

UNION ELECTRIC COMPANY
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ST. LOUIS, MISSOURI

JOHN K. BRYAN
VICE PRESIDENT

August 27, 1981

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

Mr. R. L. Spessard, Director
Division of Resident and Project Inspection
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

ULNRC-491

Dear Mr. Spessard:

INSPECTION REPORT NO. 50-483/81-10

- Reference: 1. NRC Letter, R. F. Heishman
to J. K. Bryan, dated June 24, 1981
2. ULNRC-471, dated July 24, 1981

This is in response to your letter of August 14, 1981 requesting a submittal of the details of the corrective actions taken in response to your June 24, 1981 Notice of Violation. Your letter also requested a description of our plans and the schedule for reorganizing our II/I inspection program. With regard to the latter request, please be advised that although the project is still considering transferring the responsibility for II/I inspections from Engineering to Quality Control, a final decision has not yet been reached. If this change in responsibility occurs you will be notified and advised of the schedule for reorganization.

The following is in response to the items in Appendix A, Notice of Violation. None of the material in the inspection report or in this response is considered proprietary by Union Electric Company.

Severity Level V Violation (483/81-10-01)

Failure to Provide Appropriate Procedures for
II/I Raceway Inspection

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed in documented procedures..., including quantitative or qualitative acceptance criteria.

Contrary to the above

- a. WP-03, Revision 2, "Field Fabrication and Installation of Seismic II/I Supports and Block Walls" Paragraph 4.3 and WP-301, Revision 9, "Installation of Electrical Raceway Supports, "Paragraph 3.19 cross

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reference each other for installation of II/I raceway supports, but neither procedure provides the actual instructions for the installation.

- b. WP-03, Rev. 2, Paragraph 4.3.6, requires the inspection of II/I Raceway Supports using Bechtel Dwg. EOR-8900 "Raceway Notes, Symbols and Details." Dwg. EOR-8900 does not provide appropriate acceptance criteria for determining satisfactory accomplishment of the activity.
- c. WP-03, Revision 2, Paragraph 4.3.6, requires that II/I Raceway Support inspections be documented on Exhibit A in WP-301. Exhibit A does not provide space on the form to address inspection results, instructions, or signature block for Engineering Inspector.
- d. Neither WP-03, Revision 2, nor WP-301, Revision 9 address the inspection of bolted connections on the raceway or the attachment of the raceway to the associated supports.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

- a. In an effort to clarify existing procedures, the following revisions will be made to WP-03 and WP-301.

Installation of II/I raceway supports shall be per the design documents listed on the "Conduit and Tray Support Record."

Inspection of II/I raceway supports shall be per the design drawings and the "Exposed Support Checklist."

Weld inspections of II/I raceway supports shall be performed per WP-03.

The "Exposed Support Checklist" has recently been added to WP-301. Cross referencing of WP-03 and WP-301 will be clarified.

- b. WP-03, paragraph 4.3.6 will be revised to require inspection of II/I hangers in accordance with E-OR8900, the "Conduit and Tray Support Record,"

and the "Exposed Support Checklist." The design drawings and checklist provide appropriate acceptance criteria for determining satisfactory accomplishment of raceway support installation.

- c. The "Exposed Support Checklist" provides for space for acceptance of individual inspection items and other inspection results if applicable.
- d. Drawing E-OR8900, Raceway Notes, Symbols, and Details has been revised to provide for the identification of applicable raceway as II/I. DIC will develop and implement an inspection program for II/I raceway. This program shall include the inspection of bolted connections on the raceway and the attachment of raceway to the associated supports.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

Implementation of the actions described above will preclude further noncompliance.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

DIC is now installing and inspecting II/I raceway supports per the design drawings (as listed on the "Conduit and Tray Support Record") and the "Exposed Support Checklist." WP-03 and WP-301 will be revised to more clearly address those activities by September 25, 1981.

The inspection program for II/I raceway will be developed and implemented by November 30, 1981.

Severity Level V Violation (483/81-10-03)

Failure to Follow Procedures for II/I Raceway Inspections

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with prescribed documented procedures.

Contrary to the above:

- a. WP-03, Revision 2, Paragraph 4.3.1, requires the Project Electrical Engineer to mark Work Assignments (WA) as II/I for II/I support installation.

The NRC inspector identified that five out of nine WA's inspected did not indicate that the supports were II/I. Therefore, the II/I inspections were not performed.

- b. WP-03, Revision 2, Paragraph 3.1, requires training and documentation of authorization by the Project Discipline Engineer for all Engineering Inspectors.

The NRC inspector identified seven WA's that were signed off by individuals for there was no training or authorization documentation available.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

- a. The requirement to mark the Work Assignment as II/I has been incorporated into WP-301 so that the confusion brought on by the cross reference of WP-03 and WP-301 has been eliminated.

All areas where II/I supports exist have been reviewed and all Work Assignments corrected, as applicable, to include the II/I designation. The supports previously not designated as II/I will be inspected, or re-inspected, as the case may be, per WP-301, Revision 10.

- b. Due to the fact that some Work Assignments were signed complete by unauthorized inspectors, a re-inspection program has been initiated. The program consists of a review of all completed Work Assignments involving the inspection of II/I supports to establish the scope of the re-inspection. There will be a ten (10) percent re-inspection of all completed Work Assignments signed complete by an authorized inspector and one-hundred (100) percent re-inspection of all completed Work Assignments signed complete by an unauthorized inspector.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

All personnel that are involved in the inspection of II/I supports or might become involved in the inspection of II/I supports attended a training session on May 11, 1981 and received documentation of authorization. The training session, along with the documented inspection authorization is designed to avoid further noncompliance for items a. and b. above.

Mr. R. L. Spessard

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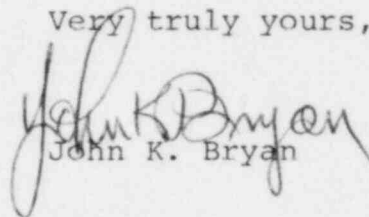
Completion of the re-inspection program will assure that all II/I supports in question will be inspected.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by February 1, 1982, upon completion of the Re-inspection Program as described above.

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. E. Konklin, NRC Region III
NRC Resident Inspector, Callaway Plant
Missouri Public Service Commission

STATE OF MISSOURI)
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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
John K. Bryan
Vice President
Nuclear

SUBSCRIBED and sworn to before me this 27th day of August, 1981

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1986
ST. LOUIS COUNTY