



UNION ELECTRIC COMPANY

1901 Gratiot Street, St. Louis

September 20, 1985

Donald F. Schnell
Vice President

Mr. W. D. Shafer, Chief
Emergency Preparedness and
Radiological Protection Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Shafer:

ULNRC-1181

INSPECTION REPORT NO. 50-483/85017

This reply is in response to your letter of August 21, 1985, which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of July 16-31, 1985. Our response to the items of noncompliance are presented below in the order listed in the body of the report.

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

(50-483/85017-01) SEVERITY LEVEL IV VIOLATION

Technical Specification 4.7.9.2 requires each sealed source to be tested prior to use unless tested within the previous 6 months.

Contrary to the above, two Troxler Density Gages, leak tested on April 11, 1984, were used at least twice between October 11, and December 28, 1984, without further leak testing.

Response

Corrective Action Taken And The Results Achieved

Incident Report No. 84-909 was written on December 28, 1984 and Licensee Event Report 84/066-00 was issued January 25, 1985. The Troxler Density Gages were placed under the control of Health Physics and the required leak tests were

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performed satisfactorily. Procedure QCP-ZZ-07000, Rev. 1, "Operational Civil Inspection" was revised to specify the requirements for control of the Troxler Gages.

Corrective Action To Be Taken To Avoid Further Noncompliance

A review of Callaway Plant Administrative Procedures APA-ZZ-00160, "Callaway Plant Health Physics Program" and APA-ZZ-00400, "Procurement of Parts, Supplies, Materials and Services" was performed. Adequate procedural controls for radioactive materials were identified to be in place.

A letter was issued by the Manager, Callaway Plant, on August 14, 1985 to Nuclear Operations Department Heads, Nuclear Engineering (Site Liaison, Engineering, and Licensing), Emergency Preparedness, Nuclear Construction, Purchasing, and Outages (responsible for the Daniel contract) requesting that they review with their organizations the importance of the requirements regarding licensable quantities of radioactive materials.

To provide ongoing awareness to personnel of the importance of and the adherence to requirements regarding licensable quantities of radioactive materials, a revision to the training lesson plan for General Employee Training will be made incorporating this corrective action.

Date When Full Compliance Will Be Achieved

The revision to the training lesson plan will be issued by October 12, 1985. Individual training will be accomplished upon participation in the regularly scheduled requalification training and General Employee Training.

(50-483/85017-02) SEVERITY LEVEL IV VIOLATION

Technical Specification 3.3.3.6, ACTION c states, in part, while in MODES 1, 2, and 3, "With the number of OPERABLE channels for the unit vent - high range noble gas monitor less than the Minimum Channels OPERABLE requirements of Table 3.3-10, initiate the preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours and either restore the inoperable channel to OPERABLE status within seven days, or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days that provides actions taken, cause of the inoperability and plans and schedule for restoring the channels to OPERABLE status." Table 3.3-10 states the Minimum Channels OPERABLE is one.

Technical Specification 3.3.3.10, ACTION b states, at all times, "With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels

OPERABLE, take the ACTION shown in Table 3.3-13. Restore the inoperable instrumentation to OPERABLE status within the time specified in the ACTION, or explain in the next Semi-annual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.7, why this inoperability was not corrected within the time specified." Table 3.3-13 states the Minimum Channels OPERABLE is one.

Contrary to the above, actions required by Technical Specification 3.3.3.6 and 3.3.3.10, during the inoperability of unit vent monitor system GT-RE-21B, were not completed between May 29, 1985 and June 11, 1985.

Response

Corrective Action Taken And The Results Achieved

Incident Report No. 85-0253 was written on June 11, 1985 and Licensee Event Report 85-028-00 was issued July 11, 1985.

The sample line was reconnected promptly upon discovery on June 11, 1985 by I & C personnel. The radioactive gaseous effluent monitor GT-RE-21B was returned to an operable status. At that time Technical Specifications 3.3.3.6.c and 3.3.3.10.b were satisfied.

Corrective Action To Be Taken To Avoid Further Noncompliance

I & C Technicians have been instructed to review what steps are taken during troubleshooting activities and perform a review at the end of the maintenance activity to ensure that equipment is placed in its normal configuration. Health Physics Technicians have reviewed this incident and are aware of the need to be observant of abnormal operating conditions associated with the Wide Range Gas Monitor.

Additionally, a special task group comprised of representatives from Health Physics, Instrumentation and Controls, Operations, and Compliance has been formed to enhance plant procedures concerning the operations and surveillance of technical specification process radiation monitors.

Date When Full Compliance Will Be Achieved

Union Electric has been in compliance with Technical Specifications 3.3.3.6 and 3.3.3.10 since June 11, 1985. Action items identified for the special task group are scheduled to be completed by November 15, 1985.

Mr. W. D. Shafer
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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". The signature is fluid and cursive, with the first name "Donald" and last name "Schnell" clearly legible.

Donald F. Schnell

SEM/JRV/pat

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