

UNION ELECTRIC COMPANY
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JOHN K. BRYAN
VICE PRESIDENT

August 14, 1980

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

ULNRC-375

Dear Mr. Fiorelli:

SUPPLEMENT TO RESPONSE TO
INSPECTION REPORT NO. 50-483/80-09

This supplements ULNRC-357 dated June 6, 1980 and ULNRC-359 dated June 13, 1980 which responded to your letter of May 14, 1980 reporting results of an inspection at Union Electric Company's Callaway Plant Site on April 23-24, 1980.

None of the material in this supplementary response is considered proprietary by Union Electric Company.

Our previous responses to infraction 483/80-09-02 should be amended as follows:

Infraction (483/80-09-02)

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 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.

Contrary to the above, several of the surface-mounted component support plates were not installed in accordance with design drawing requirements in that the concrete expansion anchor bolts and weld attachments were mislocated. Furthermore, the deficiencies were not identified and reported to design engineering for resolution.

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CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

As a result of the NRC Inspector's findings, Daniel International Corporation (DIC) initially performed a re-inspection of a representative sampling of surface-mounted plates. The initial sampling indicated that a 100% re-inspection would be required to provide assurance that all nonconforming conditions would be identified.

On July 22, 1980, DIC reported the results of the 100% re-inspection to Union Electric. The nonconforming conditions found during the 100% re-inspection were documented on the following Nonconformance and Deficiency Reports:

2SN-2009-C	2SD-1516-C	2SD-1693-C
2SN-2012-C	2SD-1519-C	2SD-1694-C
2SN-2066-C	2SD-1527-C	2SD-1720-C
2SN-2081-C	2SD-1614-C	2SD-1721-C
2SN-2116-C	2SD-1632-C	2SD-1722-C
2SN-2200-C	2SD-1663-C	2SD-1724-C
	2SD-1664-C	2SD-1725-C
	2SD-1680-C	2SD-1726-C
		2SD-1810-C

Subsequent to the above re-inspection, a surveillance was performed by Union Electric Quality Assurance (UEQA). UEQA chose eight surface-mounted plates at random that had been accepted and upon inspection of those plates found two of the plate installations to be nonconforming. DIC then performed a sample inspection on ninety-three (93) additional plates and found six more plates to be nonconforming.

Following the UEQA surveillance and the additional inspection by DIC, DIC Engineering and Quality Control Management held several meetings to discuss the findings and determine the corrective action to be taken. It was concluded that DIC's previous corrective action did not develop adequate inspector training and that additional training would be required. Our plans to resolve all of the concerns involved in this situation have been formulated.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

DIC will further develop its training program and re-certify the Quality Control Inspectors to

assure proper application of inspection criteria for surface-mounted plates. The training program will fully describe the required methodology to assure consistent application of inspection requirements. The program will consist of formal training which will include a practical demonstration by the inspector, utilizing a checklist, thus giving assurance of its acceptable application in the field.

Inspection criteria have been developed through a thorough review of design and procedural requirements related to the installation of and attachment to surface-mounted plates. The checklist to be utilized in performing the inspections has addressed the appropriate design and procedural requirements.

Training and re-certification of the Quality Control Inspectors will be complete by August 15, at which time DIC will re-inspect all surface-mounted plates installed as of that date. Any nonconforming installation detected will be documented and resolved by Nonconformance/Deficiency Reports. Supervision will perform a documented sample inspection which will cover each inspector. This will continue until the Quality Control Manager has determined that the program has been successful.

Construction personnel had previously undergone extensive retraining concerning all design requirements for surface-mounted plate installation. Any newly-assigned construction personnel will undergo training in this area as part of their indoctrination.

To aid in tracking and correcting any future installation problems, WP-100 (Work Procedure for Surface-Mounted Plate Installation) has been revised to require sign-off of the applicable craft foreman upon completion of surface-mounted plate installation. In addition, DIC will initiate a Correction Action Report to more fully outline the scope of the problem and the intended corrective action.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by December 1, 1980, upon completion of re-inspection of all surface-mounted plates installed as of August 15, 1980.

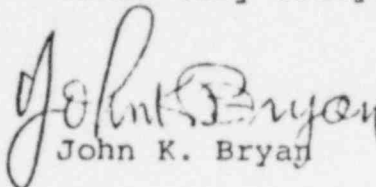
Mr. Gaston Fiorelli

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Please inform us if you have any questions regarding this response or additional information is required.

Yours very truly,


John K. Bryan

.SS/de

cc: Mr. H. M. Wescott, NRC Region III ✓
Mr. W. A. Hansen
(NRC Resident Inspector, Callaway Plant)
Missouri Public Service Commission