

UNION ELECTRIC COMPANY
1901 GRATIOT STREET
ST. LOUIS, MISSOURI

DONALD F. SCHNELL
VICE PRESIDENT

June 4, 1984

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

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ULNRC-840

Dear Mr. Denton:

READINESS FOR FUEL LOAD
CALLAWAY PLANT

Over the weekend of June 1-3, 1984, while performing surveillance tests in preparation for fuel load, the following unplanned events took place at the Callaway Plant:

1. Unintentional closing of RHR pump suction valves with pumps in operation (pumps were immediately tripped with no apparent damage sustained);
2. Three instances which initiated spurious safety injection system actuation signals; and
3. An incorrect valve lineup in the ESW system during restoration from the safety injection signal which allowed service water to be transferred from the cooling tower basin to the ultimate heat sink retention pond.

All of the above events appear to have been caused by inadvertent actions of instrument and control technicians and control room operators. These events have been discussed with the NRC Resident Inspector and will be documented on incident reports in accordance with site procedures.

Based on my preliminary review of these events, it appears that the mistakes of technicians and operators were caused primarily by the high level of activity which prevailed in the plant control room. In preparation for fuel load, we had a number of simultaneous activities underway which burdened control room personnel and others involved in surveillance testing to the point of impacting their proficiency. To alleviate this situation, we have taken the following actions:

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Mr. Harold R. Denton

June 4, 1984

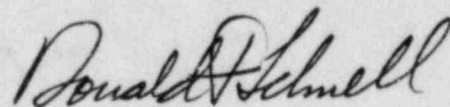
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1. Temporary suspension of post fuel load work activities to reduce the need for work request approvals and system tagging which directly impact control room personnel;
2. Reduction of temporary plant modifications remaining from the preoperational test program which can be a source of confusion for plant operators;
3. Review and close out of all unnecessary workmen's protection tagging associated with completed work.

In addition, we have increased supervision and support of instrument and control technician activities, with particular attention to personnel qualifications for each task undertaken. Finally, we have reduced overtime for Operations Department personnel to levels prescribed by Section 6.2.2.f of the Plant Technical Specifications.

These steps have stabilized personnel actions and reduced activities within the control room, thus allowing surveillance testing to proceed with a reduced risk of personnel error. Based on these events and our corrective actions, I estimate that our readiness to load fuel will be delayed for a period of a few days to one week. Consistent with this schedule, I request the Operating License be issued no later than Thursday, June 7.

Very truly yours,



Donald F. Schnell

DFS/bjp

cc: Mr. James G. Keppler

Messrs. W. E. Cornelius
E. K. Dille

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 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
Vice President
Nuclear

SUBSCRIBED and sworn to before me this 4th day of June, 1984.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1985
ST. LOUIS COUNTY