



UNION ELECTRIC COMPANY

1901 Gratiot Street, St. Louis

Donald F. Schnell
Vice President

May 31, 1985

Mr. J. J. Harrison
Engineering Branch
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

ULNRC-1104

Dear Mr. Harrison:

INSPECTION REPORT NO. 50-483/85004

This reply is in response to your letter of April 29, 1985 which transmitted the report of the inspection conducted at Callaway Plant during the period of March 4 through April 5, 1985. Our response to the item of noncompliance is presented below.

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

(50-483/85-04-01) SEVERITY LEVEL V VIOLATION

10CFR50, Appendix B, Criterion XI, as implemented by the Union Electric Quality Assurance Program, requires that test results be evaluated and documented to assure that test requirements have been satisfied.

Contrary to the above, test results packages were reviewed and approved by the On-Site Review Committee with the following existing discrepancies:

1. In ETT-SF-07033, Revision 2, "Rod Drop Time Measurements (Hot, Full-Flow)", re-evaluation of rod drop times resulted in changing the drop times for approximately 40% of the rods. Average rod drop time and the standard deviation were not subsequently recalculated in order to verify the design criterion that rod drop time for any rod should not vary from the average by more than ± 2 standard deviations.
2. In ETT-BB-07030, Revision 2, "Reactor Coolant System Flow Measurements", superseded RTD calibration curves were inadvertently used to convert resistance to temperature.

8506100133 850531
PDR ADOCK 05000483
Q PDR

Mailing Address: P.O. Box 149, St. Louis, MO 63166

JUN 4 1985

1/0
✓ 201

3. In the Thermal Power Measurement and Statepoint Data Collection series of tests (ETT-SC-07031, 07032, 07033, 07034, and 07035), incorrect test instrumentation was used and the test pressure gauges used for measuring main steam pressure lacked documentation to substantiate their acceptability. In fact, documentation was included in the package for ETT-SC-07035 which indicated that the test gauges had been rejected for calibration prior to performing the test.

Response

Corrective Action Taken and the Results Achieved

As noted in the details of Inspection Report 50-483/85004, the deficiencies were evaluated and corrected by the licensee. Where required, corrected test results or additional documentation necessary to support evaluations performed were added to the test results packages. In no instance did the errors discovered in the test results packages result in operation of the Callaway Plant with reduced margins of safety as defined in the bases of the Technical Specifications or the Final Safety Analysis Report.

Based on the review of the Callaway Initial Startup Test Program results by the licensee and the NRC, reasonable assurance has been provided that no errors exist in the Initial Startup Test results packages which would result in a reduced margin of safety as defined in the bases of the Technical Specifications or the Final Safety Analysis Report. No additional corrective action is required to validate these test results packages.

Corrective Action Taken to Prevent Further Noncompliance

The deficiencies noted in the Notice of Violation indicate that the independent review of test results packages requires improvement. The On-Site Review Committee (ORC) was chartered with the independent review responsibility for the initial startup test program. The Committee's failure to identify the deficiencies noted in the Notice of Violation is not indicative of a general weakness in the quality of ORC reviews. The ORC members have been made aware of the specific deficiencies and will augment their review process with ad hoc committees tasked to provide additional detailed review as deemed appropriate. Performance of such reviews would augment, not replace, the existing reviews performed by ORC members.

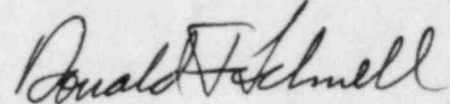
Mr. J. J. Harrison
Page 3
May 31, 1985

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by May 31, 1985.

Please contact us if you have any questions regarding this response or if additional information is required.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Donald F. Schnell". The signature is fluid and cursive, with the first name "Donald" and last name "Schnell" clearly distinguishable.

Donald F. Schnell

DFS/SEM/JRV/bjp

cc: G. C. Wright, NRC Region III
NRC Resident Inspectors, Callaway Plant (2)
Missouri Public Service Commission