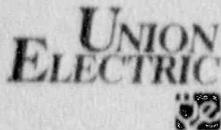


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May 22, 1990

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U.S. Nuclear Regulatory Commission  
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ULNRC-2214

Gentlemen:

**REPLY TO NOTICE OF VIOLATION  
INSPECTION REPORT NO. 50-483/90004  
CALLAWAY PLANT**

This responds to A. Bert Davis's letter dated April 23, 1990, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/90004. 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 January 22 and February 8, 1990, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10CFR Part 2, Appendix C (1989), the violations are listed below:

10CFR73.21(d)(2) requires, in part, that safeguards information be stored in a locked security storage container while unattended.

The Callaway Physical Security Plan (PSP) and Safeguards Site Contingency Plan (SCP) are considered safeguards information as described in 10CFR73.21(b)(1)(i) and (b)(1)(viii), respectively.

- A. Contrary to the above, from approximately 4:45 p.m., October 18, 1989, to approximately 3:00 a.m., October 19, 1989, a security storage container storing copies of the PSP and SCP, located in the Quality Assurance office, was unlocked and unattended.

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- B. Contrary to the above, from approximately 4:00 p.m., December 6, 1989, to approximately 1:40 a.m., December 7, 1989, a security storage container storing copies of the PSP and SCP, located in the Quality Assurance office, was unlocked and unattended.
- C. Contrary to the above, from approximately 4:00 p.m., to approximately 6:30 p.m. on December 13, 1989, a Security storage container storing copies of the PSP and the SCP, located in the Security section office, was unlocked and unattended.

This is a Severity Level III problem (Supplement III).

### Response

#### Admission or Denial of the Alleged Violation

Union Electric acknowledges the cited violation itemized as parts A, B, and C. All three instances were identified and documented by Union Electric and prompt action was taken in each instance to determine that plant security had not been compromised.

#### Reason for the Violation if Admitted

The cause of each of the three examples cited was personnel error and oversight on the part of knowledgeable individuals.

#### Corrective Steps That Have Been Taken and the Results Achieved

In each of the events, an inventory was taken as soon as a determination was made that safeguards information had been left unattended. These inventories determined no documents were missing. No signs of tampering with the containers were identified. Plant incident reports were written to evaluate reportability and track corrective actions for all incidents. The persons responsible for each event received further training on procedural requirements. As a result of the first incident, Security post instructions were modified to require a check of the security container in the Quality Assurance area. This check was effective in identifying the second incident, but did not prevent it from occurring. After the second and third incidents, signs were developed and posted in the Quality Assurance and Security areas to remind

personnel to lock the safeguards cabinets. These signs were discontinued in the Quality Assurance area after the Quality Assurance Department relocated to inside the protected area on April 30, 1990.

Quality Assurance Surveillance Report SP90-017, completed on February 14, 1990, was performed to identify locations outside the Callaway Plant protected area, including the Union Electric General Office Building in St. Louis, where safeguards information could be reduced or eliminated. As a result of this surveillance, the number of safeguards documents was reduced and some safeguards cabinets at these locations were emptied entirely. Quality Assurance performed a follow-up surveillance, SP90-037, on March 27, 1990, to determine the need for safeguards information at the various locations inside the protected area. The amount of safeguards information in each location was generally determined to be appropriate for the work activities performed at the location. After review of the surveillance results, several safeguards information accounts were consolidated or eliminated.

The Security Plans were segregated among several safeguards storage containers at all locations except three locations within the protected area. This action reduces the potential compromise of plant security if unauthorized personnel were able to obtain the contents of a single container. The Callaway Physical Security Plan, Safeguards Site Contingency Plan, and other safeguards information were removed from the Quality Assurance Department security container outside the protected area and transferred to other security accounts or destroyed. The Quality Assurance Department has since moved back into the protected area and now maintains no records or document storage containers containing safeguards information outside the protected area. The Quality Assurance Department will maintain safeguards information determined appropriate for work activities at its current location.

In addition to these actions, the controlling procedure, APA-ZZ-00204, "Safeguards Information", has been revised to require safeguards cabinets in areas not continuously manned by Security or Operations personnel be resecured immediately after removing or returning safeguards information. The applicable requirements of the safeguards control procedure, APA-ZZ-00204, were covered in the 1990 Quality Assurance Department Retraining sessions during April and May, 1990.

These actions have been effective in preventing recurrence of unattended open safeguards containers and in minimizing the amount of safeguards material.

Corrective Steps That Will Be Taken to Avoid Further Violations

Union Electric has taken the corrective actions necessary to avoid further violations.

Date When Full Compliance Will Be Achieved

Union Electric is in full compliance.

If you have any questions regarding this response or if additional information is required, please let me know.

Very truly yours,



Donald F. Schnell

EMT/CSP/pas

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