



**UNION ELECTRIC COMPANY**

1901 Gratiot Street, St. Louis

November 8, 1984

Donald F. Schnell  
Vice President

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

Dear Mr. Spessard:

ULNRC-969

INSPECTION REPORT NO. 50-483/84-44

This reply is in response to your letter of October 12, 1984 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of September 25-27 and October 2-3, 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.

(50-483/84-44-01) SEVERITY LEVEL V VIOLATION

10 CFR 50, Appendix B, Criterion V, as implemented by the Union Electric Quality Assurance Manual, requires that activities affecting quality be prescribed by documented procedures which shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Contrary to the above:

1. The procedure for evaluation of level V (commercial grade) commodities, WEP-ZZ-00001, did not provide complete guidance for the justification of commercial grade purchases.
2. The procedure for procurement, APA-ZZ-00400, did not provide adequate guidance to ensure that the appropriate quality characteristics were verified upon receipt as required by ANSI N45.2.13-1976.

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Response

Corrective Action Taken And The Results Achieved

A representative sample of 72 purchase orders which were closed after January 1, 1984 was reviewed. From this review it was concluded that, except as noted below, the items were either nonsafety-related or had sufficient justification to procure them as commercial grade items.

The above review revealed that one molded case circuit breaker utilized in Class 1E motor control centers was procured commercial grade. This breaker had not been issued to the field and has been placed on hold. A review has been made of other molded case circuit breakers stocked as spare parts for Class 1E motor control centers. None of these had been procured commercial grade. The procurement of this single molded case circuit breaker as commercial grade is considered an isolated case.

Corrective Action To Be Taken To Avoid Further Noncompliance

Interim guidelines established by the NRC will be followed until procedures WEP-ZZ-00001 and APA-ZZ-00400 are revised as indicated below.

WEP-ZZ-00001 will be revised to insure that applicable industry standards are referenced on procurement documents and additional guidance is provided for the justification of commercial grade purchases.

APA-ZZ-00400 will be revised to provide guidance on receipt inspection regarding the methods of acceptance utilized for commercial grade procurements as required by ANSI N45.2.13-1976, paragraph 10.3.2.

These revisions will require better documentation of the evaluations, justifications, and methods of acceptance associated with commercial grade procurements.

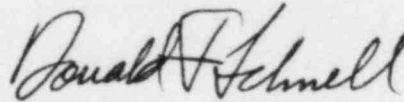
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Date When Full Compliance Will Be Achieved

Revisions to WEP-ZZ-00001 and APA-ZZ-00400 are scheduled to be issued by December 14, 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/kc

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