



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

June 22, 2007

Charles D. Naslund, Senior Vice
President and Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT - NRC RADIATION SAFETY TEAM INSPECTION
REPORT 05000483/2007006

Dear Mr. Naslund:

On June 8, 2007, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Callaway Plant. The enclosed report documents the inspection findings, which were discussed at the conclusion of the inspection with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The team reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, the team evaluated the inspection areas within the Radiation Protection Strategic Performance Area that are scheduled for review every 2 years. These areas are:

- Radiation Monitoring Instrumentation
- Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems
- Radioactive Material Processing and Transportation
- Radiological Environmental Monitoring Program and Radioactive Material Control Program

This inspection report documents one licensee-identified violation, which was determined to be of very low safety significance. If you contest any non-cited violation in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011-4005; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington DC 20555-001; and the NRC Resident Inspector at the Callaway facility.

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Michael P. Shannon, Chief
Plant Support Branch
Division of Reactor Safety

Docket: 50-483
License: NPF-30

Enclosure:
NRC Inspection Report 05000483/2007006
w/attachment: Supplemental Information

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SUNSI Review Completed: __Y__ ADAMS: ☒ Yes ☐ No Initials: _MPS_
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**U.S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Dockets: 50-483

Licenses: NPF-30

Report: 05000483/2007006

Licensee: Union Electric Company

Facility: Callaway Plant

Location: Junction Highway CC and Highway O
Fulton, Missouri

Dates: June 4-8, 2007

Inspectors: Don Stearns, Senior Health Physicist, Plant Support Branch
Bernadette Baca, Health Physicist, Plant Support Branch
Louis Carson, Senior Health Physicist, Plant Support Branch
Gilbert Guerra, CHP, Health Physicist, Plant Support Branch
Larry Ricketson, P.E., Senior Health Physicist, Plant Support Branch

Approved By: Michael P. Shannon, Chief
Plant Support Branch
Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000483/2007006; 6/4-8/2007; Callaway Plant; Radiation Safety Team Inspection

The report covers a 1-week period of onsite inspection by five regional health physicists. One licensee-identified violation, which was determined to be of very low safety significance, was reviewed. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. NRC-Identified and Self-Revealing Findings

Cornerstone: Public Radiation Safety

None

B. Licensee Identified Violations

One violation of very low safety significance, which was identified by the licensee has been reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into the licensee's corrective action program. This violation and corrective actions are listed in Section 4OA7 of this report.

REPORT DETAILS

2. RADIATION SAFETY

Cornerstones: Occupational Radiation Safety and Public Radiation Safety

2OS3 Radiation Monitoring Instrumentation and Protective Equipment (71121.03)

a. Inspection Scope

This area was inspected to determine the accuracy and operability of radiation monitoring instruments that are used for the protection of occupational workers and the adequacy of the program to provide self-contained breathing apparatus (SCBA) to workers. The team used the requirements in 10 CFR Part 20 and the licensee's procedures required by technical specifications as criteria for determining compliance. The team interviewed licensee personnel and reviewed:

- Calibration of area radiation monitors associated with transient high and very high radiation areas and post-accident monitors used for remote emergency assessment
- Calibration of portable radiation detection instrumentation, electronic alarming dosimetry, and continuous air monitors used for job coverage
- Calibration of whole body counting equipment and radiation detection instruments utilized for personnel and material release from the radiologically controlled area
- Self-assessments, audits, and licensee event reports
- Corrective action program reports since the last inspection
- Licensee action in cases of repetitive deficiencies or significant individual deficiencies
- Calibration expiration and source response check currency on radiation detection instruments staged for use
- The licensee's capability for refilling and transporting SCBA air bottles to and from the control room and operations support center during emergency conditions, status of SCBA staged and ready for use in the plant and associated surveillance records, and personnel qualification and training
- Qualification documentation for onsite personnel designated to perform maintenance on the vendor-designated vital components, and the vital component maintenance records for SCBA units

The inspector completed nine of the required nine samples.

b. Findings

No findings of significance were identified.

