



UNION ELECTRIC COMPANY

1901 Gratiot Street, St. Louis

May 17, 1985

Donald F. Schnell
Vice President

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

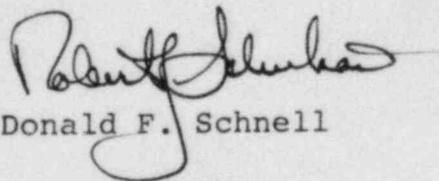
ULNRC-1098

DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT, UNIT 1
GENERIC LETTER 83-28

- References:
1. Youngblood to Schnell letter dated 3-13-85, Request for Additional Information Following Preliminary Staff Review of Licensee Responses to Generic Letter 83-28
 2. ULNRC-1002 dated 12-27-84, same subject
 3. ULNRC-829 dated 5-21-84, same subject
 4. ULNRC-763 dated 3-12-84, same subject
 5. ULNRC-687 dated 11-18-83, same subject

Reference one transmitted several NRC requests for additional information regarding Union Electric Company's implementation of Staff positions in Generic Letter 83-28. The attachment provides the requested information. Should you have further questions after reviewing the attachment, please contact us.

Very truly yours,


for Donald F. Schnell

GGY/lw

Attachment: Responses to NRC
Information Requests

8505220023 850517
PDR ADDCK 05000483
P PDR

Aoss
1/1

cc: Gerald Charnoff, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M. Street, N.W.
Washington, D.C. 20036

Nicholas A. Petrick
Executive Director
SNUPPS
5 Choke Cherry Road
Rockville, Maryland 20850

John H. Neisler
Callaway Resident Office
U.S. Nuclear Regulatory Commission
RR#1
Steedman, Missouri 65077

William Forney
Division of Projects and
Resident Programs, Chief, Section 1A
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Bruce Little
Callaway Resident Office
U.S. Nuclear Regulatory Commission
RR#1
Steedman, Missouri 65077

Tom Alexion
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop P-316
7920 Norfolk Avenue
Bethesda, MD 20014

ATTACHMENTNRC Request - Item 2.1 (Part 1)

The licensee must supply a statement confirming that reactor trip system components were reviewed and that they are identified as safety-related on documents, procedures, and information handling systems.

Union Electric Response - Item 2.1 (Part 1)

All components whose functioning is required to trip the reactor were reviewed and are identified as safety-related in accordance with Callaway Plant administrative procedures. The Callaway Q-List, as described in references 4 and 5, contains these components and is controlled by Administrative Procedure APA-ZZ-00430 and Departmental Procedure WEP-ZZ-00011. Additionally, these components are classified as safety-related on CHAMPS (Computerized History and Maintenance Planning System) which is used for generation of Work Requests, Surveillances, and Preventive Maintenance tasking. Our DS-416 reactor trip breaker maintenance manual, M-766-1175, contains the following caution statement:

"DS-416 Reactor Trip Circuit Breaker is classified as Class 1E equipment and is critical to reactor safety. Therefore, personnel performing maintenance should be aware of the safety significance of this equipment."

NRC Request - Item 2.1 (Part 2)

The licensee needs to submit detailed information describing their vendor interface program for reactor trip system components, including any non-NSSS reactor trip system components. Information supplied should state how the program assures that vendor technical information is kept complete, current and controlled throughout the life of the plant and should also indicate how the program will be implemented at Callaway 1.

Union Electric Response - Item 2.1 (Part 2)

The Westinghouse interface program was described in detail in reference 5 and summarized hereinafter. This program consists of the controlled distribution of Technical Bulletins by Westinghouse and implementation, as appropriate, by Union Electric. These Technical Bulletins are transmitted with a receipt acknowledgement form which is signed and returned to Westinghouse. Union Electric reviews each Technical Bulletin for applicability and, if applicable, revises operating and maintenance procedures as needed. In addition, Union Electric and Westinghouse have entered into a Service Agreement which controls NSSS vendor activities at Callaway. All work on NSSS

components performed by Westinghouse Water Reactors Division is subject to the controls of approved QA programs. Non-NSSS reactor trip system components are covered under the response to Item 2.2.2 below.

