



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA ST., N.W., SUITE 3100
 ATLANTA, GEORGIA 30303

Report Nos. 50-327/81-15, 50-328/81-15, 50-390/81-07, 50-391/81-07,
 50-438/81-12, 50-439/81-12, 50-518/81-06, 50-519/81-06
 50-520/81-06, 50-521/81-06, 50-553/81-04, 50-554/81-04
 50-566/81-03, and 50-567/81-03

Licensee: Tennessee Valley Authority
 500A Chestnut Street
 Chattanooga, TN 37401

Facility Names: Sequoyah, Watts Bar, Bellefonte, Hartsville, Phipps Bend,
 and Yellow Creek

Docket Nos. 50-327, 50-328, 50-390, 50-391, 50-438, 50-439, 50-518,
 50-519, 50-520, 50-521, 50-553, 50-554, 50-566, and 50-567

License Nos. DPR-77, CPPR-73, CPPR-91, CPPR-92, CPPR-122, CPPR-123,
 CPPR-150, CPPR-151, CPPR-152, CPPR-153, CPPR-162, CPPR-163,
 CPPR-172, and CPPR-173

Inspection at Office of Engineering Design and Construction, Knoxville, TN

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| Inspectors: | <u>V. L. Brownlee</u> | <u>5/5/81</u> |
| | V. L. Brownlee | Date Signed |
| | <u>FOR Robert W. Wright</u> | <u>5/5/81</u> |
| | J. J. Lenahan | Date Signed |
| | <u>N. Merriweather</u> | <u>5/5/81</u> |
| | N. Merriweather | Date Signed |
| | <u>Robert W. Wright</u> | <u>5/5/81</u> |
| | R. W. Wright | Date Signed |
| Approved by: | <u>T. E. Conlon</u> | <u>5-5-81</u> |
| | T. E. Conlon, Chief, Plant Systems Section, Engineering Inspection Branch | Date Signed |

SUMMARY

Inspection on April 6-10, 1981

Areas Inspected

This routine, announced, inspection involved 128 inspector-hours at the ODEC offices in the areas of licensee actions on previous inspection findings, and design controls applied to the EN DES engineering and design groups.

Results

Of the two areas inspected, three violations were found (Failure to Properly Evaluate OEDC Audit No. M79-12, Deficiency No. 6 for Significance and Take Prompt Corrective Action - paragraph 3.b(2); Inadequate Procedure for Preparation of Reinforced Masonry Wall As-built Drawings - paragraph 3.b(3); Failure to Control Engineering Procedures Used by Onsite EN DES Representatives at Sequoyah and Watts Bar - paragraph 5).

DETAILS

1. Persons Contacted

Licensee Employees

- G. H. Kimmons, Manager, Office of Engineering Design & Construction (OEDC)
- *D. R. Patterson, Assistant to Manager, OEDC
- *E. G. Beasley, QA Manager, OEDC
- *S. Duhan, Supervisor Quality Compliance, OEDC QA
- *I. L. Burroughs, Assist. Manager, Division of Engineering Design (ENDES)
- *R. M. Pierce, Asst. Manager, ENDES
- *C. A. Myers, Nuclear Engineering Branch (NEB), ENDES
- *J. A. Raulston, NEB, ENDES
- *J. J. Ritts, NEB, ENDES
- *R. W. Cantrell, Sequoyah Design Project Manager, ENDES
- *R. D. Guthrie, Civil Engineering Branch (CEB) ENDES
- *J. W. McReynolds, CEB, ENDES
- *R. A. Costner, QA Branch Chief, ENDES
- *J. S. Colley, Supervisor, QA Engineering Section, ENDES

Other licensee employees contacted included several QA, engineers, and office personnel.

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on April 10, 1981 with those persons indicated in Paragraph 1 above. The violations described in paragraph 3 and 5 were discussed.