2PS1 Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems (71122.01)

a. Inspection Scope

This area was inspected to ensure that the gaseous and liquid effluent processing systems are maintained so that radiological releases are properly mitigated, monitored, and evaluated with respect to public exposure. The team used the requirements in 10 CFR Part 20; 10 CFR Part 50, Appendices A and I; the Offsite Dose Calculation Manual; and the licensee's procedures required by technical specifications as criteria for determining compliance. The team interviewed licensee personnel and reviewed:

- Radiological effluent release reports since the last inspection, changes to the Offsite Dose Calculation Manual, radiation monitor setpoint calculation methodology, anomalous sampling results, effluent radiological occurrence performance indicator incidents, program for identifying contaminated spills and leakage and the licensee's process for control and assessment, self-assessments, audits, and licensee event reports
- Gaseous and liquid release system component configurations
- Routine processing, sample collection, sample analysis, and release of radioactive liquid and gaseous effluent, and radioactive liquid and gaseous effluent release permits and dose projections to members of the public
- Abnormal releases
- The licensee's understanding of the location and construction of underground pipes and tanks and storage pools that contain radioactive contaminated liquids, the technical bases for onsite monitoring, the licensee's capabilities of detecting spills or leaks and identifying groundwater radiological contamination both on site and beyond the owner-controlled area
- Changes made by the licensee to the Offsite Dose Calculation Manual, the liquid or gaseous radioactive waste system design, procedures, or operation since the last inspection
- Monthly, quarterly, and annual dose calculations
- Surveillance test results involving air cleaning systems and stack or vent flow rates

- Instrument calibrations of discharge effluent radiation monitors and flow measurement devices, effluent monitoring system modifications, effluent radiation monitor alarm setpoint values, and counting room instrumentation calibration and quality control
- Interlaboratory comparison program results
- Licensee event reports, special reports, audits, self-assessments and corrective action reports performed since the last inspection

The inspector completed 11 of the required 11 samples.

b. Findings

No findings of significance were identified.

2PS2 Radioactive Material Processing and Transportation (71122.02)

a. Inspection Scope

This area was inspected to verify that the licensee's radioactive material processing and transportation program complies with the requirements of 10 CFR Parts 20, 61, and 71 and Department of Transportation regulations contained in 49 CFR Parts 171-180. The team interviewed licensee personnel and reviewed:

- The radioactive waste system description, recent radiological effluent release reports, and the scope of the licensee's audit program
- Liquid and solid radioactive waste processing systems configurations, the status and control of any radioactive waste process equipment that is not operational or is abandoned in place, changes made to the radioactive waste processing systems since the last inspection, and current processes for transferring radioactive waste resin and sludge discharges
- Radio-chemical sample analysis results for radioactive waste streams and use of scaling factors and calculations to account for difficult-to-measure radionuclides
- Shipment packaging, surveying, labeling, marking, placarding, vehicle checking, driver instructing, and disposal manifesting
- Shipping records for non-excepted package shipments
- Licensee event reports, special reports, audits, state agency reports, self-assessments and corrective action reports performed since the last inspection

The inspector completed six of the required six samples.

b. Findings

No findings of significance were identified.

2PS3 Radiological Environmental Monitoring Program (REMP) and Radioactive Material Control Program (71122.03)

a. Inspection Scope

This area was inspected to ensure that the REMP verifies the impact of radioactive effluent releases to the environment and sufficiently validates the integrity of the radioactive gaseous and liquid effluent release program; and that the licensee's surveys and controls are adequate to prevent the inadvertent release of licensed materials into the public domain. The team used the requirements in 10 CFR Part 20, Appendix I of 10 CFR Part 50, the Offsite Dose Calculation Manual, and the licensee's procedures required by technical specifications as criteria for determining compliance. The team interviewed licensee personnel and reviewed

