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January 10, 1997

**Donald F. Schnell**  
Senior Vice President  
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U. S. Nuclear Regulatory Commission  
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ULNRC-3509

Gentlemen:

**REPLY TO NOTICE OF VIOLATION  
INSPECTION REPORT NO. 50-483/96011  
CALLAWAY PLANT**

This responds to Mr. J. E. Dyer's letter dated December 12, 1996, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/96011. 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 that reads "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 October 13 through November 23, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," (60 FR 34381; June 30, 1995) the violation is listed below:

Callaway Plant Technical Specification 6.8.1 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 3.e requires, in part, that procedures be written for component cooling water system startup, operation, and shutdown.

Normal Operating Procedure OTN-EG-1, Revision 14, "Component Cooling Water," was written to provide the appropriate operating instructions for the component cooling water system. Step 2.7 of this procedure stated that, during normal operation, the maximum component cooling water flow should not exceed 110 percent of the flow listed in Attachment 1 of the procedure.

Contrary to the above, the NRC inspectors observed that Procedure OTN-EG-1 did not give appropriate instructions for proper system operation. Attachment 1 of the procedure listed minimum flow values only and not a range of flow rates. In addition, the procedure did not identify minimum system temperature and did not provide guidance on maintaining proper system temperature. The procedure was unclear as to the required flow rates to the various components (483/96011-01).

This is a Severity Level IV Violation (Supplement I).

### **Reason for the Violation**

Development and review of Normal Operating Procedure OTN-EG-00001 had primarily focused on ensuring the Component Cooling Water System was capable of providing sufficient cooling to perform its design basis function. The reviews had not explicitly evaluated concerns of excessive cooling during cold weather operation.

### **Corrective Steps Taken and Results Achieved:**

The Component Cooling Water (CCW) System was adjusted to restore flow to the proper limits. A corrective action document, SOS 96-1795, was initiated on November 14, 1996 to address the concerns identified by the NRC Resident Inspector. Based on an engineering evaluation, the FSAR was revised to indicate an allowed minimum CCW

System temperature of 40°F. Revision 15 of OTN-EG-00001 incorporated the FSAR change and was issued on November 21, 1996.

**Corrective Steps to Avoid Further Violations:**

On November 24, 1996, Quality Assurance commenced a review of the FSAR for CCW System operating parameters. This review was requested by Nuclear Engineering as a result of SOS 96-1795 which identified that the minimum temperature for CCW System operation described in the FSAR had not been captured as an operating parameter in any plant procedures. The Quality Assurance review identified some minor discrepancies in the normal operating procedures of the CCW system but concluded that the emergency operating procedures for the system were generally consistent with the system description and design parameters included in the FSAR. These findings were published in Quality Assurance Surveillance Report SP96-103 dated December 18, 1996. FSAR Change Notice 96-075 was subsequently initiated December 26, 1996 to more accurately describe the operation of the CCW System. After processing the change notice, Operations will revise OTN-EG-00001 and the Operator Logs to ensure the CCW System design parameters for flow and temperature are properly maintained.

Union Electric is also evaluating the concerns identified by this violation for potential generic applicability to other systems. Our response to the NRC's 10CFR50.54(f) letter, dated October 9, 1996, will address whether additional actions are required.

**Date when Full Compliance will be Achieved:**

Full compliance will be achieved by February 7, 1997. Further evaluation of potential generic concerns will be described in our response to the 10CFR50.54(f) letter.