

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-8064

June 24, 2002

Garry L. Randolph, Senior Vice President and Chief Nuclear Officer Union Electric Company P.O. Box 620 Fulton, Missouri 65251

SUBJECT: CALLAWAY PLANT- NRC INTEGRATED INSPECTION REPORT 50-483/02-04

Dear Mr. Randolph:

On May 24, 2002, the NRC completed an inspection at your Callaway Plant. The enclosed report documents the inspection findings, which were discussed on May 24, 2002, with Mr. R. Affolter and other members of your staff.

This inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has identified three violations of regulatory requirements that were evaluated under the risk significance determination process as having very low safety significance (green). Because of the very low safety significance, the violations are being treated as noncited violations, consistent with Section VI.A.1 of the Enforcement Policy. Additionally, there was one finding of very low safety significance (green) identified in the report. If you deny the noncited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Callaway Plant.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <u>http://www.nrc.gov/reading-rm/adams.html</u> (the Public Electronic Reading Room).

Sincerely,

/RA/

Charles S. Marschall, Chief Engineering and Maintenance Branch Division of Reactor Safety

Docket: 50-483 License: NPF-30

cc: Professional Nuclear Consulting, Inc. 19041 Raines Drive Derwood, Maryland 20855

John O'Neill, Esq. Shaw, Pittman, Potts & Trowbridge 2300 N. Street, N.W. Washington, D.C. 20037

Mark A. Reidmeyer, Regional Regulatory Affairs Supervisor Regulatory Affairs AmerenUE P.O. Box 620 Fulton, Missouri 65251

Manager - Electric Department Missouri Public Service Commission 301 W. High P.O. Box 360 Jefferson City, Missouri 65102

Ronald A. Kucera, Deputy Director for Public Policy Department of Natural Resources 205 Jefferson Street Jefferson City, Missouri 65101 Otto L. Maynard, President and Chief Executive Officer Wolf Creek Nuclear Operating Corporation P.O. Box 411 Burlington, Kansas 66839

Dan I. Bolef, President Kay Drey, Representative Board of Directors Coalition for the Environment 6267 Delmar Boulevard University City, Missouri 63130

Lee Fritz, Presiding Commissioner Callaway County Courthouse 10 East Fifth Street Fulton, Missouri 65251

J. V. Laux, Manager Quality Assurance AmerenUE P.O. Box 620 Fulton, Missouri 65251

Jerry Uhlmann, Director State Emergency Management Agency P.O. Box 116 Jefferson City, Missouri 65101

Gary McNutt, Director Section for Environmental Public Health P.O. Box 570 Jefferson City, Missouri 65102-0570

John D. Blosser, Manager Regulatory Affairs AmerenUE P.O. Box 620 Fulton, Missouri 65251 Electronic distribution by RIV: Regional Administrator (EWM) DRP Director (KEB) DRS Director (ATH) Senior Resident Inspector (VGG) Branch Chief, DRP/B (DNG) Senior Project Engineer, DRP/B (RAK1) Staff Chief, DRP/TSS (PHH) RITS Coordinator (NBH) Scott Morris (SAM1) CWY Site Secretary (DVY)

SRI:EMB	RI:EMB	RI:EMB	RI:EMB	C:EMB	C:DRPB	C:EMB
MFRunyan/Imb	JTaylor	PAGoldberg	WMMcNeill	CSMarschall	DNGraves	CSMarschall
/RA/	/RA/	/RA/	/RA/	/R A /	/RA/	/RA/
06/12/02	06/6/02	06/6/02	06/6/02	06/6/02	06/20/02	06/24/02
OFFICIAL RECORD COPY				T=Telephone	E=E-n	nail F=Fax

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION REGION IV

Docket:	50-483		
License:	DPF-30		
Report No:	50-483/ 02-04		
Licensee:	Union Electric Company		
Facility:	Callaway Plant		
Location:	Junction Highway CC and Highway O Fulton, Missouri		
Dates:	May 6 - 24, 2002		
Team Leader:	M. F. Runyan, Senior Reactor Inspector, Engineering Maintenance Branch		
Inspectors:	P.A. Goldberg, Reactor Inspector, Engineering Maintenance Branch		
	W. M. McNeill, Reactor Inspector, Engineering Maintenance Branch		
	J. Taylor, Reactor Inspector, Engineering Maintenance Branch		
Accompanying Personnel:	H. Anderson, Beckman and Associates		
	G. Skinner, Beckman and Associates		
Approved By:	Charles S. Marschall, Chief Engineering Maintenance Branch Division of Reactor Safety		

SUMMARY OF FINDINGS

IR 05000483-02-04; Union Electric Company; 05/06-24/2002; Callaway Plant, safety system design and performance capability

The inspections were conducted by four regional inspectors and two contractors. The inspectors identified three green findings, which were characterized as noncited violations. The significance of most findings is indicated by their color (Green, White, Yellow, Red) and determined by using Inspection Manual Chapter 0609, "Significance Determination Process (SDP)." Findings for which the significance determination process does not apply are indicated by "No Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at http://www.nrc.gov/NRR/OVERSIGHT/index.html.

Cornerstone: Mitigating Systems

• Green. Fire Door DSK33022, connecting the "A" emergency diesel generator room and the engineered safety features switch gear room, had an excessive gap between the door and its frame. The door gap was greater than the specified maximum dimension of 1/8 inch.

The licensee's failure to maintain in effect the provisions of the fire protection program was a violation of Operating License Condition 2.C(5)(c). This finding was of very low safety significance since there was no actual loss of safety function (the fire door asfound was expected by the licensee to be still capable of functioning as a 3-hour fire barrier pending further evaluation). Because of the low safety significance and the licensee's action to place the issue in their corrective action program (CAR 200203016), this violation is being treated as a noncited violation in accordance with Section VI.A.1 of the Enforcement Policy (50-483/0204-01) (Section 1R21.4.b).

 Green. Requirements in Procedure EDP-ZZ-04023, "Calculations", Revision 14, were not applied correctly to the diesel generator steady-state loading calculation contained in Callaway Drawing E-21005, "List of Loads Supplied by Emergency Diesel Generator," Revision 25. The drawing functioned as a calculation, but lacked the quality requirements for calculations required by this procedure.