- Annual environmental monitoring reports and licensee event reports
- Selected air sampling and thermoluminescence dosimeter monitoring stations
- Collection and preparation of environmental samples
- Operability, calibration, and maintenance of meteorological instruments
- Each event documented in the Annual Environmental Monitoring Report, which involved a missed sample, inoperable sampler, lost thermoluminescence dosimeter, or anomalous measurement
- Significant changes made by the licensee to the Offsite Dose Calculation Manual as the result of changes to the land census or sampler station modifications since the last inspection
- Calibration and maintenance records for air samplers, composite water samplers, and environmental sample radiation measurement instrumentation, quality control program, interlaboratory comparison program results, and vendor audits
- Locations where the licensee monitors potentially contaminated material leaving the radiological controlled area and the methods used for control, survey, and release from these areas
- Type of radiation monitoring instrumentation used to monitor items released, survey and release criteria of potentially contaminated material, radiation detection sensitivities, procedural guidance, and material release records
- Licensee event reports, special reports, audits, self-assessments and corrective action reports performed since the last inspection

The inspector completed 10 of the required 10 samples.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA2 Problem Identification and Resolution

a. Inspection Scope

The team evaluated the effectiveness of the licensee's problem identification and resolution process with respect to the following inspection areas:

- Radiation Monitoring Instrumentation (Section 2OS3)
- Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems (Section 2PS1)
- Radioactive Material Processing and Transportation (Section 2PS2)
- Radiological Environmental Monitoring Program and Radioactive Material Control Program (Section 2PS3)

b. Findings and Observations

No findings of significance were identified.

4OA6 Management Meetings

Exit Meeting Summary

On June 08, 2007, the team presented the inspection results to Mr. Charles D. Naslund, Senior Vice President and Chief Nuclear Officer, and other members of the staff who acknowledged the findings. The team confirmed that proprietary information was not provided or examined during the inspection.

4OA7 Licensee Identified Violations

The following finding of very low significance was identified by the licensee and is a violation of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600 for being dispositioned as Non-Cited Violations.

- Two examples of a Technical Specification 5.4.1.a violation were reviewed by the team. Technical Specification 5.4.1.a states, in part, that written procedures shall be established, implemented, and maintained, which cover applicable

procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Section 7(e) of the regulatory guide requires procedures for radiation surveys which would limit personnel exposure and materials released into the environment. Procedure HTP-ZZ-02023, "Unconditional Release of Material from Radiological Controls," Revision 2, Section 5.1.1, states, in part, that radiation protection personnel shall survey items removed from the radiological controlled area to ensure no byproduct material is released within the limits of detection for the instrument used. Contrary to procedure, pieces of contaminated scaffolding were identified outside the radiological controlled area. The first example, on May 22, 2006, involved a worker reporting to radiation protection with a piece of scaffolding labeled as radioactive material from the south side of the replacement steam generator storage facility. A radiation protection technician surveyed the item and detected radioactive material when placed in the Gamma tool monitor and when frisked with a Ludlum Model 177 frisker. This event was documented in the licensee's corrective action program as Condition Action Request 200604011. The second example, on May 31, 2006, involved a maintenance worker who identified two pieces of scaffolding labeled as radioactive material from the south end of the 2033 turbine building. A radiation protection supervisor investigated the discovery, determined the items to be radioactive material and dispositioned them as radioactive material. This event was documented in the licensee's corrective action program as Condition Action Request 200604287. This finding was determined to be of very low safety significance because: (1) it was a radioactive material control finding, (2) it was not a transportation finding, (3) it did not result in public dose greater than 0.005 rem, and (4) the number of occurrences was not greater than five.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

