, Engineering Design & Projects" position was replaced with "Director responsible for Design Engineering or designee." This organization change was evaluated per 10 CFR 50.54(a)(3)(vi) due to changes in both functional description and organizational reporting. The evaluation determined this change continues to assure the proper authority and organizational freedom of quality assurance functions.

Sections 2.10, 10.6, 11.10, 12.4, 13.5
The "Director, Maintenance" position was replaced with "Senior Manager or above responsible for Maintenance or designee" and the "Director, Training" position was replaced with "Director responsible for Training or designee." These position title changes were evaluated per 10 CFR 50.54(a)(3)(iii) and determined that the functional description and organizational reporting remain unchanged.

OQAM Section	Current Description	Revised Description
1.7.6	The ORC shall be responsible for: a) Deleted. b) Review of 10 CFR 50.59 and 10 CFR 72.48 evaluations[1] regarding: • procedures, • changes to procedures, equipment, systems or facilities, and • tests or experiments completed under the provision of 10 CFR 50.59 and 10 CFR 72.48 to verify that such actions did not require prior NRC approval. c) Review of proposed procedures and changes to procedures, equipment, systems or facilities which may involve prior NRC approval as defined in 10 CFR 50.59 and 10 CFR 72.48[6]; d) Review of proposed test or experiments which may involve prior NRC approval as defined in 10 CFR 50.59 and 10 CFR 72.48[6]; e) Review of proposed changes to Technical Specifications or Operating License;	The ORC shall be responsible for: a) ~~Deleted.~~ Review of significant conditions adverse to quality. b) Review of 10 CFR 50.59 and 10 CFR 72.48 evaluations[1] regarding: • procedures, • changes to procedures, equipment, systems or facilities, and • tests or experiments completed under the provision of 10 CFR 50.59 and 10 CFR 72.48 to verify that such actions did not require prior NRC approval. c) Review of proposed procedures and changes to procedures, equipment, systems or facilities which may involve prior NRC approval as defined in 10 CFR 50.59 and 10 CFR 72.48[6]; d) Review of proposed test or experiments which may involve prior NRC approval as defined in 10 CFR 50.59 and 10 CFR 72.48[6];

	f) Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President and Chief Nuclear Officer. g) Review of report of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety; h) Review of all REPORTABLE EVENTS; i) Review of the plant Security Plan; j) Review of the Radiological Emergency Response Plan; k) Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems; l) Review of any accidental, unplanned or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Senior Director, Nuclear Operations. m) Review of Unit operations to detect potential hazards to nuclear safety; n) Investigations or analysis of special subjects as requested by the Senior Vice President and Chief Nuclear Officer. o) Review of Unit Turbine Overspeed Protection Reliability Program and revisions thereto; p) Review of the Fire Protection Program.	e) Review of proposed changes to Technical Specifications or Operating License; f) Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President and Chief Nuclear Officer. g) Review of report of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety; h) Review of all REPORTABLE EVENTS; i) Review of the plant Security Plan; j) Review of the Radiological Emergency Response Plan; k) Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems; l) Review of any accidental, unplanned or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Senior Director, Nuclear Operations. m) Review of Unit operations to detect potential hazards to nuclear safety; n) Investigations or analysis of special subjects as requested by the Senior Vice President and Chief Nuclear Officer. o) Review of Unit Turbine Overspeed Protection Reliability Program and revisions thereto; p) Review of the Fire Protection Program.
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 Final Safety Analysis Report-Standard Plant (FSAR SP). This list includes structures, systems, and components identified during the design and construction phase	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 Final Safety Analysis Report-Standard Plant (FSAR SP). 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 FSAR SP, are also under the control of the OQAP.	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~~ responsible for Design Engineering or designee 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 FSAR SP, are also under the control of the OQAP.
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 FSAR Site Addendum (FSAR SA). 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.	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 FSAR Site Addendum (FSAR SA). The training of permanent Plant personnel is the responsibility of the ~~Director, Training~~ Director responsible for Training or designee. 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.
10.6	An inspection personnel qualification program shall be established to assure inspection activities are being performed by personnel trained and	An inspection personnel qualification program shall be established to assure inspection activities are being performed by personnel trained and