The failure to follow procedural requirements was identified as a violation of Criterion V to 10 CFR Part 50, Appendix B, "Instructions, Procedures, and Drawings." This finding was of very low safety significance since there was no actual loss of safety function (the diesel generators retained adequate margin). Because of the low safety significance and the licensee's action to place the issue in their corrective action program (CAR 200203017), this violation is being treated as a noncited violation in accordance with Section VI.A.1 of the Enforcement Policy (50-483/0204-02) (Section 1R21.5.b).

 Green. Calculation E-B-21, "LSELS Degraded Voltage Setpoint Calculation," Revision 0, used to determine the degraded voltage relay dropout setting, referred to superseded calculations for important design inputs, and had not been updated to reflect plant configuration and loading changes. This was contrary to the requirement in Procedure EDP-ZZ-04023 that calculations be revised whenever a new or revised calculation (having an effect on the calculation) is issued.

The failure to follow procedural requirements was identified as a violation of Criterion V to 10 CFR Part 50, Appendix B, "Instructions, Procedures, and Drawings." This finding was of very low safety significance since there was no actual loss of safety function (the degraded voltage relay setpoint remained valid). Because of the low safety significance and the licensee's action to place the issue in their corrective action program (CARs 200203080 and 200203057), this violation is being treated as a noncited violation in accordance with Section VI.A.1 of the Enforcement Policy (50-483/0204-03) (Section 1R21.5.b).

• Green. Two licensee calculations contained incomplete and incorrect methods of evaluating degraded voltage conditions. Calculation E-B-21, "LSELS Degraded Voltage Setpoint Calculation," Revision 0, did not consider the voltage requirements for non-motor loads in determining the degraded voltage relay setting. In addition, Calculation ZZ-214, "Motor Operated Valve Feeder Cable Voltage Drops," Addenda 1, Revision 2, for determining minimum voltage to motor-operated valves, did not consider the effect of motor starting currents in circuit elements upstream of the motor control centers.

This finding, which did not involve a violation of NRC requirements, was of very low safety significance because the calculation errors did not result in an actual loss of safety function (the degraded voltage relay setpoint remained valid) (50-483/0204-04) (Section 1R21.5.b).

Report Details

1 REACTOR SAFETY

Introduction

A team inspection was performed to verify that facility safety system design and performance capability were adequate and that the initial design and subsequent modifications have preserved the current design basis of the systems selected for review. The scope of the review also included any necessary nonsafety-related structures, systems, and components that provided functions to support safety functions. The inspection effort also reviewed the licensee's programs and methods for monitoring the capability of the selected systems to perform the current design basis functions. This inspection verified aspects of the initiating events, mitigating systems, and barrier cornerstones.

The probabilistic risk assessment model for the Callaway Plant is based on the capability of the as-built safety systems to perform their intended safety functions successfully. The area and scope of the inspection were determined by reviewing the licensee's probabilistic risk analysis models to identify the most risk significant systems, structures, and components according to their ranking and potential contribution to dominant accident sequences and/or initiators. Deterministic effort was also applied in the selection process by considering recent inspection history, recent problem area history, and all modifications developed and implemented.

The team reviewed in detail the emergency diesel generators and the component cooling water system. The primary review prompted parallel review and examination of support systems, such as, electrical power, instrumentation, room cooling systems, and related structures and components.

The objective of this inspection was to assess the adequacy of calculations, analyses, engineering processes, and engineering and operating practices that were used to support the performance of the safety systems selected for review and the necessary support systems during normal, abnormal, and accident conditions. Acceptance criteria utilized by the NRC inspection team included NRC regulations, the Technical Specifications, applicable sections of the Final Safety Analysis Report, applicable industry codes and standards, as well as, industry initiatives implemented by the licensee's programs.

An inspection to assess the performance of the licensee's program to meet the regulatory requirements of 10 CFR 50.59, "Changes, Tests, and Experiments," was conducted during the second week of the inspection.

1R02 Evaluation of Changes, Tests, and Experiments (71111.02)

a. Inspection Scope

The inspectors found that no safety evaluations had been performed since the implementation of the new 10 CFR 50.59 procedure.

The inspectors reviewed six assessments pertaining to modifications in which the licensee determined that a full evaluation was not required by 10 CFR 50.59.

b <u>Findings</u>

No findings of significance were identified.

1R21 <u>Safety System Design and Performance Capability (71111.21)</u>

- .1 System Requirements
- a. Inspection Scope

The team reviewed the following attributes for the component cooling water system and the emergency diesel generators: (1) process medium (water, steam, and air), (2) energy sources, (3) control systems, and (4) equipment protection. The team verified that procedural instructions to operators were consistent with operator actions required to meet, prevent, and/or mitigate design basis accidents. The review also considered requirements and commitments identified in the Final Safety Analysis Report, Technical Specifications, design basis documents, and plant drawings.

b. Findings

No findings of significance were identified.

.2 System Condition and Capability

a. Inspection Scope

The team reviewed the periodic testing procedures for the component cooling water system and the emergency diesel generators to verify that the design requirements were adequately demonstrated. The team reviewed the environmental qualification of a sample of system components to verify the capability to operate under design environmental conditions and the assumed operating parameters including: voltage, speed, power, flow, temperature, and pressure.

The team also reviewed the systems' operations by conducting system walkdowns; reviewing normal, abnormal, and emergency operating procedures; and reviewing the Final Safety Analysis Report, Technical Specifications, design calculations, drawings, and procedures.

b. Findings

No findings of significance were identified.

- .3 Identification and Resolution of Problems
- a. Inspection Scope

The team reviewed a sample of problems identified by the licensee in the corrective action program to evaluate the effectiveness of corrective actions related to design issues. The sample included open and closed condition reports for the past three years that identified issues affecting the selected systems.

b. Findings

No findings of significance were identified.

