

February 22, 1993

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ULNRC -2762

Gentlemen:


**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/92015 and 50-483/93002
CALLAWAY PLANT**

This responds to Mr. Edward G. Greenman's letter dated January 25, 1993, which transmitted a Notice of Violation for events discussed in Inspection Reports 50-483/92025 and 50-483/93002. Our response to the violation is presented in the attachment.

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

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

Very truly yours,



Donald F. Schnell

DFS/tmw

Attachments: 1) Response to Violation A
2) Response to Violation B

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Statement of Violation A

During an NRC inspection conducted on October 1 through December 18, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C, the violation is listed below:

Callaway Station Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, paragraph 9, "Procedures for Performing Maintenance," states, in part, that maintenance affecting the performance of safety-related equipment should be performed in accordance with written procedures appropriate to the circumstances.

Callaway Maintenance Mechanical Procedure, MTM-ZZ-QA006, "Limitorque Actuator Limit Switch and Torque Switch Adjustment," Revision 24, dated March 6, 1992, Attachment 4, "Limitorque MOV Limit Switch Setpoints," Note 3 for MOV No. EF-HV-0066, under the setpoint for intermediate rotor No. 2 states, in part, to set the rotors such that the disc will coast into the seat after the close limit switch contacts open.

Contrary to the above, on April 12, 1992, intermediate rotor No. 2, the close limit switch for valve EF-HV-0066, was not set in accordance with procedure MTM-ZZ-QA006 in that, during operation of the valve, after the close limit switch contact opened, the disc remained approximately 25 percent open and did not coast into the seat.

This is a Severity Level IV violation (Supplement D).

Reason for the Violation

Turnover of work in process was not adequate in that the information on the work document provided by the first shift electricians was insufficient to clearly convey the status of the work in the field. The second shift electricians used the incomplete information given in the work document without confirming the status of the previous work performed. This resulted in the Intermediate 2 limit switch being left in a temporary setting and the final adjustment not being made. During work package review, maintenance supervision failed to identify that the procedural step for setting limit switches had not been signed off.

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Procedure MTM-ZZ-QA006 did not provide adequate guidance to assure that butterfly valve close limit switches will be set so that the valve will coast into the seat. Also, this procedure did not require stroking the valve electrically to verify that limit switch settings were correct.

Corrective Steps that have been taken and results achieved:

Valve EF-HV-0066 close limit switch was reset November 2, 1992, restoring the valve to an operable status.

The necessity for clear communications between work crews at shift change has been emphasized to involved personnel. An investigation of this event was performed by Union Electric personnel to determine the causal factors and corrective actions to be taken. The results of this investigation are contained in voluntary LER 50/483-92-012, Rev. 0.

Procedure MTM-ZZ-QA006, Attachment 4, Note 3 was revised to require electrical stroking of the valve to determine the final setting of switches and to assure the valve disc coasts to closure. Additionally, the procedure now requires a separate signoff for each limit switch setting rather than a single signoff for all four limit switches.

Previous MOVATS test data was not available in the field to compare with current test data. The unusually short stroke time resulting from the misadjusted motor operator of valve EF-HV-0066 might have been identified during the MOVATS testing had previous test data been available in the field. Temporary Change Notice (No. 92-1222) has been issued to procedure MTE-ZZ-QA001, Rev. 14 to include previous test data (signature traces) in work packages for MOVATS testing. The previous data may then be used by the MOV test coordinator for comparison with current traces after work is performed on an MOV.

Corrective steps that will be taken to avoid further violations:

Requalification training for Maintenance personnel will be conducted which will include:

- a) The revised MTM-ZZ-QA006 procedure,
- b) Use and limitations of MOVATS testing on butterfly valves,
- c) Written communication for use in documenting work completion and status at shift turnover,
- d) Procedural requirements for paperwork signoff in procedures, and
- e) Requirements for review of completed work packages by Supervisors.

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Additionally, Maintenance will issue a policy letter to the Maintenance Supervisors to formally document management expectations for turnover of work in progress from one shift to the next.

Date when full compliance will be achieved:

The policy letter for turnover of work in process will be issued by March 31, 1993.

Training of Maintenance personnel will be completed by September 1, 1993.

Statement of Violation B

During an NRC inspection conducted on October 1 through December 18, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C, the violation is listed below:

Callaway Station Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, paragraph 8, "Procedures for Control of Measuring and Test Equipment and for Surveillance Tests, Procedures, and Calibrations," states, in part, that specific implementing procedures are required for each surveillance test.

Callaway Operations Surveillance Procedure, OSP-EF-V001B, "ESW Train B Valve Operability," Revision 7, dated October 4, 1991, Step 6.1.2.4 states, in part, to determine the position of the valve by local observation and record the full stroke position.

Contrary to the above, on April 13, July 29, and October 21, 1992, equipment operators locally observing valve EF-HV-0066 recorded that the full stroke position was closed even though the valve had only gone approximately 75 percent closed.

This is a Severity Level IV violation (Supplement I).

Reason for the Violation

Procedure OSP-EF-V001B states, in part, to "determine the position of the valve by local observation" prior to stroking the valve and after stroking the valve. Operator training and procedures have not been specific in how to locally verify valve position. Consequently, if the observer at the valve witnessed smooth valve travel and the remote position indicating lights indicated full open or closed position, the valve positions were recorded as open or closed as required. It was difficult for the operators to locally verify that valve EF-HV-0066 stroked to the fully closed position because the valve control circuitry immediately reopens the valve. The local mechanical valve position indicator thus provides a useful but not accurate indication because it reverses direction and continues to travel during this sequence.

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Corrective Steps that have been taken and results achieved:

A night order has been issued to provide interim guidance for operations personnel on when local position indication may be used to determine full open or closed position. Work Requests are to be generated when the local position indication is not in agreement with the remote indication.

Corrective steps that will be taken to avoid further violations:

Engineering will conduct training for operations personnel to explain this event and further define when local position indication may be used to determine full open or closed position indication.

Date when full compliance will be achieved:

Training will be complete by April 1, 1993.

As an enhancement, Engineering will also revise the Section XI valve stroke procedures to delineate specific local position indication that may be used to determine full open or closed position. Procedures will be revised by June 1, 1993.