

Appendix

NOTICE OF VIOLATION

Union Electric Company
Callaway Unit 1

Docket No. 50-483

As a result of the inspection conducted on February 21-24 and February 28-29, 1984, March 1-2, 1984, March 5-9 and March 14-16, 1984, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, as implemented by Callaway Plant Quality Assurance Program, FSAR Section 17.2.5 requires that activities affecting quality be prescribed by documented instructions and procedures and accomplished in accordance with those instructions and procedures.

Contrary to the above:

- a. Section 3.6.4.c of Procedure SAI-9, Revision 5, required if a malfunction or out-of-service calibration is confirmed that the applicable supervisors shall evaluate the calibrations done with the suspect instruments and shall determine if any retests and/or re-calibrations are required. Subsequent to instrument MMD-2010-IC being found out of calibration, the calibrations of the following components were not evaluated: EP-LT-956 level transmitter; NK 21, 22, 23, and 24 ammeters; EJ-AV-8804D air valve; BN-LCV-112E level control valve; and DE-FIT 3000 flow indicating transmitter. Subsequent to instrument G-97-U being found out of calibration, the calibration of pressure indicator CB-PI-96 was not evaluated.
- b. Procedures IDP-22-0001, Revision 1, and SAI-9, Revision 5, required that M&TE checkout cards specify the equipment that was calibrated/tested using the M&TE. Seven work requests revealed M&TE usage on equipment that was not documented on the M&TE check-out cards. The work requests and M&TE involved were as follows:

<u>M&TE NO.</u>	<u>USAGE DATE</u>	<u>WORK REQUEST NO.</u>
ERT-2001-IC	12/2/83	8716
ERT-2002-IC	12/2/83	8716
RCSC-2005-IC	12/2/83	8716
MMD-2009-MA	12/2/83	8716
TW-2006-IC	8/19/83	5496
GAP-2059-IC	5/12/83	1986
GAP-2034-IC	2/3/84	15796

- c. Procedure APA-ZZ-00350, Revision D, required that a calibration sticker be attached to each M&TE device and that the sticker contain calibration

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information including the next scheduled calibration date. There were no calibration stickers on M&TE devices ERT-2001-IE and ERT-202-IC on 2/29/84. The calibration and control program records did not specify a calibration frequency or the next scheduled calibration date for the devices. These instruments were logged into the M&TE program on 12/1/83 and recorded as used on work request No. 8716 on 12/2/83.

- d. Section 4.5 of QS 10, Revision 7, required personnel who identify an apparent significant deficiency to promptly notify the Manager, Quality Assurance (QA); the Superintendent, Site Quality Assurance; or the appropriate Supervising Engineer, Quality Assurance. No one in the Quality Assurance organization was notified of the incident on December 30, 1983, regarding the exhaust fumes in the Control Room until February 22, 1984, when the NRC inspectors reviewed the incident during the inspection.
- e. APA-22-TAP08, Revision 0, Sections 2.1 and 3.0, required the Shift Supervisor/Operating Supervisor to have a SFR (Startup Field Report) initiated at the time of notification of an incident which causes an undesirable or unexpected condition during the operation or in-plant maintenance of the unit. An SFR was not issued for the incident on December 30, 1983, regarding the exhaust fumes in the Control Room until January 23, 1984.

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

- 2. 10 CFR 50, Appendix B, Criterion XVII, as implemented by the Union Electric Operating QA Program, FSAR Section 17.2.17 and Appendix 3A including a commitment to RG 1.88 - October 1976 and to ANSI N45.2.9-1974, requires that sufficient records be maintained to furnish evidence of activities affecting quality, that these records be stored in a manner to preclude deterioration, and record storage facilities to protect contents from possible destruction by causes such as fire. Union Electric (UE) Procedure No. APA-ZZ-00220, indicates that for photographs, radiographs, negatives, or microfilms the storage vaults meet the recommended storage requirements for those special process records and also the requirements in ANSI N45.2.9-1974 with exceptions stated in the UE Operating QA Manual. The QA Manual requires that the structures be Class A fire rated with the recommended two-hour minimum rating.

Contrary to the above the vault containing radiographs and certain other QA records was found to have several piping penetrations which were not sealed to provide the minimum fire rating.

This is a Severity Level V violation (Supplement II).