- .4 <u>System Walkdowns</u>
- a. Inspection Scope

The team performed walkdowns of the accessible portions of the component cooling water system and the emergency diesel generators as well as the required support systems. The walkdowns focused on the installation and configuration of power supplies, piping, components, and instruments. During the walkdowns, the team assessed:

- The placement of protective barriers and systems,
- The susceptibility to flooding, fire, or environmental conditions,
- The physical separation of trains and the provisions for seismic concerns,
- Accessibility and lighting for any required local operator action,

- The materiel condition and preservation of systems and equipment, and
- The conformance of the currently installed system configurations to the current design and licensing bases.

b. Findings

Fire Door Discrepancy

A (green) noncited violation was identified concerning a degraded fire protection barrier. During a walkdown of the emergency diesel generators, the team identified that a fire door (DSK33022), connecting the "A" emergency diesel generator room and the engineered safety features switch gear room, had an excessive gap between the door and its frame. The door gap was greater than the specified maximum dimension of 1/8 inch, but was less than 1/4 inch. The door also functioned as a Halon area door because the engineered safety features switchgear room was protected with Halon.

Several fire doors with excessive gaps, greater than 1/8 inch but less than 1/4 inch, had been previously identified by the licensee and evaluated as acceptable in Incident Report 88-184. However, this report did not address Door DSK33022. The licensee documented the nonconforming door in Callaway Action Request (CAR) 2000203016 and Fire Protection Impairment Permit 3968, which established a fire watch. Based on the evaluation of similar doors, the licensee staff considered that Door DSK33022 could still meet its design function as a three-hour fire barrier. A complete review was to be performed in response to CAR 2000203016.

Paragraph 9.5.1.7.3 of the Callaway Final Safety Analysis Report - Standard Plant establishes that a fire barrier penetration is considered functional when it meets the asdesigned condition. Paragraph 3.1.6 of Procurement Specification 10466-A-070, "Technical Specification For Procurement of Hollow Steel Doors and Pressed Steel Frames For the Standardized Nuclear Unit Power Plant System (SNUPPS)," Revision 7, requires the doors to meet National Fire Protection Association 80, "Standard For Fire Doors and Windows." Paragraph 2-5.4 of National Fire Protection Association 80, 1983 Edition, the edition applicable at the time of procurement, requires that the gap between door and frame not exceed 1/8 inch.

License Condition 2.C(5)(c) of the Callaway Plant Unit No. 1 Facility Operating License requires, in part, that the licensee implement and maintain in effect all provisions of the approved fire program. The fire protection program required that three-hour rated fire doors remain functional if compensatory measures are not in place. The license condition was not met since the three-hour fire barrier was not intact (as specified dimensionally) and the licensee did not have compensatory measures in place. The licensee's failure to maintain in effect the provisions of the fire protection program was a violation of Operating License Condition 2.C(5)(c).

The violation was entered into the licensee's corrective action program as CAR 200203016. The violation was evaluated using the significance determination process, which indicated that the violation had very low safety significance (green), This

was because an identical condition had been evaluated by the licensee as being acceptable on other similar doors, and the fire detection and suppression systems were minimally affected. Additionally, operations and security personnel routinely tour the area. Because of the very low safety significance and its entry into the licensee's corrective action program, the violation is being treated as a noncited violation consistent with Section VI.A of the NRC Enforcement Policy (50-483/0204-01).

.5 Design Review

a. Inspection Scope

The team reviewed the current as-built instrument and control, electrical, and mechanical design of the component cooling water system and the emergency diesel generators. These reviews included a review of design assumptions, calculations, required system thermal-hydraulic performance, electrical power system performance, protective relaying, and instrument setpoints and uncertainties. The team also performed a single failure review of individual components to determine the effects of such failures on the capability of the systems to perform their design safety functions.

The team reviewed calculations, drawings, specifications, vendor documents, Final Safety Analysis Report, Technical Specifications, emergency operating procedures, and temporary and permanent modifications.

b. Findings

Emergency Diesel Generator Steady State Loading

A (green) noncited violation was identified for failure to follow procedural requirements involving a safety-related calculation. The team determined that certain requirements contained in Procedure EDP-ZZ-04023, "Calculations," Revision 14, were not applied correctly to the diesel generator steady state loading calculation contained in Callaway Drawing E-21005, "List Of Loads Supplied By Emergency Diesel Generator," Revision 25. The drawing contained an itemized listing of equipment powered by the diesels during the loss of coolant accident (LOCA) and station blackout scenarios, and included the kilowatt (kW) loading for each load. The drawing also contained a summation of the total kW loading for both redundant trains.

A calculation of diesel loading did not exist in the licensee's database. Consequently, the team determined that Drawing E-21005 was a de-facto calculation and that design control requirements normally associated with calculations were also applicable to this drawing. Procedure EDP-ZZ-04023 required that calculations define the assumptions and design inputs used, and to include specific identification of references. The procedure also required performance and documentation of the calculation verification, including checking inputs, assumptions, mathematical accuracy, and results. Drawing E-21005 lacked these qualities.

The team also noted that Drawing E-21005 contained an apparent math error resulting in an overstatement of diesel generator load in the summary table of approximately 112 kW for each scenario. It was further noted that the error, as an apparent consequence of inadequate design verification, had persisted for multiple revisions of the drawing.

The team found that the lack of design inputs and references hindered a thorough review of the diesel loading. However, the team's review of major loads and the apparent margin between the maximum loading and diesel rating indicated that the diesels had adequate capability to perform their safety function. Consequently, the team concluded that there was no evidence that the lack of proper design control measures had resulted in the potential for an overloaded diesel.

The team determined that the issue had a credible impact on safety because a crucial design control parameter (the diesel loading) was not being controlled in a rigorous manner and that this situation had resulted in a persistent error in the analysis. The mitigating system cornerstone was affected since at least one of the emergency diesel generators is required to mitigate a design basis event.

Using the significance determination process, the team determined that only the mitigating systems cornerstone was affected and that there was no actual loss of safety function as the emergency diesel generators remained functional. Therefore, the problem had a very low safety significance (green).

Criterion V to 10 CFR Part 50, Appendix B, "Instructions, Procedures, and Drawings," requires that activities affecting quality be performed in accordance with applicable procedures. The failure to apply adequate design control measures to the diesel loading calculation (Drawing E-21005) as delineated in Procedure EDP-ZZ-04023 was identified as a violation of Criterion V to 10 CFR Part 50, Appendix B. However, because of the very low safety significance and the licensee's action to place the issue in their corrective action program (CAR 200203017), this violation is being treated as a noncited violation in accordance with Section VI.A.1 of the Enforcement Policy (50-483/0204-02).

