

March 8, 2007

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington, DC 20555-0001

ULNRC-05374



Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
SPECIAL REPORT 07-01**

Historical Inoperability of Seismic Instrument SGAR0008

Enclosed is a voluntary Special Report documenting three historical occurrences of seismic instrument SGAR0008, 'C' Steam Generator Support Peak Recording Accelerometer, inoperability for which a report in accordance with Final Safety Analysis Report Section 16.3.3.2 Action 'a' was not submitted.

No new commitments are identified in this correspondence. None of the material in this report is considered proprietary by Union Electric.

If you have any questions or require additional information, please contact Mr. Keith Mills, Supervisor, Regulatory Affairs Regional/Safety Analysis at 573/676-4317.

Sincerely,

A handwritten signature in black ink, appearing to read "F. M. Diya".

F. M. Diya
Director Plant Operations

Enclosure 1) Special Report

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ENCLOSURE

Special Report

The Seismic Instrumentation Limiting Condition For Operation (LCO), Section 16.3.3.2 of the Final Safety Analysis Report (FSAR), requires seismic monitoring instrumentation to be Operable at all times. With one or more of the required seismic monitoring instruments inoperable for more than 30 days, LCO Action 'a' requires a Special Report to be prepared and submitted to the Commission within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to Operable status.

There is no current inoperability of seismic instrumentation requiring the submittal of a Special Report. However, a practice associated with surveillance testing of required seismic instrument SGAR0008, 'C' Steam Generator Support Peak Recording Accelerometer, was identified to have the potential for challenging the requirements of LCO 16.3.3.2. The practice of removing SGAR0008 from service during refueling outages was initiated in 1999 without establishing a consistent method to ensure that associated LCO actions were tracked. This issue was documented in the Callaway corrective action program as CAR 200700754 on 1/26/2007. The evaluation under CAR 200700754 revealed previous instances where Special Reports for SGAR0008 inoperability were required but not submitted.

There is no specific reporting requirement addressing historical seismic instrument inoperability or the failure to report as required under FSAR 16.3.3.2 Action 'a'. However, a voluntary submittal is being made to document three failures to report and to address the cause and associated corrective actions.

Background

As part of the evaluation under the corrective action program, the electronically available work history for SGAR0008 was reviewed back through 1992. The review initially revealed four potential occurrences of seismic instrumentation inoperability lasting longer than 30 days (720 hours) for which no Special Report was issued.

Further investigation of the surveillance testing documentation on SGAR0008 revealed that a suggestion documented in CAR 199301604 was written to evaluate potential false recordings due to heavy work performed near the seismic instrumentation (SGAR0008 is located in the containment building near the equipment hatch). One of the specified actions was to create an auxiliary work document in addition to the required surveillance testing. The purpose of the auxiliary work document was to read and restore, as necessary, the scratch plates for SGAR0008 at the end of each outage and to trend the results to determine any further necessary actions. As surveillance testing was performed from 1993 through 1998, testing was completed at the beginning of each outage with the instrument restored

during the surveillance procedure. The auxiliary work document was then performed at the end of each outage.

The 1995 performance of this surveillance was originally identified as exceeding 720 hours based on the work history review; however, the surveillance record shows that the seismic monitor was restored within one day of beginning the surveillance. The auxiliary document was then performed at the end of the outage as discussed above.

Sometime between the 1998 and 1999 surveillance testing, the decision was made to physically remove the instrument following the surveillance at the beginning of an outage and to replace it under the auxiliary work document at the end. Beginning with the 1999 surveillance, guidance was added to the task instructions stating: "Store SGAR0008 in a protected location and note where located". Further review ultimately identified three occurrences where this practice resulted in SGAR0008 being removed from service for greater than 720 hours. A Special Report was not submitted in accordance with requirements of FSAR 16.3.3.2 Action 'a' for the removal of SGAR0008 as follows:

<u>Surveillance</u>	<u>Removal</u>	<u>Restoration</u>	<u>Approx. Duration [Hours]</u>
S619859	10/2/1999	11/1/1999	733
S647679	4/7/2001	5/12/2001	849
S701110	4/10/2004	5/26/2004	1119

Cause of the Failure to Submit a Special Report

Callaway Plant's evaluation determined there were inadequate administrative controls established to ensure that time tracking under FSAR 16.3.3.2 was performed when the practice of removing SGAR0008 was implemented. In addition, the controls established through surveillance procedure and work document notes to initiate time tracking were not consistently implemented.

Extent of Condition

The work practices and history of the remaining eight required seismic instruments were reviewed to determine the extent of condition. The practice of instrument removal for protection against potential false recordings during heavy work activities was not implemented for these instruments. Consequently, the unavailability of these instruments has been significantly less than the 720 hours allowed under LCO 16.3.3.2 Action 'a'. The electronic surveillance history of all eight instruments was reviewed back through 1992. No additional reporting failures were identified.

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Corrective Action

The remedial action of adding a step to the core work document, which generates the surveillance documents for SGAR0008, has been completed. The added step requires a sign-off and causes notification to the Control Room staff to track the inoperability of SGAR0008 during surveillance testing and removal from service.

Final corrective action is to incorporate a similar step into the specific surveillance procedure associated with each required seismic instrument. These corrective actions were completed on March 1, 2007.