

August 20, 2001



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

ULNRC-04545

Gentlemen:

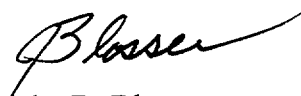
**REPLY TO NOTICE OF VIOLATION  
INSPECTION REPORT NO. 50-483/01-09  
CALLAWAY PLANT  
UNION ELECTRIC CO.**

This responds to EA-01-130 letter dated July 23, 2001, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/2001-009. 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,

  
John D. Blosser  
Manager,  
Regulatory Affairs

JDB/MAR/slk

Attachment: 1) Response to Violation

IE01

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**Statement of Violation**

During an NRC inspection completed on June 4, 2001, 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 Limiting Condition for Operation 3.7.8 requires that two essential service water trains be operable when the plant operates in Modes 1, 2, 3, or 4. Technical Specification 3.7.8.A requires that an inoperable essential service water train be restored to an operable status within 72 hours. Technical Specification 3.7.8.8 requires that the plant be placed in Mode 3 within 6 hours and in Mode 5 within 36 hours if the allowed outage time of 72 hours for an inoperable essential service water train cannot be met.

Contrary to the above, the plant operated in Mode 1 from February 9-15, 2001, a period of approximately, 132 hours, without two essential service water trains operable. Essential service water Pump B became inoperable on February 9 when a 20-foot section of reinforced tygon hose fell into the suction bay of the pump. When the pump was subsequently started on February 14, the hose became wrapped around the rotating assembly in the first stage impeller of the pump casing. This blocked a portion of the suction path, limiting the pump discharge pressure and flow to below the minimum required to perform its safety function. The tygon hose was removed from the pump suction bay on February 14, and the pump was restored to an operable status on February 15. The licensee's actions to restore operability from the time of discovery were completed within the time permitted by the Technical Specification.

This violation is associated with a White SDP finding. (50-483/01-09-01)

**Reason for the Violation**

The primary cause of this violation was insufficient foreign material exclusion (FME) controls in the Essential Service Water System pump rooms. Specifically, there were insufficient administrative controls of leakage collection devices. As a result, a tygon hose was not adequately secured to prevent the hose from entering the pump bay.

**Corrective Steps Taken and Results Achieved:**

Remedial actions taken for this event include:

1. The tygon hose was removed from the pump bay, the pump was retested and was restored to an operable status;
2. The tygon hose at the Essential Service Water System pump bay was replaced and properly secured;
3. Other plant areas were inspected for adequate leakage collection device installations; and
4. The Essential Service Water System pump areas were posted as foreign material exclusion control areas.

**Corrective Steps to Avoid Further Violations:**

Corrective action to prevent recurrence include the following:

1. Screens were installed in the Essential Service Water System pump rooms to prevent foreign material from entering the pump bays. FME controls are now required whenever the screens are removed and labels are in place clearly identifying this requirement.
2. An assessment of leakage collection device controls will be performed.
3. An assessment of the Essential Service Water System materiel condition will be performed.

**Date when Full Compliance will be Achieved:**

Full compliance with Technical Specifications was achieved on February 15, 2001 when the pump was restored to operable status. The forecasted completion date for the assessments is October 31, 2001.