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January 26, 1994

Donald F. Schnell
Senior Vice President
Nuclear

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

ULNRC-2941

Gentlemen:

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/93017
CALLAWAY PLANT**

This responds to L. Robert Greger's letter dated December 29, 1993, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/93017. Our response to the violation and Workman's Protection Assurance concern 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,

A handwritten signature in cursive script that reads "Donald F. Schnell".

Donald F. Schnell

DFS/tmw

Attachment: 1) Response to Violation

cc: J. B. Martin - Regional Administrator, USNRC Region III
M. J. Farber - Chief, Reactor Projects Section 3A, USNRC Region III
L. R. Wharton - USNRC Licensing Project Manager (2 copies)
→ USNRC Document Control Desk (Original)
Manager - Electric Department, Missouri Public Service Commission
B. L. Bartlett - USNRC Senior Resident Inspector
T. A. Baxter - Shaw, Pittman, Potts, and Trowbridge

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Statement of Violation

During an NRC inspection conducted on September 19 through November 20, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR Part 50.72 (B)(2)(ii) requires that the licensee shall notify the NRC as soon as practical and in all cases within four hours of any condition that results in manual or automatic actuation of any engineered safety feature (ESF).

Contrary to the above, on November 14, 1993, the licensee failed to notify the NRC of an automatic ESF actuation within the four hour time requirement (483/93017-01).

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

Reason for the Violation

The NRC was not notified within four hours of this automatic Engineered Safety Features (ESF) actuation because the personnel on-shift did not recognize the occurrence of a valid ESF actuation. The ESF actuation was not recognized because:

- The plant was in Mode 4 (Hot Shutdown) and the Main Steam and Feedwater Isolation System was not operable nor required to be operable.
- The feedwater isolation valves which would be closed by a Feedwater Isolation Signal were already in the closed position.
- A relay failure occurred which allowed a Reactor Coolant System Low Tave interlock to clear itself and reset one train of the Feedwater Isolation Signal.
- The system and component lineups that existed for in-progress testing and maintenance made it difficult to determine from other indications that a valid Feedwater Isolation Signal (FWIS) had been generated.

The Shift Supervisor knew that valid Feedwater Isolation System actuation would be reportable in Mode 4; however, based on review of the available indications he determined that a valid signal was not generated.

Corrective Steps taken and results achieved:

Management follow-up determined that a valid FWIS had been generated and the NRC notified within 4 hours of this determination, which was approximately 20 hours after the event. The failed relay that led to resetting one train of the FWIS has been replaced and retested satisfactorily.

Corrective steps to avoid further violations:

This notice of violation will be discussed with all licensed operators during requalification training to ensure they understand the sequence of events that led to the late determination of reportability. The reporting requirements for ESFAS actions will also be discussed during these sessions.

Date when full compliance will be achieved:

The training will be completed by April 1, 1994.

Workman's Protection Assurance (WPA) Concern:

The number of recent Workman's Protection Assurance (WPA) events that have occurred is of concern, as discussed in Section 3.1 of the inspection report.

Actions to Address the Workman's Protection Assurance Concern:

Our trending program monitors the number of WPA events and we agree it is a concern. However, our trending data does not indicate an adverse trend. Reports of WPA events are reviewed by the Superintendent, Operations on a monthly basis and Manager, Callaway Plant on a quarterly basis. In addition a number of actions have been taken to help reduce the number of WPA events.

The Maintenance Superintendent met with craft and supervisors to emphasize the need for supervisors to ensure they have reviewed the WPA tagout and have determined that personnel protection requirements have been met prior to releasing craft to perform work. He emphasized the personal responsibility of the craft to ensure that their supervisor has reviewed and signed on the WPA tagout and to verify by local observation that the protection is in place.

Operations has revised the governing procedure to require that when a WPA tagout is partially cleared, all work documents that are no longer covered by the tagout are removed from the WPA prior to removing any tags. This ensures work which was not started will not be authorized to start without proper protection in place.

We have also instituted changes to the computerized WPA system that require the supervisor to review the WPA tagout on the computer prior to signing on the protection. Once he has reviewed the WPA on the computer, if any changes are made to that WPA tagout, he is sent an electronic message notifying him that the WPA tagout has been changed. The supervisor must then re-review the tagout prior to accepting the protection and starting work.

The above changes were completed prior to January 10, 1994.

Additionally, during the current licensed operator requalification training cycle, plant management is specifically addressing the hazards of WPA inadequacies and the importance of maintaining a low threshold for reporting WPA events.