



July 13, 1994

Donald F. Schnell  
Senior Vice President  
Nuclear

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

ULNRC-3035

Gentlemen:

**SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT NO. 50-483/93014  
CALLAWAY PLANT**

This provides the current status of corrective actions being taken in response to a Notice of Violations for events discussed in Inspection Report 50-483/93014. The notice was transmitted in Mr. William Snell's letter dated October 8, 1993. We responded by ULNRC-2901, dated November 2, 1993. The current status and projected completion date for actions specified in our November response are presented in the attachment.

None of the material in the updated response is considered proprietary by Union Electric Company.

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

Very truly yours,

A handwritten signature in cursive script that reads "Donald F. Schnell".

Donald F. Schnell

DFS/tmw

Attachment: 1) Revised Response to Violation

cc: J. B. Martin - Regional Administrator, USNRC Region III  
M. J. Farber - Chief, Reactor Projects Section 3C, USNRC Region III  
L. R. Wharton - USNRC Licensing Project Manager (2 copies)  
USNRC Document Control Desk (Original)  
Manager - Electric Department, Missouri Public Service Commission  
B. L. Bartlett - USNRC Senior Resident Inspector  
T. A. Baxter - Shaw, Pittman, Potts, and Trowbridge  
C. D. Pederson, Chief, Reactor Support Programs Branch

### Statement of Violations

During an NRC inspection conducted on September 13 through 17, 1993, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

1. 10 CFR 50.47 states, in part, that "adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use."

The Callaway Plant Radiological Emergency Response Plan states that "the Radiological Release Information System (RRIS) provides near real-time predictions of atmospheric transport and diffusion estimates of radioactive releases."

Contrary to the above, on September 14, 1993, the RRIS did not provide an accurate near real-time prediction of atmospheric transport and diffusion estimate of a radioactive release when its capabilities were demonstrated.

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

2. 10 CFR 50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

The Callaway Radiological Emergency Response Plan, Section 8.1.1, states, in part, that periodic retraining is conducted to update the knowledge and skills of onsite personnel.

Contrary to the above, periodic retraining of personnel provided on May 7, 1993, for the Emergency Response Organization position of Dose Assessment Coordinator (DAC) was not effective in updating their knowledge and skills in the functional use of the RRIS.

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

3. 10 CFR Part 50, Appendix E, Section F.5, states that "all training, including exercises, shall provide for formal critiques in order to identify weak or deficient areas that need correction. Any weaknesses or deficiencies that are identified shall be corrected."

Contrary to the above, no corrective actions were taken on deficiencies identified for the Radiological Assessment Course, T68.1090.8, held on July 28, 1992.

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

#### **Status of Corrective Actions for Violation 1**

A task team was established to define a course of action to correct problems identified with the RRIS. While the team was reviewing options, it became clear that initial protective action recommendations (PARs) should be based directly on predefined plant parameters rather than dose calculations performed while an emergency is in progress.

This change will require a revision to the Radiological Emergency Response Plan prior to implementation. The revision will specify the following approach to developing Protective Action Recommendations: an Emergency Implementing Procedure will be used by the On-Shift Emergency Response Organization to determine the appropriate PARs. The PARs will be based on the degree of core damage and loss of fission product barriers. We will not require performance of dose calculations by the On-Shift Emergency Response Organization. Once the Onsite and EOF Emergency Response Organizations have been mobilized, dose assessment personnel will quantify the dose to the general public based on effluent monitors, meteorological monitors, grab samples, and field monitoring team data. After the data is obtained, dose assessment personnel will use a PC-based program to project doses to the general public and modify PARs as necessary. This program is in place and has been used previously as a backup to the RRIS.

Although the PC program does not meet all the characteristics of a Class A model as described in NUREG-0654, it does meet the criteria of NUREG/CR-2584 for developing plume exposure pathway protective action recommendations. The program has proven effective during training, drills and exercises. Also, dose assessment personnel are proficient in its use.

The RERP revision to implement this process will be submitted to the NRC for review by September 15, 1994. Following receipt of your approval, emergency implementing procedures will be revised within 30 days to incorporate the RERP changes.

### **Status of Corrective Actions for Violation 2**

As noted in our status of corrective actions for violation 1, the dose assessment program used at Callaway as a backup to the RRIS will be adapted to replace the RRIS. This program was designed to eliminate the user interface limitations and complexity of the RRIS. Input data from the plant computer has been consolidated on accident-specific summary screens to facilitate data collection and transfer to the dose assessment program.

The number of personnel maintaining qualification for the Dose Assessment Coordinator position has been reduced to facilitate training and assure that they maintain a high level of capability. Dose assessment personnel have already demonstrated proficiency using the PC-based program during past drills and exercises. Additionally, all Dose Assessment Coordinators have successfully completed problem sets administered by the Training Department.

We have completed all actions necessary to prevent recurrence.

### **Status of Corrective Actions for Violation 3**

The incorrect information in the action tracking system has been updated to show changes made as a result of student critiques from the July 28, 1992 Radiological Assessment Course.

A review of closed course deficiency items has shown that items are being closed appropriately and the one uncorrected deficiency was an isolated case. These results were discussed at a Training Department staff meeting with the Superintendent, Training and Senior Training Supervisors. All were in agreement that additional training in the closure of Training Action Tracking items was not warranted.

We have completed all actions necessary to prevent recurrence.