

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV

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

May 29, 2001

Garry L. Randolph, Senior Vice President and Chief Nuclear Officer Union Electric Company P.O. Box 620 Fulton, Missouri 65251

SUBJECT: ANNUAL ASSESSMENT LETTER - CALLAWAY PLANT (REPORT 50-483/01-01)

Dear Mr. Randolph:

On May 7, 2001, the NRC staff completed its end-of-cycle plant performance assessment of Callaway Plant. The end-of-cycle review for Callaway Plant involved the participation of all technical divisions in evaluating performance indicators (PIs) for the most recent quarter and inspection results for the period April 2, 2000, to March 31, 2001. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility so that you will have an opportunity to prepare for these inspections and to inform us of any planned inspections which may conflict with your plant activities.

Overall, Callaway Plant operated in manner that preserved public health and safety and met all cornerstone objectives with minimal reduction in safety margin. Plant performance for the most recent quarter was within the degraded cornerstone column of the NRC's Action matrix based on three white findings identified in September 2000. These findings were associated with poor planning and controls to keep radiation worker doses as low as is reasonably achievable (ALARA) during the 1999 refueling outage. During a supplemental inspection conducted in April 2001, our inspectors determined that your staff performed a thorough evaluation of the causes of job doses that were not ALARA and identified appropriate corrective actions. Our review of the 2001 refueling outage has not identified similar ALARA problems. We plan to conduct a Regulatory Performance Meeting to discuss the corrective actions associated with these findings. The schedule and agenda for this meeting will be transmitted by separate correspondence.

Additionally, on May 14, 2001, the staff issued a Severity Level III Notice of Violation and Proposed Imposition of a \$55,000 Civil Penalty in accordance with the enforcement policy. Contrary to 10 CFR 50.7, Union Electric and one of its contract organizations discriminated against a security officer and a training instructor for having engaged in protected activity. NRC followup activities will be determined following review of your response to the Notice of Violation.

The enclosure details the scheduled inspections that will occur through May 31, 2002. The inspection plan is provided to minimize the resource impact on your staff and to allow for

scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature.

For your information, the NRC is in the process of aligning the inspection and assessment cycle with the calender year. In order to transition to a calender year cycle (January 1 through December 31), the next inspection and assessment cycle will consist of only three quarters (i.e., the second, third, and fourth calendar quarters of CY 2001). As a result, a quarterly review will be conducted for the third calendar quarter (July 1 through September 30) in lieu of a midcycle review. The impact on the inspection plan, which is included as an enclosure, is minimal. Activities planned for the transition cycle represent only 60-80 percent of those activities that would be accomplished during a typical 12-month inspection and assessment cycle.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Bill Johnson at (817) 860-8148 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

Ellis W. Merschoff Regional Administrator

Docket: 50-483 License: NPF-30

Enclosure:

Callaway Plant Inspection/Activity Plan

cc w/enclosure: Professional Nuclear Consulting, Inc. 19041 Raines Drive Derwood, Maryland 20855

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Regional Administrator (EWM)
DRP Director (KEB)
DRS Director (ATH)
Senior Resident Inspector (VGG)
Branch Chief, DRP/B (WDJ)
Senior Project Engineer, DRP/B (RAK1)
Section Chief, DRP/TSS (PHH)
J. Isom, NRR (JAI)
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RIV:SPE:DRP/B	C:DRP/B	D:DRS	D:DRP	OE:NRR/IIPB
RAKopriva;df	WDJohnson	ATHowell	KEBrockman	JAIsom
N/A	/RA/	/RA/	/RA/	E-PHHarrell for
5/ /01	5/14/01	5/18/01	5/24/01	5/22/01

