UNION ELECTRIC COMPANY 1901 GRATIOT STREET ST. LOUIS. MISSOURI

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JOHN K. BRYAN

September 17, 1979

MAILING ADDRESS P. O. BOX 149

Mr. Gaston Fiorelli, Chief Reactor Construction & Engineering Support Branch U.S. Nuclear Regulatory Commission Region III 799 Roosevelt Rd. Glen Ellyn, IL 60137

ULNRC-325

Dear Mr. Fiorelli:

INSPECTION REPORT NO. 50-483/79-08

This is in response to your letter of August 23, 1979 reporting results of an inspection at Union Electric Company's Callaway Plant Site on August 7-9, 1979 and as detailed in inspection report number 50-483/79-08.

None of the material in the inspection report or in this response are considered proprietary by Union Electric Company.

The response listed below corresponds to the item listed in Appendix A, Notice of Violation, of the inspection report.

Infraction (483/79-08-01)

10 CFR 50, Appendix B, Criterion V, states, in part, that, "Activities affecting quality shall be prescribed by documented instructions, procedures....and shall be accomplished in accordance with these instructions, procedures or drawings."

SNUPPS Standard Quality Assurance Manual Section No. B-8, Paragraph 8.2, states, in part, that, ".... Measures shall be established and implemented for documenting installation, inspection, and testing operations to verify conformance to specified requirements."

Contrary to the above, on August 8, 1979, the inspector established that the Material Control Department does not have a procedure for the inspection and surveillance of piping stored in the laydown area.

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Mr. Gaston Fiorelli

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

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Daniel International Construction issued an ICP (Interim Change to Construction Procedure) to AP-IX-05. The ICP went into effect on September 7, 1979. It delineates the responsibility and procedure for the inspection and surveillance of the material storage areas.

The results achieved will be to bring Material Control into full compliance in recording and correcting discrepancies noted in the storage areas.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

Procedure AP-IX-05 is being revised to incorporate the intent of the ICP within the body of the procedure. The revised procedure will be issued before November 6, 1979.

This procedural change will maintain the material storage areas within compliance of 10 CFR 50 Appendix B Criterion V and SNUPPS SOAM Section B-8.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

ICP issued effective September 7, 1979. Full compliance was achieved on September 7, 1979.

If you have any questions regarding this response or additional information is required, please let me know.

Yours very truly,

RHR/jds cc: W. A. Hansen

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