AmerenUE Callaway Plant PO Box 620 Fulton, MO 65251

March 10, 2003

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



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ULNRC-04815

Ladies and Gentlemen:

DOCKET NUMBER 50-483 CALLAWAY PLANT UNIT 1 UNION ELECTRIC CO. FACILITY OPERATING LICENSE NPF-30 LICENSEE EVENT REPORT 2003-001-00 Improper Administrative Controls Result in Technical Specification Violation

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

Very truly yours, Warren A. Witt Manager, Callaway Plant

WAW/slk

Enclosure

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 cc: Mr. Ellis W. Merschoff Regional Administrator
U.S. Nuclear Regulatory Commission Region IV
611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011-4005

> Senior Resident Inspector Callaway Resident Office U.S. Nuclear Regulatory Commission 8201 NRC Road Steedman, MO 65077

Mr. Jack N. Donohew (2 copies) Licensing Project Manager, Callaway Plant Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Mail Stop 7E1 Washington, DC 20555-2738

Manager, Electric Department Missouri Public Service Commission PO Box 360 Jefferson City, MO 65102

Records Center Institute of Nuclear Power Operations 700 Galleria Parkway Atlanta, GA 30339

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NRC FORM 3	66		U.S. I	NUCLEAR RE	GUL	ATORY	APPI	ROVED BY C	MB	NO. 3150-0104	EX	PIRE	S 7-31-	2004			
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1. FACILITY								OCKET NU	MB	FR		3 F		ecuon			
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4. TITLE							.								•		
Improper Ad	dministra	tive Cor	ntrols r	esult in Teo	hnica	al Spec	cificat	tion Violat	ior	า							
5. EV	ENT DATE		6	LER NUMBER	1	7.1	REPOR	TDATE	T	8	. OTHER I	FACIL	ITIES I	NVOLVED			
										CILITY NAME		DOC	KET N	UMBER			
мо		VEAD	VEAD	SEQUENTIAL		MO							იგიი	0			
				NUMBER					FA	CILITY NAME			VETN				
01	07	2003	2003	- 001 -	00	03	10	2003					0500				
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9. OPERA	ATING E	1	120	2201/b)		20 22	11EU P	D PURSUANT TO THE REQUIREMENTS OF T									
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ί, ζ	•	· ~	20	2203(a)(2)(ii)	_	50 360	(C)(Z)			50.73(a)(2)(\	/)(B)		Specif	v in Abstra	act below or in		
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				12	. LICE	INSEE	CONT	ACT FOR T	HIS	S LER		<u> </u>					
NAME									TE	ELEPHONE NUM	IBER (Incl	ude A	rea Coo	je)			
Mark A. Re	lameyer								I		(57)	3) 6	/6-43	06			
		<u>13. CON</u>	IPLETE	ONE LINE F		ACH CO	MPON	IENT FAIL	JRE		IN THIS	REP	ORT		r		
			MANU- REPOF			PORTABL	E					MANU- R			REPORTABLE		
CAUSE	SYSTEM	СОМ	PONENT FACTURER		TO EPIX	,	CAUSE	_	SYSTEM	COMPO	NENT		CTURER	TO EPIX			
	14.	SUPPLE		L REPORT	XPEC	TED				15. EXPE	CTED	М	и нтис	DAY	YEAR		
									-1	SUBMIS	SION						
	yes, compl		ECTED	SUBMISSIUM	DAT	<u> </u>			<u> </u>		-			ļ	l		
16. ABSTRAC	I (Limit to	1400 spa	aces, i.e	., approximate	ely 15	single-s	paced	typewritten	line	es)							
On	01/07/03	, with the	he Pla	nt in Mode	1 at 1	100 pe	ercent	Reactor	Po	wer, valve l	EGHV0	061	(Con	ponent	Cooling		
vva	iter from	Reactor	Coola	ant Pump 1	nerm	nal Bar	rier C	Juter Con	tai	nment Isola	tion Val	ve)	failed	to strok	ke fully		
	sea, aurii	ng Cont	ainme	nt isolation	vaiv	e inse	rvice	lesting.	E	3HV0061 W	as decl	arec	Inop	erable a	at 2012 and		
lec	chnical S	pecifica		7S) 3.6.3.A	.1 Wa	as ente	ered.	At 2020,	EC	3HV0133 (t	he bypa	ISS V	aive	for EGH	V0061)		
was Tro	s openea		en EG	HV0061 va	ive w	as full	y clos	sed with p		ver removed	from t	he v	alvei	in order	to satisfy		
1/5	3.0.3 A.	T TOF THE		VUU61 pen	etrat		w pat	n. Ine I/	Sr	equired pos	sition for	r val	ve EC	SHV013	3 is closed		
	1 power r			ept when of	peneo	a unde	eradn	ninistrativ	ec	controls. La	ter it wa	as de	eterm	lined that	at		
EG		and EG		52 (the inne	er col	ntainm		solation v	aiv	e) were bot	h power	redi	rom I	Bus NG	D2B. This		
	overy re	vealed	inai in	e administr			DIS We	ere inade	qua	ate. I his wa	is a con	ditic	n pro	hibited i	by the		
Pla				n existed u		1/10/0	3 whe	en EGHV		51 was retu	rned to	serv	vice.	The root	t cause of		
ine rovi	event wa		ure to	recognize i			n pow	ver source	e 10	or both valve	es. Cor	rect	ive ad	ctions in	cluded		
	ising the	rest pro	a ceaun	e to establis	sn tne	e requ	ireme	ent for loc	alo	operation of	these v	aive	es wn	ien adm	inistrative ,		
	litois are	require	a.														
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	FACILITY NAME (1)	DOCKET (2) NUMBER (2)	L	ER NUMBER (6	5)		PAGE (3)						
	Callaway Plant Unit 1		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER									
	TIVE (If more space is required use additional	05000483	2003 A) (17)	- 001	- 00	2	OF	_						
T		DESCRIPTION OF THE REPORTABLE EVENT												
1.														
	A. REPORTABLE EVENT CLASSIF	A. REPORTABLE EVENT CLASSIFICATION												
	which was prohibited by the plant's	Technical Specificat	ions	(2)(I)(B), any	operation o	r cond	nuon							
	B. PLANT OPERATING CONDITIO	ONS PRIOR TO THE E	IVENT											
