



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

APR - 9 1996

Union Electric Company
ATTN: Donald F. Schnell, Senior Vice
President - Nuclear
P.O. Box 149
St. Louis, Missouri 63166

SUBJECT: REPLY TO NOTICE OF VIOLATION (NRC INSPECTION REPORT 50-483/96-01)

This is in response to your letter of March 4, 1996, responding to our letter and Notice of Violation dated February 9, 1996. Your reply denied that a violation of Technical Specification 6.12.2¹ existed when NRC identified that a locked "Danger High Radiation Area" barrier, the waste holdup tank room door, could be opened without the use of a key. As we understand it, your position that no violation of the Technical Specification occurred was based on the door being locked, properly posted and meeting the requirements of Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants."

Our understanding of the circumstances surrounding the NRC finding, as documented in the subject inspection report, are as follows. The waste holdup tank room included radiation areas that met the criteria for posting as a "Danger High Radiation Area." The room had a locked door with a key controlled by radiation protection personnel to prevent unauthorized entry. A plant modification, which had been installed several months prior to our inspection, included the routing of instrument tubing through the waste holdup tank room door.

The modification failed to maintain the integrity of the door lock; specifically, a cutout (approximately 5 inches by 5 inches squ. a) was installed in the door to allow the passage of the tubing along the wall and through the door. As confirmed by the NRC inspector, the cutout provided a direct access path by which an individual could open the door without the use of a key. Although the door was technically locked, the barriers provided did not reasonably prevent unauthorized entry into the waste holdup tank room, a high radiation area.

We have reviewed your reply and understand your position with respect to this violation; however, we conclude, that after the modification to the door, the controls you had in place to meet the requirements of Technical Specification 6.12.2 were changed and not adequate for preventing unauthorized entry into the waste holdup tank room. Therefore, our review confirms that a

¹ Technical Specification 6.12.2 requires areas with radiation levels greater than 1000 mR/hr, 45 cm from the radiation source, to be "locked to prevent unauthorized entry."

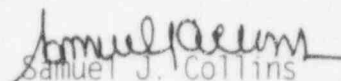
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violation of Technical Specification 6.12.2 did occur. With respect to the safety significance of this issue, the regulatory precedent is that it is a Severity Level IV violation.

The implementation of your corrective actions will be reviewed during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,



Samuel J. Collins
Deputy Regional Administrator

Docket: 50-483
License: NPF-30

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E-Mail report to D. Nelson (DJN)
E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IE01)

bcc distrib. by RIV:

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*previously concurred

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E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IE01)

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