NRC Request - Item 2.2.2

The licensee needs to describe how the recommendations of the NUTAC program will be implemented at Callaway 1. The staff found that the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility. Accordingly, the licensee will need to supplement his response to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet each element of Item 2.2.2 concern.

Union Electric Response - Item 2.2.2

The Vendor Equipment Technical Information Program (VETIP) as defined in the March 1984 NUTAC document is considered a valid response to all concerns presented in Item 2.2.2 of NRC Generic Letter 83-28. Union Electric will implement this program as described herein.

The VETIP program addresses vendor interface via the Nuclear Plant Reliability Data System (NPRDS) and Significant Event Evaluation and Information Network (SEE-IN). Union Electric provides equipment failure data to the NPRDS and reviews SEE-IN documents. In this way industry operating experience is accumulated and disseminated in the most cost-effective manner.

The NPRDS reporting system is in place and being utilized at Callaway Plant. The NUTAC recommended enhancements are currently being incorporated into our NPRDS procedures with an expected completion date of August 1, 1985. Total implementation of the program is to be complete by September 1, 1985 per our commitment in references 2 and 3.

The SEE-IN review program is in place at Callaway Plant, controlled by Administrative Procedure APA-ZZ-00530 and Quality Standard QS-21. INPO formally screens nuclear plant events as identified by operating experience entries in Nuclear NETWORK, LER's, monthly operating reports, IE Bulletins and Notices, AEOD reports, event-related Generic Letters, NSSS technical bulletins, reports made pursuant to 10CFR21 and 10CFR50.55(e), and significant trends from INPO's NPRDS and LER data bases. This screening process identifies significant events and trends which are then analyzed by INPO for the purpose of developing remedial actions. This information is disseminated to the industry via NETWORK in the form of a Significant Event Report (SER). For events requiring utility action, remedial action recommendations are disseminated via Significant Operating Experience Reports (SOER's) which Union Electric evaluates and acts upon, as

appropriate. Events that aren't significant but yield valuable operations and maintenance information are issued in the form of an Operations and Maintenance Reminder (O&MR). The SEE-IN program provides copies of draft SER's, SOER's, and O&MR's to the affected vendors for review. Vendor comments are considered in preparation of final SEE-IN reports. Once finalized, the reports are sent to the utilities. These reports are formally reviewed at Union Electric by the onsite Independent Safety Engineering Group (ISEG) as discussed in the Callaway FSAR Site Addendum, Sections 18.1.7.2 and 18.1.12.2.

Further evidence of Union Electric's adherence to the Staff positions in Item 2.2.2 is seen in the following Administrative and Departmental procedures:

- (i) APA-ZZ-00141 controls and documents revisions to approved vendor manuals via vendor manual change notices (VMCN's).
- (ii) APA-ZZ-00101 covers the incorporation of references (e.g., vendor technical information) in maintenance and operations procedures.
- (iii) PDP-ZZ-00001 and -00002 implement CHAMPS which is a set of computer programs and data files used to provide information on plant equipment. It also provides tracking, control, and history of maintenance activities. PDP-ZZ-00004 and EDP-ZZ-04012 discuss the trending of data taken from the CHAMPS data base on a semi-annual basis. Equipment with recurring maintenance problems, as evidenced by the number of work requests issued, is evaluated for corrective action. These programs ensure adequate vendor back-up.
- (iv) APA-ZZ-00401 controls vendor activities at Callaway, including associated QA requirements (i.e., work performed per approved procedures and in accordance with an approved QA program).

This program is considered to be a viable approach to vendor interface, especially since most vendors don't have departments that analyze operational data nor are vendors always aware of the service conditions and maintenance history associated with a given component failure. Further, technical problems known by vendors typically originate from a utility experiencing a hardware problem.

NRC Request - Item 4.5.3

The licensee needs to submit a description of the specific implementation plan for Callaway 1 after NRC reviews the WCAP-10271 and Supplement 1.

Union Electric Response - Item 4.5.3

NRC completed the review of WCAP-10271 and Supplement 1 on February 21, 1985 (SER issuance date). The Westinghouse Owners Group is preparing a license amendment guidance document which details all requested Technical Specification changes and includes a generic significant hazards evaluation. This guidance document is expected to be issued in June, 1985. Union Electric intends to submit a Callaway-specific amendment request in July, 1985.