

UNION ELECTRIC COMPANY

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DONALD F. SCHNELL  
VICE PRESIDENT

July 24, 1984

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

ULNRC-881

Dear Mr. Spessard:

INSPECTION REPORT NO. 50-483/84-23

This reply is in response to your letter of June 25, 1984 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of April 23 through June 1, 1984. Our responses to the items of noncompliance are presented below in the order listed within the body of inspection report number 50-483/84-23.

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

(50-483/84-23-01) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion V, as implemented by SNUPPS Quality Assurance Programs for Design and Construction, Section 17.1.5; Westinghouse site instruction, "Processing and Control of Nonconformance Reports-NSSS Equipment"; and Bechtel site instruction, EDPI 4.70-01, requires that activities affecting quality be performed in accordance with documented instructions of a type appropriate to the circumstances, specifically, that documentation be provided for disposition of nonconformance conditions.

Contrary to the above, Bechtel and Westinghouse site instructions for the processing and control of nonconformance reports were not followed in the processing of eight Startup Field Reports (SFRs) dispositioned "use-as-is" in that sufficient information explaining the rationale for the recommendation was not provided and records documenting the disposition of six of the nonconformances were not generated as required by procedures.

JUL 26 1984

## Response

### Corrective Action Taken And The Results Achieved

Union Electric performed a review of a random sample of one hundred Bechtel SFRs dispositioned "use-as-is." Of the one hundred selected, six were found to have inadequate explanations of the basis for "use-as-is." Union Electric Quality Assurance issued Request for Corrective Action (RCA) #G8406-039 for these six SFRs to have the bases for their disposition documented. The response from Bechtel to the RCA included additional technical bases for "use-as-is" dispositions for each of the SFRs identified. No revised dispositions resulted from the review of the SFRs by Union Electric or Bechtel.

Union Electric and Westinghouse are performing a review of Westinghouse SFRs with "use-as-is" dispositions. Union Electric and Westinghouse have reviewed the entire file of Westinghouse SFRs and found twenty-two having insufficient documentation to substantiate the "use-as-is" disposition. These SFRs were referred to the appropriate Westinghouse engineering shops to substantiate the existing dispositions. Of the twenty-two SFRs, sixteen have been completed, two require additional information from Union Electric and four are still being reviewed. The initial transmittal from Westinghouse containing the backup documentation for the completed "use-as-is" SFRs was transmitted to Union Electric on July 23, 1984 and is being reviewed by the Union Electric Nuclear Engineering Department. The backup documentation for the outstanding SFRs and the responses to Union Electric comments on the first transmittal is scheduled for transmittal to Union Electric the week of July 30, 1984. To date, this review has resulted in no changes to the existing dispositions.

### Corrective Action To Be Taken To Avoid Further Noncompliance

No further corrective action beyond the actions identified above are considered necessary.

### Date When Full Compliance Will Be Achieved

Union Electric should achieve full compliance by August 3, 1984.

### (50-483/84-23-02) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion XI, as implemented by SNUPPS Quality Assurance Programs for Design and Construction, 17.1.11, requires that test results be documented and evaluated to assure that the test requirements have been satisfied.

Contrary to the above, the test results packages for preoperational tests CS-03BG05, Boric Acid Blending, and CS-03BG06, CVCS

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System Hot Preoperational Test, did not receive adequate evaluation and/or documentation of the acceptability of the test results in that they were reviewed and approved with acceptance criteria which were obtained with unreliable gauges and test data which exceeded their expected values.

#### Response

##### Corrective Action Taken And The Results Achieved

An additional review and evaluation was made of test results packages CS-03BG05 and CS-03BG06. The results of the evaluation are documented on letter UOTE-207. This letter has been added to the packages and the results are outlined below.

