

UNION ELECTRIC COMPANY

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DONALD F. SCHNELL
VICE PRESIDENT

October 19, 1983

MAILING ADDRESS:
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Mr. R. C. Knop, Chief
Projects Branch 1
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

ULNRC- 677

Dear Mr. Knop:

INSPECTION REPORT NO. 50-483/83-15

This reply is in response to your letter of September 23, 1983 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of July 1, 1983 to August 31, 1983. Our response to the item of noncompliance is presented below.

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

(50-483/83-15-01) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion V, states; "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

SNUPPS Quality Assurance Programs for Design and Construction, Chapter 17.1.5, states; "The program established by the SNUPPS utilities to control the activities affecting quality provides measures for: d. The use of approved drawings, procedures, instructions or checklists to accomplish an activity."

Contrary to the above, procedural controls were inadequate to prevent unauthorized temporary alterations of plant components from being accomplished by startup personnel. Barton pressure transmitter BG-PT-120 was replaced by a Rosemount transmitter on May 13, 1983, without documented approval. A work request was not issued until May 17, 1983, nor did the Startup Engineer indicate approval of the alteration in the temporary alteration log until May 17, 1983.

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Corrective Action Taken And The Results Achieved:

The Startup Group responsible for replacement of the Barton BG-PT-120 transmitter was counseled on the above item with special emphasis placed on the requirement for documented authorization prior to the implementation of any temporary alteration.

Corrective Action To Be Taken To Avoid Further Noncompliance:

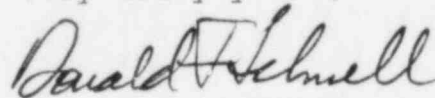
The Startup Administrative Instruction for Temporary Alteration Control (SAI-11) was revised to more clearly state that the authorization for temporary alteration shall be documented in the temporary alteration log prior to implementation.

The Date When Full Compliance Will Be Achieved:

The corrective action as outlined above, was completed on September 6, 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

RHR/jds

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