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Donald F. Schnell
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February 10, 1997

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington, DC 20555-0001

ULNRC-3523

Gentlemen:

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/96014
CALLAWAY PLANT**

This responds to Mr. James E. Dyer's letter dated January 16, 1997, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/96014. 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 190077

Attachment: 1) Response to Violation

JED 1/1

9702200120 970210
PDR ADOCK 05000483
Q PDR

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Statement of Violation

During an NRC inspection conducted November 24, 1996 through January 4, 1997, 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, 1.c requires, in part, that administrative procedures be written for equipment control tagging.

Administrative Procedure ODP-ZZ-00310, "Workman's Protection Assurance Tagging," Revision 2, Step 4.1.10.3, required that the method and order specified on the tagout control sheet be followed when hanging tags.

Contrary to the above, on December 18, 1996, the equipment operator pulled the incorrect fuses when hanging a tag specified on Workman's Protection Assurance tagout control sheet 21672. This personnel error resulted in tripping a circulating water pump and a service water pump requiring a power reduction to avoid a turbine trip on loss of vacuum (483/96014-01).

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

Reason for the Violation

The cause of the violation was determined to be personnel error by a non-licensed Equipment Operator (EO) when placing Workman's Protection Assurance (WPA) tags for tagout control sheet 21672. It was determined the EO was working in cabinet PB12102 instead of PB12104 as specified by the tagout control sheet. The EO thought he was pulling the secondary fuses for transformer XPB121, when in fact he was pulling the secondary fuses for bus PB122, which resulted in the trip of the 'B' circulating water pump and the 'B' service water pump.

Corrective Steps Taken and Results Achieved:

The 'A' Essential Service Water Pump was started to supply service water loads and licensed Reactor Operators reduced power to 92% to minimize the condenser pressure increase. The 'B' circulating water pump was restarted. Plant systems responded as expected. An Event Review Team was assembled. A corrective action document, SOS 96-1992 was initiated to document and track corrective actions associated with this event. WPA tagout 21672 was reviewed and verified to be correct.

Corrective Steps to Avoid Further Violations:

The event was reviewed with EOs on shift. "Attention to Detail" was stressed for placement of WPA.

Operations requalification training cycle 97-0 will include use of a Stop, Think, Act, and Review (STAR) Trainer. This is a control panel simulator that is designed to challenge self checking performance. The simulator provides a hands-on approach to emphasize attention to detail in performance of tasks. Operations requalification training cycle 97-1 will include management expectations for placement of WPA as well as a review of this event.

Date when Full Compliance will be Achieved:

Full compliance will be achieved upon completion of Operations requalification training. Training cycle 97-0 will be completed by March 15, 1997. Training cycle 97-1 will be completed by May 1, 1997.