

October 9, 2000

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

ULNRC-4321

Gentlemen:



**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
LICENSEE EVENT REPORT 2000-005-00
Technical Specification Bases Inadequacy Results In Technical Specification
Surveillances Not Being Performed On BNHV8812A/B Since Plant Start-Up**

The enclosed licensee event report is submitted in accordance with 10CFR50.73(a)(2)(i)(B) to report a condition that was prohibited by the plant Technical Specifications.

A handwritten signature in black ink, appearing to read "R. D. Affolter".

R. D. Affolter
Manager, Callaway Plant

RDA/gps

Enclosure

IE22

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LICENSEE EVENT REPORT (LER)

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TITLE (4) **Technical Specification Bases Inadequacy Results In Technical Specification Surveillances Not Being Performed On BNHV8812A/B Since Plant Start-Up.**

EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER		Rev No.	MONTH	DAY	YEAR
0 9	0 7	2 0 0 0	2 0 0 0	-	0 0 5	-	0 0	1 0	0 9 2 0 0 0

OTHER FACILITIES INVOLVED (8)				
FACILITY NAMES		DOCKET NUMBER(S)		
		0	5	0
		0	5	0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR : (Check one or more of the following) (11)							
POWER LEVEL (10)	1	<input type="checkbox"/> 20.2201(b)	<input checked="" type="checkbox"/> 20.2203(a)(2)(v)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)				
		<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)				
		<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 73.71				
		<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> OTHER (Specify in				
		<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> Abstract below or in				
		<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> Text, NRC Form 366A)				

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER			
NAME		AREA CODE			
J. D. Schnack, Supervising Engineer, QA Corrective Action		5 7 3 6		7 6 - 4 3 1 9	

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO					

ABSTRACT (Limit to 1400 spaces, i.e. approximately fifteen single-space typewritten lines)(16)

From plant start-up through 2000/09/07, surveillance testing was not performed on Refueling Water Storage Tank (RWST) to Residual Heat Removal (RHR) pumps suction isolation valves (BNHV8812A/B) as required by Technical Specification SR 3.5.2.5.

On 2000/09/07, plant management determined that surveillances as required by technical specification had not been performed because Technical Specification Bases were inadequate and did not include BNHV8812A/B. Original Technical Specification SR 4.5.2.e.1 failed to include BNHV8812A/B as automatic valves in the flow path for flow path switchover by electrical interlock from EJHV8811A/B RHR containment sump isolation valves upon receipt of a SI or RWST Level Low-Low 1 coincident with an SI signal.

Technical Specification Bases and the related testing procedure will be revised to include BNHV8812A/B. Nuclear Engineering determined Maintenance testing had satisfied technical specification surveillance requirements for BNHV8812B. Delinquent surveillance testing for BNHV8812A will be performed per NOED 00-06-010 and License Amendment 140 dated 10/6/00.

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TEXT (If more space is required, use additional NRC Form 366A's)(17)

DESCRIPTION OF EVENT:

During reviews of station accident analysis requirements on 9/07/00, it was determined that surveillance testing was not being performed on Refueling Water Storage Tank (RWST) to Residual Heat Removal (RHR) pumps suction isolation valves (BNHV8812A/B) to ensure that these valves would actuate to their correct position under accident conditions.

Technical Specification Surveillance Requirement 3.5.2.5 states, on an 18 month frequency, "Verify each Emergency Core Cooling System (ECCS) automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal."

The Technical Specification Bases for SR 3.5.2.5 states, "These Surveillances demonstrate that each automatic ECCS valve actuates to the required position on an actual or simulated Safety Injection (SI) signal and on an actual or simulated RWST Level Low-Low 1 Automatic Transfer signal coincident with an SI signal."

