

## UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-4005

August 31, 2007

Charles D. Naslund, Senior Vice President and Chief Nuclear Officer Union Electric Company P.O. Box 620 Fulton, MO 65251

SUBJECT:

MID-CYCLE PERFORMANCE REVIEW AND INSPECTION PLAN -

**CALLAWAY PLANT** 

Dear Mr. Naslund:

On August 7, 2007, the NRC staff completed its performance review of Callaway Plant. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results for the period July 1, 2006 through June 30, 2007. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility.

This performance review and enclosed inspection plan do not include security information. A separate letter designated and marked as "Official use Only–Security Information" will include the security cornerstone review and resultant inspection plan.

Overall, Callaway Plant operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for the most recent quarter was within the Licensee Response column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight.

In our assessment letter dated March 2, 2007, we advised you of a substantive cross-cutting issue in the area of problem identification and resolution. There were 14 findings related to the corrective action program component of the problem identification and resolution area. Eleven of these findings had a common theme related to the failure of site personnel to thoroughly evaluate problems. Several of the findings were related to the quality of engineering work in evaluating problems and the interface between operations and engineering personnel. We understand that your evaluation of these findings identified actions to address corrective action programmatic deficiencies and plant behavior changes.

During this assessment period, the NRC staff identified 14 findings related to the corrective action program component of the problem identification and resolution area. Eleven of these findings also had a common theme related to site personnel failing to thoroughly evaluate problems. These findings occurred in the Mitigating Systems, Barrier Integrity, and Initiating Events cornerstones. Examples include a failure to implement identified corrective actions to determine the extent of condition of essential service water pipe wall thinning due to microbiologically induced corrosion, a failure to initiate an operability evaluation to address

residual heat removal relief line water hammer concerns, and allowing operation of the ultimate heat sink cooling tower in a mode contrary to the design basis. We understand your corrective actions to address corrective action programmatic changes are near completion; however, actions to address plant behavior changes are still being implemented. As a result, this substantive cross-cutting issue will remain open until we determine, through the implementation of the focused, baseline inspections, that corrective actions have been effective.

The enclosed inspection plan details the inspection, except those related to security, scheduled through December 31, 2008. In addition to the baseline inspection program, we plan to complete Temporary Instruction 2515/166, "Pressurized Water Reactor Containment Sump Blockage." The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

The NRC is currently evaluating the scope and frequency of all the baseline inspection procedures. If the results of the evaluation, or any other circumstances, cause us to change the inspection plan, we will contact you to discuss the change as soon as possible. Please contact Vincent Gaddy at 817-860-8141 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

Vincent Gaddy, Chief Reactor Projects Branch B Division of Reactor Projects

Docket: 50-483 License: NPF-30

Enclosure:

Callaway Inspection/Activity Plan

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SUNSI Review Completed: VGG	ADAMS: Yes	□ No	Initials: VGG

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Non-Publicly Available 

Sensitive 

Non-Sensitive

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RIV:C:DRP/B-	concurrence	D:DRS	D:DRP	C:DRP/B signature
VGGaddy*	B. Marthy	DDChambarlain	ATHowell III	VGGaddy
/RA/	BEM	DW/	N N	Vbb
08/20/07	8/23	08/ <i></i> <sup>∞</sup> /07 <sup>1</sup> <b>1</b>	08/7/07	08/27 /07

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T=Telephone

E=E-mail

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<sup>\*</sup>Previous Concurrence