3. Licensee Action on Previous Inspection Findings

a. Noncompliances

- (1). (Closed) Infraction 518, 519, 520, 521/80-11-01; 553/80-11-01, 554/80-10-01; 566, 567/80-10-01 - Failure to Properly Identify and Handle Audit Deficiencies. TVA's letter of response dated September 2, 1980 concerning this item has been reviewed and determined acceptable by region II. The inspector conducted discussions with responsible personnel and examined pertinent documentation to verify that the deficient inspector identified audits received additional licensee reviews to evaluate the conclusions or recommendations identified therein for significant deficiencies. The licensee also examined the findings from other OEDC management audits, reviews, evaluations, and investigations that were not documented under OEDC audit procedure MO-QAP-3.1. These subsequent reviews identified several deficiencies none of which were considered significant. The inspector examined a new

procedure MO-QAP-3.4 entitled "Reviews of Formal Appraisal Findings for Significance", and approved revision 2 to MO-QAP-3.1 which were written to correct the present condition and develop the necessary corrective actions to preclude recurrence of similar circumstances. This item is closed.

- (2). (Closed) Infraction 518, 519, 520, 521/80-11-02; 553/80-11-02; 554/80-10-02; 566, 567/80-10-02 - Audit Frequencies Incorrectly Specified. The inspector examined the newly imposed requirements of revision 2 to ENDES procedure EP-1.29 paragraph 4.0 which states that "each of the QA criteria applicable to each ENDES Branch/Staff/Project shall be audited once a year". TVA conducted additional audits 80-6A in the civil, electrical, and mechanical design branches to fulfill the above requirement. The inspector examined the licensee's 1980 composite OEDC-ENDES audit program matrix of ENDES audits and determined that this plan appears to satisfy the intent of ANSI N45.2.12, Draft 3, Revision 4, Paragraph 3.4.2. The licensee's response letter dated September 2, 1980 concerning this item was reviewed and determined acceptable by Region II. This item is closed.
- (3). (Closed) Deficiency 327/80-24-01; 328/80-15-01; 438, 439/80-13-01 - Failure to Reference Sources of Information. TVA's letter of response dated September 2, 1980 concerning this item has been reviewed and determined acceptable by Region II. The inspectors held discussions with responsible personnel and reviewed applicable Sequoyah design calculation examples and verified that cover sheets are being added to each package of calculations indicating the values of design parameter used.

With regard to the Bellefonte typical support calculations, we concur with your determination that traceability does exist between the typical pipe support drawing, load sheet data and isometric; therefore, the example is not an item of noncompliance. This matter will be corrected.

- (4). (Closed) Infraction 518, 519, 520, 521/80-11-04; 553/80-11-04 and 554/80-10-04: Inadequate Civil Drawing Review. The inspector reviewed Hartsville drawing numbers 4YE5422Y7-01 and 4YEC422Y7-01 and Phipps Bend drawing number 4Y0422Y7-01 to verify that the drawings had been revised to reflect the 180-day concrete compressive strengths required by design criteria for missile shielding. The inspector discussed actions taken to avoid further violations in this area. This included a meeting held with all members of the design section during which the designers were instructed to ensure that the design requirements which prescribe construction activities are reflected on the construction drawings, and a review of drawings for other Hartsville-Phipps Bend structures which have missile protection design requirements to verify the concrete strengths required by the missile pro-

tection design criteria are reflected on the drawings. This item is closed.

- (5). (Closed) Deficiency 518, 519, 520, 521/80-11-05; 553/80-11-05; and 554/80-10-05: Improper Storage of Civil Quality Records. The inspector reviewed Civil Engineering Branch (CEB) policy memorandum dated March 31, 1980, "Procedure for Approval, Filing and Microfilming Design Calculations". This procedure documents the action to be taken in CEB to meet the requirement of EN DES EP 1.14. The inspector discussed corrective actions taken to review copies of calculations kept in the CEB to verify that all calculations are properly stored with supervisory and staff personnel of the CEB. The inspector reviewed the calculation index file which relates the calculation number to the document number in the permanent QA record storage file. This item is closed.
- (6). (Open) Infraction 327/80-24-02; 328/80-15-02; 390/80-20-01; 391/80-14-01; 438, 439/80-13-03; 518, 519, 520, 521/80-11-06; 553/80-11-06; 554/80-10-06 and 556, 567/80-10-04: Failure to Implement QA Program in the Geological Services Group. The inspector reviewed the licensee's actions to implement a QA program in the Geological Services Group (GSG). These actions included QA orientation training for most of the staff in GSG, preparation of written procedures to cover QA-related activities unique to the GSG, identification of EN DES procedures which apply to the GSG, and identification of safety related activities being performed by the GSG which are required to be included under the licensee's QA program. The inspector reviewed the training records for the QA orientation training held for the GSG. These records indicate that all but three of the professional-technical personnel in the GSG received the training on either July 28 or July 30, 1980. The inspector examined Engineering Procedure CEB-EP 21.31, "Calibration Control Measuring and Test Equipment" and CEB EP 21.34 "Geological, Geophysical, and Seismological Data for Nuclear Plant Construction - Acquiring and Distributing". These procedures cover activities unique to the GSG. Due to a recent reorganization in which the GSG was transferred from the Civil Design Branch to the Civil Engineering Branch, the approval and distribution of the above procedures was delayed. Procedure CEB-EP 21.31 was not distributed until March 16, 1981. Procedure CEP-EP 21.34 was approved on April 4 and distribution will be made by the ENDES document control unit by April 20. A review is currently under way to determine if there are additional activities unique to the GSG which require written procedures to control QA related work. The inspector discussed the implementation of the QA program with the Chief of the GSG, GSG section chiefs, and other GSG personnel. A QA coordinator has been appointed by the Chief of the GSG to monitor implementation of the QA program in the group. This item remains open pending review by NRC of implementation of QA procedures in the GSG.