Design Control Measures for Degraded Voltage Calculations

A (green) noncited violation was identified for failing to follow procedural requirements to properly control design input for a safety-related calculation. The team determined that required design control measures were not correctly applied to Calculation E-B-21, "LSELS Degraded Voltage Setpoint Calculation," Revision 0. Calculation E-B-21, used to determine the degraded voltage relay dropout setting, referred to superseded calculations for important design inputs, and had not been updated to reflect plant configuration and loading changes.

Design input to Calculation E-B-21 was provided by superseded Calculation E-B-5, "Voltage Drop Calculations for Callaway (Input Data)," Revision 3, for cable lengths and impedances, and to superseded Calculation E-B-17, "Voltage Drop Calculations & Final Tap Settings For Callaway (Case Results)," Revision 1, for transformer tap settings. These two input calculations had been replaced by load flow Calculation ZZ-62, "Plant Load Flow Calculation," Revision 7. Calculation E-B-21 had not been revised to reflect recent changes to Calculation ZZ-62. A cursory comparison of Calculation E-B-21 with Calculation ZZ-62 showed numerous slight differences in cable impedances, some of which produced slightly non-conservative results.

Calculation E-B-21 did not reflect the latest bus loading information contained in load flow Calculation ZZ-62 and its associated bus loading Calculation ZZ-179, "AC Bus Load List," Revision 4. Both calculations, ZZ-179 and ZZ-62, had been periodically updated to correct errors or reflect the changes in plant configuration, but these changes had not been incorporated into Calculation E-B-21. For instance, the relocation of the power feeder for diesel building supply fans under Modification MP 98-1025A, "Change Power Supply For Diesel Building Supply Fans," was not reflected in Calculation E-B-21. The team determined that some discrepancies were conservative and others were nonconservative. The overall effect on Calculation E-B-21 was conservative.

The team determined that the issue had a credible impact on safety because an important design control protective feature (the degraded voltage relay setpoint) was not being controlled in a rigorous manner. The mitigating system cornerstone was affected since the integrity of the Class 1E electrical buses is credited for mitigating design basis events.

Using the significance determination process, the team determined that only the mitigating systems cornerstone was affected and that there was no actual loss of safety function as the team concluded that the value of degraded voltage relay setpoint remained acceptable. Therefore, the problem had a very low safety significance (green).

Procedure EDP-ZZ-04023 required that calculations be revised whenever a new or revised calculation (having an effect on the calculation) is issued, regardless of whether the effect is conservative or nonconservative. Calculation E-B-21 was not revised as required by this procedure.

Criterion V to 10 CFR Part 50, Appendix B, "Instructions, Procedures, and Drawings," requires that activities affecting quality be performed in accordance with applicable procedures. The failure to apply adequate design control measures to Calculation E-B-21, as delineated in Procedure EDP-ZZ-04023, was identified as a violation of Criterion V to 10 CFR Part 50, Appendix B. However, because of the very low safety significance and the licensee's action to place the issue in their corrective action program (CARs 200203080 and 200203057), this violation is being treated as a noncited violation in accordance with Section VI.A.1 of the Enforcement Policy (50-483/0204-03).

Inadequate Criteria for Degraded Voltage Calculations

A (green) finding was identified for incomplete and incorrect methods used in safetyrelated calculations to evaluate degraded voltage conditions. Calculation E-B-21 did not consider the voltage requirements for nonmotor loads in determining the degraded voltage relay setting. In addition, Calculation ZZ-214, "Motor Operated Valve Feeder Cable Voltage Drops", Addenda 1, Revision 2, for determining minimum voltage to motor-operated valves, did not consider the effect of motor starting currents in circuit elements upstream of the motor control centers (MCCs). Branch Technical Position PSB-1 established that degraded voltage relay settings should be based on an analysis of Class 1E equipment at all voltage levels. The acceptance criteria in Calculation E-B-21 was based on the assumption that 92 percent of 460V (423.2V) at the worst-case MCC would provide adequate voltage to ensure operability of the MCC control circuits. The criteria were also based on the assumption that voltage to motors would be assured by sizing motor feeders in accordance with criteria in the Bechtel Design Guide E-2.11.21, "Calculations and Voltage Drop Regulations" and Callaway Design Guide EE-003, "Electrical Load Growth." The criteria did not address non-motor equipment, such as battery chargers. No calculation was available to demonstrate that battery chargers or other non-motor equipment would receive adequate voltage under worst-case conditions. In response to the team's request, the licensee provided qualification test data and preliminary calculations demonstrating adequate performance of the battery chargers under degraded voltage conditions.

The second issue involved a non-conservative analysis technique used to calculate minimum voltages. Calculation ZZ-214, for motor-operated valve feeder cable voltage drop, assumed a voltage of 92 percent of 460V at the worst case MCC based on Calculation E-B-21. (In some cases, it considered slightly higher voltages for other MCCs, based on margins for non-worst-case MCCs demonstrated in Calculation E-B-21.) Because the loading used to establish the minimum MCC voltages in Calculation E-B-21 did not include motor-operated valve starting inrush current, the calculated MCC voltages were nonconservative for this purpose. Preliminary calculations by the licensee in response to the team's questions indicated that adequate voltage was still available to all motor-operated valves, although with reduced margins. Callaway Action Request 200203091 was issued to track revision of affected calculations.

Although a specific regulatory requirement was not involved, the team considered the calculation errors to have a credible impact on safety, given that they could have resulted in unacceptable degraded grid protection. Only the mitigating systems cornerstone was affected and there was no actual loss of safety function as the value of the degraded voltage relay setpoint remained acceptable. Therefore, the problem had a very low safety significance (green) (50-483/0204-04).

.6 Safety System Inspection and Testing

a. Inspection Scope

The team reviewed the program and procedures for testing and inspecting selected components in the component cooling water system and the emergency diesel generators. The review included the results of surveillance tests required by the Technical Specifications.

