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August 15, 1996

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop P1-137  
Washington, DC 20555-0001

ULNRC-3415

Gentlemen:

**RESPONSE SUPPLEMENT TO  
NOTICE OF VIOLATION  
INSPECTION REPORT NO. 50-483/95016  
CALLAWAY PLANT**

This responds to Mr. Samuel J. Collins' letter dated July 12, 1996, which transmitted additional information regarding a Notice of Violation for events discussed in Inspection Report 50-483/95016. Our revised response to the violation is presented in the attachment. On July 29, 1996, Mr. William D. Johnson, Chief, Reactor Projects Branch B authorized a revised due date of August 30, 1996.

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 dark ink, appearing to read "Donald F. Schnell", written in a cursive style.

Donald F. Schnell

DFS/tmw

Attachment: 1) Response Supplement to Violation

References: 1) NRC letter dated December 12, 1995 - transmitting Inspection Report 50-483/95016 and Notice of Violation

2) UE letter ULNRC-3306, dated January 10, 1996 responding to Notice of Violation described in Inspection Report 50-483/95016

3) NRC letter dated March 6, 1996 - acknowledging UE response to Notice of Violation described in Inspection Report 50-483/95016

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### **Statement of Violation**

During an NRC inspection conducted on November 6-9, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995) the violation is listed below:

Technical Specification 6.8.4(g), states, in part, that a program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide: (1) representative measurements of radioactivity in the highest potential exposure pathways and (2) verification of the accuracy of the effluent monitoring program modeling of environmental exposure pathways. The program shall: (1) be contained in the Offsite Dose Calculation Manual; (2) conform to the guidance of Appendix I to 10 CFR Part 50; and (3) include monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the Offsite Dose Calculation Manual.

Table 9.11-A of the Offsite Dose Calculation Manual, states, in part, that for the airborne exposure pathway sampling for radioiodine and particulates, samples from five locations will be taken, one of which is from a control location, as for example 15 to 30 kilometers (10 to 20 miles) distant and in the least prevalent wind direction.

Contrary to the above, the control location for the airborne exposure pathway was located 9.5 miles northwest of the Callaway plant in one of the more prevalent wind directions.

This is a Severity Level IV violation (Supplement IV ).

### **Reason for the Violation**

As stated in our response dated January 10, 1996, Union Electric felt previous NRC reviews had endorsed this control station location. Additionally, the concerns identified by the INEL evaluation were not conveyed to Union Electric prior to receipt of the NRC Letter dated July 12, 1996. Therefore, Union Electric concluded the location of the control station was acceptable.

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

The NRC's letter dated July 12, 1996, and the three options presented were reviewed. After evaluating these options and clarifications provided by the NRC during a telephone conversation on July 30, 1996, the second option was selected. This option requires reclassification of control station A7 as an indicator station, and enhancement of

procedural guidance to perform an evaluation whenever gross beta activity is detected greater than an established baseline activity level.

A review of Radiological Environmental Monitoring Program (REMP) documentation has been completed and revisions required to implement this option have been identified.

A review of historical data from control station A7 was completed to confirm the validity of past evaluations. From a licensing basis perspective, the control station was not located in the optimum location. However, the past practice for evaluating airborne data was sufficient to ensure the validity of data collected, since the control station data was not used solely to determine plant influence. No invalid interpretations and no required changes to historical Annual Environmental Operating Reports were identified.

**Corrective Steps to Avoid Further Violations:**

The following changes will be made to the REMP.

- The Offsite Dose Calculation Manual (ODCM) will be revised to reclassify airborne sample location A7 from a control station to an indicator station. There will be no physical changes to the station location.
- The procedure for evaluation and reporting of REMP data will be revised to require an evaluation whenever gross beta activity is detected greater than an established baseline activity level. This evaluation will require gamma spectroscopy isotopic analysis of the individual sample to determine if the radioactive material is of plant origin or from another source. If radioactive material of plant origin is identified corrective action will be initiated to track and document a formal evaluation.

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

Full compliance will be achieved by December 31, 1996.