Reactor Facilities Branch

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

MAR 1 1976

Iowa Electric Light and Power Company Docket No. 50-331
ATTN: Mr. Duane Arnold
President
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52405

Gentlemen:

This refers to the inspection conducted by Messrs. H. Kister and R. Knop of this office of January 12-16, 28-29, and February 3 and 4, 1976, of activities at the Duane Arnold Energy Center authorized by NRC Operating License No. DPR-49 and to the discussions of our findings with Messrs. Hunt and Hammond at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as described under Enforcement Items in the Summary of Findings section of the enclosed inspection report.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty days of your receipt of this notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

The inspector determined prior to the conclusion of the inspection that corrective action had been taken, with respect to Infraction B.3 to assure that future similar noncompliance will be avoided. Consequently, no reply to this item is required.

Certain other activities, set forth under Other Significant Items in the Summary of Findings section of the enclosed inspection report, appear to be deviations from commitments which you have made in previous correspondence with the Commission. Please advise us in writing within twenty days of the corrective action you have taken or plan to take, showing the estimated date of completion with regard to these deviations.

On February 4, 1976, Messrs. Fiorelli, Knop, Kister and Jorgensen met with Messrs. Liu and Wallace of your staff at your corporate office to discuss needed improvements in the management controls which contributed to the items of noncompliance and deviations identified in our report. Specific attention was focused on the absence of a work inspection program. This matter was identified as an item of noncompliance and was highlighted because there appeared to be a lack of coordination in accomplishing the activity.

In addition, Messrs. Liu and Wallace stated during the meeting that the following corrective action would be initiated:

1. The system which provided followup on items of noncompliance, reportable occurrences, and recommended actions which result from site and corporate reviews would be fully implemented.

2. The following WASH documents would be reviewed and programs implemented as appropriate to comply with the provisions of these documents:

   a. WASH 1284 (October 26, 1974), "Guidance on Quality Assurance Requirements During the Operating Phase of Nuclear Power Plants".

   b. WASH 1309 (May 10, 1974), "Guidance on Quality Assurance During the Construction Phase of Nuclear Power Plants".

   c. WASH 1283 (May 24, 1974), "Guidance on Quality Assurance Requirements During Design and Procedurement Phase of Nuclear Power Plants - Revision 1".

3. Your efforts regarding the Emergency Plan Program would be appraised to ensure that the plan commitments are met in a timely manner.

4. Work priorities would be reviewed to provide a more timely completion and implementation of your fire protection plan. Separate correspondence on this matter has been forwarded to you from our office.

Your response to the items of noncompliance and deviations noted in our report, should confirm your planned actions including estimated completion dates with respect to Items 1, 2 and 3 above.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this notice, the enclosed inspection report, and your response to this notice will be placed in the NRC's Public Document Room, except as follows. If this report contains information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty days of your receipt of this notice, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

We will gladly discuss any questions you have concerning this inspection.

Sincerely yours,

James G. Keppler
Regional Director

Enclosure:
IE Inspection Report
No. 050-331/76-01

cc w/encl:
G. G. Hunt, Chief
Engineer

bcc w/encl:
PDR
Local PDR
NSIC
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UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Operations Inspection

IE Inspection Report No. 050-331/76-01

Licensee: Iowa Electric Light and Power Company
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52405

Duane Arnold Energy Center
Palo, Iowa

License No. DPR-49
Category: C

Type of Licensee: BWR (GE) 538 MWe

Type of Inspection: Routine, Announced

Dates of Inspection: January 12-16, 28, 29, February 3 and 4, 1976

Principal Inspector: H. Kister 2-27-76 (Date)

Accompanying Inspector: R. Knop (January 28 and 29, February 3 and 4, 1976)

Other Accompanying Personnel: G. Fiorelli (February 3 and 4, 1976)

Reviewed By: R. C. Knop, Chief
Reactor Projects Section No. 2

2-27-76 (Date)

SUMMARY OF FINDINGS

Inspection Summary

Inspection on January 12-16, 28, 29 and February 3 and 4 (76-01): Review of licensee action on previously identified enforcement actions, outstanding inspection items, housekeeping, nonlicensed training, work inspection, and system cleanliness. Three items of noncompliance related to training, work inspection, and core thermal limits were identified.