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## Callaway

## Inspection / Activity Plan 09/01/2007 - 12/31/2008

Number Unit EB2-52B RP-ORS1 EB2-12T EB1TI166 EB2-07B EXAM RP-ORS5 IP 7111405 IP 7112101 Inspection Activity IP 71151-EP02 IP 71151-EP01 IP 7111404 IP 7111403 IP 7111402 IP 71152B IP 71151-PR01 IP 7112102 IP 2515/166 IP 71152B IP 71151-OR01 IP 7111112B IP 7111107B IP 7112102 IP 7112101 IP 71151 X02355 X02355 - OCCUPATIONAL RADIATION SAFETY - ALARA **BIENNIAL PI&R INSPECTION EP PROGRAM OCCUPATIONAL RADIATION SAFETY- ALARA** TRIENNIAL MAINTENANCE RULE INSPECTION TI-166 CLOSEOUT INITIAL EXAM HEAT SINK INSPECTION Emergency Action Level and Emergency Plan Changes Alert and Notification System Testing Drill/Exercise Performance Correction of Emergency Preparedness Weaknesses and Deficiencies Identification and Resolution of Problems Occupational Exposure Control Effectiveness ALARA Planning and Controls Access Control to Radiologically Significant Areas ERO Drill Participation Emergency Response Organization Augmentation Testing Identification and Resolution of Problems RETS/ODCM Radiological Effluent Maintenance Effectiveness Pressurized Water Reactor Containment Sump Blockage [NRC GENERIC LETTER 2004-0; Heat Sink Performance CALLAWAY - INITIAL EXAM (10/07) CALLAWAY - INITIAL EXAM (10/07) Performance Indicator Verification **ALARA Planning and Controls** Access Control to Radiologically Significant Areas Title No. of Staff on Site 08/11/2008 08/11/2008 08/11/2008 08/11/2008 05/05/2008 04/21/2008 04/14/2008 04/14/2008 04/14/2008 03/24/2008 08/11/2008 08/11/2008 04/14/2008 03/18/2008 11/05/2007 11/26/2007 10/22/2007 10/01/2007 10/01/2007 10/01/2007 Start Planned Dates Start End 03/20/2008 Safety Issues 03/28/2008 Baseline Inspections 08/15/2008 04/18/2008 08/15/2008 08/15/2008 08/15/2008 05/09/2008 04/18/2008 04/18/2008 11/09/2007 10/05/2007 08/15/2008 08/15/2008 04/25/2008 04/18/2008 10/05/2007 10/05/2007 12/01/2007 10/26/2007 Baseline Inspections Not Applicable Baseline Inspections Baseline Inspections Not Applicable Baseline Inspections Inspection

RP-ORS2

- OCCUPATIONAL RADIATION SAFETY-ACCESS

Inservice Inspection Activities - PWR

Access Control to Radiologically Significant Areas

IP 7112101 IP 7112102

ALARA Planning and Controls

IP 7111108F

EB1-08

- INSERVICE INSPECTION ACTIVITIES

Alert & Notification System

08/11/2008

08/15/2008

Baseline Inspections

11/03/2008

11/07/2008

Baseline Inspections

10/20/2008

10/24/2008 Baseline Inspections

10/24/2008 Baseline Inspections

10/20/2008

IP 71151-EP03

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Callaway

Inspection / Activity Plan 09/01/2007 - 12/31/2008

Unit Number

Inspection Activity

Title

No. of Staff on Site

Planned Dates Start End

Inspection
Type

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	RP-ORS2 - OCC	RP-ORS2 - OCCUPATIONAL RADIATION SAFETY-ACCESS	-1			
	IP 71151-OR01	Occupational Exposure Control Effectiveness		10/20/2008	10/24/2008	10/24/2008 Baseline Inspections
	IP 71151-PR01	RETS/ODCM Radiological Effluent		10/20/2008	10/24/2008	10/24/2008 Baseline Inspections
	RP-ORS3 - OCC	- OCCUPATIONAL RADIATION SAFETY - ALARA	_			
_	IP 7112101	Access Control to Radiologically Significant Areas		10/27/2008	10/31/2008	10/31/2008 Baseline Inspections
	IP 7112102	ALARA Planning and Controls		10/27/2008	10/31/2008	10/31/2008 Baseline Inspections
	IP 71151-OR01	Occupational Exposure Control Effectiveness		10/27/2008	10/31/2008	Baseline Inspections
_	IP 71151-PR01	RETS/ODCM Radiological Effluent		10/27/2008	10/31/2008	10/31/2008 Baseline Inspections