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H. Osborne, Health Physicist, Radiation Protection
F. Stuckey, Respiratory Protection Program
B. Turner, Supervisor, Operations Rad Waste
C. Smith, Auditor, Quality Assurance
J. Aplan, Technician, Radiation Protection
C. Graham, Health Physicist, Radiation Protection
C. Jutting, Design Engineer, Nuclear Engineering
R. Rice, Supervising Engineer, Nuclear Engineering
E. Mayhorn, Consulting Engineer, Supplier Quality
R. Baker, Engineer, Systems Engineering

NRC

D. Dumbacher, Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

NONE

Opened and Closed During this Inspection

NONE

LIST OF DOCUMENTS REVIEWED

Section 20S3: Radiation Monitoring Instrumentation and Protective Equipment

Procedures

HPP-ZZ-06017, Rad/Chem Technician Qualification Card Respiratory Protection, Revision 005
HTP-ZZ-08501, Testing of Breathing Air, Revision 009
HDP-ZZ-04000, Radiation Protection Instrumentation Program, Major Revision 19
HTP-ZZ-04102, Operation of the Eberline Ro-2(x) Series Ion Chamber, Revision 7
HTP-ZZ-04131, Operation of Sheperd Model 89 Calibrator, Revision 4
HTP-ZZ-04178, Rotem Telepole Survey Meter Operation, Revision 2
HTP-ZZ-04176, Eberline Model GTM Small Articles Monitor Operation, Minor Revision 3
HTP-ZZ-04177, Eberline PCM-2 Operation, Minor Revision 002
HTP-ZZ-04271, Calibration of the MGPI CDM-21 Dosimeter Irradiator, Minor Revision 2

HTP-ZZ-04231, Determining Low Dose Rate Curves on the the Sheperd Model 89, Revision 7
HTP-ZZ-04542, Whole Body Counter Calibration Using the Canberra Fastscan, Revision 0
ISL-GT-00R59, CTMT High Range Area Rad Monitor, Revision 12
ISL-HB-00R18, Liquid Radwaste Discharge Radiation Detection, Revision 15
ITL-GT-0R21A, Plant Unit Vent Effluent Radiation Detector, Revision 11
ITL-GT-0R21B, Plant Unit Vent Effluent Radiation Detector (Wide Range Gas Monitor), Revision 23

Condition Reports, CAR's

200503224, 200505800, 200602218, 200602320, 200602373, 200603394, 200606372,
200607283, 200607500, 200607505, 200607992, 200608487, 200608738, 200609376
200701469, 200701470, 200701472, 200701473, 200702925, 200705430,

Self-Assessments, Quality Audit Reports

SA 07-RP-S01, Self-Assessment Report, RETS/REMP, January 25, 2007
AP07-001, Quality Assurance Audit of Radiation Protection

Installed Instrumentation Calibrations

05511889, Containment High Range Monitor (R59)
05515309, Containment High Range Monitor (R59)
05512905, Containment High Range Monitor (R60)
05515310, Containment High Range Monitor (R60)
0401640, Control Room HVAC Radiation Monitors

Radiation Protection Instrumentation Calibration

ION-4094-HP (RO2), 11-08-06
ION-4110-HP (RO2A), 12-06-06
ION-4116-HP (RO20), 2-14-07
GMI-4159-HP(Telepole), 7-08-06
PM-4022-HP (PCM-2), 3-13-07
CRM-4160-HP (Frisker), 7-20-06
CAM-4005-HP (Air monitor), 8-07-06
NRM-4010-HP (Neutron), 11-09-06 (vendor cal)
PM-4017-HP (PM-7), 8-21-06
TMI-4004-HP (tool monitor), 2-16-07
FS-5300-HP (WBC), 3-22-07
FS-5301-HP (WBC), 7-02-06
WBC-6000, 7-02-06

Miscellaneous

Respiratory Protection Qualification Cards

Section 2PS1: Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems

Procedures

APA-ZZ-01003, Callaway Offsite Dose Calculation Manual, Revision 016

FSAR-SP 16.11, Callaway Offsite Dose Calculation Manual, Radioactive Effluent Controls

