

August 27, 1998



U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop P1-137  
Washington, DC 20555-0001

ULNRC-3882

Gentlemen:

**REPLY TO NOTICE OF VIOLATION  
INSPECTION REPORT NO. 50-483/98013  
CALLAWAY PLANT  
UNION ELECTRIC CO.**

This responds to Mr. Blaine Murray's letter dated July 29, 1998, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/98013. Our response to the violation is presented in the attachment.

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

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 "Joseph V. Laux".

J. V. Laux  
Manager, Quality Assurance

JVL/MAR/tmw

Attachment: 1) Response to Violation

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### **Statement of Violation**

During an NRC inspection conducted on July 14-17, 1998, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 20.1501(a) states, in part, "Each licensee shall make surveys or cause to be made, surveys that - (2) Are reasonable under the circumstances to evaluate the (ii) concentrations or quantities of radioactive material; and (iii) The potential radiological hazards that could be present."

Contrary to the above, between April 13-15, 1998, grinding/needle gun work was performed on the 2000-foot elevation of the containment building liner floor plate without performing surveys to evaluate the concentration or quantities of radioactive material and the potential airborne radiological hazards that could be present.

This is a Severity Level IV violation (Supplement 50-483/9813-01)

### **Reason for the Violation**

The reason for this violation was inadequate guidance for performing evaluations for this type of work and incomplete documentation of evaluations for the work performed April 13 through April 15, 1998.

Callaway Plant believes the controls implemented were reasonable for the circumstances and adequately protected the worker as evidenced by the absence of Personnel Contamination Events/Incidents or positive Whole Body Counts. However, the following corrective action is being implemented to strengthen our current program.

### **Corrective Steps Taken and Results Achieved:**

1. It has been re-emphasized to the Rad/Chem Planner to identify any work documents for further evaluation which involve abrasive processes that could create a potential airborne radiological hazard.
2. The ALARA Supervisor and the ALARA Technicians have been instructed to, in conjunction with item #1, review the weekly schedule for identified items and any

other work documents which may involve abrasive processes which have the potential to cause an airborne radiological hazard.

3. HP Operations personnel have been reminded to evaluate all abrasive processes for potential fixed contamination prior to start of work. If appropriate documentation does not establish the absence of fixed contamination, then appropriate engineering controls, containment devices or respiratory protection in conjunction with air sampling will be employed to assure the worker is adequately protected against airborne radiological hazards.

**Corrective Steps to Avoid Further Violations:**

Procedural controls will be enhanced to ensure that the absence of fixed contamination is evaluated and documented when activities utilizing abrasive processes have the potential to create an airborne radiological hazard. This guidance will be contained in procedure HTP-ZZ-01201, "Preparation and Maintenance of General and Specific Radiation Work Permits". The procedure will require a documented basis be included with the Radiation Work Permit (RWP) for those cases where there is insufficient fixed contamination to create a radiological airborne hazard.

If it cannot be determined by review that an acceptable low level of fixed contamination exists, HP Personnel have been instructed to implement appropriate engineering controls and/or containment devices to protect the worker from airborne contaminants. Air sampling will be used to verify the adequacy of these controls. When warranted by TEDE ALARA Evaluations, respirators will be employed to protect the worker until such time as air samples can be analyzed and evaluated to determine whether continued use of respirators is required.

**Date when Full Compliance will be Achieved:**

The procedure revision and training of HP Personnel on the procedure changes will be completed by October 30, 1998.