- (7). (Closed) Deficiency 566, 567/80-10-05, Failure to Identify Safety-Related Drawings. The inspector reviewed the licensee's response dated September 2, 1980 and EN DES Engineering Procedures (EP) 4.25, "Design Review and Interface Coordination of Detailed Construction and Procurement Drawings" and EP-5.17, "Electrical Bills of Material and Master Bills of Material Procedure for Drafting and Handling". EP-5.17 is the applicable procedure for processing bills of materials. This procedure does not require the bill of material cover sheet to be identified with a "Q" designation in the drawing title block. The inspector verified through discussions with design project representatives that the electrical bill of material could not be used to generate a procurement requisition. This item is not a deficiency.
- (8). (Closed) Infraction 327/80-24-04; 328/80-15-04; 390/80-20-02; 391/80-14-02; 438, 439/80-13-04; 518, 519, 520, 521/80-11-07; 553/80-11-07; 554/80-10-07; and 566, 567/80-10-06 - Contract Service Audits Not Performed. The inspector examined ENDES audit Nos. 80V-50 and 80V-46 conducted on EDS Nuclear Inc. and Teledyne Engineering Services respectively and found the audits satisfactory. TVA has reviewed all ENDES personnel service contracts awarded to date and identified other contracts for which no preaward or regular scheduled audits had been performed. Most of these contracts without audits were found to be of the software variety or contracts awarded to individuals. Discussions with NRR QA branch personnel revealed that if these software contractors had a current approved letter appearing in the White Book indicating Region IV had approved and confirmed the subject contractor's QA program implementation no preaward or triannual licensee audits of that contractor were necessary. No preaward survey had to be conducted by the licensee if the contractor was on the CASE register. Likewise, if a service contract is awarded to an individual such as a University Professor to perform some quality related function or study, this individual does not have to submit a QA Manual for review and approval by the licensee provided his work is reviewed and approved by competent licensee personnel. All but a few of the service contracts that were awarded by TVA ENDES without audits being performed were found to fall in the above acceptable category. Documentation examined by the inspector revealed the licensee is in the process of amending those few remaining delinquent contracts to incorporate necessary QA requirements and to gain access to the contractors facilities to audit their QA programs. To preclude recurrence the QA vendor audit section now monitors the monthly status report concerning awarded contracts received from the Project Control Staff. The licensee's response letter dated September 2, 1980 concerning this item was reviewed and determined acceptable by Region II. This item is closed.

b. Unresolved Items

(1). Unresolved Item 327/80-24-05; 328/80-15-05, 390/80-20-03, 391/80-14-03 - Potential Safety Concerns.

- (a). (Closed) Essential sensing lines or conduits that were field routed were never evaluated for impact of internally generated missiles.

The inspectors held discussions with responsible CEB personnel, examined documentation consisting of memorandum CEB 800904007, and reviewed FSAR Section 3.5. The inspectors were informed that a functional evaluation had been performed for potentially impacted lines and maximum separation or protection of the lines needed to mitigate an event. TVA Engineering documents impose separation criteria for field routed lines and conduit and if not met a nonconformance report is generated to be evaluated by the pipe rupture team. No actual walk-down has been performed.

