

1901 Chouteau Avenue
Post Office Box 149
St. Louis, Missouri 63166
314-554-2650



April 30, 1996

Donald F. Schnell
Senior Vice President
Nuclear

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

ULNRC-3368

Gentlemen:

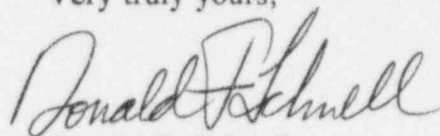
**REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-483/96002
CALLAWAY PLANT**

This responds to Mr. J. E. Dyer's letter dated April 2, 1996, which transmitted a Notice of Violation for events discussed in Inspection Report 50-483/96002. Our response to the violation is presented in the attachment.

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

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

Attachment: 1) Response to Violation

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cc: Mr. L. J. Callan
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

NRC Resident Inspector

Ms. Kristine M. Thomas
Licensing Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop 13-E-21
Washington, DC 20555

Manager, Electric Department
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Mr. Thomas A. Baxter
Shaw, Pittman, Potts, & Trowbridge
2300 N. Street N.W.
Washington, DC 20037

Manager, Plant Support
Wolf Creek Nuclear Operating Corporation
PO Box 411
Burlington, KS 66839

Statement of Violation

During an NRC inspection conducted on February 4 through March 16, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

Callaway Plant Technical Specification 6.8.1.a states 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, paragraph 9.a, requires that maintenance that can affect the performance of safety-related equipment be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Section 4.11 of Administrative Procedure APA-ZZ-00330 requires that Preventive Maintenance Deferral Notices be processed when an extension of a preventive maintenance activity late date becomes necessary.

Contrary to the above, on February 28, 1996, Preventive Maintenance Deferral Notices were not processed on the following pieces of safety-related equipment when the time interval for performing the preventive maintenance had expired as described below:

- Inspect and clean Component Cooling Water Heat Exchanger B - late January 12, 1996;
- Check tripping sequence of feeder breaker to Component Cooling Water Pump A - late October 27, 1995;
- Calibrate time delay relay of Component Cooling Water Pump A - late July 1, 1995;
- Calibrate time delay relay of Component Cooling Water Pump C - late July 1, 1995;
- Sample outboard bearing oil of Motor-Driven Auxiliary Feedwater Pump B - late November 28, 1995;
- Inspect coupling and pins on Charging Pump A main lubricating pump - late December 31, 1995.

This is a Severity Level IV violation (Supplement 1) (483/9602-01).

Reason for the Violation

Failure of responsible personnel to adhere to the requirements of the preventive maintenance (PM) program for safety related equipment.

Corrective Steps Taken and Results Achieved:

The consequences of late notices for the six subject PMs were evaluated by Engineering. No adverse effect on equipment, plant safety or reliability could be identified. The PMs have subsequently been completed or rescheduled within an acceptable time. A check of the remaining PMs on safety related equipment revealed no other program discrepancies. Typically, over 3400 safety related PMs are completed annually at Callaway.

Corrective Steps to Avoid Further Violations:

The Callaway Plant PM program in conjunction with surveillance testing, predictive performance monitoring and trend analysis, is designed to insure the operational readiness of plant equipment. Generally, if a PM task is not performed by the scheduled "late date", this does not result in an immediate operability concern. Nonetheless, we have implemented administrative improvements in the PM program designed to ensure that PM tasks are scheduled before their late date and that tasks not able to be performed as scheduled are promptly identified, evaluated and dispositioned.

A software lock has been placed in the computerized Callaway Work Control System database to prevent the PM schedule date from being extended beyond the late date without completion of the above-noted deferral process.

Failure to adhere to program requirements was also discussed with the personnel involved. This discussion provided management expectations and clarified individual responsibilities.

Date when Full Compliance will be Achieved:

Full compliance was achieved by February 23, 1996