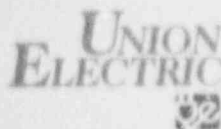


1901 Chouteau Avenue
Post Office Box 149
St. Louis, Missouri 63186
314-854-2650



October 11, 1991

Donald F. Schnell
Senior Vice President
Nuclear

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

ULNRC-2494

Gentlemen:

**ADDITIONAL RESPONSE TO:
INSPECTION REPORT NOS. 50-483/P1013 AND 91014
CALLAWAY PLANT**

In reviewing our August 30, 1991 response to the notice of violation contained in the subject inspection reports, we find that concerns expressed in Mr. A. B. Davis' transmittal letter dated August 6, 1991 were not fully addressed. The following is submitted as a supplement to our proposed corrective actions:

In our investigations following detection of unplanned events or circumstances, our first consideration is a prompt determination of the potential impact on the ability of equipment important to safety to perform its intended safety function. In some cases, our initial evaluation relies heavily on the engineering judgment and experience of our staff. This initial evaluation of safety impact is factored into our assessment of compliance with the provisions of our facility license and Technical Specifications. It is also used as an input to determine the timeline for reaching a final conclusion on the issue. In the absence of confirmed or conclusive information, our judgment in determining whether an immediate declaration of inoperability and entry into the associated Technical Specifications action statement is largely based on the initial determination of functional safety impact.

It must be recognized that each instance is unique and that situations may arise in which differing conclusions may be reached from the same available information. This is especially true when actions are reassessed after an event. In the present case, we have thoroughly reviewed and discussed the event timeline and decision-making process with all management personnel involved. While we continue to believe that our approach

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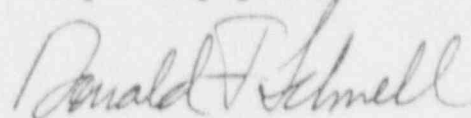
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was appropriate, this event has heightened our sensitivity to the need for prompt safety assessments and technical specification compliance determinations.

Concerning the failure of a double verification checkoff to properly establish the position of a safety-related valve, our response to the NOV addresses action to prevent recurrence of this type failure. We believe the unique configuration of the locking device and the infrequent cycling of ECCS throttle valves contributed significantly to our failure to properly verify position. The procedural controls and other actions described in our response will assure that double verification prevents recurrence. Our independent verification process has been effective as evidenced by numerous audits of valve positioning and operations management overview of plant conditions, but these actions should further strengthen our program.

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

Very truly yours,



Donald F. Schnell

DFS/bjp

cc: A. B. Davis - Regional Administrator, USNRC Region III
R. L. Fague - Chief, Reactor Projects Section 3C, USNRC, Region III
M. D. Lynch - USNRC Licensing Project Manager (2 copies)
Manager - Electrical Department, Missouri Public Service Commission
B. L. Bartlett - USNRC Senior Resident Inspector
Shaw, Plattman, Potts & Trowbridge

October 11, 1991

bcc: A160.0761 (QA Record) (CA-460)
A170.0103 (91013) (CA-460)
A170.0103 (91013 - File/Logging) (QAQS CA-460)
Nuclear Date File (S. L. Dale) (470)
E210.0001
D. F. Schnell (Chrono)
G. L. Randolph
J. V. Laux
Licensing and Fuels (A. C. Passwater/D. E. Shafer) (470)
T. P. Sharkey
NSRB (S. L. Dale) (470)
P. M. Barrett (100)
H. K. Chernoff (WCNOC)
C. E. Slizewski
C. S. Petzel
D. W. Neterer
W. E. Lacefield

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 Senior 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
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this eleventh day of
October, 1991.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
ST. LOUIS COUNTY