

UNION ELECTRIC COMPANY
CALLAWAY PLANT

June 15, 1984

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R. L. Spessard, Director
Division of Engineering
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

ULNRC-845

Dear Mr. Spessard:

INSPECTION REPORT NO. 50-483/84-11

This reply is in reponse to your letter of May 18, 1984 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of February 21 to March 16, 1984. Our responses to the items of noncompliance are presented below.

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

(50-483/84-11-15) SEVERITY LEVEL IV VIOLATION

1. 10 CFR 50, Appendix B, Criterion V, as implemented by Callaway Plant Quality Assurance Program, FSAR Section 17.2.5 requires that activities affecting quality be prescribed by documented instructions and procedures and accomplished in accordance with those instructions and procedures.

Contrary to the above:

- a. Section 3.6.4.c of Procedure SAI-9, Revision 5, required if a malfunction or out-of-service calibration is confirmed that the applicable supervisors shall evaluate the calibrations done with the suspect instruments and shall determine if any retests and/or re-calibrations are required. Subsequent to instrument MMD-2010-IC being found out of calibration, the calibrations of the following components were not evaluated: EP-LT-956 level transmitter; NK 21, 22, 23, and 24 ammeters; EJ-AV-8804D air valve; BN-LCV-112E level control valve; and DE-FIT 3000 flow indicating transmitter. Subsequent to instrument G-97-U being found out of calibration, the calibration of pressure indicator CB-PI-96 was not evaluated.
- b. Procedures IDP-ZZ-0001, Revision 1, and SAI-9, Revision 5, required that M&TE checkout cards specify the equipment that was calibrated/tested using the M&TE. Seven work requests revealed M&TE usage on equipment that was

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not documented on the M&TE check-out cards. The work requests and M&TE involved were as follows:

<u>M&TE NO.</u>	<u>USAGE DATE</u>	<u>WORK REQUEST NO.</u>
ERT-2001-IC	12/2/83	8716
ERT-2002-IC	12/2/83	8716
RCSC-2005-IC	12/2/83	8716
MMD-2009-MA	12/2/83	8716
TW-2006-IC	8/19/83	5496
GAP-2059-IC	5/12/83	1986
GAP-2034-IC	2/3/84	15796

- c. Procedure APA-ZZ-00350, Revision D, required that a calibration sticker be attached to each M&TE device and that the sticker contain calibration information including the next scheduled calibration date. There were no calibration stickers on M&TE devices ERT-2001-IC and ERT-2002-IC on 2/29/84. The calibration and control program records did not specify a calibration frequency or the next scheduled calibration date for the devices. These instruments were logged into the M&TE program on 12/1/83 and recorded as used on work request No. 8716 on 12/2/83.
- d. Section 4.5 of QS 10, Revision 7, required personnel who identify an apparent significant deficiency to promptly notify the Manager, Quality Assurance (QA); the Superintendent, Site Quality Assurance; or the appropriate Supervising Engineer, Quality Assurance. No one in the Quality Assurance organization was notified of the incident on December 30, 1983, regarding the exhaust fumes in the Control Room until February 22, 1984, when the NRC inspectors reviewed the incident during the inspection.
- e. APA-ZZ-TAP08, Revision 0, Sections 2.1 and 3.0, required the Shift Supervisor/Operating Supervisor to have a SFR (Startup Field Report) initiated at the time of notification of an incident which causes an undesirable or unexpected condition during the operation or in-plant maintenance of the unit. An SFR was not issued for the incident on December 30, 1983, regarding the exhaust fumes in the Control Room until January 23, 1984.

Responses

a. Corrective Action Taken And The Results Achieved

All instruments that were affected by M&TE which were subsequently found to be in violation of program requirements were: 1) evaluated and found to be acceptable, 2) had a calibration check and were found to be within calibration, 3) recalibrated, or 4) scheduled for a calibration check or evaluation as necessary.

An evaluation was performed of preoperational tests in which instruments of suspect calibration were used. This evaluation demonstrated that all preoperational test results were valid.

The above actions are documented on Union Electric CAR-0002 item 1.

Corrective Action To Be Taken To Avoid Further Noncompliance

Operations procedure, APA-ZZ-00350 was revised to supersede Start-Up procedure SAI-9 on March 28, 1984. APA-ZZ-00350 assures adequate review of M&TE out-of-calibration conditions.