Subsequent to this inspection the inspectors held discussions with NRR review personnel related to the acceptability of the FSAR section 3.5, "Missile Protection", Commitments to meet 10 CFR 50, Appendix A, Criteria 4, "Environmental and Missile Design Bores" requirements.

NRR has accepted the FSAR commitments for Sequoyah plant and is presently reviewing Watts Bar commitments. During this inspection no specific items were identified that did not meet NRC requirements.

- (b) (Closed) No detail analysis and evaluations of internally generated missiles on essential equipment or containment has been conducted.

The statements in 3.b.(1)(a) above are applicable to this matter.

- (c) (Closed) Pipe rupture loads (longitudinal ruptures) have not been considered for the main steam and feedwater guard pipes.

The criteria for the evaluation of the plant for postulated pipe break does not require the arbitrary postulation of longitudinal ruptures inside guard pipes. This criteria is in accordance with the NRC Standard Review Plan. TVA has elected not perform the break analysis, but, will perform the optional inservice inspection.

The inspectors contacted NRR representatives and found that they were aware of this matter and confirmed that this is standard practice.

- (d) (Closed) Breaks in the MS and FW lines have not been considered for the DBA analysis.

The inspectors conducted discussions with TVA design personnel and reviewed engineering documents. The DBA analysis assumes an instantaneous break in the largest pipe of the reactor coolant system and a free end displacement (LOCA). The result of such an assumption maximizes compartment pressurization and consequential loading effects upon containment. The LOCA establishes the envelope which encompasses the MS and FW line breaks. MS and FW line bellows were tested by being compressed and displaced in a transverse direction well beyond the materials plastic limit and found never to lose its pressure boundary. Consequently it was determined that movements at the containment penetration for the MS and FW piping were within the allowables for the bellows which connect the MS and FW piping to the containment.

Therefore, it is TVA's position that it is not necessary nor required to assume that MS or FW piping would fail as a result of a DBA. NRR representatives were contacted and concur in this position.

- (e) (Closed) DBA analysis of piping may not have considered the effect of internally generated missiles on containment.

The design consideration for performing a DBA analysis does not require an arbitrary assumption that a missile be postulated to result concurrent with the DBA. Furthermore, missiles which have been identified for the plant that may be released as a result of the postulated event are within the crane wall, or other compartments which would prevent their impacting the containment.

- (f) (Closed) Seismic qualifications of flex conduit and flex hoses were never validated. Report CEB-MET-77-12 never reached the field/construction (Ref. SND Spec. G-40). Some conduits are not designed for thermal movements.

Discussions with responsible personnel and review of memorandum CEB 800904007 revealed that further analysis of construction Specification G-40 by TVA revealed that the specification had built-in seismic factors which would provide acceptable installation regarding seismic concerns for flexible conduit. Specification G-40 has been revised to provide clearer guidance for installation of flexible conduit to provide for thermal movement. Seismic qualification of flex hoses is considered during procurement and installation.

Flex hoses are procured with strict consideration for demonstrating capability for resisting seismic effects. The manufacturer is given an envelope of conditions including displacements and pressures, and is required to provide testing to demonstrate the hoses will meet the requirements of the specification. The Construction Specification G-43 provides requirements for installing flex hose for assuring acceptable installation.

This identified potential safety concern appears to have been resolved by factors already inherent in existing procedures.

- (g) (Closed) CEB has asked SNP to provide identification of process pipe to simplify or to properly conduct field evaluations. SNP has refused to identify the process pipes with proper tags. Without proper identification it appears that the field evaluation can not be performed effectively.
- (h)

During field evaluation interactions of sensing lines and conduits in local areas of essential equipment has to be checked. It is impossible for field evaluation teams to trace sensing lines and conduits after they leave a particular area. The field evaluation team relies heavily on the field construction personnel to route the lines as per separation criteria.

The inspectors held discussions with responsible CEB personnel and pipe rupture team representatives. The inspectors concluded that although inconvenience existed for tracing sensing lines, conduit and process pipe by the pipe rupture team at this time, no procedural requirements had been violated nor could it be determined that safety issues were involved.

- (i) (Closed) EDS performance as an AE for documentation preparation and document control has not been evaluated for effectiveness.

