



**UNION ELECTRIC COMPANY**

1901 Gratiot Street, St. Louis

November 15, 1984

Donald F. Schnell  
Vice President

Mr. Richard C. DeYoung, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. DeYoung:

ULNRC- 976

INSPECTION REPORT NO. 50-483/84-36

This reply is in response to your letter of October 19, 1984 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of July 30 through August 3 and August 13-17, 1984. Our responses to the items of noncompliance are presented below in the order listed within the body of inspection report number 50-483/84-36.

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

(50-483/84-36-01) SEVERITY LEVEL III VIOLATION (Civil Penalty)

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 HOT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

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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.

### Response

#### Admission or Denial of the Alleged Violation

As previously noted in Licensee Event Report 84-029-00 transmitted to the NRC September 10, 1984, Union Electric acknowledges the cited violations.

#### Reasons for the Violation If Admitted

The reasons for the violation were failure to follow procedures and orders and failure to recognize the interrelationships among administrative controls as listed below:

- o On May 7, 1984 Containment Spray manual isolation valves (EN-V014 and EN-V018) were closed, locked and tagged on Workman's Protection Assurance (WPA) 84-3252 to prevent inadvertent discharge into containment. At this time, the valves were not entered on the Equipment Out of Service Log (EOSL).
- o On May 9, 1984 valves EN-V014, EN-V018 and EN-V097 were noted as exceptions upon completion of OTN-EN-00001, but their status was not entered in the EOSL as required by Standing Order 84-24.
- o On August 3, 1984 in preparation for entering Mode 4 a review was made of WPA. WPA 84-3252 for valves EN-V014 and EN-V018 was not identified as being required for Mode 4.
- o On August 8, 1984 Temporary Change Notice (TCN) 84-945 to ODP-ZZ-00014 was executed to delete the sign-off requirement for the review of the EOSL, the WPA log review, and the Temporary Modification log review.
- o On August 10, 1984 Mode 4 was entered.
- o On August 14, 1984 WPA 84-3252 showing valves EN-V014 and EN-V018 closed was found. These valves were subsequently opened, locked and independently verified.

#### Corrective Actions Taken And The Results Achieved

On August 14, 1984 upon discovery of the Containment Spray Manual Isolation valves being locked closed, the valves were immediately opened, locked, and independently verified. Also when the EOSL was found to be out of date, immediate reviews of the Surveillance Master Tracking log, outstanding Work Requests, outstanding WPA, and outstanding Temporary Modifications were initiated against the EOSL to bring it up to date. These reviews were completed and the EOSL brought up to date on August 20, 1984. The individuals responsible for not entering EN-V014 and EN-V018 in the EOSL were counseled by August 30, 1984.

The Plant Manager and/or the Assistant Plant Managers held a series of meetings with plant staff and support personnel. The purpose of these meetings was to re-emphasize management's determination to ensure compliance with Callaway operating procedures and Technical Specifications to all levels of the work force, highlight the recent Callaway events, and stress the necessity for improving individual performance, group performance, and communication. These meetings were completed September 7, 1984.

In addition, on August 20, 1984 the content of Standing Order 84-24 was incorporated into ODP-ZZ-00002, Equipment Status Control, and APA-ZZ-00310, Workman's Protection Assurance.

And finally, on August 15, 1984 TCN 84-945, which removed the requirement for review of EOSL, WPA, and Temporary Modifications, was eliminated by a revision to procedure ODP-ZZ-00014, Operational Mode Change Requirements. This revision also included the requirement to do the same reviews for all mode ascensions. It previously applied to the change from Mode 5 to Mode 4 only. The individuals who initiated TCN 84-945 were counseled on August 17, 1984 and August 19, 1984. They had been aware of the limitations imposed on temporary changes and had not intended the TCN to delete the reviews of the EOSL, WPA, and Temporary Modifications. They had intended only to delete what they believed to be redundant documentation of the reviews. As an added precaution, a letter was issued on August 18, 1984 to Nuclear Operations personnel and contractors emphasizing the limitations on the use of temporary changes.

#### Corrective Actions To Be Taken To Avoid Further Violations

No further corrective action is considered necessary.

#### Date When Full Compliance Will Be Achieved

Union Electric achieved full compliance September 7, 1984.

