

UNION ELECTRIC COMPANY

1901 GRATIOT STREET
ST. LOUIS, MISSOURI

April 19, 1984

DONALD F. SCHNELL
VICE PRESIDENT

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

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

ULNRC- 805

Dear Mr. Knop:

INSPECTION REPORT NO. 50-483/83-32 (D.'RP)

This reply is in response to your letter of March 21, 1984 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of December 1, 1983 to February 15, 1984. 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.

(50-483/83-32-01) SEVERITY LEVEL IV VIOLATION

10CFR 50, Appendix B, Criterion XI, Test Control, 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 applicable design documents.... Test procedures shall include provisions for assuring that all prerequisites for the given test have been met...and that the test is performed under suitable environmental conditions. Test results shall be documented and evaluated to assure that test requirements have been satisfied."

Union Electric Company's Quality Assurance Manual Section 17.1.11 states in part, "The SNUPPS utilities will accomplish tests in accordance with written test procedures.... Test procedures, developed to control tests, will incorporate or reference the requirements and acceptance limits specified in applicable design and procurement documents. These test procedures, as appropriate, will also include test objectives; test prerequisites; instructions for performing each test; operating instructions for test equipment and instrumentation, or reference

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thereto; and documentation and evaluation of test results to assure satisfaction of test requirements...."

Contrary to the above the inspector found:

- a. On December 8, 1983, during the performance of the auxiliary feedwater pumps endurance preoperational test (CS-03AL03), the environmental conditions to meet acceptance criteria for the PAL02 pump test had not been established. Test prerequisites for establishing environmental conditions were not provided in the test procedure.
- b. On January 30, 1984, during the performance of the LOCA Sequencer preoperational test (CS-03NF02), the emergency diesel generator was operated without cooling water for approximately six minutes, resulting in the overheating of the diesel generator. The test procedure was deficient in that the required backup cooling water was not specified as a prerequisite, and the procedure failed to specify establishing backup cooling prior to securing the essential cooling water pump.
- c. A Startup Field Report (SFR) SFR-2-EJ-068A dated February 14, 1984, documented a nonconforming condition which was identified during the performance of an Emergency Cooling Water Sump Test on October 7, 1983. The test was performed without an approved procedure. Test results including test deficiencies were neither formally documented nor evaluated.

Corrective Action Taken And The Results Achieved:

- a. In order to assure that testing was adequate and in accordance with a prescribed test method which satisfied the intent of the acceptance criteria, Procedure CS-03AL03 was changed via Minor Change Notice, to include pump room prerequisites. The test was performed using the revised procedure and the results were satisfactory.
- b. An examination of Procedure CS-03NF02 shows that consideration for the loss of cooling water and resultant engine heating was made. The Notes and Precaution Section (5.0) included the following:
 - 5.6 If at anytime during the DG short-time or Continuous Rated Load Test, the engine jacket water temperature rises above 185 degrees F, the lube oil temperature exceeds 160 degrees F or the valve rocker lube oil temperature exceeds 165 degrees F, unload the generator, open the feeder breaker to the bus under test and shut down the engine. After correcting the problem, the test can be restarted.

- 5.10 Essential service water and component cooling water supplies will be interrupted during phases of this pre-operational test. Equipment requiring a continuous cooling water for normal operation should be aligned to an alternate source or placed out of service.

These entries in the Procedure as precautions (which apply throughout the procedure) provide adequate procedural coverage. The events which were observed relating to loss of cooling water and resultant overheating resulted from personnel error. Corrective actions taken in regard to this matter were as follows:

- o Partial disassembly and visual inspection of the diesel generator by a vendor representative with no damage noted.
 - o Operational testing of the diesel generator subsequent to inspection with no evidence of adverse conditions.
 - o Re-training of Startup personnel in conduct of preoperational testing with emphasis on procedural requirements including adherence to precautions and limitations.
- c. Testing of the Emergency Core Cooling System (ECCS) sump which was initially performed was felt to be of a general performance evaluation and developmental nature. In addition, the testing was not a defined FSAR requirement and thus, was not performed as a preoperational test. Subsequent evaluation of the testing and documentation requirements resulted in preparation of Preoperational Test Procedure C-03EJ04 (approved March 9, 1984) and field performance testing (successfully completed March 13, 1984).

Documentation of evaluation and corrective action was made on Request for Corrective Action (RCA) S8402-014, Rev. 0, initiated March 1, 1984 and closed out on March 20, 1984.

Corrective Action To Be Taken To Avoid Further Noncompliance:

Actions as noted above have been completed. These findings are of an individual nature and are not expected to recur. Corrective action in the form of retraining of personnel has been conducted.

The Date When Full Compliance Will Be Achieved:

Preoperational Test Procedure CS-03AL03 testing activities were completed on February 21, 1984.

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Field performance of Preoperational Test Procedure CS-03NF02, including actions to correct the problems noted was completed and results approved March 6, 1984.

Preoperational Test Procedure C-03EJ04 was approved on March 9, 1984 and testing was successfully completed on March 13, 1984.

Startup training on the Preoperational Test Procedure program was completed on March 7, 1984.

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

Very truly yours,

A handwritten signature in dark ink, appearing to read "Donald F. Schnell". The signature is fluid and cursive, with the first name "Donald" and last name "Schnell" clearly distinguishable.

Donald F. Schnell

NRI/glp

cc: W. L. Forney, NRC Region III
NRC Resident Inspectors, Callaway Plant (2)
Missouri Public Service Commission