

UNION ELECTRIC COMPANY

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DONALD F. SCHNELL
VICE PRESIDENT

March 16, 1984

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Mr. J. A. Hind, Chairman
Region III SALP Board
Director, Division of Radiological
and Materials Safety Program
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

ULNRC-767

Dear Mr. Hind:

COMMENTS ON SALP REPORT NO. 4
CALLAWAY PLANT

We appreciated the opportunity to discuss the SALP report findings with Mr. Davis and other Region III and NRR personnel on February 29. Your comments with respect to our performance have always been and will continue to be given our most serious consideration.

While your assessment of the thirteen functional areas inspected during the report period was very favorable, comments in Enclosure 1 relative to our subsequent performance raise concerns about Union Electric management attention to emergency preparedness, the experience level of the operating staff and preservation of plant equipment. I want to assure you that these areas are receiving my personal attention as well as the attention of my line managers. Specifically, my comments in each area are as follows:

Emergency Preparedness

Irrespective of the large number of open items and improvement items identified during the combined Region III/HQ assessment during January, Union Electric has dedicated significant resources, personnel, and management attention to emergency preparedness. Our emergency operations facility and technical support center are equipped with state-of-the-art systems for monitoring plant conditions and projecting off-site consequences during postulated emergencies. Over the last six months, all corporate and plant personnel involved in emergency response duties have been extensively trained and have participated in numerous drills. Through critiques of these activities, we have improved our emergency plan procedures and overall response capability. Nonetheless, we acknowledge

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your concerns in this area and have taken positive management action to resolve problems identified during the January inspection. Your reassessment of our emergency preparedness will commence on March 19. Our emergency plan exercise will take place on March 21. I believe our performance during these events will relieve your concerns in this area.

Experience Level of the Operating Staff

Union Electric recognizes its management responsibility to properly select and train operators so that Callaway Plant is started and operated in a manner which helps insure public health and safety, while at the same time protecting our plant investment. We expect Callaway to provide safe, reliable and efficient generation to our system. With this goal in mind, we have selected, trained and licensed an outstanding group of operators who, though light in commercial nuclear plant experience, have already demonstrated their competence and reliability in activities leading to plant startup. We have prepared these people through participation in a comprehensive training program which includes classroom work, simulator training, on-the-job experience, and observation training at operating plants similar to Callaway. The effectiveness of this program has been demonstrated through the outstanding success achieved in preparing license candidates for the NRC examinations (43 of 44 candidates have successfully licensed).

Notwithstanding this, the staff as well as the ACRS have required, and we have committed to the addition of advisors to supplement our shift experience base. Recently, the NRC has expressed concern over use of advisors to make up for lack of commercial operating experience within NTOL utilities. Last month, the Utility Group on Shift Operating Experience presented a plan to the Commissioners which defined a means to insure that each new plant is staffed with personnel having requisite nuclear experience. I have been personally involved in the work of this group and assisted in the presentation made to the Commissioners on February 24. Union Electric will meet the shift experience requirements as presented to the Commissioners by this utility group. During our SALP discussion on February 29, I briefed the Region III and NRR attendees on the status of the utility group's work and our management involvement in this effort.

Preservation of Plant Equipment

Over the last several months, we have been keenly aware of the need to improve protection of equipment from the potential degrading effects of exposure to dirt, construction

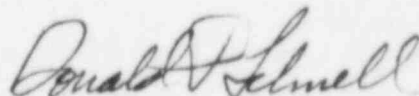
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debris and other environmental contaminants. We have taken additional steps to enforce our housekeeping program to assure all plant areas are clean and maintained in specified cleanliness levels during remaining construction activities.

In our view, the housekeeping situation at Callaway has not compromised the integrity of plant equipment. This opinion is supported by the results of our preoperational test program. Nevertheless, we will continue to emphasize the need to maintain the prescribed cleanliness levels to all supervisory personnel responsible for work in the plant.

In conclusion, let me restate Union Electric's commitment to continuation of quality performance during the transition from construction and into the operation of Callaway Plant. I would hope that you will consider the foregoing comments and, through observation of our activities, be convinced of our determination to maintain a high level of management attention in all areas relative to safe, reliable and efficient operation of Callaway Plant.

Very truly yours,



Donald F. Schnell

DFS/bjp

cc: Mr. J. E. Konklin, NRC
NRC Resident Inspector, Callaway Plant
Missouri Public Service Commission