



Callaway Plant

April 9, 1990

Mr. H. J. Miller, Director
Division of Reactor Safety
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Rd.
Glen Ellyn, IL 60137

ULNRC-2188

Dear Sir:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
FACILITY OPERATING LICENSE NPF-30
RESPONSE TO INSPECTION REPORT 50-483/89024

This responds to your letter dated March 14, 1990 which transmitted the results of the NRC Emergency Operating Procedures Inspection conducted at Callaway Plant during the period of January 22 through February 2, 1990. Our response to the open items contained in the report is presented in the attachment.

Union Electric has addressed the inspection team's concerns and will continue to enhance our capabilities related to Emergency Operating Procedures. If you have any questions regarding the response, or if additional information is required, please let me know.

Very truly yours,


Donald F. Schnell

LHK/CSP/pas

Attachment

cc: A. B. Davis - Regional Administrator, USNRC Region III
R. L. Hague - Chief, Reactor Projects Section 3A, USNRC
Region III
→ A. T. Gody, Jr. - USNRC Licensing Project Manager (2 copies)
USNRC Document Control Desk (original)
Manager - Electric Department, Missouri Public Service
Commission
B. H. Little - USNRC Senior Resident Inspector
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RESPONSE TO OPEN ITEMS IN INSPECTION REPORT 50-483/89024

1. Open Item 50-483/89024-01

"...the licensee has started a valve relabelling program with larger, more visible labels. Completion of this labelling program will be tracked as an open item."

Response

The Emergency Operating Procedures (EOPs) have been reviewed to identify local valve operations performed in the plant. The labelling team will walkdown this listing of local valves by July 1, 1990 to ensure accuracy of information and identify the potential need for additional lighting and access platforms. Potential lighting and platform problems will be submitted to Nuclear Engineering for evaluation of design adequacy. Larger, more visible labels will be ordered and installed on the valves. Installation of these labels will be completed by July 1, 1991.

2. Open Item 50-483/89024-02

"Issuance of the PGP as a controlled document addressing these concerns [as identified in the inspection report] will be tracked as an open item."

Response

The Procedure Generation Package (PGP) has been drafted as a new plant administrative procedure. It is presently in the review process and will be issued as an approved procedure by June 30, 1990. Walkdowns of EOP revisions will be required in accordance with the Verification and Validation (V and V) process specified in the PGP. V and V will be required on procedures referenced in the EOPs. Table-top reviews will only be used as an enhancement to the validation process in conjunction with other validation techniques. APA-ZZ-00101, "Preparation, Review, and Control of Procedures", and APA-ZZ-00102, "Emergency Operating Procedures Writer's Guide", will be reviewed in conjunction with the review process for the PGP to ensure cross-referencing is provided as necessary and conflicting guidance is not provided. The PGP will contain a responsibilities section outlining the responsibilities of the key personnel involved in the preparation, review, and approval process.

3. Open Item 50-483/89024-03

"In summary, the inspectors identified a need for upgraded training for licensed operators in the use of EOPs and more training of equipment operators in those tasks they may be required to perform during EOP implementation...The resolution of the training issues will be tracked as an open item."

Response

EOP training is continually conducted as identified in the performance based Licensed Operator Regualification Program. The weaknesses identified during the EOP inspection will be included in the Licensed Operator Regualification Training scheduled to be completed by August 31, 1990. Specific areas to be included in the training are:

- a) ES-0.0 entry requirements
- b) DBA LOCA symptoms
- c) Emphasis on timely completion of EOP steps, including rules of usage

The affected lesson materials for the initial Licensed Operator Course will also be reviewed and revised as necessary to include these items. This revision will be completed by June 30, 1990.

The EOPs have been reviewed to identify local operations to be performed by equipment operators during implementation. Each crew will be required to walkdown the required local operations and attest to these walkdowns by January 1, 1991. The local operator actions will be evaluated for inclusion in initial and regualification training programs. This evaluation will be completed by July 1, 1991.