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January 6, 1997

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U. S. Nuclear Regulatory Commission
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ULNRC-3506

Gentlemen:

**REPLY TO NOTICES OF VIOLATION
INSPECTION REPORT NO. 50-483/96012
CALLAWAY PLANT**

This responds to Mr. Thomas P. Gwynn's letter dated December 6, 1996, which transmitted two Notices of Violation for events discussed in Inspection Report 50-483/96012. On December 10, 1996, Mr. William D. Johnson, Chief, Division of Reactor Projects, Branch B authorized a revised due date of January 10, 1997.

None of the material in the response is considered proprietary by Union Electric.

If you have any questions regarding this response, or if additional information is required, please let me know.

Very truly yours,

Donald F. Schnell

DFS/tmw

Attachment: 1) Response to Violations

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A. **Statement of Violation**

During an NRC inspection conducted on November 4-8, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

Technical Specification 6.12.1 states, in part, that each high radiation area, as defined in 10 CFR Part 20, shall be barricaded and conspicuously posted as a high radiation area. A high radiation area is defined in 10 CFR 20.1003 as an area, accessible to individuals, in which radiation levels could result in an individual receiving a dose equivalent in excess of 0.1 rem in one hour at 30 centimeters from the radiation source or from any surface that the radiation penetrates.

10 CFR 20.1902 requires the posting of each high radiation area with a conspicuous sign bearing the radiation symbol and the words "Caution, High Radiation Area."

Contrary to the above, the licensee did not barricade and conspicuously post the entrance to "D" steam generator bay on November 4, 1996.

This is a Severity Level IV violation (Supplement Iv) (483/9612-01).

Reason for the Violation

A high radiation area (HRA) sign was on the door to the bioshield area; however the door was tied in the open position and the posting was not noticeable to people entering the area. Contractor electricians working in the area were making frequent bioshield entries to support electrical cable pulling. The contractor electrician secured the door in an open position to ease frequent access to the bioshield area. Contributing factors for this event include inattention to detail and worker knowledge of posting requirements.

Corrective Steps Taken and Results Achieved:

The entrance to the bioshield was immediately posted by means of a barrier rope and sign. Discussions were held with involved personnel clarifying posting requirements for HRA's and re-emphasizing expectations for compliance with radiological postings.

These actions were completed on November 5, 1996.

Corrective Steps to Avoid Further Violations:

The concerns identified by this violation will be incorporated in training for contractor workers and supervisors prior to the next scheduled refueling outage. This event will also be included in upcoming retraining for Union Electric Health Physics technicians.

Date when Full Compliance will be Achieved:

Union Electric Health Physics technicians retraining will be completed May 2, 1997. Full compliance will be achieved upon revision of Pre-Outage Training lesson plans for contractor workers prior to the next refueling outage scheduled to begin April 4, 1998.

B. Statement of Violation

Technical Specification 6.8.1 states that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 7e.(4) lists "contamination control."

Procedure HTP-ZZ-02005, "Handling and Control of Radioactive Material," Revision 20, Section 4.2.1.1, states that health physics personnel shall survey items removed from the radiological controlled area to ensure the items meet established criteria for unconditional release.

49 CFR 171.2(a) states, in part, that no person may offer or accept a hazardous material for transportation in commerce unless the hazardous material is properly classed, described, packaged, marked, labeled, and in condition for shipment as required or authorized by 49 CFR Parts 171-177.

Contrary to the above, on October 24, 1996, health physics personnel did not survey the trunnions that were attached to a radioactive shipping container and did not identify beta/gamma contamination levels in excess of the established criteria of 1000 disintegrations per minute per 100 centimeters squared before allowing items to be unconditional released from the licensee's control. Also, licensee personnel did not classify, describe, package, mark, and label radioactive material before offering it for shipment.

This is a Severity Level IV violation (Supplement IV and V) (483/9612-03).

Reason for the Violation

During the removal of the Reactor Coolant Pump (RCP) internals shipping container from containment, the trunnions (used to lift the container) were not adequately surveyed for loose surface contamination. The trunnions were removed from the shipping container and placed in the escort vehicle prior to final release for shipment to the decontamination facility.

Corrective Steps Taken and Results Achieved:

The RCP internals and trunnion left the Callaway Plant site on October 24, 1996. On October 25, 1996 potential contamination of the lifting rig used during the handling of the RCP internals shipping container was identified. The transport company was notified on October 25, 1996 of the potential contamination concern with the trunnions. The trunnions were covered with plastic as a precautionary measure to prevent any potential contamination from being dispersed during the remaining time of transport. Upon receipt of the shipment on October 29, 1996 at the decontamination facility, contamination surveys were performed. Low level contamination was found in the grease on the trunnions. No contamination was found on the escort vehicle or on the exterior of the shipping container.

The concerns identified by this violation were discussed with Health Physics personnel during shift turnover meetings immediately following the event. In addition, a Health Physics technician was sent to the decontamination facility to perform additional surveys. These actions were completed on November 1, 1996.

Corrective Steps to Avoid Further Violations:

The concerns identified by this violation will be incorporated in training for Health Physics vendor technicians prior to the next scheduled refueling outage. This event will also be included in upcoming Health Physics retraining.

The RCP internals shipping container procedure will be revised to ensure sufficient guidance is contained in the procedure. In addition, procedures for shipping casks Callaway Plant is licensed to use will also be reviewed.

Date when Full Compliance will be Achieved:

Union Electric Health Physics retraining and the shipping container procedure reviews and revisions will be completed by May 2, 1997. Full compliance will be achieved upon revision of Health Physics vendor technician training lesson plans prior to the next refueling outage scheduled to begin April 4, 1998.