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Donald F. Schnell
Senior Vice President
Nuclear

January 4, 1991

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

ULNRC-2346

Gentlemen:

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-481/90019
CALLAWAY PLANT**

This responds to Richard C. Knop's letter dated December 6, 1990, which transmitted a Notice of Violation for events discussed in Inspection Report 50-481/90019. Our response to the violation is presented below.

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

Statement of Violation

As a result of the inspection conducted October 1 through November 15, 1990, one violation of NRC requirements was identified. The violation involved a failure to properly seal a conduit penetration as a fire barrier as described below.

Technical Specification 6.8.1 requires, in part, written procedures for the Fire Protection Program implementation. APA-22-00703, Revision 1, "Fire Protection Operability Criteria and Surveillance Requirements," Attachment 6, page 1, requires, in part, that "all fire barriers...separating safety related fire areas...and all sealing devices in fire rated assembly penetrations...shall be operable at all times." Bechtel Drawing M-0Y003, Revision 1, "Conduit Fire Stop/Smoke and Gas Seal," item I.1.A, requires that "all conduits four inches diameter and smaller that penetrate a fire zone boundary wall or floor shall be sealed with a fire stop/smoke and gas seal at the penetration or at both ends of the conduit."

Contrary to the above, on November 1, 1990, an NRC inspector identified an open, uncapped one and one half inch conduit through the fire barrier separating safety related fire areas A.14 (Motor Driven Auxiliary Feedwater Pump "A") and A.15 (Turbine Driven Auxiliary Feedwater Pump).

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This is a Severity Level IV violation.

Response

Corrective Steps That Have Been Taken and the Results Achieved

Once the missing conduit seal was identified, immediate corrective action included verifying operable fire detection on both sides of the penetration. An hourly fire watch was already established on one side of the penetration. Work Request G482048-053 was generated to seal the conduit at both ends. This work was completed on the same day the missing seal was discovered.

Corrective Steps That Will Be Taken to Avoid Further Violations

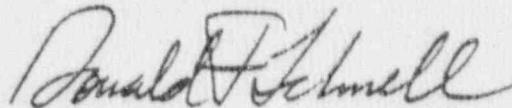
On March 28, 1986, internal conduit seals were found missing and reported to the NRC as Licensee Event Report 86-007. As a result of this LER, approximately 2000 conduit seals were inspected to ensure all internal conduit seals were properly installed. This inspection and final supplemental report to LER 86-007 were completed on April 8, 1988. The subject missing conduit seal has been the only internal conduit seal deficiency identified since that date. The subject missing conduit seal is believed to be an isolated oversight of the conduit inspection program conducted as a result of LER 86-007. No additional corrective actions are deemed necessary.

Date When Full Compliance Will Be Achieved

The subject noncompliance was corrected on November 1, 1990.

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

Very truly yours,



Donald F. Schnell

PWG/lkr

cc: → A. B. Davis - Regional Administrator, USNRC Region III
R. L. Hague - Chief, Reactor Projects Section 3C,
USNRC Region III
A. T. Gody, Jr. - USNRC Licensing Project Manager (2 copies)
Manager - Electric Department, Missouri Public Service
Commission
B. L. Bartlett - USNRC Senior Resident Inspector
Shaw, Pittman, Potts & Trowbridge

January 4, 1991

bcc: A160.0761 (QA Record) (CA-460)
A170.0103 (90019) (CA-460)
Nuclear Data File (S. L. Auston) (490)
E210.0001
D. F. Schnell (Chrono)
G. L. Randolph
J. V. Laux
Licensing and Fuels (A. C. Passwater/ D. E. Shafer/
D. J. Walker) (490)
T. P. Sharkey
NSRB (S. L. Auston) (490)
H. Wuertenbaecher (100)
O. Maynard (WCNOC)
C. E. Slizewski
C. S. Petzel

STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Senior Vice President-Nuclear and an officer of 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 Donald F. Schnell
Donald F. Schnell
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this 7th day of January, 1991.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
ST. LOUIS COUNTY