Date When Full Compliance Will Be Achieved

Union Electric will complete the calibration check or evaluation of the remaining instruments by July 16, 1984.

b. Corrective Action Taken And The Results Achieved

While the equipment that was calibrated/tested using the M&TE was not listed on the M&TE checkout cards, a review of this area determined that adequate history of use information for the M&TE was achieved by using a combination of the M&TE checkout cards and/or the CHAMPS Tool Usage Log.

Corrective Action To Be Taken To Avoid Further Noncompliance

Operations procedure, APA-ZZ-00350 was revised to supersede Start-Up procedure SAI-9 on March 28, 1984. All tool usage will now be recorded in the CHAMPS Tool Usage Log.

Date When Full Compliance Will Be Achieved

Union Electric began recording tool usage exclusively on CHAMPS on March 28, 1984.

c. Corrective Action Taken And The Results Achieved

M&TE devices ERT-2001-IC and ERT-2002-IC have been removed from field activities. Instruments available for issue that require calibration have calibration stickers attached. Work done under WR 8716 was not invalidated by use of these devices.

Corrective Action To Be Taken To Avoid Further Noncompliance

Operations procedure, APA-ZZ-00350 was revised to supersede Start-Up procedure SAI-9 on March 28, 1984.

Date When Full Compliance Will Be Achieved

Union Electric revised APA-ZZ-00350 on March 28, 1984 and completed attaching calibration stickers to M&TE devices on May 4, 1984.

d. Corrective Action Taken And The Results Achieved

A copy of QS-10 was transmitted to each Operations Department Supervisor to refamiliarize personnel with the reporting requirements for an apparent significant deficiency. APA-ZZ-00500 (Nonconforming Operations Reporting and Corrective Actions) has been revised to provide a means for documenting plant nonconforming events, including a multilevel review.

Corrective Action To Be Taken To Avoid Further Noncompliance

Control Room Operator training, which is scheduled on an annual basis, will emphasize event reporting responsibilities.

Date When Full Compliance Will Be Achieved

Union Electric issued APA-ZZ-00500 Rev. 3 on May 23, 1984 and has scheduled operator training on this revised procedure beginning on June 7, 1984.

e. Corrective Action Taken And The Results Achieved

APA-ZZ-00500 (Nonconforming Operations Reporting and Corrective Actions) has been revised to provide a means for documenting such events, including a multilevel review. Operation procedure OTA-KC-00008 Rev. 0 (Control Alarm Response) for the smoke detector in this HVAC system has been revised to include specific actions to be taken in the event of such an occurrence.

Corrective Actions To Be Taken To Avoid Further Noncompliance

Control Room Operation training, which is scheduled on an annual basis, will emphasize event reporting responsibilities.

Date When Full Compliance Will Be Achieved

Operator training, which includes this corrective action, began on May 21, 1984 and is scheduled to be completed on June 22, 1984.

(50-483/84-11-21) SEVERITY LEVEL V VIOLATION

2. 10 CFR 50, Appendix B, Criterion XVII, as implemented by the Union Electric Operating QA Program, FSAR Section 17.2.17 and Appendix 3A including a commitment to RG 1.88 - October 1976 and to ANSI N45.2.9-1974, requires that sufficient records be maintained to furnish evidence of activities affecting quality, that these records be stored in a manner to preclude deterioration, and that record storage facilities protect contents from possible destruction by causes such as fire. Union Electric (UE) Procedure No. APA-ZZ-00220, indicates that for photographs, radiographs, negatives, or microfilms the storage vaults meet the recommended storage requirements for those special process records and also the requirements in ANSI N45.2.9-1974 with exceptions stated in the UE Operating QA Manual. The QA Manual requires that the structures be Class A fire-rated with the recommended two-hour minimum rating.

Contrary to the above, the vault containing radiographs and certain other QA records was found to have several piping penetrations which were not sealed to provide the minimum fire rating.

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Response

Corrective Action Taken And The Results Achieved

On February 24, 1984, work documents were generated to seal the penetrations. Inspection Report No. 659.742 documents that the penetrations were sealed and the work was completed on February 25, 1984. UE QA confirmed that all penetrations were satisfactorily sealed.

Corrective Action To Be Taken To Avoid Further Noncompliance

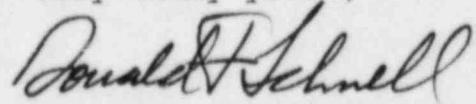
No further Union Electric action is required to avoid further noncompliance.

Date When Full Compliance Will Be Achieved

Union Electric completed work on the penetrations on February 25, 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

JRV/slz

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