

ENCLOSURE 1

NOTICE OF VIOLATION

Union Electric Company
Callaway Plant

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

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).

Pursuant to the provisions of 10 CFR 2.201, Union Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a

Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the Public Document Room without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the Public Document Room, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas
this 28th day of February 1997