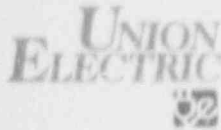


1901 Chouteau Avenue
Post Office Box 149
St. Louis, Missouri 63166
314-554-2650



January 4, 1993

Donald F. Schnell
Senior Vice President
Nuclear

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

ULNRC -2740

Gentlemen:

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/92025
CALLAWAY PLANT**

This responds to C. D. Pederson's letter dated December 3, 1992, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/92025. An extension of the response due date to January 13, 1993 was discussed with NRC Inspector Dave Nelson on December 16, 1992. The extension was granted due to Union Electric's receipt of the Inspection Report on December 14, 1992 and the scheduled holidays and vacations. Our response to the violation is presented below.

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

Statement of Violation

During an NRC inspection conducted on November 2 through 6, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR2, Appendix C, the violation is listed below:

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained. Callaway Health Physics Technical Procedures HTP-ZZ-02002 and HTP-ZZ-02004 require that upon receipt of a package containing radioactive material, including the receipt of radioactive sources, Health Physics shall perform a survey within three hours or within eighteen hours if received after normal working hours.

Contrary to the above, on July 22, 1992 and September 9, 1992, the licensee failed to survey a package containing radioactive material within three or eighteen hours of receipt.

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

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Reason for the Violation

The occurrence of July 22, 1992 was caused by miscommunication between Storeroom and Radwaste personnel and failure of Union Electric to provide adequate procedural guidance to ensure notifications reach the appropriate personnel. A shielded shipping container used for sending radioactive samples to an off-site laboratory was returned to the site following sample analysis. Storeroom personnel notified the Radwaste Supervisor that the container had been returned and in doing so, assumed the requirement of HTP-ZZ-02002 to "Notify Health Physics" had been satisfied. The Radwaste Supervisor assumed the container was being returned empty and did not recognize the call from the storeroom as a notification for receipt of radioactive material. Not realizing the samples had been returned along with the shipping container, the Radwaste Supervisor directed Storeroom personnel to deliver the container to the Radwaste Building. The container was discovered by Health Physics personnel during routine surveys on July 27, 1992.

The occurrence of September 9, 1992 was caused by a provision in Union Electric's procedure HTP-ZZ-02002, Receipt and Shipment of Radioactive Material, which requires surveys of all radioactive material regardless of quantity. Although we provide instructions to vendors that all packaged radioactive material be externally identified, the regulatory requirements of 10CFR20.205 allow limited quantities to be shipped without such identification. If a vendor does not provide labeling per our instructions, there is no mechanism to trigger arrival notification. When the additional labeling is not provided, the material is not identified as radioactive and initial notification of Health Physics by storeroom personnel does not occur, resulting in violation of procedural requirements to perform receipt surveys on all radioactive material within three or eighteen hours of receipt.

Corrective Steps that have been taken and results achieved:

1. A special training session was presented to all Storeroom personnel who work on the receiving dock. This training covered receipt survey requirements of radioactive material, radioactive material markings and labels, and a review of SOS 92-1579.
2. HTP-ZZ-02002, Receipt and Shipment of Radioactive Material, has been revised to remove mandatory receipt surveys for quantities of radioactive material below the requirements of 10CFR20.205.
3. HTP-ZZ-02004, Control of Radioactive Sources, has been revised to delete initial receipt survey requirements. Receipt surveys for all radioactive material, including radioactive sources, are now addressed only in HTP-ZZ-02002, Receipt and Shipment of Radioactive Material.

4. WSP-ZZ-00003, Storeroom Material Receiving has been revised to direct storeroom personnel to provide radioactive material receipt notification to a specific individual in the Health Physics Department (Health Physics Shift Supervisor) instead of previous wording which simply stated, "Notify Health Physics."

Corrective steps that will be taken to avoid further violations:

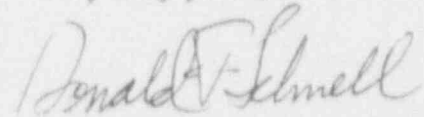
The actions listed above should be adequate to prevent recurrence of the cited procedural violations.

Date when full compliance will be achieved:

Full compliance was achieved by January 4, 1993.

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/skn

cc: A. B. Davis - Regional Administrator, USNRC Region III
I. N. Jackiw - Chief, Reactor Projects Section 3C, USNRC Region III
C. D. Pederson, Chief, Reactor Support Programs Branch, USNRC Region III
L. R. Wharton - USNRC Licensing Project Manager (2 copies)
USNRC Document Control Desk (Original)
Manager - Electric Department, Missouri Public Service Commission
B. L. Bartlett - USNRC Senior Resident Inspector
Shaw, Pittman, Potts, and Trowbridge

DEC 15 1992

American College of Nuclear Physicians,
ATTN: Robert J. Lull, M.D.
1101 Connecticut Avenue, N.W.
Suite 700
Washington, D.C. 20036

Dear Dr. Lull:

Thank you for submitting the name of Mr. Terry Frazee in nomination for membership on the Advisory Committee on the Medical Uses of Isotopes.

We will consider your nominations along with those of other applicants received in response to our Federal Register notice of October 16, 1992.

If you have any questions please call Sally Merchant of the staff at (301) 504-2637.

Sincerely,

Larry W. Camper, Section Leader
Medical and Academic Section
Medical, Academic, and Commercial
Use Safety Branch
Division of Industrial and
Medical Nuclear Safety
Office of Nuclear Material Safety
and Safeguards

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