The team reviewed the program and procedures for testing and inspecting the component cooling water pumps and heat exchangers.

b. Findings

No findings of significance were identified.

4 OTHER ACTIVITIES (ZA)

4OA6 Management Meetings

Exit Meeting Summary

The team leader presented the inspection results to Mr. R. Affolter, Vice President, Nuclear, and other members of licensee management at the conclusion of the onsite inspection on May 24, 2002.

At the conclusion of this meeting, the team leader asked the licensee's management whether any materials examined during the inspection should be considered proprietary. Some proprietary information was identified, but it was returned to the licensee.

ATTACHMENT

Licensee Contacts :

M. Evans, Manager, Nuclear Engineering
J. McGraw, Superintendent, Engineering
J. Imhoff, Engineer, Engineering
W. Warren, Plant Manager
R. Affolter, Vice President, Nuclear
D. Hollabaugh, Superintendent, Design Engineering
J. Blosser, Manager, Regulatory Affairs
S. Bond, Superintendent, System Engineering
J. Hiller, Engineer, Regulatory Affairs
M. Haag, Consulting Design Engineer, Nuclear Engineering

NRC:

- V. Gaddy, Senior Resident Inspector
- J. Hanna, Resident Inspector

ITEMS OPENED AND CLOSED

Opened and Closed

50-483/0204-01	NCV	Fire Door Out of Specification (Section 1R21.4.b)
50-483/0204-02	NCV	Inadequate Calculation Of Diesel Loading (Section 1R21.5.b)
50-483/0204-03	NCV	Failure To Control Design Input For Degraded Voltage Relay Calculation (Section 1R21.5.b)
50-483/0204-04	FIN	Incomplete and Erroneous Methods Used In Degraded Voltage Relay Calculation (Section 1R21.5.b)

Documents Reviewed:

Callaway Action Requests

199201472	200002042	200102209	200203025	200203091	200203342
200000185	200002057	200202900	200203045	200203156	200203344
200000456	200002082	200202999	200203055	200203167	200203348
200000761	200002121	200203010	200203057	200203213	200203349
200001236	200002821	200203016	200203080	200203271	200203354
200001815	200101957	200203017			

Requests for Resolution

13786 17902 <u>PM Tasks</u>

A592312A P592312 P618126

Procedures

00A-NE-00002, "Locally Starting NE02," Revision 0

00A-ZZ-IN010, "Emergency Fuel Tank Operator Aid," Revision 0

00A-ZZ-SEC07, "D/G B Operator Aid," Revision 2

APA-ZZ-00143, "10 CFR 50.59 Reviews," Revision 0

EDP-ZZ-04023, "Calculations," Revision 14

ETP-EG-00001, "Component Cooling Water Heat Exchanger Test," Revision 2

ETP-EG-00002, "Component Cooling Water Flow Verification," Revision 0

ITL-EG-00F66, "Loop-Flow; CCW To Seal Water Heat Exchanger Flow," Revision 6

MSM-ZZ-QV001, "IST Relief Valve Surveillance Test," Revision 23

MTE-ZZ-QA023, "MOVATS UDS Testing Of Torque Controlled Limitorque Motor-Operated Rotating Rising Stem Valves," Revision 0

MZM-ZZ-QV018, "Relief Valve Test," Revision 008

OSP-EG-P01AC, "CCW Train Pump A and Valve Inservice Test," Revision 19

OSP-EG-P01BD, "CCW Train Pump B and Valve Inservice Test," Revision 17

OSP-NE-0001A, "Standby Diesel Generator A Periodic Tests," Revision 10 with TCN 02-0084

OSP-NE-0001B, "Standby Diesel Generator B Periodic Tests," Revision 10 with TCN 02-0085 and TCN 01-0442

OTA-KJ-00122, "Annunciator Response Procedure Diesel Generator NE02 Control Panel," Revision 13

OTA-RL-RK-051, "Annunciator Response Procedure Windows 51A Through 51F," Revision 003

OTN-EG-00001, "Component Cooling Water System," Revision 18

OTN-NE-0001B, "Standby Diesel Generation System Train B", Revision 11

OTN-NE-0001B, "Standby Diesel Generation System Train A", Revision 10

512-34-10466, "Containment LOCA P/T Analysis," Revision A

84-0291, "Callaway Modification Package (CMP) #84-0291- Day Tank Table Of Scale Markings," Revision A, Field Change Notice #01 and Addenda 1, Revision 0

BIT-M-00072, "Diesel Generator Operability When Outside Ambient Temperature Is -25 $^\circ\text{F}$," May 12, 1980

E-B-10, "Allowable MCC Circuit Lengths For Circuits With Auxiliary Relay Coils In Parallel With the Starter Coil," Revision 003

E-B-12, "Close Circuit Lengths For Callaway Diesel Generator Breakers," Revision 0

E-B-15, "Voltage Drop For Class 1E and Nonclass 1E Distribution Transformers," Addenda No. 1, Revision 1

E-B-17, "Voltage Drop Calculations and Final Tap Settings For Callaway (Case Results)," Revision 1

E-B-21, "LSELS Degraded Voltage Setpoint Calculation," Revision 0

E-B-5, "Voltage Drop Calculations For Callaway (Input Data)," Revision 3

E-H-10, "System NE Protective Relays," Addenda No. 3, Revision 4

EF-38, Addenda No. 1, "Heat Rejected To the UHS Pond," Revision 0

EF-38, Addenda No. 2, "Heat Rejected To the UHS Post-LOCA," Revision 0

EF-38, Addenda No. 3, "Heat Rejected To the UHS Post-LOCA," Revision 0

EF-38, Addenda No. 4, "UHS Heat Loads Post-LOCA," Revision 0

EF-38, Addenda No. 5, "Determine Heat Loads Rejected To the UHS," Revision 0

EF-38, Addenda No. 6, "Clarifications/corrections Identified During the FSAR Review Process and RFR 18704," Revision 0

EF-38, Addenda No. 7, "Determine the Effect That the Heat Load From a Reracked Pool Will Have With Regard To the Ultimate Heat Sink (UHS) Heat Removal Capability," Revision 0