	qualified to a capability necessary for performance of the activity. Plant procedures shall prescribe the qualification requirements of inspection personnel. The Director, Training shall be responsible for providing related technical and quality training appropriate to the certification/qualification of Ameren Missouri personnel.	qualified to a capability necessary for performance of the activity. Plant procedures shall prescribe the qualification requirements of inspection personnel. The ~~Director, Training~~ Director responsible for Training or designee shall be responsible for providing related technical and quality training appropriate to the certification/qualification of Ameren Missouri personnel.
11.10	A program shall be established to assure testing activities are performed by personnel trained and qualified to a capability necessary for performance of the activity. Plant procedures and procurement documents shall prescribe the qualification requirements for testing personnel. Provisions may be made for on-the-job training of individuals not qualified to the program provided they are supervised or overseen by qualified individuals for the activities being performed. The Director, Training shall be responsible for providing related technical and quality training for Ameren Missouri personnel who perform testing.	A program shall be established to assure testing activities are performed by personnel trained and qualified to a capability necessary for performance of the activity. Plant procedures and procurement documents shall prescribe the qualification requirements for testing personnel. Provisions may be made for on-the-job training of individuals not qualified to the program provided they are supervised or overseen by qualified individuals for the activities being performed. The ~~Director, Training~~ Director responsible for Training or designee shall be responsible for providing related technical and quality training for Ameren Missouri personnel who perform testing.
12.4	The calibration and control program established at the CEC shall assure that M&TE, reference standards, and PI maintain their required accuracy. The Director, Maintenance is responsible for assuring the program establishment. Program implementation is the responsibility of the appropriate Department Heads.	The calibration and control program established at the CEC shall assure that M&TE, reference standards, and PI maintain their required accuracy. The ~~Director,~~Senior Manager or above responsible for Maintenance or designee is responsible for assuring the program establishment. Program implementation is the responsibility of the appropriate Department Heads.
13.5	The Director, Maintenance shall establish an inspection program for Plant material handling equipment that provides for routine maintenance and inspection in accordance with documented procedures which specify acceptance criteria. Routine inspections shall determine the acceptability of equipment and rigging. Routine inspections shall be supplemented by nondestructive examinations and proof tests as delineated in procedures for items requiring special handling. Personnel performing nondestructive examination and proof testing shall be qualified.	The ~~Director,~~ Senior Manager or above responsible for Maintenance or designee shall establish an inspection program for Plant material handling equipment that provides for routine maintenance and inspection in accordance with documented procedures which specify acceptance criteria. Routine inspections shall determine the acceptability of equipment and rigging. Routine inspections shall be supplemented by nondestructive examinations and proof tests as delineated in procedures for items requiring special handling. Personnel performing nondestructive examination and proof testing shall be qualified.
16.6	Engineering Design or Projects personnel shall review conditions adverse to quality which involve design deficiencies or which involve recommending design/configuration changes as corrective action. Fuel Cycle Management should review conditions adverse to quality for fuel related issues. The ORC shall review significant conditions adverse to quality.	Engineering Design or Projects personnel shall review conditions adverse to quality which involve design deficiencies or which involve recommending design/configuration changes as corrective action. Fuel Cycle Management should review conditions adverse to quality for fuel related issues. ~~The ORC shall review significant conditions adverse to quality~~.

End of OQAMCN 24-002

Summary of OQAMCN 24-003 (OQAM Rev. 37c)

Policy/Introduction
The reference to "10 CFR Part 100" was changed to "10 CFR 50.67 and Regulatory Guide 1.183" as it relates to the consequences of accidents which could result in off-site exposures. This change was based on issuance of Amendment 233 provided in Reference 4 of this letter and was evaluated per 10 CFR 50.54(a)(3)(i).

Sections 1.7.6 and 3.18
The OQAM was clarified to better align with language stated in ANSI N18.7-1976 (ANS3.2).

Policy/Introduction, Section 18.8, Appendix A
Several typographical errors were corrected that were made from previous OQAM changes. These changes were determined to be administrative and/or editorial.

