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November 25, 1996

Donald F. Schnell
Senior Vice President
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U. S. Nuclear Regulatory Commission
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ULNRC-3495

Gentlemen:

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/96009
CALLAWAY PLANT**

This responds to Mr. J. E. Dyer's letter dated October 31, 1996, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/96009. 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 dark ink, appearing to read "Donald F. Schnell".

Donald F. Schnell

DFS/tmw

Attachment: 1) Response to Violation

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PDR ADOCK 05000483
G PDR

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Statement of Violation

During an NRC inspection conducted on September 1 through October 12, 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:

Callaway Plant Technical Specification 6.8.1 a states 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, paragraph 6.1. lists procedures for combating loss of primary coolant.

Section 18 of Emergency Operating Procedure E-1, "Loss of Reactor or Secondary Coolant", Rev. 1B2, describes the steps required to energize hydrogen recombiners following a loss of coolant accident. This procedure instructs that hydrogen recombiners be energized according to Procedure OTN-GS-00001, "Containment Hydrogen Control System", Rev. 5

Contrary to the above, on September 19, 1996, the inspectors identified that Procedure OTN-GS-00001 was not properly maintained because a modification made to a hydrogen recombiner temperature indicator was not translated into Procedure OTN-GS-00001.

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

Reason for the Violation

The Callaway Plant Design Change Program utilizes a tiered approach determined by the significance of the change. Equivalent Material-Request for Resolution (RFRs) may be used to make design changes to material, components or parts which are considered a like-kind replacement. Replacement of the analog instrument GSTI0029 with a digital instrument was accomplished using the Equivalent Material RFR process since the instrument was non-safety related, had no control function, and provided indication only.

Procedure OTN-GS-00001 "Containment Hydrogen Control System", Revision 5, Step 4.4.9.2 requires taking temperature readings from GSTI0029. This indicating function was not affected by the change made under the Material Equivalent RFR, even though the instrument was physically changed.

The physical change to the instrument did not adversely affect the operator's ability to take the required temperature reading per the procedure. Operations is notified of all RFR approvals so that they may be screened for potential impact. No changes were deemed

necessary during the screening review of this Material Equivalency RFR. OTN-GS-00001 was not revised to remove the informational note which pertained to the analog instrument and did not apply to the replacement digital temperature indicator. (The note described tapping the analog gauge when changing thermocouples to ensure a true reading.) Procedure OTN-GS-00001 is a Reference Use procedure, and the informational note is not a procedure step. Therefore, there was no impact on the procedure results.

Corrective Steps Taken and Results Achieved:

Procedure OTN-GS-00001, Rev. 5, was revised by Temporary Change Notice 96-248 and issued October 3, 1996. Further reviews determined that the analog-to-digital change to the temperature indicator similarly affected OSP-GS-00001, Rev. 6, "Containment H2 Recombiner Functional Test". Revision 7 was issued October 4, 1996.

Corrective Steps to Avoid Further Violations:

There is no safety significance or operational impact described in this violation. The procedure change process would likely have addressed deletion of the informational note as a future enhancement. Therefore, no further actions are necessary and the current tiered design change program will be retained.

Date when Full Compliance will be Achieved:

Full compliance was achieved on October 4, 1996.