



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

April 8, 1998

EA 97-469

Garry L. Randolph, Vice President and  
Chief Nuclear Officer  
Union Electric Company  
P.O. Box 620  
Fulton, Missouri 65251

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 50-483/97-11 AND NOTICE OF  
VIOLATION

Dear Mr. Randolph:

Thank you for your letter of February 6, 1998, in response to our December 24, 1997, letter and Notice of Violation concerning the findings of the Maintenance Rule baseline inspection at the Callaway Plant. We have reviewed your reply, and require additional information for each of the three violations.

Violation A

In regard to your response to Example 1, additional information regarding the planned change to the performance criteria for the containment isolation function is needed in order to evaluate the effectiveness of the corrective actions. Specifically, we request that you provide the definition of "failure" which is referred to in Item 2 of the planned changes to the performance criteria on page 5 of your response. As presently stated, simultaneous failures of both valves in a penetration could be interpreted to mean: both valves of a penetration exceeding their individual administrative leakage limits; both valves, as well as, eight other valves exceeding their administrative leakage limits; or both valves exceeding 0.4 L<sub>a</sub>. Please explain simultaneous failure of both valves in a penetration with regard to test program leakage.

In regard to your response to Example 2, you did not agree that a violation had occurred in your monitoring of feedwater heaters. We agree with your position that the feedwater heaters are not classified as run-to-failure and are presently being monitored at the plant level. We also recognize that a design change to replace the feedwater heater tube bundles with an improved design is in progress. However, additional information is needed before we can further consider your denial of this portion of Violation A, Example 2. Specifically, have there been, or could there be, occasions where tube failures have been repaired without incurring a power loss? In addition, how will your plant-level performance criteria recognize and capture degraded heater performance using unplanned capacity loss when there is an existing reduced power level for core axial offset, or any other reason?

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G PDR

E-Mail report to T. Frye (TJF)  
 E-Mail report to D. Lange (DJL)  
 E-Mail report to NRR Event Tracking System (IPAS)  
 E-Mail report to Document Control Desk (DOCDESK)  
 E-Mail report to Richard Correia (RPC)  
 E-Mail report to Frank Talbot (FXT)

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In regard to your response to Example 2 that addressed heater drain pump seals, the planned corrective action to evaluate the heater drain pump seals for monitoring in a run-to-failure mode is satisfactory. We will verify the implementation of your planned corrective action during future inspection activities at the Callaway site.

#### Violation B

In regard to your response to Violation B, we note that you intend to review all suggestion occurrence solution reports that have been initiated since July 10, 1993, in order to verify that all structures, systems, or components (SSCs) within the program scope have been properly evaluated and classified as Category (a)(1) or (a)(2). This corrective action is satisfactory and will be reviewed during a future inspection. However, we request clarification on your completed corrective action. In particular, the team noted in the inspection report that a failure would not be classified as a functional failure on the basis that an equipment operator was available at the valve to open it and that personnel errors during the performance of maintenance activities were not considered for functional failure evaluations. As a result of your response to Violation C, please discuss your current position relative to taking credit for operator intervention for functional failure evaluation. Also, please describe how your program evaluates personnel errors in determining whether functional failures have occurred.

#### Violation C

In regard to your response that provides train unavailability criteria for monitoring the reactor protection trip system, we find the planned corrective action to be acceptable. We will review the implementation of the corrective action during a future inspection.

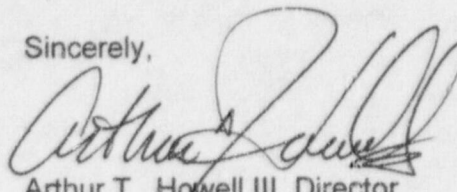
Your planned program change concerning the evaluation of unavailability does not take into consideration the unavailability of risk-significant SSCs during surveillance if there is a minimal restoration time for those SSCs and is, therefore, not acceptable because this action would not necessarily preclude future violations. Your reference to INPO performance indicator reporting guidelines for taking credit for operator action to quickly restore SSCs undergoing surveillance is not endorsed by NRC. NUMARC 93-01 guidance, which is endorsed by NRC, is clear with respect to availability determination in that SSCs, which respond automatically, must be subject to direct control or function automatically without human action to be considered available. Your approach does not take into consideration that maintenance/surveillance time be counted as unavailable for the purpose of determining the effectiveness of the maintenance and surveillance performed on SSCs. Furthermore, your stated intention to take exception to the guidance of NUMARC 93-01 for availability determination, by allowing a "minimal" intervention time, was not accompanied by an acceptable alternative for NRC review.



You are required to respond to our concerns relating to your response to Violations A, B, and C within 30 days of receipt of this letter. If you have questions about this letter, please contact Dr. Dale A. Powers at 817/860-8195. For your completed and planned corrective actions that are considered to be appropriate, we will review the implementation of those corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

As discussed in our letter of December 24, 1997, we wish to hold a management meeting with Union Electric to discuss your plans to improve your Maintenance Rule program. At this meeting, we want to include, as agenda items, the results of your continuing corrective action evaluations that were targeted for completion by April 30, 1998, and your response to the questions in this letter. As discussed between Messrs. Mark Reidmeyer and Dale Powers on February 17, 1998, we understand that your proposed time for this meeting is near the end of May 1998. Dr. Powers will be contacting your representative to obtain details for the meeting and to establish the meeting date.

Sincerely,



Arthur T. Howell III, Director  
Division of Reactor Safety

Docket No.: 50-483  
License No.: NPF-30

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