

UNION ELECTRIC COMPANY

1901 GRATIOT STREET
ST. LOUIS, MISSOURI

DONALD F. SCHNELL
VICE PRESIDENT

January 3, 1984

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

Mr. J. F. Streeter, Chief
Engineering Branch 1
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

ULNRC- 713

Dear Mr. Streeter:

INSPECTION REPORT NO. 50-483/83-18

This reply is in response to your letter of December 6, 1983 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the periods of October 25-28, November 1-3, 7-10, and 14-18, 1983. Our responses to the items of noncompliance are presented below in the order listed within the body of inspection report number 50-483/83-18.

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

(50-483/83-18-01) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion XI states in part: "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in the applicable design documents... Test procedures shall include provisions for assuring...that adequate test instrumentation is available and used..."

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..."

Startup Administrative Instruction SAI-5, Rev. 6, states in part, that the Lead Startup Engineer "ensures that the Preoperational Test Procedure receives a detailed review to verify that the procedure: 1) is technically correct and accurate, and 3) has addressed the required Acceptance Criteria and Test Objectives."

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Contrary to the above:

- (a) Test procedure CS-03AB02, Rev. 0, Main Steam Safety Valve Test, was approved and issued specifying the use of test instrumentation which did not support the accuracy required by the acceptance criteria. The permanently installed steam pressure indication is specified by the procedure as the test instrumentation and has an accuracy of 1.58%, whereas the accuracy required by the acceptance criteria for safety valve actuation setpoint is .97%;
- (b) Test procedure CS-03AL01, Auxiliary Feedwater Motor-Driven Pump and Valve Test, was approved and issued with an acceptance criterion that was less conservative than the design value in the FSAR. The acceptance criteria for discharge flow was specified as equal or in excess of 500 gpm not including recirculation flow whereas the SNUPPS FSAR in Sections 10.4.9.2.1 and 10.4.9.2.2 implies that the pump should provide 500 gpm plus recirculation flow.

Response

Corrective Action Taken And The Results Achieved:

- (a) Procedures CS-03AB02 was changed by a Minor Change Notice to delete the use of permanent plant pressure indicators located in remote panels and to install pressure gauges with an accuracy of .1% in each main steam line.
- (b) A Startup Field Report was written to obtain clarification of acceptance criteria from the responsible design agency. Subsequent to their response, a change was issued to procedure CS-03AL01 by a Minor Change Notice to show acceptance criteria as greater than or equal to 575 gpm (including recirculation flow).

Corrective Action Taken To Avoid Further Noncompliance:

Items a and b were brought to the attention of members of the Joint Test Group in a meeting on December 21, 1983. Discussions held in this meeting reiterated to the members their responsibilities during procedure review.

The Date When Full Compliance Will Be Achieved:

The above actions were accomplished on December 21, 1983.

(50-483/83-18-04) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion XVI, states in part, "In the case of significant conditions adverse to quality...identification of the conditions adverse to quality, the cause of the conditions, and the corrective action shall be documented and reported to

appropriate levels of management." Criterion XVII states in part, "Inspection and test records shall...identify...the action taken in connection with any deficiencies noted."

Startup Administrative Instruction SAI-12, Revision 6, requires "Documentation and resolution of problems, deficiencies, and nonconformances identified..."

Contrary to the above, the documentation of significant conditions adverse to quality during the establishing of prerequisite conditions for CS-03BB05, RCS Hot Preoperational Test, was inadequate. Test problems which occurred were not adequately documented in the test log nor were the necessary followup documents (i.e., Startup Field Report or Startup Work Request) being generated. Two examples of this are as follows:

- (a) Three inadvertent Residual Heat Removal (RHR) System isolations occurred (potentially damaging the running RHR pumps) without proper recording of the events or corrective action taken, either in the test log or in followup documentation.
- (b) Reactor Coolant Pump B could not be operated due to a failed overload relay. The test log indicates that the relays were exchanged with Pump A without further documenting corrective action.

Response

Corrective Action Taken And The Results Achieved:

- (a) Inspections of the Residual Heat Removal pumps revealed no damage or abnormalities. A Startup Field Report was initiated to obtain further evaluations for this item.
- (b) Calibration retests of the Reactor Coolant Pump (RCP) relays were performed to recalibrate the RCP relays.

Corrective Action Taken To Avoid Further Noncompliance:

As a result of this item and related discussions, the HFT Test Directors have been directed to continue to initiate Startup Field Reports to document test problems.

APA-ZZ-TAP08, "Temporary Control of Operational Incident Reporting," has been issued to clarify reporting requirements for Operations Personnel.

The Date When Full Compliance Will Be Achieved:

The above-stated actions will be completed by January 30, 1984, pending resolution of the Startup Field Report.

Mr. J. F. Streeter

-4-

January 3, 1984

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/lw

cc: J. E. Konklin, NRC Region III
NRC Resident Inspectors, Callaway Plant (2)
Missouri Public Service Commission

bcc: D. F. Schnell
J. F. McLaughlin
W. H. Weber
S. E. Miltenberger
M. A. Stiller
R. J. Schukai
D. W. Capone
A. C. Passwater
D. E. Shafer
W. B. Bobnar
W. H. Zvanut
R. P. Wendling
W. S. Strothman
R. L. Powers
J. V. Laux
J. R. Veatch
J. C. Gearhart
J. E. Davis
W. H. Sheppard
N. A. Petrick
E. W. Creel, KG&E
B. L. Meyers
J. H. Smith
R. W. Bradford
C. C. Wagoner
W. R. Bird (Consumers Power)
D. Dedrick (Public Service Indiana)
DFS/Chrono
QA Date
Nuclear Date
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J. L. Marden