#### U. S. NUCLEAR REGULATORY COMMISSION

Report No. 50-483/84-28(DE)

Docket No. 50-483

License No. CPPR-139

Licensee: The Union Electric Company

Post Office Box 149 St. Louis, MO 63166

Facility Name: Callaway, Unit 1

Inspection At: Callaway Site, Callaway County, MO

Inspection Conducted: Callaway site on May 31 and June 1, 1984

Inspector: N. C. Choules for

THANKINS, Chief Approved By:

Management Programs Section

6/14/84 Date

## Inspection Summary

Inspection on May 31 and June 1, 1984 (Report No. 50-483/84-28(DE)) Areas Inspected: Routine announced inspection to review previous unresolved and open items contained in Inspection Report No. 50-483/84-11. The inspection involved a total of 11 inspector hours onsite by one inspector. Results: No items of noncompliance or deviations were identified.

#### DETAILS

### Persons Contacted

#### Union Electric Company

\*A. P. Neuhalfen, Assistant Manager, Operations Maintenance

\*R. L. Power, Assistant Manager, QA

\*J. C. Gearhart, Supervising Engineer, QA Operations

J. E. McLaughin, Superintendent, Administration - Records

K. L. Wickes, Supervisor, Instrument Control (I&C)

\*J. A. McGraw, Supervising Engineer, Nuclear Engineering

M. E. Taylor, Superintendent, Operations

\*J. M. Shadduck, Engineer, Compliance

\*W. A. Norton, OA Engineer

P. Godt, QA Engineer

C. Norris, Metrology Lab Supervisors

C. Evans, Engineering Supervisor

C. Nasland, Assistant Superintendent Engineering

H. W. Need, Lead Configuration Engineer, Nuclear Engineering

C. S. Clark, Rad/Chem Foremen

J. Moose, Engineer, Engineering

#### USNRC

B. H. Little, Senior Resident Inspector (Operations)

\*Denotes those attending the exit interview on June 1, 1984.

# 2. Action on Previous Inspection Findings

- a. (Closed) Open Item (3/84-11-01): Revision of Procedure APA-ZZ-00600, "Design Change Control". The licensee had revised the procedure to include a review to assure that Callaway Modification Requests (CMR) are properly classified as safety or nonsafety related, the current approval route for CMRs is correct and the onsite Review Committee (ORC) review of Callaway Modification Packages (CMP) is documented by noting the ORC meeting number on the CMP form.
- b. (Closed) Open Item (483/84-11-03): Revision of Procedure EDP-ZZ-04005, "Design Change Review." The procedure had been revised to include requirements for installation procedures and defined the requirements for an independent reviewer of CMPs in accordance with ANSI 45.2.11, 1974.
- c. (Open) Open Item (483/84-11-04): Drawing control concerns (3 items). The licensee had completed the two items which they had previously agreed to complete by fuel load. These were the preparation of a list of "OP" drawings requiring update and revision of ADP-ZZ-20001 ("Control of Documents") to specify the distribution of updated "OP" drawings. In addition, procedure QE 340 ("Plant Configuration Status") had been revised to require updating "OP" drawings.

Regarding corrective action on the third item, the preparation of a drawing control procedure was in progress. Pending completion of the procedure this item remains open.

- d. (Open) Open Item (483/84-11-08): Independent verification of instrument valve positions. The licensee had issued a temporary instruction to require independent verification of instrument valve positions which meet its short term fuel load commitment. The licensee is in the process of revising surveillance and calibration procedures to require independent verification to meet long term commitments. This item will remain open until all applicable procedures have been revised to require independent verification of instrument valves.
- e. (Closed) Open Item (483/84-11-09): Preparation of locked valve list. The licensee has completed development and implemented a lock valve/breaker list.
- f. (Closed) Open Item (483/84-11-14): Application to utilize the 10 CFR 50, Appendix B QA program to satisfy 10 CFR 71 QA Program requirements. Union Electric has submitted a proposal to the NRC (NMSS) which outlined their intent to use the applicable parts of the approved 10 CFR 50, Appendix B, QA program to fulfill requirements of 10 CFR 71.101(b) in regards to a QA program for Packaging and Transportation of Radioactive Material as required by 10 CFR 71.101(f).
- g. (Closed) Open Item (483/84-11-16): Lack of procedure guidance to control the issuance of measuring and test equipment (M&TE). The licensee has revised APA-ZZ-00350, "M&TE Program". The procedure now specifies that M&TE inventory control is the responsibility of the individual departments which control M&TE. The two departments, I&C and Maintenance, have each developed procedures (IDP-ZZ-001 and MDP-ZZ-MT002) which cover the issuance and control of M&TE.
- h. (Closed) Unresolved Item (483/84-11-17): Lack of calibration specifications for four viscometer tubes. At the time this item was identified the licensee had not put the viscometers into the normal calibration system. One of the viscometers, J795, has been identified on a Preventive Maintenance (PM) task sheet which gives the calibration specifics. The other three viscometers have been placed in a hold area because they are not presently in use. They will be identified on PM task sheets if they are used. The viscometers are calibrated with ASTM Viscosity Standard S-3 purchased from Cannon Instrument Company. The standard is traceable to the National Bureau of Standards.
- i. (Open) Unresolved Item (483/84-11-18): M&TE instruments were not identified on usage cards, discrepancy reports needed additional evaluation, and permanent process instruments used during preoperational testing were not recorded on usage cards. Each of the above areas were inspected, evaluated, and corrective action had been taken or was in progress.

For the first item, a review of M&TE utilized in preoperational tests conducted prior to February 8, 1984 was made and a total of 75 devices failed recalibrations, were damaged, or were lost after use. The effect on the preoperational tests was evaluated and appropriate corrective action was taken.

For the second item, 600 Discrepancy Reports were reviewed.

Ninety-six were found to have inadequate or incomplete evaluations.

Forty-nine of these were cleared through further investigation and work requests were written to recalibrate plant instruments for the other 47 cases. For the third item, all process instruments used as sole source for obtaining data to support acceptance criteria for preoperational tests were recalibrated. System Engineers were notified of any discrepancies and these discrepancies were reviewed by the Joint Test Group (JTG) prior to final results package approval. Any outstanding discrepancies were addressed as JTG punch list items.

The above information was obtained from review of a Corrective Action Request (CAR)-002 status report dated May 30, 1984. The inspector reviewed some of the supporting data for the above report and the actions were adequate. However, at the time of this inspection, these items identified in CAR-002 had not been closed out by the QA department. This item will remain open pending closeout by QA and further review during a subsequent inspection.

### 3. Exit Interview

The inspector met with licensee representatives denoted in Paragraph 1 on June 1, 1984. The inspector discussed the scope and findings of the inspection.