

UNION ELECTRIC COMPANY
1901 GRATIOT STREET
ST. LOUIS, MISSOURI

DONALD F. SCHNELL
VICE PRESIDENT

October 15, 1982

MAILING ADDRESS:
P. O. BOX 149
ST. LOUIS, MISSOURI 63166

Mr. C. E. Norelius, Director
Division of Engineering and Technical Inspection
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

ULNRC- 586

Dear Mr. Norelius:

INSPECTION REPORT NO. 50-483/82-09

This letter is in response to your letter of September 17, 1982 which transmitted the report of the inspection conducted during the period of August 23 to August 25, 1982. Our response to the items of non-compliance are presented below in the order listed within the body of inspection report number 50-483/82-09.

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

(50-483/82-09-01) SEVERITY LEVEL IV VIOLATION

10 CFR 50, Appendix B, Criterion II, states in part, that "The quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components, to an extent consistent with their importance to safety."

SNUPPS PSAR, Section 17.1.2, states in part, that "This [Quality Assurance] program encompasses those quality affecting activities...necessary to provide assurance of meeting quality objectives during...construction ..."

Contrary to the above, four instances were identified in which Union Electric failed to provide control over concrete drilling and coring activities, in that, the documentation of damaged reinforcing steel was neither accurate nor complete when compared to the as-built condition.

Corrective Action Taken And The Results Achieved:

An action plan has been formulated to assure timely documentation of cut rebar. This plan provides for adjustments to the existing program

OCT 20 1982

8211010140 821026
PDR ADOCK 05000483
Q PDR

and an inspection of reinforcing steel cut prior to implementation of the revised work procedure.

The basic steps involved in this plan are as follows:

- 1) At the time cut or damaged rebar is identified, the Area Civil Engineer will record all cut rebar information on the original Post-Pour Embed Installation Form (PEIF), generate a copy of the PEIF reflecting cut rebar information and apply his signature, badge number, and the date, thus signifying that the copy can be used for entering cut rebar information on the as-built drawings.
- 2) All accessible core drills in safety-related structures will be investigated to assure that cut rebar has been properly documented.
- 3) All Civil NCR's originated prior to establishment of the cut rebar identification program on August 31, 1978 will be reviewed to determine if any other NCR's exist involving cut rebar which have not been documented on the as-built drawings.
- 4) Existing backlog of PEIF's or documentation of cut rebar which has been held in suspense and not entered on the as-built drawings will be entered and any new instances of cut rebar will be entered on the as-built drawings.
- 5) A separate distribution copy of all Civil NCR's will be routed to the Civil Draftsman to facilitate the timely incorporation of any cut rebar information, and to provide a second check that information has already been entered on the as-builts.
- 6) All instances of cut rebar not already entered on as-built drawings will be incorporated; NCR's or DR's will be originated as required to document program deficiencies which may have occurred.
- 7) A training session will be held with all involved personnel stressing the importance of complete and accurate documentation. A standardized format for recording cut rebar information will be utilized for consistency.

Corrective Action To Be Taken To Avoid Further Noncompliance:

Work procedure WP-100 will be revised to incorporate the provisions of Step 1, and a training session will be held with appropriate personnel as detailed in Step 7.

Corrective Action Report 2C-0021 was originated on September 13, 1982 to document the deficiency and control corrective action.

The Date When Full Compliance Will Be Achieved:

Full compliance is expected to be achieved by January 31, 1983.

(50-483/82-09-02) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion XVI states in part, that "...measures shall assure that the cause of the condition [adverse to quality] is determined and corrective action taken to preclude repetition."

SNUPPS PSAR, Section 17.1.16 states in part, that "The SNUPPS utilities have established a corrective action program which determines the need for corrective action and assures that conditions adverse to quality are promptly identified, reported, corrected and that the corrective action is appropriate and effective."

Contrary to the above, the corrective actions to preclude recurrence of the adverse findings documented in DIC Audit QAR 81-09-01 were not effectual; that is, identical findings relative to the documentation of damaged reinforcing steel due to concrete drilling and coring activities were made during this inspection.

Corrective Action Taken And The Results Achieved:

After thorough review and evaluation of NRC Inspection Report 50-483/82-09 and DIC QA Audit QAR 81-09-01, it has been concluded that the scope of CAR 2C-0016, which was written in response to QAR 81-09-01, was not of sufficient magnitude to adequately address the problems identified in the subsequent Inspection Report. QAR 81-09-01 consisted of a record review to assure that all cut rebar information on the PEIF was being entered properly on the as-built drawings. It did not compare the cut rebar documentation to the actual physical status of the rebar in the core-drilled holes. Corrective Action Report 2C-0021 has been written to address the program deficiencies identified in this inspection.

Corrective Action To Be Taken To Avoid Further Noncompliance:

The corrective action required by CAR 2C-0021 will include:

- 1) Elimination of the existing back-log of PEIF's.
- 2) A review of all Civil NCR's originated prior to August 31, 1978 to identify cut rebar not documented on as-built drawings.
- 3) An inspection of all accessible core drills in safety-related structures to assure that any cut rebar has been properly documented.
- 4) Incorporation of any of the above identified cases onto the as-built drawings.

Mr. C. E. Norelius

- 4 -

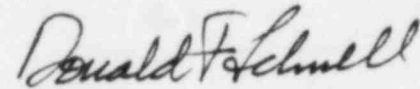
October 15, 1982

The Date When Full Compliance Will Be Achieved:

Full compliance is expected to be achieved by January 31, 1983.

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

Very truly yours,



Donald F. Schnell

JGJ/jds

cc: Mr. H. M. Wescott, NRC Region III
NRC Resident Inspector, Callaway Plant
Missouri Public Service Commission