

UNION ELECTRIC COMPANY  
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ST. LOUIS, MISSOURI

JOHN K. BRYAN  
VICE PRESIDENT

March 14, 1980

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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- 341

Dear Mr. Fiorelli:

INSPECTION REPORT NO. 50-483/80-02

This is in response to your letter of February 15, 1980 reporting results of an inspection at Union Electric Company's Callaway Plant Site on January 23-25, 1980 and as detailed in inspection report number 50-483/80-02.

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 (483/80-02-01)

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

SNUPPS Union Electric Company Quality Assurance Manual Section No. 17, Table 17.1-1, states, in part, that, "Safety-related construction activities shall be conducted in accordance with documented procedures, drawings, instructions, checklists, or their equivalent."

Daniel International Corporation Procedure No. WP-503, Revision 9, paragraph 3.14 states, "Low hydrogen electrodes conforming to SFA5.1, 5.4, and 5.5 shall be maintained

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in heated containers (caddies) when out in the field. Electrodes may be taken from the portable heated containers and carried in a welding rod pouch to facilitate climbing or working in inaccessible areas for a maximum time of four hours. After this time period, the electrodes shall be considered over exposed and destroyed by bending."

Contrary to the above, on January 23 and 24, 1980, the inspector established that the welder welding on the Reactor Coolant System Weld No. 2BB-01-F404 on drawing No. M-03-BB01 had electrodes conforming to SFA 5.4 in a welding rod pouch. The inspector further established that the portable heated container was at the same level as the welder and the area where he was welding could hardly be called as inaccessible.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

Daniel Work Procedure (Control of Welding Consumables) WP-503, paragraph 3.14 has been revised to reflect the requirements of the DIC (nuclear) Quality Assurance Manual, section 6.0, paragraph 6.2.2.4b, which allows electrodes to be taken from the portable heated containers for periods up to four (4) hours without restriction in regard to inaccessible areas or to facilitate climbing.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

Quality Control Procedure (Monitoring the Control of Welding Consumables) QCP-503, has been revised to provide bi-weekly monitoring of the activities of paragraph 3.14 of WP-503. Implementation of WP-503, along with Quality Control monitoring, is designed to avoid further noncompliance.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Interim Change to Procedure WP-503 was issued February 28, 1980. QCP-503 has been revised and is in the process of review. The expected issue date for QCP-503 is April 6, 1980, at which time we will be in full compliance.

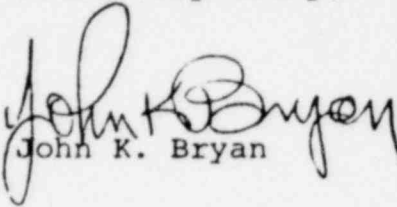
Mr. Gaston Fiorelli

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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

RHR/jds

cc: W. A. Hansen  
Missouri Public Service Commission