EF-38, "Heat Rejected To the UHS Post-LOCA," Revision 0

EG-10, "Calculation Of Available NPSH For CCW Pump," Revision 0

EG-12, "Determine Flowrate Resulting From a Break In Radwaste Building Supply Piping. Verify That NPSH Available NPSH Required For the CCW Pumps After Break Loss," Revision 0

EG-12-C, "CCW Water Lost and NPSH Available For CCW Pumps Based On 13-Second Valve Isolation Time," Revision 0

EG-14, "Component Cooling Water System Calculation," Revision 0 and Addenda 1, 2, & 3

EG-20, "Maximum CCW Temperature Post-LOCA," Revision 0

EG-20, Addenda 1, "Max CCW Temperature Post-LOCA," Revision 0,

EG-20, Addenda 2, "EBG08A/B Temperature With Reduced CCW Flow Rates (From 55 GPM to 45 GPM," Revision 0,

EG-32, "Volume Contained In the Component Cooling Water Surge Tank As a Function of Fluid Height," Revision 0

EG-5, "Calculate the NPSH Available To the Component Cooling Water Pumps," Revision 0

GL-133, "(CCW Pump Room) Steady State Temperature," Revision 0

GL-39-0, "Auxiliary Building HVAC," Revision 0

GM-01, "Diesel Generator Minimum Room Temperature Calculation," Revision 0

GM-01, Addenda 1, "Diesel Generator Minimum Room Temperature," Revision 0,

GM-03, "Determine a More Accurate Prediction Of the Final Steady State Temperature In An Emergency Diesel Generator Room When the D/G Is Running and Loaded and Normal Ventilation Is Secured," Revision 0

GM-2-C, "D/G Room Temperature (UIT-284)," Revision 0

GM-286, "Diesel Generators Building HVAC," Revision 0

GM-320, "Diesel/Generators Building HVAC," Revision 0

HI-971768, "Thermal-Hydraulic Evaluation Of the Reracked Callaway Spent Fuel Pool," Revision 3

HV-319, "Site Temperature and Humidity Histogram," Revision 0

J-U-BB01, "Loop Uncertainty Estimate, Sensor Allowance and Rack Allowance: System BB Loops: 17-20," Revision 0

J1JE, "Instrument Loop Uncertainty Estimate: Bistable 1 and 21, System JE," Revision 2

JE-01, "Diesel Generator Day Tank Levels," Revision A

JE-02, "Diesel Generator Day Tank Level Transmitter Current Outputs (based on levels found in Calculation #1)," Revision A

JE-02, Revision A, Addenda No. 1, "Diesel Generator Day Tank Level Transmitter Current Outputs," Revision A,

JE-03, "Diesel Generator Fuel Oil Day Tank Levels," Revision A

JE-05, "Emergency Diesel Generator Fuel Oil Storage Tank Pressure Calculation," Revision 0

JE-11, "Recalculate the Emergency Diesel Fuel Oil (EDFO) Tank Low Level Alarm Setpoint and the Pump Start Setpoint To Account For the Increase In the Minimum Required Storage Volume As a Result Of License Amendment #100," Revision 0, Addenda No. 1

JE-11, "EDFO Day Tanks Level Instrumentation Scaling and Setpoints, Revision 0 and Addenda 1," Revision 0

JE-321, "Emergency Fuel Oil System," Revision 0

JE-321, Addenda 1, "Emergency Fuel Oil Storage and Day Tank Volume Requirements," Revision 0

JE-321, Addenda 2, "Determine Level In EFO Storage Tank IAW T/S 3.8.3," Revision 0

JE-321, Addenda 3, "Calculate the Level Required In the Emergency Diesel Fuel Oil Storage Tanks To Satisfy Technical Specifications," Revision 0

KJ-08, "Recalculation Of Anticipated Running Time To Account For the Use Of 139 Degrees F.," Revision 0

KJ-440, "Pressure Drop in the Diesel Generator Exhaust Piping," Revision 0

M-EF-52, "Heat Exchanger Performance Based On Reduced ESW Temperature and Flow," Revision 1

M-EG-14, "Reference Calculation M-EG-20 Add #1 For Changes In the Design Basis Operational Temperatures Of the CCW System," Revision 0, Addenda No. 1

M-EG-05, Addenda 1, "Calculate the NPSH Available To the Component Cooling Water Pumps Under Elevated Post-LOCA Temperature Conditions Taken From M-EG-20, Addenda No. 1," Revision 0,

M-EG-05, Addenda 2, "Calculate the NPSH Available To the CCW Pumps With the Surge Tank Empty," Revision 0

M-EG-14, "Component Cooling Water System Calculation," Revision 0

M-EG-14, Addenda 2, "Update CCW Calculation To Reflect the Removal Of the PDP," Revision 0

M-EG-14, Addenda 3, "EBG08A/B Flow Rate Revision - Flow Rate Associated With EBG08A/B Has Been Revised From 55 GPM to 45 GPM," Revision 0

NB-05, "System NB Protective Relays", Addenda No. 1, Revision 3

NE-04, "EDG Evaluation For ESW and Containment Spray Pump Start - SOS 92-1492," Revision 0

NG-02, "Voltage Drop In Control Circuits Fed From MCC Class 1E Distribution Panels", Revision 0

NG-12, "NG MCC Setpoint Calculation", Addenda No. 1, Revision 3

NG-22, "NG Load Center Setpoint Calculation", Revision 0

ZZ-145, "Short Circuit Calculation", Addenda No. 2, Revision 2

ZZ-17, "Volume Calculations For Tank Data Book," Revision 3

ZZ-17, "Volume of TJE02A and B, Addenda 3," Revision 0

ZZ-179, "AC Bus Load List", Revision 4

ZZ-214, "Motor-Operated Valve Feeder Cable Voltage Drops," Addenda No. 1, Revision 2

ZZ-62, "Plant Load Flow Calculation," Revision 7

Surveillance and Test Procedures

EIP-ZZ-00231, "Response To Severe Thunderstorm / High Wind / Tornado Watches and Warnings," Revision 12

