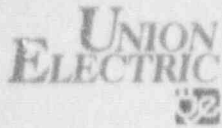


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January 28, 1993

Donald F. Schnell
Senior Vice President
Nuclear

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

ULNRC -2753

Gentlemen:

**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/92015
CALLAWAY PLANT**

This responds to Mr. Edward G. Greenman's letter dated December 31, 1992, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/92015. Our response to the violation is presented below.

None of the material in the response is considered proprietary by Union Electric Company.

Statement of Violation

During an NRC inspection conducted on October 1 through November 30, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Callaway Station Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, i.e., recommends administrative procedures be established for equipment control (e.g., locking and tagging).

Callaway Operations Department Procedure ODP-ZZ-00004, "Locked Component Control," Revision 13, dated March 24, 1992, Attachment 1, "Locked Component List (Q)," specifies that valve BG V-0027 be locked closed with a seal type locking device.

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Contrary to the above, on November 15, 1992, valve BG V-0027 was found closed, but was not locked with a seal type locking device.

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

Reason for the Violation

Valve BG V-0027 is used to isolate sluice water to a demineralizer in the Chemical and Volume Control System. The valve was found in the correct position; however, a locking device was not installed on the valve.

Operations personnel had removed the locking device and placed a local control tag on valve BG V-0027 on August 4, 1992 to allow operation of the valve during resin changeout and inspection of the CVCS Mixed Bed Demineralizer. Upon completion of the resin changeout and inspection, the valve was closed. The local control tag was cleared on November 12, 1992. The tagging control sheet specified the restored position of the valve as closed rather than locked closed per the normal operating procedure checklist and the locked component procedure. The licensed operators involved in the preparation, review and approval of the tagging did not identify that the valve should have been locked closed rather than just closed.

Corrective Steps that have been taken and results achieved:

A locking device was installed on BG V-0027 at the time of discovery.

Operations personnel performed a walkdown of accessible components listed in the locked component procedure. All discrepancies noted were documented and either locking devices were installed or components were listed in the locked component deviation log as appropriate.

Corrective steps that will be taken to avoid further violations:

Personnel involved with the improper tagging of BG V-0027 have been instructed on expectations and procedural requirements for proper restoration.

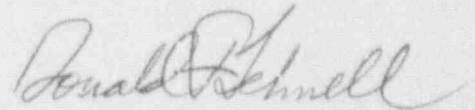
While we consider the preceding to be adequate corrective action for the violation identified in the inspection report, additional corrective action may improve our program. We will therefore evaluate a modification to the Workman's Protection Assurance computer program to enhance availability of information to personnel preparing WPA tagging. Such modification would display the proper locked position of any component controlled by procedure ODP-ZZ-00004 as the 'restore' position when WPA tagging is developed.

Date when full compliance will be achieved:

Full compliance was achieved by January 28, 1993.

If you have any questions regarding this response, or if additional information is required, please let me know.

Very truly yours,



Donald F. Schnell

DFS/tmw

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