	Callaway Plant was in Mode 1 at 100 percent power.													
	C. STATUS OF STRUCTURES, SYSTEMS OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT													
	"A" Train Component Cooling Water from Reactor Coolant Pump Thermal Barrier Outer Containment Isolation Valve, EGHV0061 was out of service for maintenance.													
	D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES													
•	On 01/07/03, with Callaway Plant in Mode 1 at 100 percent power, the Operations Department was performing a Component Cooling Water (CCW) Train "A" Containment Isolation Valve Test. During the performance of the test, valve EGHV0061 (Component Cooling Water from Reactor Coolant Pump Thermal Barrier Outer Containment Isolation Valve) failed to stroke to the fully closed position. EGHV0061 was stroked a second time with the same result. EGHV0061 was declared inoperable at 20:12 and Technical Specification (T/S) 3.6.3.A 1 was entered. T/S 3.6.3 A 1 requires the isolation of the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. The Bases Section includes the statement " The method of isolation must include the use of at least one leak rate isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve (this includes power operated valves with the power removed), a blind flange, and a check valve with flow through the valve secured. (A remote manual valve's Main Control Board power isolate switch may be used to de-activate the valve.)". At 20.20, EGHV0061 was fully closed and power was removed from the valve to satisfy T/S 3 6.3 A.1.													
	(the inner Containment Isolation Valve) and EGHV0133 (the bypass valve for EGHV0061) with administrative controls, which consisted of a dedicated Control Room Operator. This action was performed to satisfy T/S 3.6.3.A.1 for this flowpath. Later it was determined that EGHV0133 and EGHV0062 were both powered from Bus NG02B. This discovery revealed that the administrative controls were inadequate. This was a condition prohibited by the Plant's T/S.													
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	FACILITY NAME (1)	DOCKET (2) NUMBER (2)		PAGE (3)								
	Collowey Plant Unit 1		YEAR	SE		L F	REVISION					
	Callaway Flant Onit 1	05000483	2003	-	001	-	00	3	OF			
NARRA	TIVE (If more space is required, use additional of	copies of NRC Form 366	4) (17)									
	E. METHOD OF DISCOVERY OF EA	ACH COMPONENT,	SYSTEM I	FAILU	JRE, OF	R PR	OCEDUI	RAL EI	ROR			
	The failure of EGHV0061 was discover The NRC Senior Resident Inspector	vered during schedu noted that EGHV01	lled testing 33 and E	g. GHV()062 ha	ve a	commo	n powe	er sourc	е		
II.	EVENT DRIVEN INFORMATION											
	A. SAFETY SYSTEMS THAT RESPONDED											
	Not applicable for this event.											
	B. DURATION OF SAFETY SYSTEM INOPERABILITY											
	The total out of service time was 71 hours and 58 minutes from January 7, 2003 at 20:12, until January 10, 2003 at 20:10.											
	C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT.											
	A probabilistic risk assessment was reliance on valves EGHV0062 and E account that both of the aforementio and the assessment assumed that o isolation. The risk assessment is co release. The assessment determine safety of the public.	conducted to evalua GHV0133 for conta ned valves are power perator action to clo nsidered to be a rea ed that this event wa	ite the fail inment isc ered from se a valve sonable e s not risk	lure o olation the s e was estima signif	f EGHV n. The i ame sa necess ate of th icant wi	0061 risk a fety- ary f e im th re	1, and th assessm related t for conta pact on spect to	e subs nent too ous (No ainmen large e o the he	equent ok into G02B) t arly ealth and	þ		
ш.	CAUSE OF THE EVENT											
	The root cause of the event was a failure to recognize the common power source for both valves											
IV.	CORRECTIVE ACTIONS											
	The test procedure was revised to es Room as the required administrative the requirement of T/S 3 6.3 Note 1 EGHV0133.	stablish a dedicated control when EGH with consideration fo	local ope /0133 is o or the com	rator open. nmon	in comn This ac power ຄ	nunio Imini sourc	cation w istrative ce to EG	ith the contro HV006	Control I meets 52 and			
v .	PREVIOUS SIMILAR EVENTS											
I												

A review of Callaway's Corrective action Program and LERs for the last three years identified one LER. LER 2000-004-00 documented the inoperability of a containment isolation valve. The cause was a design error

	FACILITY NAME (1)	DOCKET (2) NUMBER (2)	L	ER NUMBER		PAGE (3)		
	Callaway Plant Unit 1		YEAR		L REVIS	ION ER		
		05000483	2003	- 001	- 00	4	OF	4
NARRAT	IVE (If more space is required, use additional of	copies of NRC Form 366/	A) (17)					
	during a modification that was perfor	med to resolve NRC	C Information	on Notice 9	2-18 cond	erns.		
VI.	ADDITIONAL INFORMATION							
	The system and component codes li 803A-1984 respectively.	sted below are from	the IEEE S	Standard 80)5-1984 a	Ind IEEE	Standard	ł
	System: CC							
	Component: ISV							