

UNION ELECTRIC COMPANY

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DONALD F. SCHNELL  
VICE PRESIDENT

July 18, 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-648

Dear Mr. Knop:

INSPECTION REPORT NO. 50-483/83-11

This reply is in response to your letter of June 17, 1983 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of April 16 through May 31, 1983. 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.

(50-483/83-11-01) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion X, states "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures and drawings for accomplishing the activity."

Daniel International Procedure QCP-200, Exhibit BI "Component Support Inspection Checklist" Section III (f) requires, "Cotter pins installed correctly and are properly sized" and (g) "retaining rings fit snugly in the grooves."

Contrary to the above, inspections were not adequate to identify missing cotter pins, retaining rings and short pins in five safety-related pipe supports in the component cooling water and high pressure injection systems.

Corrective Action Taken And The Results Achieved:

Daniel Hanger Engineering investigated the five safety-related supports identified by the Inspector to be deficient. The results of the investigation are as follows:

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- EG08-C003/151Q: The Component Support Inspection Checklist documents that on February 2, 1983, the installation of this support was complete and acceptable. On May 5, 1983, during the Pre 79-14 Walkdown, Hanger Engineering discovered the cotter pins to be missing and on May 18, 1983 initiated Deficiency Report 2SD-11026-H. Rework was completed on June 10, 1983 and the Deficiency Report closed on June 14, 1983.
- EG08-R010/151Q: This support was initially inspected on May 4, 1982. The installation was found to be complete and acceptable. On April 27, 1983, the Pre 79-14 Walkdown identified a sway strut out of alignment. The support was reworked per Deficiency Report 2SD-11062-H initiated on May 21, 1983. Rework, including replacement of the missing retaining ring was completed on June 16, 1983 and the Deficiency Report closed on June 20, 1983.
- EF15-R003/314Q: The Component Support Inspection Checklist documents that on January 13, 1983 the installation of this support was complete and acceptable. On March 25, 1983, during the Pre 79-14 Walkdown, Hanger Engineering examined this support and as documented on the Pre 79-14 checklist, the cotter pins were found to be in place. Subsequent to the Quality Inspection and Pre 79-14 Walkdown, the NRC Inspector discovered the cotter pins to be missing. The support will be reworked to replace the cotter pins per Deficiency Report 2SD-11376-H initiated July 1, 1983.
- EM07-R505/134Q: These supports are in-process. Prior to final  
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EG26-C017/122Q inspection and acceptance these supports will be brought into compliance with the drawing requirements.

Though the actual cause of the deficiencies is indeterminate, the investigation confirms that the inspection procedure is adequate. Verification of correct cotter pin and retaining ring installation is a requirement of Daniel Quality Control Procedure QCP-200 (Inspection of Fabrication and Installation of Safety-Related Pipe Supports), Exhibit BI. The subject cotter pins and retaining rings were inspected by Quality Inspection as evidenced by the Inspectors' initials on the specific items on the checklists.

Corrective Action To Be Taken To Avoid Further Noncompliance:

The Deficiency Reports written to document the identified deficiencies state the cause to be indeterminate because inspection records indicated correct installation. As corrective action to discourage the possibility of tampering with hardware following inspection, Project Management has advised craft and supervision of the severe disciplinary action that they will take against individuals who engage

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in such activities. In addition they were also notified such acts are a violation of federal law.

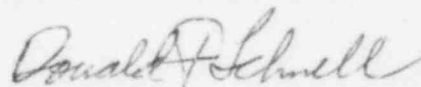
The Constructor Pre 79-14 Walkdown, followed by the actual 79-14 Walkdown performed by the Architect Engineer provides a means to identify deficiencies such as the inspector reported. Additionally, though not intended to be a detailed inspection, the final walkdown prior to Release for Test provides another opportunity for identification of deficiencies.

The Date When Full Compliance Will Be Achieved:

Full compliance will be achieved upon completion of the rework required for EF15-R003/314Q, scheduled to be complete by July 25, 1983.

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

Very truly yours,



Donald F. Schnell

NRI/CCW/jds

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