

UNION ELECTRIC COMPANY  
1901 GRATIOT STREET  
ST. LOUIS, MISSOURI

JOHN K. BRYAN  
VICE PRESIDENT

March 25, 1981

MAILING ADDRESS:  
P. O. BOX 149  
ST. LOUIS, MISSOURI 63168

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

ULNRC- 428

Dear Mr. Fiorelli:

INSPECTION REPORT NO. 50-483/81-02

This is in response to your letter of February 23, 1981 reporting results of an inspection at Union Electric Company's Callaway Plant Site on January 5-30, 1981 and as detailed in inspection report number 50-483/81-02.

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

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

Severity Level VI Violation (483/81-02-02)

10 CFR 50, Appendix B, Criterion V and SNUPPS PSAR paragraph 17.1.5 states: "Activities affecting quality shall be prescribed by documented instructions.....and shall be accomplished in accordance with these instructions."

Contrary to the above: (1) There is no procedure for the repair of damaged electrical cable jackets (instructions are contained on drawings only). (2) Daniel International Work Procedures requiring that installed cables be kept free of construction materials and other debris were not followed.

Response  
Item (1):

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

A procedure revision to wP-303 "Installation of Wire and Cable" has been initiated to incorporate a cable repair procedure and proper control and documentation methods.

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CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER  
NONCOMPLIANCE:

Daniel Engineering and Quality Control will coordinate the revision of QCP-303 "Inspection of Cable Pulling" to align with the revision to WP-303. Issue and implementation of WP-303 and QCP-303 is designed to avoid further non-compliance.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Daniel will be in full compliance by April 30, 1981 with the issue of the revision to WP-303 and QCP-303.

Item (2):

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

Daniel Construction performed an inspection of all installed cable tray and removed any debris or construction material found, leaving the installed cable tray in an acceptable condition.

The Construction Manager issued CM-1297 to all personnel on January 14, 1981, directing them to adhere to project and procedural requirements in the area of cable tray cleanliness and protection. This letter was issued as a follow-up to DES-120 which was issued on May 9, 1980 to all Electrical Superintendents, General Foremen and Foremen.

Appropriate craft personnel have been informed of the importance of meeting cleanliness requirements. The foremen have been monitoring the installed cable tray and when necessary remind their crews of the requirements. Field action to control this problem has proved beneficial as indicated by a recent surveillance.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER  
NONCOMPLIANCE:

Daniel considers this to be a problem which can be controlled only by impressing on all involved personnel the importance of compliance to the requirements of protection of installed cable. The Construction Manager will periodically issue a reminder letter (if warranted) instructing and directing craft personnel in this area.

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In addition, a training film is being developed by Quality Control with the assistance of the General Electrical Superintendent and the Project Discipline Electrical Engineer. The film will cover quality related activities involving electrical installation. It is our intention to develop a keener awareness on the part of foremen and the film will illustrate the foreman's responsibility in this area. Appropriate Foremen (responsible for each of the crafts involved in areas where electrical installations are made) will view the training film.

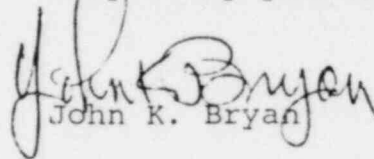
If a particular crew or an individual member of any crew is found to be negligent in carrying out project requirements, the crew or member of the crew will be scheduled into a training session which will include viewing the film. This problem will also be discussed periodically (as warranted) in the weekly Superintendent's meeting.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by June 15, 1981, following development of film and subsequent viewing by appropriate Foremen.

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

Very truly yours,

  
John K. Bryan

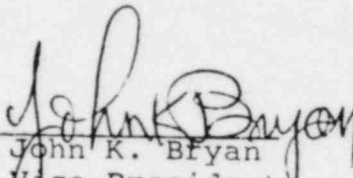
DAO/jds

cc: Mr. J. Konklin, NRC Region III  
Mr. W. A. Hansen, NRC Resident Inspector, Callaway Plant  
Missouri Public Service Commission

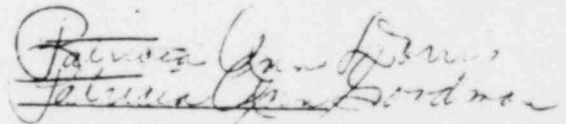
STATE OF MISSOURI )  
 ) S S  
CITY OF ST. LOUIS )

John K. Bryan, of lawful age, being first duly sworn upon oath says that he is Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By

  
John K. Bryan  
Vice President  
Nuclear

SUBSCRIBED and sworn to before me this 25th day of March, 1981



PATRICIA ANN DORRIS  
NOTARY PUBLIC, STATE OF MISSOURI  
MY COMMISSION EXPIRES 1/31/82  
ST. LOUIS COUNTY