HTP-ZZ-02006, Liquid Radwaste Release Permit (Batch), Revision 056

HTP-ZZ-02007, Gaseous Radwaste Release Permit (Gas Decay Tank), Revision 033

HTP-ZZ-02008, Gaseous Radwaste Release Permit (Auxiliary/Fuel Bldg) – Unit Vent, Revision 021

HTP-ZZ-02009, Gaseous Radwaste Release Permit (Radwaste Building Vent), Revision 020

HTP-ZZ-02014, Release Permit Processing Using the VAX/EMS Application Software, Revision 046

HTP-ZZ-02021, Gaseous Radwaste Release Permit (Miscellaneous Release Points), Revision 010

ESP-GG-03001, FGG02A Charcoal Test Canister Removal and Lab Testing, Revision 017

OSP-GK-0001A, "A" Train Control Room Filtration and Pressurization System Monthly Operability Verification, Revision 008

ETP-ZZ-03004, In-place Bypass Leakage Testing of Adsorber Stage, Revision 004

ETP-ZZ-03005, In-place Bypass Leakage Testing of HEPA Filters, Revision 006

Surveillance Tests

FKG02A, In-Place Bypass Leakage Test, Revision 008

10466-J-361-0067-03, [Primary] Calibration Report for Model RD-60 Particulate, Iodine, and Gas Detector System (April 7, 1983)

05507779, Plant Unit Vent Effluent Radiation Detector - 21A (October 2, 2006)

05507940, Plant Unit Vent Effluent Radiation Detector - 21B (December 13, 2006)

W590710, Liquid Radwaste Discharge Monitor (Primary Calibration, February 24, 1997)

05506880, Liquid Radwaste Discharge Radiation Detector (November 29, 2006)

Condition Reports, CAR's

200502962, 200505500, 200507793, 200600016, 200601056, 200603055, 200603168,
200601654, 200603503, 200604338, 200605236, 200605851, 200605885, 200701664,
200702709, 200705531, 200705731

Self-Assessments, Quality Audit Reports

Simple Surveillance Report SP06-031, "Evaluation of the release of Discharge Monitor Tank A from initial sample collection to release," August 8, 2006

Self-Assessment Report SA07-RP-F01, "RETS/REMP," January 25, 2007

Quality Assurance Audit AP06-008, "Environmental Monitoring," July 24, 2006

NUPIC Audit 18946, Audit of NCS Corporation, Columbia, Ohio

Release Permits

RP09-2005-L0125;1, Discharge Monitor Tank "A"
RP10-2006-L0048;1, Discharge Monitor Tank "B"
RP12-2006-G0001;56, Unit Vent
RP12-2005-G0001;75, Unit Vent
RP13-2007-G0006;2, Rad-Waste Vent
RP15-2006-G0003;10, Laundry Facility Vent
UR02-2006-G0006;1, S/G PORV

Miscellaneous

Annual Radioactive Effluent Release Report for 2005 and 2006

Particulate Plateout Measurements on the Unit Vent Stack Wide-Range Air Monitor at the Callaway Nuclear Power Station - Final Report (July 9, 1984)

Certificate of calibration - Source No. 53039-73 (used for liquid discharge monitor calibrations)

Certificate of Transfer Source - SE/IPL Serial No. CS-137-90-1259/371-43-2 (used for unit vent calibrations)

Section 2PS2: Radioactive Material Processing and Transportation

Procedures

RTN-HC-01000, Storage and Handling of Radwaste, Revision 14
RTN-HC-01100, Shipment of Radioactive Materials, Revision 18
RTS-HC-01130, 10 CFR 61 Sampling Program, Revision 8
RTS-HC-01160, Shipment of Radioactive Wastes, Revision 18
RTN-HM-00200, Radwaste Container Control Program, Revision 016

Training Records

T64.3050Q, Radwaste Shipping
T64.3051, Radwaste Department Of Transportation Function Specific Duty Area Qualification

