UNION ELECTRIC COMPANY

1901 GRATIOT STREET ST. LOUIS, MISSOURI

May 18, 1983

DONALD F. SCHNELL.

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

Mr. R. L. Spessard, Director Division of Engineering US Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, IL 60137

ULNRC- 629

Dear Mr. Spessard:

INSPECTION REPORT NO. 50-483/83-02

This reply is in response to your letter of April 18, 1983 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of February 23-24, 1983 and March 14-17, 1983. Our response to the item of noncompliance, and the answer to the question raised in the body of your letter of April 18, 1983 are presented below.

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

(50-483/83-02-01) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion XI requires that testing be performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

The Wastinghouse document "Standardized Nuclear Unit Power Plant Systams: Precautions, Limitations and Setpoints for Nuclear Steam Supply Systems" delineates the temperature limits for preasurization of the safety injection accumulators.

Contrary to the above, preoperational test procedure CS-03EP01, Revision 0, "Accumulator Testing," was approved and the test was conducted with no requirements to verify or record safety injection accumulator temperature prior to and during pressurization.

Corrective Action Taken And The Results Achieved:

A Minor Change Notice (MCN) has been added to CS-03EP01 to add a precaution to the Notes and Precautions to ensure the accumulator temperatures are recorded in the test log before each accumulator pressurization. During subsequent retest using procedure CS-03EP01, the temperatures were verified to be acceptable and recorded.

.Mr. R. L. Spessard -2-May 18, 1983 Corrective Action To Be Taken To Avoid Further Noncompliance: On April 6, 1983, a letter was issued by the Superintendent of Startup to all startup personnel, which discussed the situation and emphasized to each Startup Engineer the responsibility to ensure that all technical limits, restrictions and procedures associated with assigned systems are to be properly addressed and implemented. The Date When Full Compliance Will Be Achieved: The corrective action, as outlined above, has been completed on the dates discussed. In response to your request that we indicate the steps taken to meet our FSAR committment to submit approved test procedures for all tests described in FSAR Chapter 14 sixty days prior to test performance, we submit the following: Union Electric will make every effort to comply with this commitment. Steps taken to assure this include a substantial enlargement of the procedure development group and the scheduling of procedure development on an extensive overtime basis for the near term. If you have any questions regarding this response or if additional information is required, please let me know. Very truly yours, SM/mc cc: Mr. H. M. Wescott, NRC Region III NRC Resident Inspector, Callaway Plant Missouri Public Service Commission