

OFFICE OF ENFORCEMENT  
NOTIFICATION OF SIGNIFICANT ENFORCEMENT ACTION

Licensee: Union Electric Company (SDP/EA-00-208)  
Callaway Plant, Docket No. 50-483

Subject: ISSUANCE OF FINAL SIGNIFICANCE DETERMINATION AND NOTICE OF VIOLATION

This is to inform the Commission that a Notice of Violation associated with three White Significance Determination Process (SDP) findings will be issued January 9, 2001, to the Union Electric Company. These White findings involved performance deficiencies in the ALARA (As Low As is Reasonably Achievable) planning and controls program. Although there were no exposures in excess of regulatory limits, these performance deficiencies resulted in unnecessary doses to workers. The licensee originally estimated that plant workers would receive exposures totaling 165 rem during Refueling Outage 10. The actual value was 305 rem. A substantial portion of this increase was the result of poor ALARA practices.

The NRC has determined that these performance deficiencies constitute a violation of 10 CFR 20.1101(b). Specifically, the licensee did not use, to the extent practical, procedures and engineering controls based upon sound radiation protection principles to achieve occupational doses ALARA. These deficiencies involved: 1) conducting maintenance in the vicinity of the reactor coolant system (RCS) with dose rates temporarily elevated from RCS clean-up; 2) conducting maintenance in the vicinity of the steam generators (SG) before the SG bowl drains were flushed; 3) conducting maintenance on the reactor coolant pumps and SG without the SG secondary sides filled with water; 4) Insufficient mock-up training; and 5) Ineffective communications. In accordance with the NRC Enforcement Policy, NUREG-1600, the Notice of Violation is considered an escalated enforcement action because it is associated with White finding.

It should be noted that the licensee has not yet been specifically informed of the final significance determination and enforcement action. The schedule of issuance and notification is:

Mailing of Final Significance Determination and Notice of violation	January 9, 2001
Telephone Notification of licensee	January 9, 2001

The State of Missouri will be notified.

Contacts: Christopher Nolan, OE 301-415-2249; James Luehman, OE, 301-415-2741

Distribution

OWFN _____	OWFN _____	TWFN _____	Regional Offices
Chairman Meserve	EDO	OCFO	RI ____
Comm. Dicus	DEDOR	OP CTR	RII ____
Comm. Diaz	DEDMRS	NMSS	RIII ____
Comm. McGaffigan	OE	OCIO	RIV ____
Comm. Merrifield	STP	OIG	
SECY	OGC	RES	
OCA	NRR	ACRS	
PA	OI		
IP			