ETP-EF-0002A, "Essential Service Water Train A Flow Verification," Revision 7

ETP-EF-0002B, "Essential Service Water Train B Flow Verification," Revision 8

ETP-EG-00001, "Component Cooling Water Heat Exchanger Test," Revision 4 Test results October 3, 1999 (under Revision 3 of procedure)

ETP-EG-00002, "Component Cooling Water System Flow Verification," Revision 0 Test results -

Train A	June 4, 2001	by PM Task Sheet No. P661676
	August 29, 2001	by PM Task Sheet No. P676810
	September 20, 2001	by PM Task Sheet No. P680652
Train B	May 20, 1998	by Retest WR R182855B
	December 2, 1999	by PM Task Sheet No. P648490

ETP-KJ-00003, "Diesel Generator Heat Exchanger Test," Revision 3 Test results -

DG-AAugust 2, 2000by PM Task Sheet No. P645988DG-BSeptember 8, 2000by PM Task Sheet No. P642945RFR #19203, "Evaluate Test Results from P642945 and P645988," Revision C

ETP-ZZ-03001, "Heat Exchanger Inspection," Revision 3 Inspection results -A CCW Hx April 23, 2001 by PM Task Sheet No. P631061 B CCW Hx April 14, 2001 by PM Task Sheet No. P614178

MSM-KJ-QT001, "10 Year Emergency Diesel Generator Fuel Oil Storage Tank Cleaning," Revision 8 Planned cleaning -				
Tank A Tank B	October 15, 2010 March 11, 2006	by Surveillance Task Sheet S674631 by Surveillance Task Sheet S618888		
Lineup check	OSP-EG-0001A, "CCW Train A, Control Room Alignment," Revision 3 Lineup checkoff -			
Train A	April 12, 2002 by Su	rveillance Task Sheet S689311		
Lineup check	off -	oom Alignment," Revision 2		
Train B	April 27, 2002 by Su	rveillance Task Sheet S689978		
OSP-EG-P01AC, "CO Test results -	CW Train A Pump and	d Valve Inservice Test," Revision 19		
Pump A Pump C	February 6, 2002 November 14, 2001	by Surveillance Task Sheet S684197 by Surveillance Task Sheet S680458		
OSP-EG-P01BD, "CCW Train B Pump and Valve Inservice Test," Revision 17 Test results -				
Pump B Pump D	November 29, 2001 September 5, 2001	by Surveillance Task Sheet S680959 by Surveillance Task Sheet S677193		
OSP-JE-P001A, "Em Test results -	ergency Fuel Oil Pum	p A Inservice Test," Revision 22		
Pump A	March 13, 2002			
OSP-JE-P001B, "Emergency Fuel Oil Pump B Inservice Test," Revision 22 Test results -				
Pump B				
OSP-NE-0001A, "Standby Diesel Generator A Periodic Tests," Revision 10 Test results -				
DG-A	May 8, 2002			
OSP-NE-0001B, "Standby Diesel Generator B Periodic Tests," Revision 10				
Log records -		Daily Log Readings and Channel Checks," Revision 37		
	•	perating Procedure," Revision 18		
OTO-EG-00001, "CC	CW System Malfunctio	n," Revision 5		
ISP-SA-2413A, "Diesel Generator and Sequencer Testing (Train A)," Revision 13				
ISL-BB-00F20, "Loop-Flow; RCP D Thermal Barrier Cooling Flow," Revision 1				

ISL-NF-NB02A, "Loop-Misc; NB02A Degraded & UV to LSELS," Revision 15

Drawings

13104, Sheet 2, "Louver Schedule for DWGS 13102 & 13103," no revision indicated

A74111-1, "Chempump Division Crane Co. - Fuel Oil Storage Pump Curve (Pumps PJE01A and PJE01B)," Revision 1

A74111-2, "Chempump Division Crane Co. - Fuel Oil Storage Pump Curve (Pumps PJE01A and PJE01B)," Revision 1

C2037, "Civil Structural Standard Details Sheet No. 34," Revision 1

C2C1908, "Auxiliary Building Conc. Neat Line & Reinforcing Wall Elevation Sheet-8," Revision 1

E-21005, "List Of Loads Supplied By Emergency Diesel Generator," Revision 25

E-23EG01A, "Schematic Diagram Component Cooling Water Pump A", Revision 8

E-23EG01B, "Schematic Diagram Component Cooling Water Pump B," Revision 6

E-23EN01(Q), "Schematic Diagram Containment Spray Pumps," Revision 4

E-23KJ01A, "Schematic Diagram Diesel Generator KKJ01A Engine Control (Start / Stop Circuit)," Revision 11

E-23KJ01B, "Schematic Diagram Diesel Generator KKJ01A Engine Control (D/G Trips)," Revision 1

E-23NE10(Q), "Schematic Diagram 4.16 KV DG NE01 Feeder Breaker 152NB0111," Revision 10

E-23NE11(Q), "Schematic Diagram 4.16 KV DG NE01 Feeder Breaker 152NB0211," Revision 9

E21005, "List Of Loads Supplied By Emergency Diesel Generator," Revisions 23 and 25

E23JE01, "Schematic Diagram Emergency Fuel Oil Transfer Pumps," Revision 4

EF03-H021/142, "Pipe Supports Essential Service Water System Auxiliary Building A Train Return," Revision 1

EG08-R013/151, Sheets 1 and 2, "Pipe Supports - Component Cooling Water Surge Tank Area," Revision 4

M-105-015-09, "Two (2) 48" O.D. X 5' 9" Tang. Line Emergency Fuel Oil Day Tank," Revision 1B

M-109-013-07, "Emergency Fuel Oil Storage Tank," Revision 6

M-22JE01 (Q), "Piping and Instrumentation Diagram Emergency Fuel Oil System," Revision 17

M-23JE01 (Q), "Piping Orthographic Emergency Oil Storage (Below Grade)," Revision 0

M-650-00029, "Preaction Sprinkler System Diesel Generator Bldg. Floor Elev. 2000'-0"," Revision 11

M-650-00174,"Fire Protection Sprinkler System Diesel Generator Bldg. Plan El. 2019'-0"," Revision 4

M018-0096, "Colt Industries - Fuel Oil System," Revision 12

M082(0), "Centrifugal Pump Data Sheet, Component Cooling Water Pumps," Revision 5

