

UNION ELECTRIC COMPANY

1901 GRATIOT STREET
ST. LOUIS, MISSOURI

DONALD F. SCHNELL
VICE PRESIDENT

April 2, 1982

MAILING ADDRESS:
P. O. BOX 149
ST. LOUIS, MISSOURI 63166

Mr. C. E. Norelius, Director
Division of Engineering and Technical Inspection
US Nuclear Regulatory Commission
Region III
799 Roosevelt Rd.
Glen Ellyn, IL 60137

ULNRC-550

Dear Mr. Norelius:

INSPECTION REPORT NO. 50-483/82-01

This is in response to your letter of March 8, 1982 reporting results of an inspection at Union Electric Company's Callaway Plant Site on January 11-15, 1982 and as detailed in inspection report number 50-483/82-01.

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

The following is in response to the items in Appendix A, Notice of Violation, of the inspection report.

Severity Level V Violation (483/82-01-02)

As a result of the inspection conducted on January 11-15, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

10 CFR 50, Appendix B, Criterion XVIII, Audits, states that a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program. The audits shall be performed in accordance with the written procedures or checklists....Followup action...shall be taken where indicated.

Procedure Number QA-106, from the quality assurance section on audits in the Union Electric Quality Assurance Procedures Manual,

states in part...5.2.5 (Re: the AFSS-Audit Finding Summary Sheet)...the AFSS will serve as a documented basis for the timely commencement of corrective and/or investigative action by the audited organization prior to receipt of the audit report; 5.3.4, the audited organization shall be requested to review and investigate in writing within 30 days after receipt of the audit report; 5.4.1.d., confirm that resolution is accomplished as scheduled.

Contrary to the above, the audited organizations did not respond in a timely manner to the audits of the start-up activity conducted in February and July of 1981 in that the findings of the February 1981 audit were not completely closed out until January 1982 and only two out of thirteen findings of the July 1981 audit were closed out as of the date of this inspection.

Response

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

- A. The Union Electric Startup (UESU) Test Program Coordinator (TPC) has been assigned the responsibility to:
 - 1. Interface with QA for the tracking and resolution of open audit and surveillance items.
 - 2. Implement and maintain a Startup Administrative Punch List to be periodically distributed to Superintendent of Startup and staff supervisors.
- B. Eight of the eleven findings identified in the inspection report as being open have been closed out. Three findings remain open that require revision of procedures. The procedures are expected to be issued by April 30, 1982.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

The Test Program Coordinator has been directed to review the status of all open items monthly and submit a report to the Superintendent of Startup for evaluation and corrective action when required.

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The Superintendent of Startup has directed all startup personnel to respond to all open items assigned to them in a timely manner and to forward individual responses as they are completed. Completed responses will be forwarded to the Auditor as they are approved rather than in a complete audit package.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The corrective action, as outlined above, assures Startup responses to audits of the Startup organization in a timely manner. Complete closeouts of the audit items are expedited by utilizing the Startup Administrative Punch List. This report provides Startup with the capability to track open items on a continuous basis.

It is felt that the present Startup program to address, track, and closeout audit items is in compliance with NRC requirements.

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

Very truly yours,


Donald F. Schnell

RMD/jds

cc: Mr. J. E. Konklin, NRC Region III
NRC Resident Inspector, Callaway Plant
Missouri Public Service Commission

STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell
Donald F. Schnell
Vice President
Nuclear

SUBSCRIBED and sworn to before me this 2nd day of April , 1982

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1985
ST. LOUIS COUNTY