

UNION ELECTRIC COMPANY
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JOHN K. BRYAN
VICE PRESIDENT

January 29, 1980

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

ULNRC- 336

Dear Mr. Fiorelli:

INSPECTION REPORT NO. 50-483/79-12

This is in response to your letter of January 4, 1980 reporting results of an inspection at Union Electric Company's Callaway Plant Site on November 14-16, 1979 and as detailed in inspection report number 50-483/79-12.

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

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

Infraction (483/79-12-04)

10CFR50, Appendix B, Criterion III states, in part, that "Measures shall be established to assure that applicable regulatory requirements and the design basis . . . are correctly translated into specifications, drawings, procedures, and instructions."

Design drawing EOR-8900 Revision 9 paragraph 2.12 states, "Trays will be joined with splice plates and hardware according to tray manufacturer's recommendations."

P-W Industries, the cable tray manufacturer in a letter dated August 14, 1979 recommended "Tapping the bolt head with a hammer, finger threading the nut, then tighten to a maximum of 30 foot pounds torque."

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Contrary to the above, the inspectors determined that the manufacturer's recommendations to ensure that cable trays are adequately joined were neither translated in cable tray installation procedure WP302 nor inspection procedure QCP302.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

As a result of the NRC finding, additional installation recommendations have been obtained from the cable tray manufacturer.

P-W Industries has provided the following as an alternate method for joining cable trays: "When connection hardware is drawn up tight as determined by visually observing the head of the connector bolt coming into firm contact with the tray side rail, the resultant torque is adequate to insure electrical continuity and structural integrity."

This recommendation was submitted to Bechtel via RCI-2-205-E. Bechtel concurred with the recommendation on January 18, 1980.

By issuing an Interim Change to Procedure (ICP-2, Rev. 1, to WP-302, Rev. 7) on January 29, 1980, this recommendation was included in the cable tray installation procedure.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

Quality Control procedure QCP-302 will be revised to include a visual inspection to assure that the connection bolt head is in firm contact with the tray side rail. Previously inspected tray will be reinspected to the new criterion.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by March 1, 1980 upon implementation of the revision to QCP-302, incorporation of ICP-2, Rev. 1, to WP-302, and reinspection of previously accepted cable tray.

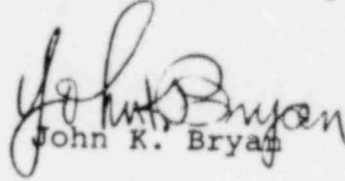
Mr. Gaston Fiorelli

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

Yours very truly,


John K. Bryan

LEO/jds

cc: W. A. Hansen