

As a result of these NRC findings, the licensee stated that this CATD would be reopened and the package amended to include the appropriate information documenting the completion of actions required to satisfy CDR 390, 391/91-14.

The current status of CATDs reviewed by NRC is as follows:

	SR CATDs	TROI CLOSED %	NRC READY %	NRC INSP.	TOTAL DEFIC.	EC NOT RES.
WBN	493	367 74%	205 41%	141	22	9
NPS	124	103 83%	92 74%	4	1	0
TOT	617	470 76%	297 48%	145 23.5%	23 16.6%	9 6.9%

3. Actions on Previous Inspection Findings (92701, 92702)

a. (Open) URI 390/90-06-02, Improper Closure of CAQRs

This URI identified continuing concerns with inappropriate closure of CAQRs. In April 1993, QA initiated an audit (SSA93308) of improper closure of CAQRs based on an unacceptable trend in the March 1993 trend report. The audit identified 12 examples of the improper closure of corrective action documents; several were associated with old "rollover" documents. As a result of the audit, corrective action document WBFIR930075308 was initiated to investigate the cause of the negative trend. The description of condition for the FIR stated, "The actions to prevent recurrence of improper CAQ closures taken in response to NRC Unresolved Item 50-390/90-06-02 and WBCA910212 have not prevented recurrence."

The corrective actions in section 3B of the FIR indicated that additional reviews of IIs, PERs, FIRs and SCARs would be conducted to determine the extent of condition. The portion of the corrective actions that applied to PERs was completed and agreed with the results of the licensing review performed as a result of VIO 390/93-35-05, and 391/93-35-02 (see paragraph 3.d of this report).

This issue remains open pending the NRC review of results of the trend investigation for remaining corrective action documents.

b. (Closed) URI 390, 391/90-22-02, Maintaining NRC Commitments in Procedure Revisions

In the 1990 inspection, the NRC inspector reviewed the licensee's process of ensuring that commitments made to the NRC are carried from one procedure generation to another. The review resulted in the identification of commitments which had been omitted from procedures during the procedure change process. Ten NRC inspection findings had been closed and the commitments had been

The inspector considers the issue of the adequacy of the sample process to be adequately resolved based on the additional information provided in SCAR WBP870036.

The item is closed.

- d. (Closed) VIO 390/93-35-05, and 391/93-35-02, Inadequate Corrective Action "Rollover" Resulting in an Incomplete Seismic Calculation

This violation involved the licensee process that permitted closing one corrective action document when a second corrective action document was determined to perform exactly the same actions. The violation occurred when the licensee failed to verify that all of the corrective actions cited in PER 920092 were appropriately identified in the SCAR WBSA910259 before closing the PER. This resulted in the failure to implement corrective actions of PER 920092.

The licensee responded to the violation in a letter to the NRC dated June 12, 1993, which stated that the inadequate closure had been a personnel error and an isolated case and that corrective actions to prevent recurrence were already in place.

The inspector found that the licensee reviewed all "rollover" PERs that had been initiated at WBN. The results of the licensee review indicated that all conditions identified on closed PERs were properly identified when transferred to other documents. The licensee review did show that in two cases the closed PER was not referenced by the corrective action documents which remained open.

The inspector determined that the examples of deficient cross referencing had occurred prior to the implementation of Revision 10 to procedure SSP-3.06, Problem Evaluation Reports, which was initiated to prevent such administrative omissions. Procedure SSP-3.06 now requires a one-to-one cross referencing between documents.

The inspector considered the corrective actions to be adequate to control cross referencing PERs and concluded that the measures should prevent recurrence of the violation.

This item is closed.

- e. (Closed) IFI 390, 391/93-42-01, Sampling Criteria

This issue involved corrective actions to be implemented as a result of CATD 80407-WBN-01, where NCRs did not use standard sample practices for sample size and selection processes for acceptability determinations. This CATD was developed from several employee concerns; for example, concern number IN-86-243-00201 stated,

issued a DCN to update the SSD for surge tank level transmitter loop 1-L-70-63A. The inspector reviewed DCN M-16481-A, which incorporated F-DCN 24539-A, which provided the new SSD information. The inspector also verified that the SSD had been updated with the new calibration data. The licensee's actions have addressed the NRC's questions and concerns. This item is closed.

#### 4. Exit Interview

The inspection scope and findings were summarized on September 30, 1993, with those persons indicated in paragraph 1. The inspectors described the areas inspected and discussed in detail the inspection results. Dissenting comments were not received from the licensee. Proprietary information is not contained in this report.

<u>Item Number</u>	<u>Status</u>	<u>Description and Reference</u>
390/90-06-02	Open	URI - Improper Closure of CAQRs (paragraph 3.a)
390/90-22-02 391/90-22-02	Closed	URI - Maintaining NRC Commitments in Procedure Revisions (paragraph 3.b)
390/92-29-04 391/92-29-04	Closed	URI - Adequacy of Sampling (paragraph 3.c)
390/93-10-02 391/93-10-01	Closed	IFI - CCRS Discrepancies (paragraph 3.h)
390/93-35-05 391/93-35-02	Closed	VIO - Inadequate Corrective Action "Rollover" Resulting in an Incomplete Seismic Calculation (paragraph 3.d)
390/93-42-01 391/93-42-01	Closed	IFI - Sampling Criteria (paragraph 3.e)
390/93-49-01	Closed	URI - Failure to Follow Procedures for Review of Preoperational Test Instructions (paragraph 3.f)
390/93-52-01	Closed	URI - Residual Heat Removal System Preoperational Test Deficiencies (paragraph 3.g)
390/93-202-01	Closed	IFI - Calculation Discrepancies (paragraph 3.i)

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The inspector considers the issue of the adequacy of the sample process to be adequately resolved based on the additional information provided in SCAR WBP870036.

The item is closed.

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The inspector considered the corrective actions to be adequate to control cross referencing PERs and concluded that the measures should prevent recurrence of the violation.

This item is closed.

- e. (Closed) IFI 390, 391/93-42-01, Sampling Criteria

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390/93-35-02 391/93-35-02	Closed	VIO - Inadequate Corrective Action "Rollover" Resulting in an Incomplete Seismic Calculation (paragraph 3.d)
390/93-42-01 391/93-42-01	Closed	IFI - Sampling Criteria (paragraph 3.e)
390/93-49-01	Closed	URI - Failure to Follow Procedures for Review of Preoperational Test Instructions (paragraph 3.f)
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