M082-29, "Gould Pumps Inc. - Centrifugal Pump Characteristics," Revision 0

M082-32, "Gould Pumps Inc. - PEG01C (Pump Curve)," Revision 3

M082-33, "Gould Pumps Inc. - Test Log PEG01C," Revision 3

M082-34, "Gould Pumps Inc. - PEG01B (Pump Curve)," Revision 2

M082-36, "Gould Pumps Inc. - Test Log PEG01B," Revision 2

M082-37, "Gould Pumps Inc. - PEG01A (Pump Curve)," Revision 3

M082-38, "Gould Pumps Inc. - Test Log PEG01A," Revision 3

M082-42, "Gould Pumps Inc. - PEG01D (Pump Curve)," Revision 1

M082-43, "Gould Pumps Inc. - Test Log PEG01D," Revision 1

M087-0014-02, "Chempump Division Crane Co., Appendix D - Emergency Fuel Oil Transfer Pumps - Centrifugal Pump Data Sheet," Revision 1

M087-0024, "Outline Mod GA - 1/2K 25 PSIG @ 80 degrees F (ASME)," Revision 0

M21EG01, "System Flow Diagram Component Cooling Water," Revision 0

M21EG02, "System Flow Diagram Component Cooling Water," Revision 0

M22EG01, "Piping and Instrumentation Diagram Component Cooling Water System," Revision 6

M22EG02, "Piping and Instrumentation Diagram Component Cooling Water System," Revision 13

M22EG03, "Piping and Instrumentation Diagram Component Cooling Water System," Revision 14 TDB-001, "Tank Data Book,"

,
"Component Cooling Water Surge Tank," Revision 23
"Emergency Diesel Fuel Oil Day Tank," Revision 32.
"Emergency Diesel Fuel Oil Storage Tank," Revision 32
"Tank - TJE01A, B Emergency Fuel Oil Stor Tk," Revision 36
"Tank - TJE02A, B Emergency Fuel Oil Day Tk," Revision 37
"Tank - TEG01A, B CCW Surge Tank," Revision 23

Modification Packages

99-1044, "Replacement of EDG Governor Control System," Revision A 98-1020, "Rewire of 73 MOVs to Preclude Hot Short Scenario," Revision A MP 98-1025, "Change Power Supply for Diesel Building Supply Fans"

Evaluation Assessments for 10CFR50.59

MP-96-1026 MP-99-1020 MP-99-1048 MP-01-1020 MP-02-1003 MP-02-1005

Specifications

10466-M-018(Q), "Design Specification For Standby Diesel Generators For the Standardized Nuclear Unit Power Plant System (SNUPPS)," Revision 11

10466-A-070, "Technical Specification For Procurement Of Hollow Steel Doors and Pressed Steel Frames For the Standardized Nuclear Unit Power Plant System (SNUPPS)," Revision 7

Miscellaneous Documents

Incident Report 88-0184

Callaway Door Information DC 92-226

Masoneilan No. 74-102 air pressure filter regulator instructions

D1106-1 / October 1989, "Engine Description and Data, Colt-Pielstick Diesel Engines Ratings and Deratings Factors," October 1989

DEC #1616, "Document Error Change - List Of Loads Supplied By Emergency Diesel Gen," March 19, 1999

FSAR SP/ #93-17, "Callaway Plant Primary Licensing Document Change Form-Table 6.2.1-3 - Revise UA Values For CCW Heat Exchangers," March 26, 1993

M-018-0321-01, including:

"Test Report - First Emergency Diesel Generator Unit, Union Electric Company, Callaway Unit No. 1, S.O. No. 67-700001/1, Order No. 10466-M-018-2"

"Starting Test 11-273-495 - Colt Industries, Fairbanks Morse Engine Division - June 18, 1979" "Specification No. 10466-M-018, Appendix A, Diesel Engine Specification - Diesel Engine Data Sheet," Revisions 5 and 6. NAT-985-051888-01M / Colt Industries To T.M. Stevenson, "SNUPPS 70001 Reduced Raw Water Flow," May 18, 1988.

SCP-02-30 / LTR-SEE-02-123 / Westinghouse To Ameren UE, "Callaway RHR Heat Exchanger Performance," May 17, 2002

ULNRC-3656 / U.E. to USNRC, "Response To Request For Information Pertaining To Room Temperature Effects On Emergency Diesel Generator Operation - Inspection Report No. 50-0483 / 97005," October 2, 1997

WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985

WOG (Westinghouse Owners Group) STS 3.8, "3.8 Electrical Power Systems," Revision 1 (April 7, 1995)

No ID# / Ameren UE to Westinghouse, "RSLC (Reload Safety and Licensing Checklist) For Callaway Cycle 12," June 27, 2000

No ID#, "Reload Safety Evaluation Callaway Cycle 12," April 1, 2001 (Westinghouse Document) 1046-M-072, including:

(Struthers Wells Exchanger Specification Sheet)

"Component Cooling Water Exchanger Surface Requirements Based On Case "A" Conditions," Revised February 10, 1977

"Component Cooling Water Exchanger Surface Requirements Based On Case "E" Conditions," Revised October 24, 1975

"Appendix A - Component Cooling Water Heat Exchanger Performance Data," Revision 6

700001, "Colt - Pielstick-- PC2.5V--Plant Operating Instructions," November 1984

J-104-00347, "Instruction Manual for Installation, Operation, Maintenance Engineered Safety Features Actuation System (EFSAS), Load Shedder and Emergency Load Sequencer", Revision 17

Bechtel Design Guide E-2.11.21, "Calculations and Voltage Drop Regulations"

Callaway Design Guide EE-003, "Electrical Load Growth"

Training Manuals

Engineering Systems Training T68.0130.6, 930125 MOD 020304, "Electrical Distribution Systems - Safeguards Power"

Engineering Systems Training T68.130.6, 930125 MOD 990416, "Standby Generation (NE)"

Operations Training T61.0110.6/T61.016C.6, 010312, "Standby Generator/Operations Training" T61.0110.6/T61.016C.6, 010403, "Safeguards Power"

Engineering Design Guide

EE-003, "Electrical Load Growth" Revision 2