Enforcement Action

A. Violations

None.

B. Infractions

1. Contrary to Technical Specifications, Section 6.4.1, Quality Assurance Directive 1301.5, and Administrative Control Directive 1401.5, Paragraph 5, a program for training and retraining has not been fully implemented for DAEC nonlicensed plant personnel. (Paragraph 5, Report Details)

2. Contrary to Section X of 10 CFR Part 50, Appendix B, and the licensee's Quality Directive 1310.1, the licensee has failed to implement the work inspection program for maintenance activities as required by the directive. (Paragraph 6, Report Details)

3. Contrary to Section 3.12.C of the Technical Specifications, on January 10, 1976, the Minimum Critical Power Ratio (MCPR) was exceeded and the required action was not initiated within fifteen minutes to restore MCPR to the required value within the required two hours. (Paragraph 3, Report Details)

C. Deficiencies

None.

Licensee Action on Previously Identified Enforcement Action

A. IE Inspection Report No. 050-331/75-11 (Items Identified as numbered in the Enforcement Actions Section of the Inspection Report).

1. Infraction A.1.c, Operations Committee Review of Special Test Procedures. The inspector verified completion of corrective actions described in the licensee's response.[1/] This item is consider closed.

2. Infraction A.6, Replacement Part Certification. The inspector reviewed the licensee's corrective action and noted that the action was not complete. (Paragraph 2, Report Details)

3. Infraction A.8.a, b, d, and f, Failure to Comply with ACP's (also Report No. 75-16, Deviation). The inspector verified completion of corrective actions identified in the licensee's responses.[2/][3/] These items are considered closed.

4. Infraction A.8.c, Post Modification Testing. The inspector verified completion of corrective actions described in the licensee's response.[4/] This item is considered closed.

5. Infraction A.8.e, Maintenance Procedures. The inspector verified that corrective actions[5/] with regard to issuance of Generic Procedures has been implemented. This item is considered closed.

6. Infraction A.8.g, Filler Material Control. The inspector verified completion of corrective actions described in the licensee's response.[6/] This item is considered closed.

7. Deficiency B.2, Inspection and Fabrication Procedures. The inspector verified completion of corrective actions described in licensee's response.[7/] This item is considered closed.

8. Deficiency B.3, Hydro Test Documentation. The inspector reviewed the corrective action described in licensee's response.[8/] This item will remain open.

9. Letter Item 1, Administrative Control Procedure Issue. The inspector reviewed the licensee's commitment[9/] and noted that the stated action was not complete. (Paragraph 2, Report Details)

1/ IELP ltr to IE:III dtd 10/17/75.
2/ Ibid.
3/ IELP ltr to IE:III dtd 12/18/75.
4/ IELP ltr to IE:III dtd 10/17/75.
5/ Ibid.
6/ Ibid.
7/ Ibid.
8/ Ibid.
9/ Ibid.

10. Letter Item 2,[10] Followup Program for Commitments to NRC. As a result of a review of licensee committments to NRC, the inspector concluded that the interim follow-up system has not yet been implemented. This item remains open. (See Management Interview Section)

B. IE Inspection Report No. 050-331/75-13

The inspector verified completion of corrective actions for Infractions A.1, A.2, A.3 and Deficiencies B.1, B.2, and B.3 described in licensee's response.[11] These items are considered closed.

C. IE Inspection Report No. 050-331/75-16

The inspector verified completion of corrective actions for Infraction B.1, Deficiencies C.1, C.3, and C.4 and Deviation as described in licensee's response.[12] These items are considered closed.

D. IE Inspection Report No. 050-331/75-18

The inspector verified completion of corrective actions for Infraction B.1, and Deficiencies C.2 and C.3 as described in licensee's response.[13] These items are considered closed.

Other Significant Findings

A. Systems and Components

None identified during this inspection.

B. Facility Items (Plans and Procedures)

The system for assuring the safety related status of components, systems and structure needs further review to determine adequacy of control. (Paragraph 7, Report Details)

C. Managerial Items

None.

