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June 3, 1984

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

Dear Mr. Denton:

ULNRC-839

DOCKET NUMBER 50-483
CALLAWAY PLANT, UNIT 1
CALLAWAY PRESERVICE EXAMINATIONS

Reference: SLNRC-84-0061 dated April 9, 1984

The reference letter advised NRC that the preservice examination effort at Callaway Plant was essentially complete, and based on knowledge available at that time, no additional volumetric examination relief requests would be required. Subsequent to the reference letter, we have identified a number of longitudinal-seam pipe welds requiring preservice examination (volumetric and/or surface). These welds were not included in the PSI program and have only recently been identified during the final stages of the preservice examination process and documentation reviews.

The need to extend the PSI effort to include additional longitudinal-seam pipe welds was first indicated in March of this year when inconsistencies were noted between the "as-built" documentation furnished by the piping supplier, Dravo, and the physical condition of several installed Class 2 pipe spools. Specifically, longitudinal-seam welds were noted by the PSI examiner in contrast to the Dravo documentation which indicated the pipe being examined at that time to be seamless. These inconsistencies were documented on a Field Change Authorization and action was subsequently taken to incorporate these welds into the PSI Program and to perform the required examinations. It should be noted that the Bechtel purchase specification for Class 2 piping permits use of either seamless or longitudinal seam-welded pipe and fittings. Hence, the as-delivered and as-installed piping is in conformance with applicable purchase specifications. However, because of PSI/ISI considerations, the specifications obligate the supplier to document on the piping spool data sheets the as-built condition; i.e., seamless or seam-welded, of the materials furnished. (Note: Only seamless piping materials are specified for use in Class 1 systems).

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On the basis of the data indicated in the aforementioned Field Change Authorization, it was apparent that inconsistencies existed in some of the supplier's documentation for the pipe spools referenced therein. Review of these documentation packages with Dravo confirmed the inconsistencies to be limited to recording the physical condition; i.e., seamless or welded, of a number of pipe spools.

Prompted by these documentation errors, a comprehensive investigation was initiated by Bechtel and Union Electric to systematically examine all pipe spool data sheets furnished by Dravo for Class 2 piping subject to PSI/ISI examination and to compare the recorded physical condition of the pipe and fittings on these data sheets against the data specified on the Certified Material Test Reports (CMTRs). Inconsistencies have been identified and subsequently verified by Dravo. This effort has been completed and the results indicate the need for extending the preservice examination effort (surface and/or volumetric) to 80 additional pipe longitudinal-seam welds located in the following systems:

- . System EJ, Residual Heat Removal 63
longitudinal-seam welds
- . System EM, High Pressure Coolant Injection . . 16
longitudinal-seam welds
- . System EP, Accumulator Safety Injection 1
longitudinal-seam welds

The required field examinations have been satisfactorily completed and no weld problems were identified. Consequently, no relief requests are necessary. The Callaway PSI Program Plan is being revised to incorporate the additional pipe spools and will be forwarded to the NRC during the week of June 4, 1984. Upon revision and resubmittal of the updated plan, this matter can be considered resolved.

We would like to emphasize the fact that the inconsistencies in the piping supplier's as-built data sheets were identified and recorded in the course of scheduled inspections performed by the PSI examination agency. The inconsistencies were promptly reported to the NRC resident inspector. Once the nature and potential impact of these inconsistencies were recognized, management actions were initiated in the form of a system-by-system investigation of all Class 2 piping materials supplied by Dravo which are subject to preservice and/or inservice examination. The results of this investigation were reviewed with the responsible supplier and all identified inconsistencies confirmed through physical inspection of the particular piping materials in question. Upon completion of the investigation and verification of the results, follow-up action was promptly taken to extend the PSI effort to cover the additional seam weld

Mr. Harold R. Denton

June 3, 1984

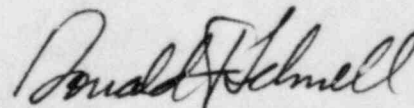
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examinations. These inspections have been performed by qualified examination personnel and the results have been reviewed by Union Electric. As previously indicated, all inspections were satisfactorily completed without difficulty or complication and no weld defects were found. We believe these actions demonstrate the effectiveness of the quality program in place at Callaway and provide further indication of Union Electric's continuing commitment to take prompt and aggressive action to assure the integrity of the Callaway Plant.

As an added precaution, the investigations described in this letter have been extended in part to the other Callaway piping supplier, Pullman-Kellogg. Stainless steel piping spools supplied by Pullman-Kellogg requiring PSI/ISI examination are limited to System BG, Chemical and Volume Control. Discussions with examination agency personnel indicate no inconsistencies similar to that reported with the Dravo piping materials. Representative Pullman-Kellogg documentation has been audited and the results of this audit confirm no inconsistencies between the Pullman-Kellogg data packages and the as-constructed condition of the piping spools. We believe this review provides further confirmation of the fact that the concerns described in this letter are limited to the discrepancies identified.

We trust the information provided in this letter will resolve any remaining questions you have concerning the Callaway PSI effort.

Very truly yours,



Donald F. Schnell

SJS/DS/lw

cc: William Forney, Region III
Richard DeYoung, Director, I&E
Bruce Little, USNRC/Cal
J. H. Neisler, USNRC/Cal