OQAM Section	Current Description	Revised Description
Policy/Introduction	3) The capability to prevent or mitigate the consequences of accidents which could result in off-site exposures comparable to the guideline exposures of NRC Regulation 10 CFR Part 100.	3) The capability to prevent or mitigate the consequences of accidents which could result in off-site exposures comparable to the guideline exposures of NRC Regulation ~~10 CFR Part 100~~ 10 CFR 50.67 and Regulatory Guide 1.183.
Policy/Introduction	Callaway Energy Center has been licensed to use 10CFR50.60 "Risk-Informed Categorization and Treatment of Structures, Systems, and Components for Nuclear Power Reactors."	Callaway Energy Center has been licensed to use 10CFR~~50.60~~50.69 "Risk-Informed Categorization and Treatment of Structures, Systems, and Components for Nuclear Power Reactors."
1.7.6	The ORC shall be responsible for: a) Review of significant conditions adverse to quality. b) Review of 10 CFR 50.59 and 10 CFR 72.48 evaluations regarding: • procedures, • changes to procedures, equipment, systems or facilities, and • tests or experiments completed under the provision of 10 CFR 50.59 and 10 CFR 72.48 to verify that such actions did not require prior NRC approval. c) Review of proposed procedures and changes to procedures, equipment, systems or facilities which may involve prior NRC approval as defined in 10 CFR 50.59 and 10 CFR 72.48. d) Review of proposed test or experiments which may involve prior NRC approval as defined in 10 CFR 50.59 and 10 CFR 72.48[6];	The ORC shall be responsible for: a) Review of significant conditions adverse to quality to ensure causes of the condition have been determined and adequate corrective action has been taken. b) Review of 10 CFR 50.59 and 10 CFR 72.48 evaluations regarding the following and to verify that such actions did not require prior NRC approval: • procedures, • changes to procedures, equipment, systems or facilities, and • tests or experiments completed under the provision of 10 CFR 50.59 and 10 CFR 72.48 ~~to verify that such actions did not require prior NRC approval~~. c) Review of proposed procedures and changes to procedures, equipment, systems or facilities which may involve prior NRC approval as defined in 10

	e) Review of proposed changes to Technical Specifications or Operating License; f) Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President and Chief Nuclear Officer. g) Review of report of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety; h) Review of all REPORTABLE EVENTS; i) Review of the plant Security Plan; j) Review of the Radiological Emergency Response Plan; k) Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems; p)Review of the Fire Protection Program.	CFR 50.59 and 10 CFR 72.48, or involves a change in Technical Specifications. d) Review of proposed test or experiments which may involve prior NRC approval as defined in 10 CFR 50.59 and 10 CFR 72.48[6]; e) Review of proposed changes to Technical Specifications or Operating License; f) Investigation of all violations of the Technical Specifications including forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President and Chief Nuclear Officer. g) Review of report of operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems, or components that affect nuclear safety; h) Review of all REPORTABLE EVENTS; i) Review of the plant Security Plan and the Cyber Security Plan and revisions thereto; j) Review of the Radiological Emergency Response Plan and revisions thereto; k) Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems and revisions thereto; p)Review of the Fire Protection Program and revisions thereto.
3.18	Safety Related Design changes shall be reviewed by the ORC and approved by the Senior Director, Nuclear Operations.	Safety ~~Related Design~~ evaluations for design changes shall be reviewed by the ORC and approved by the Senior Director, Nuclear Operations.
18.8	*A grace period of a maximum of 25 percent of the audit interval may be applied to the 24 month frequency for internal audits, provided the 24 month frequency for the following audit performance is not set forward.	*A grace period of a maximum of 25 percent of the audit interval may be applied to the ~~24~~ 36 month frequency for internal audits, provided the ~~24~~ 36 month frequency for the following audit performance is not set forward.
Appendix A	Every instance of ANSI N18.7-1976	ANSI N18.7-1976/ANS 3.2

End of OQAMCN 24-003

Summary of OQAMCN 25-001 (OQAM Rev. 37d)

This change replaced "each Callaway Energy Center Director" with "Director or above" in Appendix B, "Dry Cask Storage System Quality Assurance Program." This position title change was evaluated per 10 CFR 50.54(a)(3)(iii) and determined that the functional description and organizational reporting remain unchanged.

OQAM Section	Current Description	Revised Description
Appendix B, 1.2	Overall implementation of the quality program requirements for the Dry Cask Storage System and spent fuel dry cask loading operation resides with each Callaway Energy Center Director for their area of responsibility.	Overall implementation of the quality program requirements for the Dry Cask Storage System and spent fuel dry cask loading operation resides with each Callaway Energy Center Director and above for their area of responsibility.

End of OQAMCN 25-001