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October 7, 1996

Donald F. Schnell
Senior Vice President
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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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ULNRC-3438

Gentlemen:

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/96007
CALLAWAY PLANT**

This responds to Mr J. E. Dyer's letter dated September 9, 1996, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/96007. Our response to the violation is presented in the attachment.

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

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

DFS/tmw

Attachment: 1) Response to Violation

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Statement of Violation

During an NRC inspection conducted on July 21 through August 31, 1996, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

- A. Callaway Plant Technical Specification 6.8.1.a states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, 1.d, requires administrative procedures for procedure adherence and temporary changes.

Administrative Procedure APA-ZZ-00100, "Procedure Adherence," Revision 11, Step 4.2.1, states, in part, that continuous use procedures must be performed exactly as written. Additionally, APA-ZZ-00100, Step 4.2.6 states, in part, that variance from the guidance contained within a continuous use procedure requires a procedure revision or temporary change.

Contrary to the above, the licensee failed to adhere to the requirements of Procedure APA-ZZ-00100 on two occasions:

1. On August 9, 1996, during the performance of the local pre-start checks on Emergency Diesel Generator A, plant operators identified that lube oil temperature was outside the required range specified in Procedure OSP-NE-0001A, "Standby Diesel Generator A Periodic Tests," Revision 0, Step 6.1.7. Procedure OSP-NE-0001A was classified as a continuous use procedure. Plant operators proceeded with the test without changing the procedure.
2. On August 23, 1996, during the performance of solid state protection system testing, instrument and control technicians failed to use retractable sheathed banana plug test leads as specified by Procedure ISF-SB-00A32, "Solid State Protection System Functional Test, Revision 14, Step 6.6.4. Procedure ISF-SB-00A32 was classified as a continuous use procedure.

This is a Severity Level IV violation (Supplement 1).

Reason for the Violation

- 1st Example

The Shift Supervisor recognized the procedure deficiency and determined a procedure revision was required. A procedure revision was initiated. However, the Shift Supervisor did not understand that the approved procedure revision had to be issued for use prior to continuation of the surveillance test.

- 2nd Example

The I&C technician did not comply with the caution statement prior to step 6.6.4 performance. Two caution statements were listed, the second of which actually included a third caution. The third warned of the need to use retractable sheathed banana plug test leads to prevent a potential undesired Engineered Safety Feature Actuation.

Corrective Steps Taken and Results Achieved:

- 1st Example

Procedure OSP-NE-0001A has been revised to increase the allowable lube oil temperature band to account for the operational characteristics of the lube oil heater.

- 2nd Example

When identified by the inspector, the I&C technician stopped, corrected himself, obtained the correct equipment and completed the task without incident. In addition, a revision to ISF-SB-00A32, "Solid State Protection System Functional Test" has been initiated.

Corrective Steps to Avoid Further Violations:

Management expectations for continuous use procedure adherence were reinforced by the Superintendent, Operations with the shift licensed senior reactor operators and by the General Supervisor I&C with the I&C department. The requirement to perform continuous use procedures exactly as written was stressed. The training also stressed that variance from a continuous use procedure requires completion of an approved procedure revision or temporary change prior to continuing performance of the procedure.

Date when Full Compliance will be Achieved:

Full compliance was achieved on September 26, 1996.