

UNION ELECTRIC COMPANY  
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ST. LOUIS, MISSOURI

JOHN K. BRYAN  
VICE PRESIDENT

August 2, 1979

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Mr. Gaston Fiorelli, Chief  
Reactor Construction & Engineering Support Branch  
US Nuclear Regulatory Commission  
Region III  
799 Roosevelt Rd.  
Glen Ellyn, IL 60137

ULNRC-321

Dear Mr. Fiorelli:

INSPECTION REPORT NO. 50-483/79-06

This is in response to your letter of July 3, 1979 reporting results of an inspection at Union Electric Company's Callaway Plant site on May 30-June 1, 1979 and as detailed in inspection report number 50-483/79-06.

None of the material in the inspection report or in this response are considered proprietary by Union Electric Company.

The response listed below corresponds to the items listed in Appendix A, Notice of Violation, of the inspection report.

Infraction (483/79-06-03)

10 CFR 50, Appendix B, Criterion V and SNUPPS PSAR, paragraph 17.15 requires in part, that activities affecting quality shall be accomplished in accordance with instructions, procedures or drawings.

Daniel International procedure AP-VII-03 "Material and Equipment Receiving and Inspection", requires that subvendor data packages shall be received within 60 days after receiving material or the lack of documentation will be identified with a nonconformance report. Reactor coolant system piping was received on site from a Westinghouse subcontractor in March of 1978. Contrary to procedural requirements, no nonconformance report had been written as of June 1, 1979. 266 331

a. CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

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The absence of part of the data package for reactor coolant system piping has been documented on Nonconformance Report 2SN-0816-M to satisfy the requirements of AP-VII-03 "Material and Equipment Receiving and Inspection".

b. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

As described in the NRC inspection report, the documentation problem identified by Union Electric concerning data packages is in the process of being resolved. Although the missing radiographs in the Reactor Coolant System piping package had not been identified at the time of the inspection, the RCS piping package was part of the on-going documentation review program which would have revealed the nonconformance.

Subsequent review of a random sampling of earlier NSSS data packages indicated that a further review of Westinghouse data packages will be necessary. The extent of that review and the organization responsible for conducting the review is now under consideration.

The specific responsibilities of Daniel International Corporation Quality Control Receiving and the Documents Section of Quality Control Services have been reevaluated. It was established that QC Receiving will verify the receipt of all documentation required to complete the NSSS data packages. NSSS data packages received on site since April of 1979 have been received under the guidelines of this system which was designed to prevent reoccurrence of the subject noncompliance. In addition, QC Receiving maintains a "follow-up-file" which is reviewed periodically to assure adherence to the requirement of DIC procedure AP-VII-03.

c. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The issuance of Nonconformance Report 2SN-0816-M establishes compliance with project inspection requirements for the RCS

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piping data package. Delivery of the radiographs to complete the package is expected by August 15, 1979.

Infraction (483/79-06-02)

10 CFR 50, Appendix B, Criterion XVI and SNUPPS PSAR paragraph 17.1.13 states, "Measures shall be established to control the handling, storage, shipping and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration. When necessary for particular products special protective environments, such as inert gas atmosphere, specific moisture content levels and temperature levels, shall be specified and provided."

Contrary to the above, work instructions have not been prepared to prevent damage to the reactor vessel during upcoming fabrication work as evidenced by:

1. The reactor vessel was stored in place in the reactor building. The top was not properly sealed allowing water/condensate to collect on a plain carbon steel platform placed inside the vessel which caused rust to enter the vessel. Three (3) protective caps were missing from the thimble guides at the base of the vessel.
2. Rust stains were also found in the holes in the reactor core flow mixer plate. There was no explanation of the cause of the staining.
3. Liquid Radwaste Valve (2HB24-LCB-1003 a class 3-quality listed valve) was on the concrete floor, in moisture and dirt contrary to the level B requirements specified in ANSI N45.2.2.

a. CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

1. Reactor Vessel

NCR 2SN-0473-M dated April 23, 1979  
was written to document excessive

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condensation and rust inside the reactor vessel as described in the subject inspection report. All vessel cleaning has been completed. Westinghouse Site Liaison evaluated the vessel cleaning and found the condition of the vessel to be acceptable.

The ends of the thimble guide (with missing caps) were wrapped with Grade C Milpack #12 (waxed paper) and secured with Permacel tape. Access to the reactor vessel will be controlled to prevent damage or contamination.

2. Reactor Internals

The rust stains referred to in the inspection report were brought to the attention of Westinghouse Site Liaison. Westinghouse determined the discoloration to be waterspots which left an iron oxide residue upon evaporation. This condition is not considered detrimental and would normally be removed during final cleaning. However, to alleviate further concern the waterspots and residue were removed by light sanding with aluminum oxide paper, authorized by Storage Correction Report No. MFS-0762.

Dust and paper/dirt debris were removed from the fuel cavity of the internals and the protective covering for the internals has been repaired.

3. We believe the liquid radwaste valve identified in the inspection report to be 2HB24-LCV-1003 which is a non-safety related valve. The valve has been inspected, properly prepared for installation and put in place.

b. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

A documented training session was held on June 15, 1979, by the General Piping Superintendent with all Piping Superintendents in attendance. The session

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stressed the requirement of equipment being maintained in the proper storage condition upon issuance to the field. Procedures involving storage requirements were reviewed.

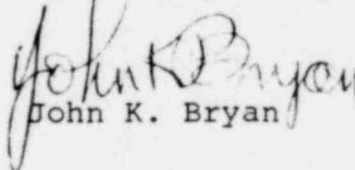
Additional requirements which will be incorporated into DIC's quality program are being established to assure preservation and protection of NSSS equipment during installation.

c. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The concerns of the three specific storage items have been resolved. Instructions to prevent similar storage problems will be implemented by August 13, 1979.

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

Yours very truly,

  
John K. Bryan

PWG/jds

cc: W. A. Hansen

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