The RWST Level Low-Low coincident with an SI signal automatically opens the RHR containment sump isolation valves (EJHV8811A/B). Normal switchover from the injection mode (suction from the RWST) to the recirculation mode (containment recirculation sump) involves the sequential opening of the RHR containment sump isolation valves (EJHV8811A/B), followed by the closing of the RWST isolation valves (BNHV8812A/B). BNHV8812A/B are interlocked with EJHV8811A/B and will automatically close after the full open position switches on EJHV8811A/B are actuated. The automatic closure of BNHV8812A/B was not previously included in the plant Technical Specification surveillance procedures because the valves do not actuate via a slave relay and therefore were not recognized as covered by this surveillance requirement.

In conclusion, the Surveillance Requirement (SR) 3.5.2.5 has not been performed within the specified frequency (18 months). SR 3.0.3 allows a 24-hour extension to perform the surveillance. Since this surveillance should not be performed at power, SR 3.0.3 would require that LCO 3.5.2 be declared not met after the 24-hour delay period expires. Therefore, AmerenUE asked the NRC for a NOED (Notice of Enforcement Discretion) on 9/7/00 with ULNRC 04307. The NOED was granted on 9/8/00.

BASIS FOR REPORTABILITY:

These events are reportable per 10CFR50.73 (a)(2)(i)(B) as a condition prohibited by the plant's Technical Specification.

CONDITION AT TIME OF EVENT:

MODE 1, Power Operations, 100% power.

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TEXT (If more space is required, use additional NRC Form 366A's)(17)

ROOT CAUSE:

During the development of the "Proof and Review" copy of the original Callaway Technical Specifications from Revision 4a of NUREG-0452 (the Standard TS at the time), insufficient attention to detail was given to differences between Callaway and the reference standard plant, Comanche Peak Steam Electric Station (CPSES). Surveillance Requirement 4.5.2.e.1 in the original Callaway Technical Specifications should have identified that BNHV8812A/B are also automatic valves in the flow path for recirculation switchover; however, the actuation signals from the EJHV8811A/B limit switches indicating full open (ZS-10) were not explicitly specified at that time. At CPSES, the equivalent valves are remote-manual valves with a 20-minute operator action time. They are not included in the surveillance of automatic valves at CPSES.

CORRECTIVE ACTIONS:

- Procedure OSP-EJ-V002A "RHR Encapsulated Isolation Valve Operability Inservice Test" will be revised by 10/15/2000 to include periodic testing of valve interlocks between BNHV8812A/B and EJHV8811A/B to meet the Technical Specification Surveillance Requirement.
- Maintenance testing completed during Refuel 10 (October 1999) tested a portion of the circuitry for BNHV8812B. Additional testing was completed on line on August 31, 2000 to complete the surveillance requirements for BNHV8812B.
- Since BNHV8812A was not similarly tested during Refuel 10, surveillance of BNHV8812A will be performed per NOED No. 00-6-010.
- Exigent Callaway License Amendment 140 was approved by the NRC on 10/06/00 to revise Technical Specifications per ULNRC 04308.
- Technical Specification Bases will be revised to clarify the testing requirements for the valve interlocks.

A review of other valve applications that receive Technical Specification required automatic actuation signals was completed without additional findings. An on-going review of station accident analysis assumptions for response time testing will be completed by 11/01/00.

SAFETY SIGNIFICANCE:

Although a surveillance program was not established for testing this interlock, this circuitry has been satisfactorily tested in the past outside of the plant's surveillance program. BNHV8812A/B are also stroke time tested quarterly per the Inservice Testing Program.

A sensitivity calculation has been completed and verified using Emergency Operating Procedures on the Callaway simulator to show that sufficient time would have been available for the Licensed Reactor Operators to reposition BNHV8812A/B to their correct position if required during accident conditions.

Based on the above discussion this event was not significant with respect to public health and safety.

**LICENSEE EVENT REPORT (LER)
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TEXT (If more space is required, use additional NRC Form 366A's)(17)

PREVIOUS OCCURRENCES:

No previous occurrences exist for Technical Specification SR 3.5.2.5 and no previous occurrences exist for original Technical Specification 4.5.2.e.1.

FOOTNOTES:

The system and component codes listed below are from IEEE Standard 805, 1984 and IEEE Standard 803A, 1983 respectively.

System BP, JE

Component V, 20