EN DES QA Audit Group conducted audit No. 80V-50 of EDS Nuclear incorporated on December 1-4, 1980. The audit did not identify any significant problems. Discussions with responsible CEB personnel revealed that all contractors work (EDS included) is reviewed to the extent necessary. At the time of this inspection two CEB personnel were in the process of reviewing Watts Bar class 1 stress reports which were generated by EDS.

This identified potential safety concern could not be substantiated as a safety concern.

- (2). (Closed) Unresolved Item 327/80-24-06; 328/80-15-06; 390/80-20-04; 391/80-14-04; 438, 439/80-13-05; 518, 519, 520, 521/80-11-08; 553/80-11-08; 554/80-10-08; 566, 567/80-10-07 - OEDC Audit M79-12, Deficiency No. 6 "Lack of EN DES QA Organizational Freedom, Authority, and Access to Management".

A management meeting was held with TVA at RII Atlanta offices on July 25, 1980 regarding this matter. Subsequent to this meeting TVA submitted letters dated October 8 and December 18, 1980 describing the results of their investigative activities, actions and organizational changes taken regarding this matter. Topical Report TVA-TR75-1, Rev. 5 has been submitted to NRC. Revision 5 describes the present organizational alignment.

During this inspection the inspectors verified that the actions and organizational changes described in the above letters had been implemented. Discussions held with personnel from EN DES and OEDC QA indicate that the QA organizations are receiving more management attention and that personnel appear to have more direct access to management without fear of reprisal. Management has reinforced this philosophy by issuing a program to reflect "Differing Staff Opinions" to help resolve any concerns or complaints related to nuclear safety matters.

TVA's investigation confirmed that there was widespread perception by personnel in the QA organization, that they did not have sufficient organizational freedom and that management did not give adequate support to quality assurance. In essence, TVA's investigation verified that Deficiency No. 6 of OEDC Audit M79-12 was a valid finding in that it uncovered a major problem area. This matter is being closed out as an unresolved item and will be identified as violation 327, 328/81-15-01; 390, 391/81-07-01; 438, 439/81-12-01; 518, 519, 520, 521/81-06-01; 553, 554/81-04-01; 566, 567/81-03-01 - Failure to properly evaluate OEDC Audit No. M79-12, Deficiency No. 6 for significance and take prompt corrective action. Deficiency No. 6 was documented by the OEDC QA Auditor on November 16, 1979 and TVA management was not made aware of the problem until the NRC RII July 7-11, 1980 inspection. This violation is based on NRC's July 7-11, 1980 inspection findings, results of TVA's investigation and subsequent corrective actions.

No response to this violation is required in that NRC/TVA management meeting, TVA's investigation, corrective actions, organizational changes and TVA's October 8 and December 18, 1980 letters describing the matter were completed prior to this inspection. TVA's letter of October 8, 1980 confirmed that there was widespread perception by personnel in the QA organization, that they did not have sufficient organizational freedom and that management did not give adequate support to quality assurance. TVA management attributed the cause of the problem to be one of inadequate organizational/functional alignment. The corrective actions taken

were: the OEDC QA Staff has been elevated to the same organizational level as the branches and projects in Engineering Design and Construction; new supervisors were appointed to manage the OEDC and EN DES QA units. To prevent recurrence of this type problem, management has instituted an open door policy (Differing Staff Opinion Policy) to permit employees to voice their concerns or complaints related to any nuclear safety matters without intimidation, reprisal, or like action toward the employee. Date of full compliance of the above matters was November 24, 1980.