D. Noncompliance Identified and Corrected by Licensee

None identified during this inspection.

10/ Ibid.
11/ IELP ltr to IE:III dtd 11/28/75.
12/ IELP ltr to IE:III dtd 12/18/75.
13/ IELP ltr to IE:III dtd 12/31/75.

E. Deviations

1. Contrary to the licensee's commitment to follow the guidance of WASH 1284 (October 26, 1974), "Guidance on Quality Assurance Requirements During the Operating Phase of Nuclear Power Plants":

   a. The licensee has failed to train and certify inspectors in accordance with Regulatory Guide 1.58 and ANSI N45.2.6-1973, "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel". (Paragraph 6, Report Details)

   b. Failed to fully implement the Housekeeping Requirements of Regulatory Guide 1.39 and ANSI N45.2.3-1973. (Paragraph 4, Report Details)

   c. Failed to implement the Programatic Requirements of Regulatory Guide 1.37 and ANSI N45.2.1-1973 for cleaning of fluid systems and associated components of water cooled nuclear power plants. (Paragraph 8, Report Details)

2. Contrary to the licensee's commitment[14/], all remaining ACP's undergoing trial use and procedures for like replacement of part on safety related equipment were not issued by December 1, 1975. (Paragraph 2.b, Report Details)

F. Status of Previously Reported Unresolved Items

Core thermal limits during load following situations (IE Report No. 050-331/75-16) has been resolved with the issue of Amendment 15 to Facility License No. DPR-49 and Change No. 16 to the license Technical Specifications. (Paragraph 3, Report Details)

Management Interview

Plant Site

At the conclusion of the inspection at the site on January 16, 1976 and February 3, 1976, the inspectors discussed their findings with Messrs. Hunt and Hammond. Mr. Wallace was also present on January 16, 1976. The following matters were discussed:

A. Problems encountered regarding implementation of a system for for followup on corrective actions committed to as a result of noncompliance and reportable occurrences. (Paragraph 2, Report Details)

B. Training of plant personnel not requiring NRC licenses. (Paragraph 5, Report Details)

C. Recent Technical Specification changes with regard to core thermal limits. (Paragraph 3, Report Details)

14/ IELP ltr to IE:III dtd 10/17/75.

D. Requirements for maintaining plant cleanliness and housekeeping. (Paragraph 4, Report Details)

E. Work inspection program and qualification of inspection. (Paragraph 6, Report Details)

F. Cleaning and maintaining cleanliness of fluid systems. (Paragraph 8, Report Details)

Corporate Office

On February 4, 1976, Messrs. Fiorelli, Knop, Kister, and Jorgensen met with Messrs. Liu and Wallace to discuss several NRC Inspection and Enforcement concerns. The following matters were discussed:

A. The dates provided by the licensee[15/] concerning the implementation of an approved DAEC Fire Plan were discussed. It was noted that this matter is also addressed in IE:III letter to IELP dated February 5, 1976, which includes a request for response, no additional reply to this item is required.

B. IE:III concerns with regard to a continued emphasis on the Site Emergency Plan were discussed. As a result, it is understood that the required IELP management attention will be applied to insure a continued effort toward maintaining a viable Emergency Plan.

C. IE:III's continuing concerns with regard to implementation of a commitment followup system were discussed. It was understood that licensee efforts are progressing toward implementation of a system for both the site and corporate office.

D. The licensee's failure to initiate and implement a Maintenance Work Inspection Program was discussed. As a result, it was understood that the licensee is developing a work inspection program for implementation at DAEC.

E. IELP's commitment (FSAR, Amendment 16) to follow the guidance of WASH 1284 (October 26, 1974), "Guidance on Quality Assurance Requirements During the Operating Phase of Nuclear Power Plant", WASH 1309 (May 10, 1974), "Guidance on Quality Assurance During the Construction Phase of Nuclear Power Plants", and WASH 1283 (May 24, 1974), "Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants - Revision 1", was discussed. The resultant understanding was

15/ IELP ltr to IE:III dtd 1/7/76.

that IELP would review the documents and implement programs as appropriate to comply with the provisions of these documents.

