

ENCLOSURE 1

NOTICE OF VIOLATION

Union Electric Company
Callaway Plant

Docket No.: 50-483
License No.: NPF-30

During an NRC inspection conducted on October 21 through December 9, 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:

Criterion IX of Appendix B to 10 CFR Part 50 states, in part, "Measures shall be established to assure that special processes, including . . . nondestructive testing, are controlled and accomplished . . . using qualified procedures in accordance with applicable, codes, standards, specifications, criteria, and other special requirements."

Section 2.3 of Procedure ETP-BB-01309, "Steam Generator Eddy Current Testing Acquisition and Analysis Guidelines," Revision 7, states, "All techniques used shall be qualified in accordance with Appendix H of the EPRI PWR Steam Generator Examination Guidelines, Revision 4."

Westinghouse Report DDM-96-009, "Documentation of Appendix H Compliance and Equivalency," identifies the qualified Appendix H analysis span and phase rotation settings for plus point coil examination of tube expansion transition regions to be, respectively, one-half screen height response to a 40 percent notch and rotation set to 20 degrees for a 100 percent through-wall notch.

Contrary to the above, analysis of plus point probe eddy current data during Refueling Outage RF8 was not controlled to assure use of Appendix H qualified settings for span and phase rotation, as evidenced by:

1. Specific direction was not provided by the primary eddy current analysis contractor, Westinghouse, to the analysts on span and phase rotation settings to be used for analysis of plus point coil examination data.
2. Procedure ETP-BB-01309, Revision 7, provided span and phase rotation settings for only the rotating pancake coil. These settings differed from those used in the qualification of the plus point coil and were inappropriate for use with that coil.

This is a Severity Level IV violation (Supplement I) (50-483/9610-01).

Pursuant to the provisions of 10 CFR 2.201, Union Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within

30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas
this 14th day of February 1997