- (3). (Closed) Unresolved Item 327/81-05-01 and 328/81-04-01: Masonry Wall Re-evaluation Program Procedures: The inspector reviewed Civil Engineering Branch Memorandum dated October 27, 1980, "Sequoyah Nuclear Plant Units 1 and 2 - NRC Information Request on Category I Masonry Walls", which documents the procedures to be followed in the field survey and design evaluation of nonreinforced masonry walls in Category I structures at the Sequoyah site. The results of the field survey and design evaluation of the nonreinforced black walls are documented in Sequoyah and Watts Bar Design Project (SWP) Memorandums dated November 5, 1980 and December 17, 1980. Based on the summaries contained in the three memorandums listed above, the inspector concluded that the program for identification, performance of field surveys, and design evaluation of non reinforced masonry walls was adequate. The inspector reviewed Nuclear Engineering Branch memorandums dated May 23, 1980 and June 11, 1980, "Sequoyah Nuclear Plant Units 1 and 2 - NRC Information Request on Category I Masonry Walls". These memorandum outline the program for design re-evaluation of reinforced masonry walls in Category I structures at the Sequoyah site. However there are no details in these memos which document the procedures to be followed in performance of field surveys and preparation of as built drawings. Discussions with personnel in SWP group and review of the field data and as built drawings for the reinforced masonry walls disclosed that no memorandum, procedure or instructions had been developed to prescribe the process for performance of field surveys or preparation of as-built drawings for reinforced masonry walls. In addition, the reinforced masonry wall as built sketches had been prepared by one individual who did the field measurements himself with the assistance of another individual, and these sketches had not been reviewed or checked in order to verify their accuracy prior to being incorporated into the design re-evaluation program. This item is closed as Unresolved item 327/81-05-01 and 328/81-04-01 and upgraded to Violation Item 327, 328/81-15-02 "Inadequate Procedure for Preparation of Reinforced Masonry Wall As-built Drawings".

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Independent Inspection Effort

The inspector examined Sequoyah procedure SWP-EP 43.12, "Program for Hanger and Support Requirements". This procedure controls modification to hanger and supports and addresses the activities of the EN DES personnel who are located on the project site. The inspector discussed the responsibilities of the on-site EN DES personnel with their supervisor (Section chief) in the Sequoyah-Watts Bar Project Design Branch (SWP). The inspector also discussed interface controls between the Section Chief and the onsite EN DES personnel and the distribution of current design criteria and engineering procedures to the EN DES personnel stationed at the Sequoyah site. These discussions disclosed that distribution of engineering criteria and engineering procedures are not being controlled in accordance with the requirements of Engineering Procedure EN DES-EP 1.28 "Control of Documents Affecting Quality". The engineering procedures and design criteria used by the EN DES on site personnel at the Sequoyah site are uncontrolled copies furnished them by their section chief from SWP. Further discussions with other SWP personnel disclosed that the EN DES onsite representatives at the Watt Bar project site also do not have controlled copies of engineering procedures and design criteria. The failure to control distribution of engineering procedures and design criteria to the Sequoyah and Watts Bar on site EN DES personnel was identified to the licensee as Violation item 327, 328/81-15-03 and 390, 391/81-07-02, "Failure to Control Engineering Procedures Used by Onsite EN DES Representatives at Sequoyah and Watts Bar".

No deviations were identified.

6. Inspector Followup Items

- a. (Closed) Inspector Followup Item 438, 439/80-13-02; 518, 519, 520, 521/80-11-03; 553/80-11-03; 554/80-10-03; 566, 567/80-10-03 - Program for Seismic Analysis of Small Bore Pipe. The inspectors verified that TVA had informal controlled measures in place to verify that all rigorously and alternately analyzed and field supported piping would be analyzed for Sequoyah, Watts Bar and Bellefonte. TVA committed to develop formal procedures approximately 2 years before schedule fuel loading for each subsequent plant to ensure that all safety-related pipe is analyzed and supported to specified requirements.
- b. (Closed) IFI 327/80-24-03 and 328/80-15-03, AC Auxiliary Power System. Documents reviewed:
 - (1). ECN-L5242 and ECN-2805, Removal of the current reactors in the 480V shutdown boards.
 - (2). ECN-L5377, Splitting the 480V shutdown boards.
 - (3). ECN-L5047, Addition of degraded voltage relaying.
 - (4). ECN-L5096, Addition of common station service transformer (CSST) C.

- (5). NCR-EEB8034, Wrong tap settings specified for the 161KV CSST.
- (6). Numerous memoranda between Electrical Engineering Branch (EEB), Nuclear Engineering Branch and Sequoyah and Watts Bar Design Projects (SWP).

The inspector examined the documents identified above and discussed in detail the AC power system problems and corrective actions taken, with responsible engineering personnel in both EEB and SWP. The inspector has no further questions.

7. Licensee Identified Items (10 CFR 5.55(e))

Prior to this inspection, the licensee identified the following item under 50.55(e):

- a. (Closed) 328/81-04-02: Nonreinforced Masonry Walls. This item was tracked under item number 328/81-02-16 which was eventually closed in RII inspection report 328/81-18.