DRA	RA		
TPGwynn	EWMerschoff		
N/A	/RA/		
5/ /01	5/29/01		

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Callaway

Inspection / Activity Plan

06/01/2001	-	05/31	/2002

Unit		1 .	No. of Staff	Planne		Inspection	
Number	Inspection Activity	Title	on Site	Start	End	Туре	
	PBB-Q1 - RI INSPECTION Q1 2						
1	IP 7111101	Adverse Weather Protection		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111104	Equipment Alignment (Quarterly)		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111104S	Equipment Alignment		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111105Q	Fire Protection		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111106	Flood Protection Measures		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111107A	Heat Sink Performance		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111111Q	Licensed Operator Requalification		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111112Q	Maintenance Rule Implementation		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111113	Maintenance Risk Assessments & Emergent Work Evaluation		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111115	Operability Evaluations		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111119	Post Maintenance Testing		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111120	Refueling and Outage Activities		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111122	Surveillance Testing		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111123	Temporary Plant Modifications		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 7111406	Drill Evaluation		04/01/2001	07/07/2001	Baseline Inspections	
1	IP 71151	Performance Indicator Verification		04/01/2001	07/07/2001	Baseline Inspections	
	SI-01 - SPEC	IAL INSPECTION 01	2				
1	IP 7111122	Surveillance Testing		05/31/2001	06/09/2001	Baseline Inspections	
	PSB-S1 - ACCE	SS AUTH/CONTROL, SEC PLAN & PIV	1				
1	IP 7113001	Access Authorization Program (Behavior Observation Only)		06/04/2001	06/08/2001	Baseline Inspections	
1	IP 7113002	Access Control (Search of Personnel, Packages, and Vehicles: Identification and Authorization		06/04/2001	06/08/2001	Baseline Inspections	
1	IP 7113004	Security Plan Changes		06/04/2001	06/08/2001	Baseline Inspections	
1	IP 71151	Performance Indicator Verification		06/04/2001	06/08/2001	Baseline Inspections	
	PSB-RP3 - GASE	OUS & LIQUID EFFLUENTS	1				
1	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		06/18/2001	06/22/2001	Baseline Inspections	
	PBB-Q2 - RI INS	SPECTION Q2	2				
1	IP 7111104	Equipment Alignment (Quarterly)		07/08/2001	09/29/2001	Baseline Inspections	
1	IP 7111105Q	Fire Protection		07/08/2001	09/29/2001	Baseline Inspections	
1	IP 7111106	Flood Protection Measures		07/08/2001	09/29/2001	Baseline Inspections	
1	IP 7111111Q	Licensed Operator Requalification		07/08/2001	09/29/2001	Baseline Inspections	
1	IP 7111112Q	Maintenance Rule Implementation		07/08/2001	09/29/2001	Baseline Inspections	
1	IP 7111113	Maintenance Risk Assessments & Emergent Work Evaluation		07/08/2001	09/29/2001	Baseline Inspections	
1	IP 7111115	Operability Evaluations		07/08/2001	09/29/2001	Baseline Inspections	
1	IP 7111116	Operator Workarounds		07/08/2001	09/29/2001	Baseline Inspections	

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

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Callaway

Inspection / Activity Plan

06/01/2001 - 05/31/2002

Unit			No. of Staff	Planned Da	tes	Inspection	
Number	Inspection Activity	Title	on Site	Start E	End	Туре	
	PBB-Q2 - RI INSPECTION Q2 2						
1	IP 7111119	Post Maintenance Testing		07/08/2001 09/	29/2001	Baseline Inspections	
1	IP 7111122	Surveillance Testing		07/08/2001 09/	29/2001	Baseline Inspections	
1	IP 7111123	Temporary Plant Modifications		07/08/2001 09/	29/2001	Baseline Inspections	
1	IP 7111406	Drill Evaluation		07/08/2001 09/	29/2001	Baseline Inspections	
1	IP 71151	Performance Indicator Verification		07/08/2001 09/	29/2001	Baseline Inspections	
	PSB-RP1 - ACC	ESS CONTROL TO RAD SIGN AREAS & PIV	1				
1	IP 7112101	Access Control to Radiologically Significant Areas		08/06/2001 08/	10/2001	Baseline Inspections	
1	IP 71151	Performance Indicator Verification		08/06/2001 08/	10/2001	Baseline Inspections	
	PSB-RP4 - ALAI	RA PLANNING AND CONTROL (3)	1				
1	IP 7112102	ALARA Planning and Controls		08/06/2001 08/	10/2001	Baseline Inspections	
	PSB-RP5 - RAD	ENVIRONMETAL MONITORING	1				
1	IP 7112203	Radiological Environmental Monitoring Program		08/13/2001 08/	17/2001	Baseline Inspections	
	EMB - HX P	PERFORMANCE	1				
1	IP 7111107B	Heat Sink Performance		10/01/2001 10/	05/2001	Baseline Inspections	
	PBB-Q3 - RI IN	SPECTION Q3	2				
1	IP 7111101	Adverse Weather Protection		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111104	Equipment Alignment (Quarterly)		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111104S	Equipment Alignment		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111105A	Fire Protection		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111105Q	Fire Protection		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111106	Flood Protection Measures		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111111Q	Licensed Operator Requalification		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111112Q	Maintenance Rule Implementation		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111113	Maintenance Risk Assessments & Emergent Work Evaluation		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111115	Operability Evaluations		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111119	Post Maintenance Testing		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111122	Surveillance Testing		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111123	Temporary Plant Modifications		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 7111406	Drill Evaluation		09/30/2001 12/	29/2001	Baseline Inspections	
1	IP 71151	Performance Indicator Verification		09/30/2001 12/	29/2001	Baseline Inspections	
	OB-RQ - REQ	UAL INSP	2				
1	IP 7111111B	Licensed Operator Requalification		10/01/2001 10/	05/2001	Baseline Inspections	
	PSB-EP1 - EXER	RCISE EVAL, EAL/EP, PIV	3				
1	IP 7111401	Exercise Evaluation		10/01/2001 10/	05/2001	Baseline Inspections	

