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March 14, 1997

Donald F. Schnell
Senior Vice President
Nuclear

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington, DC 20555-0001

ULNRC-3546

Gentlemen:

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/97003
CALLAWAY PLANT**

This responds to Mr. Arthur T. Howell's letter dated February 28, 1997, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/97003. Our response to the violation is presented in the attachment.

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,

A handwritten signature in cursive script that reads "Donald F. Schnell".

Donald F. Schnell

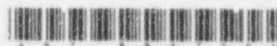
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Attachment: 1) Response to Violation

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Statement of Violation

During an NRC inspection conducted on January 5 through February 15, 1997, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Callaway Plant Technical Specification 6.2.2.f states, in part, that administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions, for example, licensed operators.

Administrative Procedure APA-ZZ-00905, "Limitations of Callaway Plant Staff Working Hours," Revision 3, Step 3.1.1.3, stated that individuals should not be permitted to work more than 24 hours in any 48-hour period. Additionally, Step 3.2 stated that deviations from working hour restrictions shall be approved and documented on Attachment 1, "Request to Exceed NRC Overtime Restrictions," prior to exceeding the overtime restriction.

Contrary to the above, on January 23, 1997, the inspectors identified that two licensed operators exceeded the overtime limits by working greater than 24 hours in a 48-hour period without prior approval and documentation on the "Request to Exceed NRC Overtime Restrictions" form. Specifically:

- On December 4 and 5, 1996, Operator A worked 27.2 hours in a 48-hour period.
- On December 5 and 6, 1996, Operator B worked 26.7 hours in a 48-hour period.

This is a Severity Level IV violation (Supplement I) (50-483/9703-01).

Reason for the Violation

The violation occurred during a forced outage to repair hydraulic actuator leaks for two main feedwater isolation valves. For both cases, the Superintendent, Operations and the Manager, Callaway Plant were cognizant the licensed operators required authorization to exceed working hour restrictions specified by APA-ZZ-00905. Although Attachment 1, "Request to Exceed NRC Overtime Restrictions" had not been completed, the working hour restriction deviations had been authorized by the appropriate management specified by APA-ZZ-00905. The reason for the violation was failure to document the authorization.

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Corrective Steps Taken and Results Achieved:

A corrective action document, SOS 97-0098 was initiated on January 23, 1997 to address the concern identified by the NRC resident staff.

Corrective Steps to Avoid Further Violations:

This violation has been discussed with Operations management personnel. This violation will also be a topic of discussion in meetings conducted by the Superintendent, Operations with Operations department management staff

Date when Full Compliance will be Achieved:

Full compliance will be achieved by May 1, 1997.