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Donald F. Schnell
Vice President

October 26, 1984

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- 959

INSPECTION REPORT NO. 50-483/84-34

This reply is in response to your letter of September 28, 1984 which transmitted the report of the inspection conducted at Callaway Plant, Unit 1 during the period of July 16 through August 30, 1984. Our response to the individual segments of the item of noncompliance is presented below in the order listed within the body of inspection report number 50-483/84-34.

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

(50-483/84-34-01) SEVERITY LEVEL IV 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:

1. A suspect deficient condition was identified and documented in the test log for CS-03NF02 Rev. 0 "LOCA Sequencer" for which no Startup Field Report (SFR) was initiated as required by SAI-12, "Test Program Problem Resolution". Further, the Joint Test Group (JTG) evaluated and approved the results package without requesting that an SFR be initiated to resolve the possible deficient condition.

OCT 29 1984

Response

Corrective Action Taken And The Results Achieved

The test log entry states that there was a substantial water hammer or check valve "slam" when service water was restored. Because of leakage of service water to the UHS, WR-025113 was issued June 7, 1984, to disassemble, inspect, and rework the valve seats of check valves V-001 and V-004. The valves were tested in accordance with the vendor instruction manual to determine if cracking had occurred.

The results of the examination showed that no valve damage was present. Some rough areas were noted on the valve seat and disc surface of V-001, but these were determined to have no effect on the ability of the valve to perform its designed function.

Operational Surveillance Procedures OSP-EF-P001A and OSP-EF-P001B were successfully completed during ESFAS testing which verified the valves' operability after internal inspection.

It should be noted that valve slamming is normal for these valves by design. Slamming occurs due to the sudden surge of essential service water against piping which is not completely filled downstream of the check valves in question.

A copy of this response has been included in the CS-03NF02 Pre-operational Test Results Package as a supplemental record for future reference.

Corrective Action Taken To Avoid Further Noncompliance

The JTG is no longer a functional body at Callaway. Although the above identified problem should have been addressed by the JTG in accordance with the Pre-operational Start-up Program, corrective action was taken by Plant Operations and Maintenance based on service water leakage past the check valves back to the UHS.

Should significant leakage occur in the future which would be indicative of valve loss of passive integrity, inspections including the disassemblage of the valve(s) will be undertaken by Plant Operations and Maintenance.

Date When Full Compliance Will Be Achieved

Disassembly and inspection of V-001 and V-004 were completed on June 12, 1984. Results were satisfactory. ESFAS testing was performed in July 1984, which provided evidence that the valves in question were functioning as designed.

2. Normal operating procedures for the Residual Heat Removal System, OTN-EJ-00001, R1, and Containment Spray System, OTN-EN-00001, R0, were written and approved without adequate instructions for filling and venting to assure their operability in the post Loss of Coolant Accident (LOCA) recirculation mode of operation.

Response

Corrective Action Taken And The Results Achieved

The normal operating procedure for the Residual Heat Removal System and the Containment Spray System was revised to reflect comments addressed by Inspection Report 50-483/84-34. The necessity of venting this piping is still in question. The venting is being tracked with Surveillance Task numbers ST-00136 and ST-00137 which cover EN and EJ systems.

Corrective Action To Be Taken To Avoid Further Noncompliance

Evaluation of the continued need for these tasks will be made at some future date by Nuclear Engineering. To prevent future noncompliances, Plant Engineering will review all operational technical procedures.

Date When Full Compliance Will Be Achieved

Union Electric achieved full compliance August 5, 1984.

3. The surveillance procedure for determining Reactor Coolant System (RCS) leakage as required by Technical Specifications 3.4.6.2.d and f (procedure No. OSP-BB-00009, R0, "RCS Inventory Balance") was written and approved with technical errors that made the procedure invalid for the purpose intended.

Response

Corrective Action Taken And The Results Achieved

As part of Union Electric's Procedure Development Program, OSP-BB-00009 was issued as Revision 0 approximately one year prior to issuance of the final Technical Specifications. The procedure was in review for Revision 1 at the time of the NRC inspection and was issued during the NRC visit. Revision 1 corrected the NRC identified deficiency and was issued concurrent with the initial performance of the procedure. Subsequent review indicated the need for Revision 2, which was issued August 31, 1984.

Corrective Action To Be Taken To Avoid Further Noncompliance

Minor parameter differences may become apparent when the Tank Data Book is issued in final approved form. This is scheduled to be completed by November 30, 1984. A Revision 3 may be written and issued as a result of these minor changes.

Date When Full Compliance Will Be Achieved

Full compliance was achieved August 31, 1984.

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

Very truly yours,

Robert F. Schnell

for Donald F. Schnell

SEM/JRV/le

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