

UNION ELECTRIC COMPANY

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DONALD F. SCHNELL
VICE PRESIDENT

August 30, 1984

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Mr. R. L. Spessard, Director
Division of Engineering
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Spessard:

ULNRC-915

INSPECTION REPORT NO. 50-483/84-31

This reply is in response to your letter July 30, 1984 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of June 11 through July 13, 1984. Our response to the item of noncompliance is presented below.

None of the material in the inspection report or in this response is considered proprietary by Union Electric Company.

(50-483/84-31-02) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion V, as implemented by SNUPPS Quality Assurance Programs for Design and Construction, Section 17.1.5, and Startup Administration Instruction, SAI-5, requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

Contrary to the above, preoperational test CS-03NE01, Rev. 0, Diesel Generator Electrical Test was not performed as required by the procedure in that the required period of time between data sheet entries was not observed during the thirty-five start sequence. Test log entries were not sufficient to ensure that the requirements of Regulatory Guide 1.108 for valid tests had been met. Further, the Joint Test Group (JTG) failed to recognize this discrepancy or evaluate it for its impact on the acceptability of the results package.

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Response

Corrective Action Taken And The Results Achieved

Union Electric Nuclear Operations Engineering issued Request for Resolution RFR-00225 to identify and track the apparent discrepancy between the requirements of Regulatory Guide 1.108 and pre-operational test procedure CS-03NE01. The test has been reevaluated and the results have been found to be acceptable.

Regulatory Guide 1.108 recommends that the diesel generators be loaded to at least 50% of continuous rating and run for at least one hour. Test procedure CS-03NE01 is more restrictive in that it requires that there be at least one hour between taking data after loading the diesel generators and taking data prior to unloading the diesel generators.

Reevaluation of the test log entries with regard to closing and opening circuit breakers NB0111 and NB0211 to determine the loading and unloading of the diesel generators indicates that the loaded one hour run time recommended by the Regulatory Guide was satisfied.

Reevaluation of the data sheet entries reveals that the one hour time lag between entries was not always met. However, a comparison of data parameters for tests that have less than one hour between entries with parameters for tests that have at least one hour between entries indicates the diesel generators had stabilized.

Therefore, it has been determined that although the data sheet entries do not reflect verbatim procedural adherence, the test log entries assure that the intent of the Regulatory Guide and the procedure had been met.

The pre-operational test phase has been completed and the JTG has been dissolved. It appears that the JTG evaluated the loaded run times for the diesel generators based upon the operations of the circuit breakers, and no comment was made by the JTG because the requirement of the Regulatory Guide had been met based on test log information.

Corrective Action To Be Taken To Avoid Further Noncompliance

To ensure that future reference to test procedure CS-03NE01 does not create a similar apparent discrepancy as described above, a copy of RFR-00225 has been included in the CS-03NE01 record file.

No further corrective action is considered necessary, since the pre-operational test phase has been completed.

Mr. R. L. Spessard

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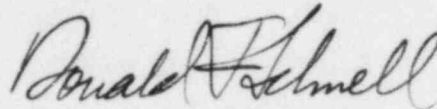
August 30, 1984

Date When Full Compliance Will Be Achieved

Full compliance was achieved with closure of RFR-00225 and its inclusion in the CS-03NE01 record file. This action was completed on August 13, 1984.

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

Very truly yours,



Donald F. Schnell

SEM/JRV/gbg

cc: W. L. Forney, NRC Region III
NRC Resident Inspectors, Callaway Plant (2)
Missouri Public Service Commission