



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

MAR 25 1997

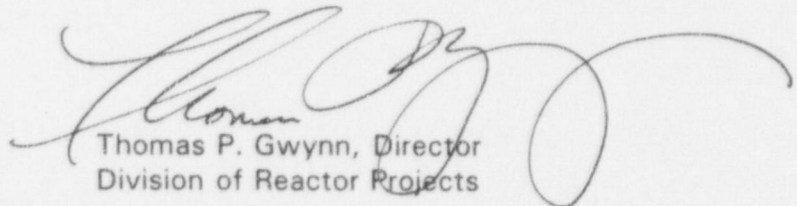
Donald F. Schnell, Senior Vice  
President - Nuclear  
Union Electric Company  
P.O. Box 66149  
St. Louis, Missouri 63166-6149

SUBJECT: NRC INSPECTION REPORT 50-483/97-03

Dear Mr. Schnell:

Thank you for your letter of March 14, 1997, in response to our letter and Notice of Violation dated February 28, 1997. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,



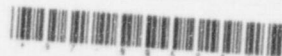
Thomas P. Gwynn, Director  
Division of Reactor Projects

Docket No.: 50-483  
License No.: NPF-30

cc w/enclosure:  
Professional Nuclear Consulting, Inc.  
19041 Raines Drive  
Derwood, Maryland 20855

Gerald Charnoff, Esq.  
Thomas A. Baxter, Esq.  
Shaw, Pittman, Potts & Trowbridge  
2300 N. Street, N.W.  
Washington, D.C. 20037

9703280206 970325  
PDR ADOCK 05000483  
G PDR



H. D. Bono, Supervising Engineer  
Site Licensing  
Union Electric Company  
P.O. Box 620  
Fulton, Missouri 65251

G. L. Randolph, Vice President  
Nuclear Operations  
Union Electric Company  
P.O. Box 620  
Fulton, Missouri 65251

Manager - Electric Department  
Missouri Public Service Commission  
301 W. High  
P.O. Box 360  
Jefferson City, Missouri 65102

Ronald A. Kucera, Deputy Director  
Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102

Otto L. Maynard, President and  
Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
P.O. Box 411  
Burlington, Kansas 66839

Dan I. Bolef, President  
Kay Drey, Representative  
Board of Directors Coalition  
for the Environment  
6267 Delmar Boulevard  
University City, Missouri 63130

Lee Fritz, Presiding Commissioner  
Callaway County Court House  
10 East Fifth Street  
Fulton, Missouri 65151

Union Electric Company

-3-

Alan C. Passwater, Manager  
Licensing and Fuels  
Union Electric Company  
P.O. Box 66149  
St. Louis, Missouri 63166-6149

J. V. Laux, Manager  
Quality Assurance  
Union Electric Company  
P.O. Box 620  
Fulton, Missouri 65251

MAR 25 1997

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator

DRP Director

Branch Chief (DRP/B)

Project Engineer (DRP/B)

Branch Chief (DRP/TSS)

Resident Inspector

DRS-PSB

MIS System

RIV File

Leah Tremper (OC/LFDCB, MS: TWFN 9E10)

DOCUMENT NAME: R:\\_CW\CW703AK.DGP

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

RIV:PE:DRP/B	C:DRP/B	D:DRP					
SJCampbell;df <i>SC</i>	WDJohnson <i>WJ</i>	TPGwynn <i>TPG</i>					
3/25/97	3/25/97	3/25/97					

OFFICIAL RECORD COPY

MAR 25 1997

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator

DRP Director

Branch Chief (DRP/B)

Project Engineer (DRP/B)

Branch Chief (DRP/TSS)

Resident Inspector

DRS-PSB

MIS System

RIV File

Leah Tremper (OC/LFDCB, MS: TWFN 9E10)

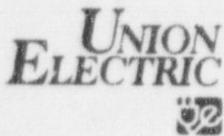
DOCUMENT NAME: R:\\_CW\CW703AK.DGP

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

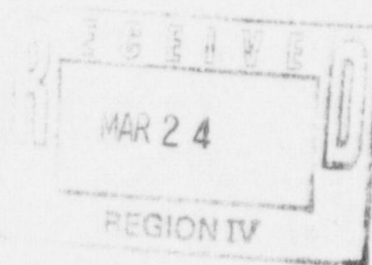
RIV:PE:DRP/B	C:DRP/B	D:DRP					
SJCampbell;df <i>SC</i>	WDJohnson <i>WJ</i>	TPGwynn <i>TPG</i>					
3/25/97	3/25/97	3/25/97					

OFFICIAL RECORD COPY

1901 Chouteau Avenue  
Post Office Box 149  
St. Louis, Missouri 63166  
314-554-2650



March 14, 1997



Donald F. Schnell  
Senior Vice President  
Nuclear

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop P1-137  
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,

Donald F. Schnell

DFS/tmw

Attachment: 1) Response to Violation

97-0833

9703250059 4pp

ULNRC-3546  
March 14, 1997  
Page 2

cc: Mr. James E. Dyer  
Regional Administrator - Acting  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Ms. Kristine M. Thomas (2 copies)  
Licensing Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop 13E16  
Washington, DC 20555-2738

Manager, Electric Department  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65102

Mr. Thomas A. Baxter  
Shaw, Pittman, Potts, & Trowbridge  
2300 N. Street N.W.  
Washington, DC 20037

Manager, Plant Support  
Wolf Creek Nuclear Operating Corporation  
PO Box 411  
Burlington, KS 66839

### 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.



Attachment to  
ULNRC-3546  
March 14, 1997  
Page 2

**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.