

NOTICE OF VIOLATION

AND

PROPOSED IMPOSITION OF CIVIL PENALTY

Union Electric Company
Callaway Plant
Unit 1

Docket No. 50-483
License No. NPF-25
EA 84-97

During a routine inspection at the Callaway Plant site during the period of July 30 through August 3 and August 13 through 17, 1984, the NRC reviewed the circumstances associated with a violation of a technical specification limiting condition for operation. The violation involved operation in Mode 4 with both Containment Spray Systems inoperable. This violation was identified and promptly reported to the NRC by the licensee.

To emphasize the importance the NRC places on: (1) conducting licensed activities in accordance with established procedures, (2) providing adequate attention to detail to minimize personnel errors, and (3) being cognizant of abnormal conditions that may exist during facility operations, the Nuclear Regulatory Commission proposes to impose a civil penalty in the amount of Twenty-five Thousand Dollars (\$25,000) for this matter. This penalty reflects a reduction of 50% from the base penalty of \$50,000 for a Severity Level III violation in recognition of the licensee's prompt reporting and extensive corrective actions. In accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, as revised, 49 FR 8583 (March 8, 1984) and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended ("Act"), 42 U.S.C. 2282, PL 96-295 and 10 CFR 2.205, the particular violation and the associated civil penalty is set forth in Section I below:

I. Civil Penalty Violation

Technical Specification 3.6.2.1 states, "Two independent Containment Spray Systems shall be OPERABLE with each Containment Spray System capable of taking suction from the RWST and transferring suction to the containment sump." This requirement is applicable for operational Modes 1, 2, 3, and 4.

Technical Specification 3.0.3 states, "When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour ACTION shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in:

- a. At least HOT STANDBY within the next 6 hours,
- b. At least HCT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

8410230064 841019
PDR ADOCK 05000483
G PDR

OCT 19 1984

Contrary to the above, at 6:30 a.m.(CDT) on August 10, 1984, the licensee entered operational Mode 4 (hot shutdown) with Containment Spray manual isolation valves EN-V014 and EN-V018 closed and, therefore, with both Containment Spray Systems inoperable. The plant remained in Mode 4 with both valves closed until the closed valves were subsequently identified by the licensee and opened at 10:50 a.m.(CDT) on August 14, 1984.

This is a Severity Level III violation (Supplement I).
(Civil Penalty - \$25,000)

II. Violations Not Assessed A Civil Penalty

- A. 10 CFR Part 50, Appendix B, Criterion XVI, Corrective Action, states in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected..."

The Callaway Plant FSAR, Section 17.2.16, states in part, "Measures shall be established to assure that conditions adverse to quality are promptly identified, reported, and corrected..."

Contrary to the above, adequate measures were not established to assure that conditions adverse to quality were promptly identified and corrected in that a deficient Bechtel design drawing resulted in a card associated with bistable 456B being installed incorrectly. Although this condition existed since November 1983, it was not detected during preoperational testing and the licensee did not become aware of it until this condition caused an inadvertent safety injection which occurred on August 13, 1984 when bistable 456B was tripped during a loop calibration surveillance procedure. Additionally, the trip status of 456B was unknown because the indicator light for it on the Partial Trip Status Panel located in the Control Room was burned out. Work Request No. 30748 to relamp the Partial Trip Status Panel was authorized on July 28, 1984, with a requested completion date of August 1, 1984, although the work was not accomplished until August 13, 1984, after the inadvertent safety injection occurred.

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

- B. 10 CFR Part 50, Appendix B, Criterion V, states in part, "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."

Contrary to the above:

1. On August 3, 1984, during the removal of the No. 1 seal for Reactor Coolant Pump "C", Steps 5.8.4 and 5.8.5 of Procedure MPM-BB-QP001 were not accomplished. The seal was removed by

hand rather than by the required extension tray mounted to the articulated arm.

2. Work Request No. 31368, dated August 12, 1984, was written to repair the drive mechanism for the exterior door to the containment personnel air lock. Block (009) of the Work Request incorrectly stated that outage of this equipment would not affect a Limiting Condition for Operation (LCO). Procedure APA-ZZ-00320, Revision 3, "Initiating and Processing Work Requests," states, "The approval authority should check the

appropriate box if this component could cause an LCO, whether or not the specific work request requires that the component be OSS (Out of Service)." With the exterior door out of service, the plant was subject to the action statement of the LCO in Technical Specification 3.6.1.3.

3. Procedure ODP-ZZ-00002, Revision 1, "Equipment Status Control," states in part, "When a...component, or device which is safety-related or is otherwise required to be operable to satisfy technical specifications...is determined to be out of service the shift supervisor shall initiate Attachment 1, Equipment Out of Service Log Sheet...." While the exterior door to the containment personnel air lock was inoperable during repairs on August 13, 1984, the shift supervisor did not make an entry in the Equipment Out of Service log to indicate the door was inoperable.

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

The inspection showed that action has been taken to correct the items of noncompliance identified in II.B. and to prevent recurrence. Consequently, no reply to these items of noncompliance is required and we have no further questions regarding this item.

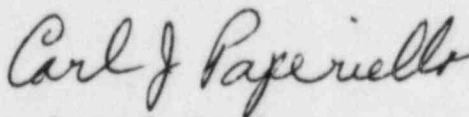
Pursuant to the provisions of 10 CFR 2.201, Union Electric Company is hereby required to submit to the Director, Office of Inspection and Enforcement, U. S. Nuclear Regulatory Commission, Washington, D.C., 20555, with a copy to the Regional Administrator, U. S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, IL 60137, within 30 days of the date of this Notice a written statement or explanation, including for each alleged violation except II.B: (1) admission or denial of the alleged violation; (2) the reasons for the violation, if admitted; (3) the corrective steps which have been taken and the results achieved; (4) the corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

OCT 19 1984

Within the same time as provided for the response required above under 10 CFR 2.201, Union Electric Company may pay the civil penalty in the amount of \$25,000 or may protest imposition of the civil penalty, in whole or in part, by a written answer. Should Union Electric Company fail to answer within the time specified, the Director, Office of Inspection and Enforcement, will issue an order imposing the civil penalty proposed above. Should Union Electric Company elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty such answer may: (1) deny the violation listed in this Notice in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty. In requesting mitigation of the proposed penalty, the five factors contained in Section V(B) of 10 CFR Part 2, Appendix C should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate statements or explanations by specific reference (e.g., giving page and paragraph numbers) to avoid repetition. The Union Electric Company's attention is directed to the other provisions of 10 CFR 2.205, regarding the procedures for imposing a civil penalty.

Upon failure to pay any civil penalty due, which has been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION



for James G. Keppler
Regional Administrator

Dated at Glen Ellyn, Illinois
this 10/19 of October 1984