

1901 Chouteau Avenue
Post Office Box 149
St. Louis, Missouri 63166
314-554-2650



November 13, 1992

Donald F. Schnell
Senior Vice President
Nuclear

UI-NRC-2721

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

Gentlemen:

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/92012
CALLAWAY PLANT**

This responds to L. R. Greger's letter dated October 14, 1992, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/92012. Our response to the violation is presented below.

None of the material in the response is considered proprietary by Union Electric Company.

Statement of Violation

During an NRC inspection conducted on August 1, 1992 through September 30, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification (TS) 6.8.1.a requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. Item 1.c of RG 1.33 requires administrative procedures on equipment controls (e.g. locking and tagging). Operations Department Procedure ODP-ZZ-00004, Revision 13, "Locked Component Control" was instituted to implement this requirement.

Contrary to the above, on September 2, 1992, damper GKD0325 and the upper cable spreading room exhaust register were not locked as required by ODP-ZZ-00004.

This is a severity level IV violation (Supplement I).

9211230078 921113
PDR ADOCK 05000483
Q PD3

LEO/
1/0

Reason for the violation

The reason for this violation was a combination of inadequate procedural controls and personnel error. The procedure inadequacies are contained in ODP-ZZ-00004 Rev. 13, "Locked Component Control"; MPE-GK-QG001 Rev. 1, "Control Room Emergency Ventilation System Train A Flow Verification"; and MPE-GK-QG002 Rev. 1 "Control Room Emergency Ventilation System Train B Flow Verification". The personnel error was incorrect performance of a restoration step in procedure MPE-GK-QG001.

Procedure ODP-ZZ-00004 currently allows personnel other than Operations or Radwaste and Chemistry personnel to remove locking devices when working to an approved procedure.

Maintenance procedures MPE-GK-QG001 and MPE-GK-QG002 do not direct the procedure performer to have locks removed per the requirements of ODP-ZZ-00004. They also do not specifically require notification to the Control Room that the testing is complete and the locking devices are to be restored. There is a restoration step to verify that adjusted dampers and registers are relocked but the procedure does not provide clear direction on how this is to be done.

The originally installed locking devices were apparently removed as part of system flow balancing activities and were not replaced due to personnel error in implementing restoration.

Corrective steps that have been taken and the results achieved:

At the time of discovery, the damper and register were verified to be in their correct position and were relocked.

SOS 92-1718 was initiated to evaluate the cause and determine the corrective action to prevent recurrence.

Corrective Actions to be taken to avoid further violations:

ODP-ZZ-00004 will be revised to clarify that only Operations or Radwaste and Chemistry personnel are allowed to remove and restore locking devices.

To assure positive control of locked dampers and registers, MPE-GK-QG001 and MPE-GK-QG002 will be revised to have Operations personnel remove the locking devices and ensure that the components are entered in the Locked Component Deviation List. These procedures will also require that the Control Room is informed when testing is complete and locking devices can be restored. The procedures will then require specific verification that locking devices have been restored.

Date when full compliance will be achieved:

Full compliance will be achieved by December 31, 1992.

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

Very truly yours,



Donald F. Schnell

DFS/tmw

cc: A. B. Davis - Regional Administrator, USNRC Region III
I. N. Jackiw - Chief, Reactor Projects Section 3C,
USNRC Region III
L. R. Wharton - USNRC Licensing Project Manager
(2 copies)
USNRC Document Control Desk (original)
Manager - Electric Department, Missouri Public Service
Commission
B. L. Bartlett - USNRC Senior Resident Inspector
Shaw, Pittman, Potts, & Trowbridge