

UNION ELECTRIC COMPANY

1901 GRATIOT STREET

ST. LOUIS, MISSOURI

December 22, 1978

JOHN K. BRYAN  
VICE PRESIDENT

MAILING ADDRESS:  
P. O. BOX 49  
ST. LOUIS, MISSOURI 63166

Mr. R. F. Heishman, Chief  
Reactor Construction & Engineering Support Branch  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

ULNRC- 302

Dear Mr. Heishman:

INSPECTION REPORT NO. 50-483/78-10

This is in response to your letter of November 24, 1978 reporting results of an inspection at Union Electric Company's Callaway Plant Site on October 2-4, 1978 and as detailed in inspection report number 50-483/78-10.

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

The response listed below corresponds to the items listed in Appendix A, Notice of Violation, of the inspection report.

Infraction

1. 10CFR50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be accomplished in accordance with instructions and procedures.

Paragraph 17.1.5 of the SNUPPS PSAR requires that these activities shall be accomplished in accordance with the applicable instructions and procedures.

Paragraph 3.16 of Work Procedure number WP-503, Control of Welding Consumables, Revision 6 dated May 5, 1978, states in part that "Loose electrodes and filler wire shall not be left lying around but shall be contained in a portable container or a weld pouch." Inter-office memorandum CM-450, dated June 9, 1977, from the Welding Superintendent to All Superintendents and Welders on the subject of Rules

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for Welding Control states in part "Weld rod stubs shall be put in stub containers and emptied in a trash container at the end of the shift."

Contrary to the above on October 4, 1978, the RIII inspector observed a large quantity of E7018 weld rod stubs lying around in the stiffener channels that are attached to the liner plate at the fourteenth lift area of the containment exterior wall. (483/78-10-02).

a. CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The weld rod stubs identified by the NRC Inspector have been removed and properly disposed of. Other areas of the plant are being checked to insure that all weld rod stubs have been properly disposed of.

b. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Interoffice Communication CM-883 has been issued to all Daniel supervision and Daniel welders instructing them of the importance of complying with this procedural requirement. Daniel letter DLSC-80-2746 has been issued to the subcontractor working in this area informing him of these requirements. In addition, weld rod waste containers have been fabricated and placed in each building for disposal of weld rod stubs.

A program of monitoring compliance with weld rod control has been implemented and will continue until a level of confidence has been achieved that this problem is under control.

c. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

March 1, 1979

2. 10CFR50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be accomplished in accordance with instructions and procedures.

Paragraph 17.1.5 of the SNUPPS PSAR requires that these activities shall be accomplished in accordance with the applicable instructions and procedures.

Paragraph 5.3.4 of UE QA Procedure number QA-106, Revision 5 requires that responses to audits, where corrective action is indicated are to be submitted within 30 days after receipt of the audit report.

Contrary to the above, five of the eight audits reviewed by the RI inspector identified that the Constructor (audited organization) did not respond within the required time. (483/78-10-06)

a. CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

Daniel personnel directly involved in audit responses have been reminded of the requirement for making timely responses to Quality Assurance audits. The responses to the two Union Electric QA Monthly Audits which were due since the NRC infraction was identified have been submitted in a timely manner.

b. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

The Daniel Project Manager has issued a directive (PM-638) to all Department Managers concerning this infraction. This directive emphasizes the requirement for making timely responses to Quality Assurance audits. The Union Electric Site QA Group will contact Nuclear Construction and/or Daniel as appropriate when a response is not received within 30 days of submittal of the audit report.

c. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

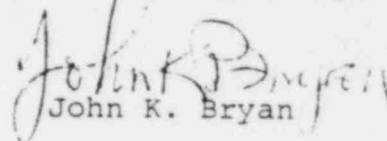
December 26, 1978

Mr. R. F. Heishman

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

Yours very truly,

  
John K. Bryan

WSS/jds

cc: E. R. Schweibinz