Proposed Civil Penalty

Union Electric acknowledges the cited violation and appreciates the reduction in the amount of civil penalty from the base amount. However, we feel there are additional circumstances which may not have been considered and should result in complete mitigation of the penalty.

The subject Severity Level III Violation is the only Severity Level III Violation Union Electric has received. This incident regarding the containment spray valves is the first and only incident of that nature to have occurred at Callaway.

The Commission's General Policy and Procedures for Enforcement Actions provide that civil penalties "are considered for Severity Level III Violations." In contrast, the Policy is to impose civil penalties for Severity Level I Violations and to impose civil penalties "absent mitigating circumstances" for Severity Level II Violations (10 C.F.R. Part 2, Appendix C, Section V.B.). More specifically, the Commission's Policy indicates that a civil penalty may be considered appropriate for the second and subsequent Severity Level III Violations of a "similar" nature (10 C.F.R. Part 2, Appendix C, Section V.D., Table 2). In making the most recent change to Table 2, the Commission stated: "Table 2 has been changed to indicate that a civil penalty might not be imposed for the first Severity Level III Violation in an area of concern . . . ." 49 Fed. Reg. 8586 (March 8, 1984).

In addition, 10CFR2, Appendix C, V.B.1., 2. and 3. provide reductions of civil penalties of 50%, 50% and 100% respectively for prompt identification and reporting, corrective action to prevent recurrence, and good prior performance. We feel that the Callaway Plant staff took timely action regarding identification, reporting and corrective action and has demonstrated good prior performance.

For these reasons, Union Electric Company believes that the proposed penalty should be reduced by 100% rather than only 50% and we request your reconsideration of these factors. Nevertheless, if your position is that these factors do not justify a further reduction in the penalty, the proposed penalty of \$25,000 will be paid and we will not further contest it. Please advise us of your decision.

(50-483/84-36-03) SEVERITY LEVEL IV VIOLATION

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 nonconformance 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.

#### Response

#### Corrective Action Taken and The Results Achieved

The circumstances regarding this item were reported to the NRC by Licensee Event Report (LER) 50-483/84-028-00 transmitted to the NRC September 11, 1984.

As stated in the LER, three of the four instrument channels that monitor RCS pressure feed a permissive circuit (P-11) which permits blocking of the Pressurizer Low Pressure/Steamline Low Pressure Safety Injection (SI) signals at low RCS pressures. Prior to this event, P-11 was in the "BLOCK" mode as the plant was in Mode 4 and at low RCS pressure. Also, one of the three pressure loops (Loop 456) that make up the 2 out of 3 coincidence logic for P-11 was failed in the tripped state due to incorrect strapping on the associated bistable. This design error caused the bistable to provide a tripped output when plant conditions did not require it. This trip went undetected due to failed lamps on the associated window of the Partial Trip Status Panel. Also, the initial surveillance tests had not yet been performed on any of these pressure loops prior to this event. Thus, when the pressure loop (Loop 455) being calibrated was placed in test, the required 2 out of 3 coincidence for P-11 was satisfied, the block of the SI signal was automatically reset and the Pressurizer Low Pressure SI signal initiated.

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The failed lamps in the Partial Trip Status Panel have been replaced and the bistable that resets P-11 on Loop 456 has been corrected to prevent the false output. A step was added to procedure ISL-BB-0P455 on August 21, 1984 to require a lamp test on the Partial Trip Status Panel prior to putting an instrument channel in the test mode.

Corrective Action To Be Taken To Avoid Further Noncompliance

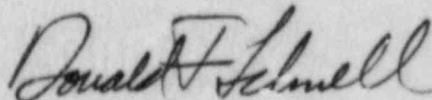
A step similar to the one added to ISL-BB-0P455 is being added to other applicable Instrumentation and Control procedures.

Date When Full Compliance Will Be Achieved

Procedure revisions are expected to be completed by December 7, 1984.

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

Very truly yours,



Donald F. Schnell

SEM/JRV/bjk

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

STATE OF MISSOURI )  
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CITY OF ST. LOUIS )

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell  
Donald F. Schnell  
Vice President  
Nuclear

SUBSCRIBED and sworn to before me this 15<sup>th</sup> day of November, 1984.

Barbara J. Pfaff  
BARBARA J. PFAFF  
NOTARY PUBLIC, STATE OF MISSOURI  
MY COMMISSION EXPIRES APRIL 22, 1985  
ST. LOUIS COUNTY