UNION ELECTRIC COMPANY
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March 9, 1984

DONALD F. SCHNELL
VICE PRESIDENT

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

ULNRC-761

Dear Mr. Streeter:

INSPECTION REPORT NO. 50-483/83-27(DE)

This reply is in response to your letter of January 26, 1984 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of November 18, 1983 to January 7, 1984. This reply is submitted following a two-week extension granted by the Region III office and expiring March 9, 1984. Our responses to the items of noncompliance are presented below in the order listed within the body of inspection report number 50-483/83-27(DE).

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

50-483/83-27-01 SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion V, as implemented by Startup Administration Instruction SAI-5, requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

Contrary to the above, Test Procedure CS-03EJ02, Rev. 0, Residual Heat Removal System Hot Preoperational Test was approved and issued with an acceptance criteria that did not meet either the FSAR test objective or the stated objective of the test itself.

Corrective Action Taken and Results Achieved

An evaluation of the test objectives and acceptance criteria stated in FSAR abstract 14.2.12.1.35 and Procedure CS-03EJ02 was made by Startup. Considered in this evaluation was input from the A/E (Bechtel - via the draft procedure) and the ability of the test method to verify heat removal capability of the Residual Heat Removal (RHR) heat exchangers. Verification of RHR pump design flow rates are demonstrated in CS-03EJ03 and design flow rate of the component cooling water through the RHR heat exchanger is covered in CS-03EG01. The test method established in the site

approved CS-03EJ02 Procedure, in conjunction with CS-03EJ03 and CS-03EG01, provides verification of heat exchanger ability to cool the reactor coolant system at the design rate by verifying the design heat transfer coefficient. The test objectives section of CS-03EJ02 has been revised to show these changes.

Corrective Action Taken to Avoid Further Noncompliances

Verification of the acceptance criteria and test objectives of preoperational tests was discussed by the JTG to assure continued compliance with implementation of program requirements.

The Date When Full Compliance Will Be Achieved

Actions as noted above were completed December 22, 1983.

50-483/83-27-04 SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion V, as implemented by SNUPPS Quality Assurance Programs for Design and Construction, Startup Administration Instruction SAI-5, and APA-ZZ-00001, requires that activities affecting quality be performed in accordance with documented instructions and procedures.

Contrary to the above:

a. An "On-the-Spot" change was incorporated into the Hot Functional Test Master Copy of normal Operating Procedure OTN-AB-00001, Main Steam System, that lacked approval by three of the four required approval authorities required by Section 2.1 of Temporary Administrative Procedure, TAP-07.

b. Documentation of prerequisites requiring re-verification prior to resumption of the following tests was not in accordance with Section 3.4.1.M of SAI-5:

(1) CS-03AB04 contained two entries which indicated that only the prerequisites applicable to specific test sections had been completed. The entry failed to identify these prerequisites and to justify why the remaining prerequisites were not completed.

(2) CS-03BB13 contained entries which indicate that testing was resumed before the required prerequisites were re-verified. These entries also indicated that only the prerequisites applicable to the specific test section had been completed. The entry failed to identify these prerequisites and to justify why the remaining prerequisites were not completed.

Corrective Action Taken and Results Achieved

a. A complete review of the "On-the-Spot" Change Program was conducted and all discrepancies noted in this inspection were corrected. The noted deficiencies were evaluated and found to have no impact on any testing performed. Following this review, training sessions were conducted for all shift crews. Procedure APA-ZZ-TAP07, which was prepared for use only during HFT, has been deleted. The program for temporary changes is now covered by Administrative Procedure APA-ZZ-00101.

b. (1) An evaluation was made regarding Test CS-03AB04 with the following results: Based on discussions with the individuals involved, prerequisites were verified at the time of the test based on the specific point in testing, but not documented due to personnel error. During test results review, the JTG reviewed this item and found no impact on test performance or acceptance criteria. Additional training has been conducted on test performance and proper test log entries on prerequisite verification has been stressed.

(2) Test CS-03BB13 was evaluated and found to have been performed in continuous manner and did not terminate due to interference or problems. The references to test stoppage in the test log were to allow for system stabilization and shift turnover only.

Corrective Action Taken to Avoid Further Noncompliance

Revision of Startup Administrative Instruction SAI-5, Preoperational Test Procedure Development, Test Conduct and Results Approval, and training was completed March 3, 1984.

The Date When Full Compliance Will Be Achieved

Full Compliance was achieved by March 3, 1984.

Very truly yours,

Donald F. Schnell

Donald F. Schnell

JES/amd

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