

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



**Donald F. Schnell**  
Senior Vice President  
Nuclear

March 4, 1996

Document Control Desk  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop P1-137  
Washington, DC 20555

ULNRC-3339

Gentlemen:

**REPLY TO NOTICE OF VIOLATION  
INSPECTION REPORT NO. 50-483/96001  
CALLAWAY PLANT**

This responds to Mr. Thomas P. Gwynn's letter dated February 9, 1996, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/96001. 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

130053

9603130263 960304  
PDR ADOCK 05000483  
Q PDR

IEO1  
11

cc: Mr. L. J. Callan  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

NRC Resident Inspector

Ms. Kristine M. Thomas (2 copies)  
Licensing Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop 13-E-21  
Washington, DC 20555

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 8-12, 1996, a 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:

Technical Specification 6.12.2 states, in part, "areas accessible to personnel with radiation levels greater than 1000 mR/hr at 45 cm (18 in.) from the radiation source or any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be under the administrative control of the Shift Supervisor/Operating Supervisor on duty, and/or health physics supervision."

Contrary to the above, on January 9, 1996, an NRC inspector discovered that the door to the waste hold-up tank room (Room 7122), a room that had general area dose rates up to 1200 mR/hr, had an opening in the door large enough to permit reaching through the door and unlocking the door without a key, thereby not preventing unauthorized entry to the area.

This is a Severity Level IV violation (Supplement IV) (483/96001-01).

### **Reason for the Violation**

A difference of opinion between the inspector and licensee regarding barrier configurations that would adequately control access to the waste hold-up tank room.

### **Corrective Steps Taken and Results Achieved:**

After notification by the NRC inspector, the Superintendent, Health Physics inspected the door on January 9, 1996 to determine what actions were necessary to address the concern. It was, and still is, Union Electric's position that the door satisfied the Technical Specification requirement. It was also determined that the door was locked and met the requirements of Regulatory Guide 8.38, Control of Access to High and Very High Radiation Areas in Nuclear Power Plants. The decision was made to place a chain and supplemental lock on the door until the matter could be resolved.

A corrective action document was also initiated on January 10, 1996 to formally evaluate the concern identified by the NRC inspection and determine what actions may be warranted.

**Corrective Steps to Avoid Further Violations:**

It is inconceivable to us that anyone possessing the knowledge to qualify for entry into a radiological control area at Callaway Plant would willfully violate a locked entry point clearly identified as a high radiation area. Nonetheless, the door in question was modified to minimize the amount of free space around the instrument tubing which passes through the doorway. All Danger, High Radiation Area (DHRA) doors were inspected to determine if additional doors could be subject to the NRC interpretation of locked high radiation area (HRA) doors. Two additional doors with a similar configuration were modified as a result of this inspection.

**Date when Full Compliance will be Achieved:**

Door modifications were completed on February 8, 1996.