UNION ELECTRIC COMPANY
1901 GRATIOT STREET
ST. LOUIS, MISSOURI

JOHN K. BRYAN
VICE PRESIDENT

MAILING ADDRESS:
P. O. BOX 149
ST. LOUIS, MISSOURI 63166

January 21, 1980

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

ULNRC- 335

Dear Mr. Fiorelli:

INSPECTION REPORT NO. 50-483/79-13

This is in response to your letter of December 20, 1979 reporting results of an inspection at Union Electric Company's Callaway Plant Site on November 5-30, 1979 and as detailed in inspection report number 50-483/79-13.

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

The responses listed below correspond to the items listed in Appendix A, Notice of Violation, of the inspection report.

1. 10CFR50, Appendix B, Criterion XIII and SNUPPS PSAR, paragraph 17.1.13 require in part that, "Measures shall be established to control the handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

   Contrary to the above, the measures taken have not precluded:

   a. Liquid from wetting the internal surfaces of coolant pump volute number 4 and coolant piping.

   b. The reactor vessel from becoming uncovered thereby exposing internal surfaces to possible contamination and damage.

JAN 25 1980

8002200 270

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

a. The liquid in the pump volutes and coolant piping was documented on Storage Correction Report MFS-1159-SC. Internal surfaces of Reactor Coolant Pump Casings and the affected piping have been cleaned with clean, white, lint-free rags wetted with acetone and wiped down. This work was completed November 21, 1979. Visual inspection has been performed on internal surfaces of pump casings and pipe to assure that they were satisfactorily cleaned.

   DIC Quality Control personnel performed a chemical analysis on samples of the liquid and presented the results of the analysis to the Westinghouse Site Representative for review. On December 19, 1979, Westinghouse informed Union Electric that the chemical analysis indicated there would be no deleterious long range effect as a result of the liquid, provided the area was thoroughly hand cleaned and wiped dry. As stated in the paragraph above, this requirement was met on November 21, 1979.

   Westinghouse has advised that "swipe" tests are not required at this time since the internal surfaces of the casings will be final cleaned and "swipe" tested prior to pump internals assembly. Remaining exposed internal surfaces will be final cleaned and "swipe" tested prior to heatup.

b. Concerning the reactor vessel observed uncovered, the temporary polyethylene cover has been replaced with the "permanent" construction cover, providing required protection for the interior of the reactor vessel.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

a. In an effort to preclude entry of any foreign material into these components, a special protective covering consisting

of a combination of plywood, polyethylene and tape has been placed over the tops of the pump casings to provide full protection to the inside surfaces. The bottom access openings (pump suction) have been covered with a combination of polyethylene, foam rubber and tape. The entrance into the pipe, from the interior of the pump casing, has been covered with polyethylene and tape to protect the internal surface of the pipe (cold leg) from the casing end.

It is believed by Daniel that curing water from concrete pour 2C242W20 was the specific cause of the finding. Preventive measures had been taken to try to divert the curing water away from the pumps, however, these measures did not prove satisfactory.

Construction has taken action to minimize the possibility of recurrence.

1) Construction Supervision is controlling wet curing to the extent that "flooding" is not allowed. A sufficient amount of water is applied at intervals to meet the requirements of curing. This control will assure that large spills of water are not falling onto areas below.

2) During Pre-Pour meetings, an evaluation is being made to determine the effect of wet curing on equipment and components stored in areas below. Special emphasis is being placed on preventive measures to avoid damage due to water over-run.

b. Concerning the crane hook dislodging the protective covering over the reactor vessel, crane operators have been verbally instructed not to leave the crane hooks above any equipment when cranes are unattended. As a further safeguard, the ladder providing operator access to the crane has been re-positioned so that when the crane is

shut down at the end of a shift, it will not be left positioned over any equipment.

Reactor Coolant Pump Casings have been entered into the Daniel Preventive Maintenance Program as of November 13, 1979, to provide for visual inspection to be performed on a monthly basis. Reactor coolant piping has also been entered into the Preventive Maintenance Program to provide for visual inspection to be performed every two weeks.

Construction has assigned an Area Superintendent the responsibility of monitoring NSSS equipment and components on a daily basis to assure prompt identification of adverse or deficient conditions. This will provide assurance that the reactor vessel will remain covered.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

a. Full compliance was achieved January 4, 1980 at close-out of MFS-1150-SC.

b. Full compliance was achieved November 19, 1979 when the "permanent" construction cover was replaced.

2. 10CFR50, Appendix B, Criterion XVI and SNUPPS PSAR paragraph 17.1.16 require in part that, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Contrary to the above:

a. Liquid present in the coolant pump volute was not identified as a deficient condition.

b. Liquid in the coolant system pipe was not promptly reported or removed. The liquid was observed on November 8 and on November 13, 1979.

c. Debris such as steel washers, wire and wood chips were not identified before concrete placement 2C241W24 was made or when the forms were removed.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

a. As a result of the deficiencies, Storage Correction Report MFS-1159-SC was initiated and has been closed out. Pump casings and pipe have been entered into the Daniel Preventive Maintenance Program (Reference: Response to Items 1 a. and 1 b. of this report).

b. Upon notification by the NRC of the pump casing and piping deficiencies, meetings were held to discuss the problem. It is acknowledged that these discussions and subsequent sampling attempts caused undue delays in removing the liquid. On November 13, 1979, the liquid was removed from the pipe.

c. Due to congestion within the concrete beam, pre-pour inspection did not reveal the debris.

The post-pour report made after forms were removed did identify some cosmetic repair but did not identify the debris noted specifically by the NRC inspection. These defects were reported to Engineering and Construction forces and patched per Engineering disposition.

Daniel Quality Control procedures are adequate in both areas of pre-pour inspection and post-pour inspection as we feel this is an isolated case.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

a. & b. Construction has assumed direct responsibility for maintaining a security system to control access to the area housing NSSS components

and equipment. An Area Superintendent has been assigned to this function and as part of his responsibility has been directed to perform daily monitoring of NSSS components and equipment and has been instructed to seek immediate resolution to any adverse or deficient condition found, by notifying responsible personnel.

The new assignment of responsibility outlined above is designed to preclude further noncompliance.

c. Post-placement inspectors were cautioned to be specific in addressing any defect, regardless of its severity. We feel this condition was not adequately followed-up, but that the program presently is designed to accomplish the above intent.

Pre-placement inspectors were also cautioned to exhaust all options to assure clean-up is adequate in congested areas before signing-off to receive concrete.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

a. & b. Full compliance was achieved on November 19, 1979, upon assignment of the responsibility for daily monitoring.

c. Full compliance was achieved on December 21, 1979.

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

Yours very truly,

John K. Bryan

DAO/jds

cc: W. A. Hansen