

UNION ELECTRIC COMPANY  
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DONALD F. SCHNELL  
VICE PRESIDENT

September 23, 1982

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Mr. R. L. Spessard, Director  
Division of Projects and Resident Programs  
US Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

ULNRC-583

Dear Mr. Spessard:

INSPECTION REPORT NO. 50-483/82-06

This letter is in response to your letter of August 25, 1982 which transmitted the report of the inspection conducted during the period of July 21-31, 1982 of activities at Callaway Plant Unit 1. Our response to the item of noncompliance is presented below.

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

(50-483/82-06-01) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures and Drawings, states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings."

Daniel International Corporation's Procedure QCP-307, Inspection of Electrical Seismic II/I Installations, Revision 0, dated 3-12-82, section 3.1 states, "The Project Electrical Engineer shall be responsible for ensuring that applicable Seismic II/I related material/equipment is installed in accordance with...this procedure." Section 3.2 of QCP-307 states, "Electrical Quality Control shall be responsible for inspection of Seismic II/I related materials and installations in accordance with this procedure...."

Contrary to the above, the junction box and hanger installation above Class IE conduit 4U1029 on the 1988 ft. elevation had not been installed or inspected according to procedures governing Seismic II/I installations.

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Corrective Action Taken And The Results Achieved:

The conduit leading to the "in line pull box" (junction box), originates in the Turbine Building (a non-seismic area), goes through the Auxiliary Building, Area 5 (a seismic area) and then to the Condensate Storage Water Tank (a non-seismic area). Work assignment WA-LGX-4003 was written in error as it did not specify II/I requirements and was therefore not forwarded to Quality Inspection to perform the required inspection. The work was performed per C-0600 series drawings, and thus all work was completed to II/I details and signed off by Engineering.

Work Assignment WA-LGX-4003 has been superseded by WA-LGX-1501 to provide Quality Inspection of the portion of conduit routing which is designated as II/I. This action will bring the documentation into compliance and assure supports are in compliance with II/I criteria. Work Assignment WA-LGX-1501 was forwarded to Quality Inspection on August 17, 1982, for processing.

The problem identified by the Inspector was a case where the Work Assignment was mistakenly written for a non-seismic designated area, though a portion of the conduit would route through a seismic area. Daniel has completed a review of the drawings to assure the same problem does not exist in other areas. The review identified one other instance, specifically, Work Assignment WA-CMX-4002, which has been superseded by Work Assignment WA-CMX-1501 to impose II/I requirements. No other deficiencies were identified. These two cases are considered isolated instances.

Corrective Action To Be Taken To Avoid Further Noncompliance:

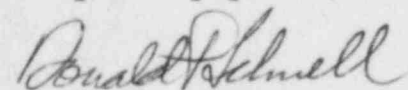
A review of all completed Work Assignments for Non-Q Non-scheduled raceway within Seismic II/I boundaries is in process to assure identification and compliance with II/I requirements.

The Date When Full Compliance Will Be Achieved:

Full compliance will be achieved upon completion of Work Assignments WA-LGX-1501 and WA-CMX-1501 and when the review of Non-Q Non-scheduled raceway is completed. The expected completion date is December 10, 1982.

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

Very truly yours,



Donald F. Schnell

WSS/jds

cc: Mr. H. M. Wescott, NRC Region III  
NRC Resident Inspector, Callaway Plant  
Missouri Public Service Commission