

## NOTICE OF VIOLATION

Union Electric Company  
Callaway Plant

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

During an NRC inspection conducted November 21, 1993, through January 22, 1994 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Callaway Plant Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, 1.c, requires administrative procedures be established for procedure adherence.

Procedure OTN-BG-00001, Revision 15, "Normal Operating Procedure for Chemical and Volume Control System," procedure step 5.3.1 specifies that the seal water injection filter, which is to be placed in service, be verified filled and vented.

Callaway Operations Department Procedure ODP-ZZ-004, Revision 16, "Locked Component Control," Attachment 1, "locked Component List (Q)," specifies that valve AP V-0006 be locked open with a seal type locking device.

Procedure MDP-ZZ-S0001, Revision 7, "Scaffolding Installation and Evaluation," procedure step 7.2.2.1 specifies that the supervisor evaluate the scaffold against the criteria established in section 5.0 (specific guidance for the installation of scaffolding to meet seismic requirements).

Contrary to the above:

1. On January 13, 1994, seal water injection filter FBG04B was not verified to be filled and vented prior to being placed in service (483/93020-01b).
2. On December 6, 1993, valve AP V-0006 was found by the NRC inspectors to be open but was not locked with a seal type locking device (483/93020-01a).
3. On January 5, 1994, NRC inspectors identified scaffolding that was installed in contact with safety related electrical conduit and duct work on the 2047 foot elevation of the auxiliary building (483/93020-01c).
4. On January 5, 1994, NRC inspectors identified "anti-tipping" restraints that were not installed in the top 1/3 of the scaffold on the 1974 foot elevation of the auxiliary building (483/93020-01d).

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

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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 U.S. Nuclear Regulatory Commission, Region III, 801 Warrenville Road, Lisle, Illinois 60532 and a copy to the NRC Resident Inspector at the Callaway Nuclear Power Plant 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 the Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that will be taken and results achieved, (3) the corrective steps that have been taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, a demand for information may be issued to show cause 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.

Dated at Lisle, Illinois  
this 25th day of February