



November 14, 2012

ULNRC-05932

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
SPECIAL REPORT 2012-02 – PAM REPORT:
INOPERABILITY OF A POST ACCIDENT
MONITORING (PAM) INSTRUMENT FOR
GREATER THAN 30 DAYS**

Attached is a special report (PAM Report) addressing the inoperability of a containment normal sump water level instrument at Callaway.

No new commitments are identified in this correspondence. None of the material in this report is considered proprietary by Union Electric.

If you have any questions or require additional information, please contact Mr. Thomas Elwood, Supervising Engineer, Regulatory Affairs and Licensing at 314-225-1905.

Sincerely,

David W. Neterer
Plant Director

EMP/nls

Enclosure

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Special Report 2012-02
PAM Report

Requirement

Callaway Plant Unit 1 Technical Specification (TS) 3.3.3, "Post Accident Monitoring (PAM) Instrumentation", contains requirements for Containment Normal Sump Water Level Instrumentation. TS 3.3.3 Limiting Condition for Operation (LCO) requires two channels of Containment Normal Sump Water Level Instrumentation to be Operable while in MODES 1, 2, 3. With one of the required instruments inoperable for more than 30 days, Required Action B.1 applies. It states, "Initiate action in accordance with Specification 5.6.8."

TS 5.6.8, "PAM Report", states, "When a report is required by Condition B or F of LCO 3.3.3, 'Post Accident Monitoring (PAM) Instrumentation', a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status."

Summary of the PAM Instrument Inoperability

On October 13, 2012, Operations declared one channel of the Containment Normal Sump Water Level Instrumentation inoperable. During a review of Reactor Operator logs, it was noticed that the containment normal sump level indicator, LFLI0010 CTMT NORM SMP WEST LEV IND, had been constant since 10/07/2012, while indications on other sump level indicators appeared to have properly varied with actual sump level changes. After power to the sump level indicator was cycled, indications returned to normal trending on 10/24/2012. Further review of logs revealed erratic indications during high temperature periods but indications returned to normal following minor manipulations of the instrument loop.

Preplanned Alternate Method of Monitoring

Associated sump level indicator, LFLI0094 CTMT NORM SMP WEST LEV IND, provides an alternate means for monitoring the containment normal sump water level (in the same area of the sump monitored by the LFLI0010 indicator). This instrument provides adequate indication of a potential flooding condition in containment during a design basis accident.

Cause of the Inoperability

The cause of the erratic performance of the sump level indicator has been determined to be an electrical problem. The most likely sources of an electrical issue were determined to be a stuck reed switch in the float assembly, a faulty connection in the float assembly, or a faulty splice in the containment penetration. Further troubleshooting is required and is being pursued.

Plans and Schedule for Restoring the Instrumentation Channel to OPERABLE status

Based on this preliminary evidence, a decision was made to replace the level transmitter and to rework inner/outer penetration splices. This is currently scheduled to occur between November 13th and November 16th 2012. Additionally, we are planning to replace the lower float level element (located in containment) during the next refueling outage. This is currently scheduled for April 2013. Completion of the transmitter and penetration work will be completed prior to any operability determination.