Condition Reports, CAR's

200409141, 200507178, 200508381, 200509232, 200601034, 200609598, 200609600,
200609660, 200609877, 200609882, 200701426, 200702301, 200702892, 200705814,
200705820, 200705852, 200705853

Self-Assessments, Quality Audit Reports

AP06-017, Quality Assurance Audit of Radwaste
AUCA 06-063, Root Cause Evaluation: Lack of QA Program for Radwaste Activities

Shipping Packages

05-006, 05-008, 05-0011, 06-0010, 06-0029, 06-0031, 06-0035, 06-0036, 06-0045, 06-0069,
06-0070, 07-0010, 07-0024, 07-0027

Section 2PS3: Radiological Environmental Monitoring Program (REMP) And Radioactive Material Control Program

Procedures

HOA-ZZ-00030, Location - Dosimetry, Revision 006
HTP-ZZ-02004, Control of Radioactive Sources, Revision 022
HTP-ZZ-02005, Control of Radioactive Material, Revision 029
HTP-ZZ-02023, Unconditional Release of Material from Radiological Controls, Revision 002
HTP-ZZ-02023, Unconditional Release of Material from Radiological Controls, Revision 006

HTP-ZZ-04221, Calibration of Miscellaneous Air Samplers, Revision 014

HTP-ZZ-07001, Collection and Shipping of Environmental Samples, Revision 047

HTP-ZZ-07100, Land Use Census Program, Revision 004

HTP-ZZ-07101, Radiological Environmental Monitoring Program, Revision 009

HTP-ZZ-07103, Evaluation and Reporting of REMP Data, Revision 006

ISL-Rd-00S10, I&C Calibration Surveillance Procedure, 10 Meter Wind Speed - Primary, Revision 021

ISL-RD-00Z10, I&C Calibration Surveillance Procedure, 10 Meter Wind Dir - Primary, Revision 020

ISL-RD-0DP10, I&C Calibration Surveillance Procedure, 10 Meter Dew Point - Primary, Revision 008

ISL-RD-0Z10A, I&C Calibration Surveillance Procedure, 10 Meter Wind Dir - Secondary, Revision 005

Surveillance Tests

ITL-RD-0DP10, dated 3/19/07

ISL-RD-00Z10, dated 3/19/07

ISL-RD-00S10, dated 3/19/07

ITL-RD-0Z10A, dated 3/12/07

Condition Reports, CAR's

200503550, 200503749, 200503829, 200504007, 200504601, 200505407, 200506240, 200506304, 200507089, 200507769, 200507774, 200507792, 200510253, 200601937, 200602515, 200602748, 200603672, 200604011, 200604229, 200604287, 200604709, 200606299, 200607364, 200607366, 200607367, 200607368, 200607370, 200607429, 200607430, 200609862, 200700368, 200701309, 200701420, 200701619, 200701873, 200703897, 200704798, 200705814

Self-Assessments, Quality Audit Reports

SEGR 06-08-003, Independent Technical Review Report

NUPIC Audit 19238 for Environmental, Inc.

AP06-008, Quality Assurance Audit

SA07-RP-F01, Self Assessment

Surveillance Report SP06-028, Revision 001

Miscellaneous

2005 and 2006 Callaway Plant Annual Radiological Environmental Operating Report

Calibration Records: LAS-4094-HP, LAS-4096-HP, LAS-4100-HP, LAS-4101-HP,
LAS-4093-HP

Callaway 2005 and 2006 Land Use Census Report

Environmental Inc. Midwest Laboratory Report Numbers 8036-100-326-1, 8036-100-327A
8036-100-296, and 8036-100-297

HPOSSD-2020: Expectations for Control of Radioactive Material during Outages and Major
Modifications

Work Order 07507605

Yellow Communication: CAR 200604011-Piece of Radioactive Scaffolding Found in Clean Area