

December 24, 1997

EA 97-469

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

SUBJECT: NRC INSPECTION REPORT 50-483/97-11 AND NOTICE OF VIOLATION

Dear Mr. Randolph:

An NRC inspection was conducted August 18-22, 1997, at your Callaway Plant reactor facility. Following the inspection, an exit meeting was held to provide the inspection findings to Mr. R. Affolter and other members of your staff. Subsequently, in-office inspection was conducted until December 19, 1997. Supplemental telephonic exits were also held on October 24 and December 19, 1997. The inspection evaluated your program and its implementation to meet the requirements of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants [the Maintenance Rule]." The enclosed report presents the scope and results of that inspection.

The inspection results revealed that you had developed and implemented a program that generally met the requirements of 10 CFR 50.65; however, the team identified a significant program weakness in the performance monitoring of structures, systems, and components (SSCs).

During the inspection, three violations of NRC requirements were identified. The first violation involved the failure to provide an adequate technical basis for the reliability performance criteria relative to the containment integrity function (containment isolation valves), and a failure to evaluate the consequences of operating non safety-related equipment in a run-to failure mode. The second violation identified inadequate demonstration that the performance of preventive maintenance was effective to assure the reliability of safety-significant SSCs. The third violation identified inadequate demonstration that preventive maintenance was effective to assure availability of SSCs.

In addition to these violations, a number of weaknesses were also identified relative to the implementation of Maintenance Rule. Collectively, these violations and weaknesses are indicative of ineffective risk significance determinations for some SSCs, and ineffective monitoring of a number of SSCs. Because of these problems, we desire to meet with you in the Region IV office in order to discuss your plans to improve the program. We will contact you regarding a mutually agreeable date for this management meeting following our review of your response to this letter.



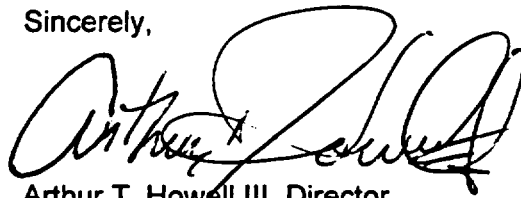
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The violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding these violations are described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Arthur T. Howell III, Director
Division of Reactor Safety

Docket No.: 50-483
License No.: NPF-30

Enclosures:
Notice of Violation
NRC Inspection Report
50-483/97-11

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

Gerald Charnoff, Esq.
Thomas A. Baxter, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

H. D. Bono, Supervising Engineer
Quality Assurance Regulatory Support
Union Electric Company
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
Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

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 Court House
10 East Fifth Street
Fulton, Missouri 65151

Alan C. Passwater, Manager
Licensing and Fuels
Union Electric Company
P.O. Box 66149
St. Louis, Missouri 63166-6149

Union Electric Company

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J. V. Laux, Manager
Quality Assurance
Union Electric Company
P.O. Box 620
Fulton, Missouri 65251

E-Mail report to T. Frye (TJF)
 E-Mail report to T. Hiltz (TGH)
 E-Mail report to NRR Event Tracking System (IPAS)
 E-Mail report to Document Control Desk (DOCDESK)
 E-Mail report to Richard Correia (RPC)
 E-Mail report to Frank Talbot (FXT)

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator	Resident Inspector
DRP Director	DRS-PSB
Branch Chief (DRP/B)	MIS System
Project Engineer (DRP/B)	RIV File
Branch Chief (DRP/TSS)	
G. F. Sanborn, EO	
M. Satorius	
W. L. Brown, RC	
J. Lieberman, OE, MS: 7-H5	
OE:EA File, MS: 7-H5	

DOCUMENT NAME: CW711RP.JEW

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RIV:RI:MB	RI:MB	RI:MB	RI:MB	RI:MB
JEWhittemore/lmb	PCGage	CEJohnson	WMMcNeill	CJPaulk
10/4/97	10/4/97	10/4/97	10/4/97	10/4/97
RI:PBF	C:MB	EO	C:PBB	D:DRS
KWeaver	DAPowers	GFSanborn	WDJohnson	ATHowell
10/19/97	10/15/97	12-18-97	10/19/97	10/19/97

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KWeaver	DAPowers	GFSanborn	WDJohnson	ATHowell
10/9/97	10/7/97	12/18/97	10/1/97	10/1/97

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