

UNION ELECTRIC COMPANY

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VICE PRESIDENT

June 15, 1983

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Mr. R. C. Knop, Chief  
Projects Branch 1  
US Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

ULNRC- 637

Dear Mr. Knop:

INSPECTION REPORT NO. 50-483/83-05

This reply is in response to your letter of May 20, 1983 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of March 1, to April 15, 1983. Our responses to the items of noncompliance are presented below (in the order listed within the body of inspection report number 50-483/83-05).

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

(50-483/83-05-01) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion V, states, "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures and drawings."

SNUPPS Quality Assurance Programs for Design and Construction, Section 17.1.5, states, "The program established by the SNUPPS utilities to control activities affecting quality provides for: (a) The preparation of procedures, instructions, drawings or checklists of a type appropriate to the activity and its importance to safety. (c) The approval of these documents by responsible personnel prior to accomplishing an activity.

Contrary to the above, activities affecting quality were not prescribed by documented instructions/procedures in that: (a) no requirements were established for hold or witness points during the performance of tests; (b) no evidence was available that the test procedures used by the Test Program Surveillance Group had been approved by the responsible personnel prior to use; and (c) schedules for routine surveillance had not been developed since November 1982.

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Corrective Action Taken And The Results Achieved:

- (a) The original charter for the Test Program Surveillance Group (TPSG) was to "provide management with the additional assurance of the quality of Startup activities." In this capacity there was no formal program which defined minimum requirements for what must be witnessed by the TPSG during the Test Program with the exception of independent verification of system restoration during trouble shooting. In this original program there were therefore no hold or witness points established during testing but only a commitment to provide for monitoring and surveillance of testing activities. The TPSG Program is being revised to upgrade and establish the requirements for witnessing testing activities.
- (b) The Test Program Surveillance Group performs monitoring and surveillance activities in accordance with Startup Administrative Instruction No. 23. This SAI is reviewed and approved in accordance with Project Requirements. Specific Implementing Instructions had been developed which described specific direction to the TPSG personnel. These Implementing Instructions were not addressed in the Startup Administrative Instruction with respect to Review and Approval Requirements. SAI-23 is being revised to establish the Review and Approval Requirements for the Implementing Instructions.
- (c) The TPSG Surveillance Schedule had been established by the TPSG Supervisor with no procedural requirements or controls. The TPSG Program revisions described above will define the requirements for witnessing testing activities and therefore the testing activities will determine the schedule for TPSG Activities rather than a Surveillance Schedule.

Corrective Action To Be Taken To Avoid Further Noncompliance:

The program revisions discussed above will provide for a program by which the TPSG activities will be conducted. In addition to revising the Startup Administrative Instructions, a reorganization was effected April 1, 1983 which changed the reporting of the TPSG from the Superintendent of Startup to the Assistant to the Vice President Nuclear. This reorganization will provide: TPSG organizational independence from line functions within Startup, opportunities for more effective monitoring of the overall program, and direction at a management level within Union Electric commensurate with the group's responsibilities.

The Date When Full Compliance Will Be Achieved:

The revisions to the TPSG Program described above will be completed by July 15, 1983.

(50-483/83-05-02) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion I, states, "The authorities and duties of persons and organizations performing activities affecting the safety-related functions of structures, systems, and components shall be clearly established and delineated in writing.

SNUPPS Quality Assurance Programs for Design and Construction, Section 17.1.1, states, "It is the policy of the SNUPPS utilities to clearly establish and delineate in writing the authority and responsibilities of those individuals and organizations performing activities related to quality."

Contrary to the above, the authorities and duties of persons and organizations performing activities were not clearly established and delineated in writing, in that the startup program did not establish clear interfaces between elements of the startup group and stop work authority had not been established.

Corrective Action Taken And The Results Achieved:

Startup Administrative Instruction No. 2 "Startup Organization and Responsibilities" has been revised to more clearly delineate the duties and responsibilities of persons and groups within the Startup Organization. Stop work authority is established in Union Electric Quality Assurance Procedures QS-7 "Correction Action Report", and QA-103 "Stop Work Action".

Corrective Action To Be Taken To Avoid Further Noncompliance:

As a result of various organizational changes during the implementation of the Startup Program, procedure revisions have been required. These revisions changed, in some cases, responsibilities from one group or person to another which resulted in unclear interfaces between some procedures. The Startup Administrative Instructions have been reviewed and revised where necessary to provide for clear delineation of responsibilities and duties. Responsibility has been assigned in SAI-1 "Preparation, Review, and Approval of Startup Administrative Instructions" to provide for a review requirement during the SAI revision process to ensure program interfaces are clearly established.

Date When Full Compliance Will Be Achieved:

Revisions to SAI-1 and 2, as described above, have been completed and issued.

(50-483/83-05-03) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion XVIII, states, "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. .... Followup action, .... shall be taken were indicated."

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Union Electric Company Quality Assurance Procedure QA-106, Section 5.6.1, states, "The audit team leader is responsible to ensure appropriate followup action to assure that corrective action is accomplished in accordance with the established effective date."

Contrary to the above, timely followup action had not been taken where required in four audits that were performed by the Licensee Quality Assurance Organization and twenty-three reports of surveillance performed by the Test Program Surveillance Group. Responses were overdue on five reports. One report was routed to a startup engineer whose response was that he had no authority to initiate the recommended corrective action. This item was closed with no other apparent followup. In addition, an audit performed on June 15 through 18, 1982 had six findings involving alteration control. Corrective action and closeout of the three items had not been accomplished at the time of the February 22 through 28, 1983, audit or as of the date of this inspection.

Corrective Action Taken And The Results Achieved:

The referenced Audit Items were all closed 3/25/83. These items involved program changes which after implementation were determined to be less effective than desired, therefore, another change was implemented and corrective action effected. The surveillance reports have been responded to and are now current.

Corrective Action To Be Taken To Avoid Further Noncompliance:

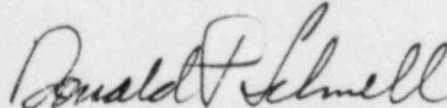
The responsibility within Startup to track open items had previously been assigned as a colateral duty to an individual. A full time position has been created to assign responsibility to a single individual for tracking open items to assure timely response.

Date When Full Compliance Will Be Achieved:

The position of the Startup Response Coordinator was established in March 1983 and has proven to be effective in maintaining open items current.

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

Very truly yours,



Donald F. Schnell

RHR/lw

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