

UNION ELECTRIC COMPANY
1901 GRATIOT STREET - ST. LOUIS

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ST. LOUIS, MO. 63166

August 20, 1981

Mr. James G. Keppler, Director
US Nuclear Regulatory Commission
Region III
799 Roosevelt Rd.
Glen Ellyn, IL 60137

ULNRC- 484

Dear Mr. Keppler:

INVESTIGATION REPORT NO. 50-483/81-04

This is in response to your letter of June 25, 1981 reporting results of an investigation at Union Electric Company's Callaway Plant, Unit 1 on February 20, March 3-6, 23-27, 1981 and as detailed in investigation report No. 50-483/81-04.

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

The following is in response to the item in Appendix A, Notice of Violation of the investigation report.

Severity Level V Violation (483/81-04-02)

10 CFR Part 50, Appendix B, Criterion IX, states, "Measures shall be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Pipe piece No. 5P, part of the accumulator discharge line from accumulator TEPOIA, was manufactured to material specification ASME SA-358. Specification SA-358 requires "Radiographic Examination in Accordance with ... ASME ..." Section I, Paragraph PW-51.

ASME Code, Section I, Paragraph PW-51 states "Sections of weld that are shown by radiography to have any of the following types of imperfections shall be judged unacceptable and shall be repaired..."

51.3.1 Any type of crack, or zone of incomplete fusion or penetration.

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Contrary to the above, on March 6, 1981, the inspector determined from a review of radiographs of the seam weld on pipe piece No. 5P at film location markers 13-14 that the film indicated apparent incomplete fusion and excess reinforcement and yet the pipe piece had not been judged unacceptable or repaired.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

The subject deficiency was initially found during the field installation process at Callaway. The deficiency was first documented on NCR #2SN-0501-P on April 30, 1979. Subsequent to the NCR being returned by Bechtel, the field installer, DIC, reworked the apparent deficiency under DR #2SD-0699-P, dated 9/6/79. The rework and final inspection was completed by 11/15/79.

Per NRC Investigation Report #81-04 initial contact by the alleged was on or about October 11, 1979. Subsequent NRC investigation led to conclusion in report #81-04 that the vendor originally improperly accepted the radiographic records. Additional field radiographs were made showing conclusively the weld radiographic acceptability during the NRC investigation. In summary the apparent deficiency was properly identified and controlled through the field QA/QC inspection program, and the subject pipe now has been found by both the licensee and the NRC to be acceptable.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

Considering the time intervals involved and the isolated nature of the apparent deficiency, further corrective action with the vendor at this time would not appear to be productive. Union Electric Company will continue to maintain a vigilant QA/QC program to identify and resolve deficiencies found in the field including appropriate corrective action with vendors as necessary. The above corrective action was discussed in a telephone conversation with Mr. W. J. Key on August 20, 1981.

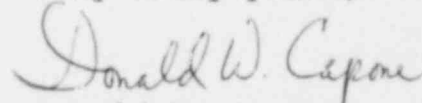
August 20, 1981

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Not applicable.

The architect engineer has reviewed the circumstances of the disposition of the Nonconformance Report No. 2SN-0501-P and their response will be in the project files for review. The A/E admits use of the incorrect edition of the ASME Code in the evaluation of the nonconformance report. Union Electric will direct Bechtel to instruct their engineers to exercise more care in selection of the proper Code edition when evaluating nonconformance reports.

Very truly yours,



Donald W. Capone
Manager-Nuclear Engineering

DAO/jds

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

STATE OF MISSOURI)
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CITY OF ST. LOUIS)

D. W. Capone, of lawful age, being first duly sworn upon oath says that he is Manager, Nuclear Engineering for 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 *D. W. Capone*
D. W. Capone
Manager, Nuclear Engineering

SUBSCRIBED and sworn to before me this 20th day of August, 1981

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1985
ST. LOUIS COUNTY