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

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Inspection / Activity Plan

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Unit	No. of Staff Planned Dates		d Dates	Inspection		
Number	Inspection Activity	Title Title	on Site	Start	End	Туре
	PSB-EP1 - EXER	3				
1	IP 7111404	Emergency Action Level and Emergency Plan Changes		10/01/2001	10/05/2001	Baseline Inspections
1	IP 71151	Performance Indicator Verification		10/01/2001	10/05/2001	Baseline Inspections
	EMB - EVAL	. OF TESTS, CHANGES, OR EXPERIMENTS	1			
1	IP 7111102	Evaluation of Changes, Tests, or Experiments		12/03/2001	12/07/2001	Baseline Inspections
	EMB - MAIN	TENANCE RULE IMPLEMENTATION	1			
1	IP 7111112B	Maintenance Rule Implementation		12/03/2001	12/07/2001	Baseline Inspections
	PSB-RP6 - RAD I	MATERIALS PROCESSING & SHIPPING	1			
1	IP 7112202	Radioactive Material Processing and Transportation		12/03/2001	12/07/2001	Baseline Inspections
	PBB Q1 - RI RE	PORT Q1	2			
1	IP 7111101	Adverse Weather Protection		12/30/2001	03/31/2002	Baseline Inspections
	OB-PIR - PROB	BLEM ID INSP	3			
1	IP 71152	Identification and Resolution of Problems		03/04/2002	03/15/2002	Baseline Inspections
	PSB-RP7 - ALAR	A PLANNING AND CONTROLS (4)	1			
1	IP 7112102	ALARA Planning and Controls		03/04/2002	03/08/2002	Baseline Inspections
	PBB-Q2 - RI RE	PORT Q2	2			
1	IP 7111101	Adverse Weather Protection		03/31/2002	06/29/2002	Baseline Inspections
	EMB - SSD&	PC INSPECTION	5			
1	IP 7111121	Safety System Design and Performance Capability		05/06/2002	05/13/2002	Baseline Inspections
1	IP 7111121	Safety System Design and Performance Capability		05/20/2002	05/24/2002	Baseline Inspections
	PSB-EP1 - EP PR	ROGRAM BASELINE INSPECTION	1			
1	IP 7111402	Alert and Notification System Testing		05/13/2002	05/17/2002	Baseline Inspections
1	IP 7111403	Emergency Response Organization Augmentation Testing		05/13/2002	05/17/2002	Baseline Inspections
1	IP 7111404	Emergency Action Level and Emergency Plan Changes		05/13/2002	05/17/2002	Baseline Inspections
1	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies		05/13/2002	05/17/2002	Baseline Inspections
1	IP 71151	Performance Indicator Verification		05/13/2002	05/17/2002	Baseline Inspections