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ENCLOSURE 1

NOTICE OF VIOLATION

Union Electric Company (UE)
Callaway Nuclear Plant

Docket: 50-483
License: NPF-30

During an NRC inspection conducted on November 27 through December 1, 1995, a violation of NRC requirements was identified. The violation involved problems with the access authorization program. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995) the violation is listed below:

License Condition 2.E of the licensee's facility operating license requires, in part, that the licensee fully implement and maintain in effect all provisions of the Commission approved Physical Security Plan, including amendments made pursuant to the authority of 10 CFR 50.54(p).

Section 1.6 (Access Authorization) of the licensee's Physical Security Plan requires, in part, that access to the protected area and vital areas of the plant be allowed only to authorized individuals.

Section 1.6.1.3(1) requires, in part, that the UE screening program meets Regulatory Guide 5.66 (June 1991) to satisfy the requirements of 10 CFR 73.56.

Section 1.6.1.3(4) of the licensee's Physical Security Plan requires, in part, that the vital area access list be reviewed and re-approved at least every 31 days to ensure the need for continuing access.

Regulatory Guide 5.66, dated June 1991, with Appendix, NUMARC 89-01 ("Industry Guidelines for Nuclear Power Plant Access Authorization Programs"), guideline 9.0, requires that each individual granted unescorted access shall be subject to a continual behavior observation program. Clarification 3 (of Regulatory Guide 5.66) states, in part, that prior to reinstatement of the access authorization, "The licensee will ascertain that whatever activities the employee engaged in during his or her absence would not have the potential to affect the employee's trustworthiness and reliability." (NUMARC 91-03, dated March 1992, paragraph III.B.4, clarifies that this absence has to have been more than 30 consecutive days.)

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Contrary to the above, on November 30, 1995, the inspector determined that:

- (1) The licensee failed to withdraw the security badge for an individual no longer authorized unescorted plant access. The individual, a former Vectra contract employee, had been authorized plant access based, in part, upon his employment with Vectra. On August 17, 1995, the individual terminated his employment with that company.
- (2) From August 17 through November 30, 1995, the licensee incorrectly validated each month, an individual's continued need for access to the protected and vital areas of the plant. During this time the individual was not authorized plant access.
- (3) From August 17 through November 30, 1995, an individual, authorized unescorted plant access, was not subject to a continual behavior observation program. This individual could have gained unescorted plant access without the licensee ascertaining if activities during his absence had the potential to affect his trustworthiness and reliability.

This is a Severity Level IV violation (Supplement III)(483/9515-01).

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 Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply, addressing each part of the violation, should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an Order or a Demand for Information may be issued as to 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.

Because the response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary,

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SAFEGUARDS INFORMATION

or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of the response that identifies the information that should be protected and a redacted copy of the response that deletes such information. If Union Electric Company (Licensee) requests withholding of such material, Licensee must specifically identify the portions of the response that Licensee seeks to have withheld and provide in detail the bases for Licensee's claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas
this 29th day of December 1995.

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