

JCD/KCB (RSDS)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

DEC 31 1992

Docket No. 50-483
License No. NPF-30
EA 92-249

Union Electric Company
ATTN: Mr. Donald F. Schnell
Senior Vice President - Nuclear
Post Office Box 149 - Mail Code 400
St. Louis, MO 63166

Dear Mr. Schnell:

This refers to the inspection conducted by Mr. B. L. Bartlett, and Ms. D. R. Calhoun, of this office on October 1, through December 18, 1992. The inspection included a review of activities authorized for your Callaway facility, Unit 1. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation involved the discovery by the resident inspector that a valve in the chemical and volume control system was not locked as required. We understand that your recent audit of your locked valve program also uncovered similar discrepancies.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In addition, one apparent violation was identified, and is being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C. The apparent violation for which escalated enforcement is being considered involves the failure to properly set the close limit switch for a safety-related valve. Accordingly, no Notice of Violation is presently being issued for this inspection finding. Please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

9301120034 921231 110065
PDR ADOCK 05000483
G PDR

LEO/11

DEC 31 1992

Union Electric Company

2

An enforcement conference to discuss this apparent violation has been scheduled for January 12, 1993, at 1:00 p.m., in the NRC Region III office. This enforcement conference will be open to public observation in accordance with the Commission's trial program. The purposes of this conference are to discuss the apparent violation, its causes and safety significance; to provide you the opportunity to point out any errors in our inspection report; to provide an opportunity for you to present your proposed corrective actions; and to discuss any other information that will help us determine the appropriate enforcement action in accordance with the Enforcement Policy. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding the apparent violation is required at this time.

During the enforcement conference, you should be prepared to discuss: 1) the apparent miscommunication between the two crews of electricians as to the interim and final setting of the butterfly valve's limit switch; 2) the apparent misunderstanding of the electricians as to the capability of MOVATS testing; 3) the reasons why the close limit switch setting error was not identified during post-maintenance testing; and 4) the inability of equipment operators to identify incomplete stroking of the valve.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,



Edward G. Greenman, Director
Division of Reactor Projects

Enclosures:

1. Notice of Violation
2. Inspection Report
No. 50-483/92015(DRP)

See Attached Distribution

Union Electric Company

3

Distribution

cc w/enclosure:

G. L. Randolph, Vice President,
Nuclear OperationsJ. V. Laux, Manager,
Quality AssuranceTom P. Sharkey, Supervising Engineer,
Site Licensing

DCD/DCB (RIDS)

Licensing Fee Management Branch

Resident Inspector, RIII

Region IV

Resident Inspector, Wolf Creek

K. Drey

Chris R. Rogers, P. E.

Utility Division, Missouri

Public Service Commission

CFA, Inc.

Gerald Charnoff, Esq.

Thomas Baxter, Esq.

R. A. Kucera, Deputy Director

Department of Natural Resources

L. R. Wharton, Licensing Project Mgr., NRR

A. T. Gody, Chief, Inspection and Licensing Programs
Branch, NRR (OWFN 12-E-4)

J. Lieberman, Director, OE

J. G. Partlow, NRR

J. R. Goldberg, OGC