CS-03BG05 documents emergency boration flows as recorded by BG-FI-183A and -183B as more than 150 gpm. An evaluation of the calibration of the instrument was not included in the test package. SFR-BG-122A was issued to identify the indeterminate flows above 150 gpm and was dispositioned "use-as-is" based on SNP-SU-2.2.2 Acceptance Criteria which require emergency flow to be greater than 85 gpm. Subsequent to the SFR resolution, and as part of the pre-op post-calibration program, BG-FI-184A and -184B were recalibrated and documented on CS-06CS12A. Both instruments were found to be within tolerance from the 120 gpm to 150 gpm range.

CS-03BG06 requires letdown flow through SBG04A to be  $45 \pm 3$  gpm as measured by FI-132 which is ungraduated from 0 to 50 gpm. During the conduct of the test to measure flow through this orifice, the test engineer recorded "approximately 48 gpm." No evaluation was made as to the acceptability of the "best estimate" of this flow rate. During operations the 45 gpm orifice is never utilized singularly. A 75 gpm orifice (SBG04B or C) is always utilized during letdown. The 45 gpm orifice is opened to supplement a 75 gpm orifice already in service providing approximately 120 gpm flow. As documented in the test package, FI-132 successfully demonstrated letdown flows of approximately 75 gpm and 120 gpm when SEG04A, B, and C were utilized in various combinations.

CS-03BG06 also specified an allowable range of 7.5 to 8.5 gpm seal water flow to the No. 1 RCP seals. During the test the No. 1 seal flow to all four RCPs exceeded the maximum allowable, ranging from 9.1 to 9.5 gpm. No evaluation of exceeding the maximum was identified in the test results package. Manual M-712-0068, section 6.1.1 "Injection Water", specified a normal operating range of 8 gpm to 13 gpm, with absolute minimum and maximum flows of 6 gpm and 20 gpm, respectively. Therefore, the allowable range of 7.5 to 8.5 gpm is more conservative than allowed by the manufacturer. Although the allowable ranges specified in the test were not met, they are considered acceptable based on the manufacturer's specifications.



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The results of the additional review and evaluation confirmed the acceptance of pre-operational tests CS-03BG05 and CS-03BG06.

Corrective Action To Be Taken To Avoid Further Noncompliance

The Pre-operational Test Program was completed with issuance of the License to load fuel. Letter UOTE 84-207 has been added to the record copies of CS-03BG05 and CS-03BG06 to clarify any questions related to these concerns. No other corrective action is considered necessary.

Date When Full Compliance Will Be Achieved

Union Electric achieved full compliance July 10, 1984.

(50-483/84-23-05) SEVERITY LEVEL IV VIOLATION

10 CFR 50, Appendix B, Criterion II, as implemented by commitment in SNUPPS-C FSAR, Appendix 3A, to Regulatory Guide 1.33 (endorsing American National Standards Institute N18.7-1976) requires that activities affecting quality be accomplished under suitably controlled conditions.

Contrary to the above, engineered safety feature pump and fan motor start limitations were not found in applicable system or plant operating procedures in the control room. Personnel contacted in the control room were not cognizant of the limits by training or experience and on one occasion the safety injection pump was started from the control room in violation of the manufacturer's recommended limitations for the motor.

Response

Corrective Action Taken And The Results Achieved

Motor nameplates and operating manuals for plant pumps and motors were reviewed to determine motor start limitations.

The appropriate operating procedures have been revised or Temporary Change Notices to procedures have been issued to add the pump and fan motor start limitations.

An Operations Department Night Order has been issued to ensure that all personnel, including back shift, are aware of these limitations.

Corrective Action To Be Taken To Avoid Further Noncompliance

No further corrective action is considered necessary.

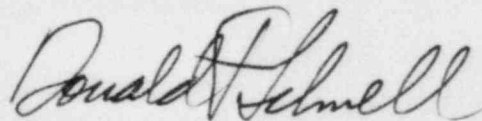
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Date When Full Compliance Will Be Achieved

Full compliance was achieved July 10, 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 cursive script, reading "Donald F. Schnell".

Donald F. Schnell

SEM/THM/JRV/lw

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