In conclusion, based on our discussion with your Management, it is our understanding that you will provide a formal response to Items B. through E above.

REPORT DETAILS

1. Persons Contacted

Site

G. G. Hunt, Chief Engineer
E. Hammond, Assistant Chief Engineer
B. York, Operations Supervisor
R. Zook, Shift Supervising Engineer
D. Kalavatinos, Shift Supervising Engineer
C. Vondra, Shift Supervising Engineer
J. Gebert, Maintenance Superintendent
R. Rockhill, Mechanical Maintenance Supervisor
J. Vinquist, Electrical Maintenance Supervisor
G. Phillips, Administrative Supervisor
K. Young, Radiation Protection Engineer
R. Hannen, Reactor and Plant Performance Engineer
D. Wilson, Technical Engineer
R. Rinderman, Quality Supervisor
L. Nelson, Engineer
J. Davis, Quality Auditor
K. Harrington, Instrument Mechanic
D. Mineck, Shift Supervising Engineer
J. Weeda, Surveillance Engineer

Corporate Office

J. Wallace, Vice President, Generation
L. Liu, Vice President, Engineering
K. Harrington, Supervising Engineer, Construction
G. Cook, Manager, Quality Assurance

2. Licensee Action on Previously Identified Enforcement Action

a. The licensee response[16/] to Infraction A.6 in Inspection Report No. 75-11 included a commitment to issue a procedure to provide instructions for replacement of like for like items on safety related equipment by January 1, 1976. The inspector noted that as of January 16, 1976, the procedure had not been issued. Discussions with the licensee regarding the commitment resulted in the establishment of a new commitment date of March 1, 1976.[17/]

16/ IELP ltr to IE:III dtd 10/11/75.
17/ IELP ltr to IE:III dtd 1/22/75.

b. The licensee response[18] to Letter Item 1 in Inspection Report No. 75-11 included a commitment to issue the remaining seven Administrative Control Procedures that were undergoing trial use by December 1, 1975. The inspector noted that as of January 16, 1976, six of the seven remain to be issued. A new date of February 15, 1976[19] has been established. The inspector informed the licensee that failure to meet this commitment and 2.a above is considered to be a deviation. The licensee was reminded of their obligation to inform the NRC when it becomes known that commitment dates will not be met, notification should be no later than the commitment date.

3. Core Thermal Limits

Inspection Report No. 050-331/75-16 included an unresolved item with regard to interim core thermal limits and associated limiting conditions for operation. Subsequent review of the problem and resultant issue, in final form, of License Amendment No. 15 and Technical Specification Change No. 16 resolved the questions. Operating conditions have been redefined and operability requirements with time limits were added.

Upon arrival at the site, the inspector was informed that on January 10, 1976, MCPR limits had been exceeded during a transient that resulted from a rod adjustment performed to compensate for fuel depletion. The inspector reviewed the event and noted that action had not been taken to restore MCPR to within the required limits and in the time frame required by the recently revised Technical Specifications. The inspector reviewed the Control Room copy of the Technical Specifications and noted that the subject change had not yet been incorporated. Discussions with the personnel indicated that they were aware that a change had been made but had not seen it. The inspector informed the licensee that the least conservative limiting conditions for MCPR had not been adhered to. The Technical Specification change was incorporated and the licensee prepared and submitted a reportable occurrence[20] regarding this event. The inspector subsequently informed the licensee that this event would be considered as an item of noncompliance. No response would be necessary since corrective action had already been taken by the licensee.[21]

18/ IELP ltr to IE:III dtd 10/17/75.
19/ IELP ltr to IE:III dtd 1/22/76.
20/ Reportable Occurrence 76-002 dtd 1/21/76.
21/ Ibid.

4. Cleanliness/Housekeeping

The inspector reviewed the plant requirements for maintaining cleanliness. Plant directives regarding this subject include Special Order's 80 and 82 for maintenance personnel and Operating Order 2-32 for operating personnel. Although the above documents provide cleaning assignment, and general guidance, specific instructions such as, the levels of cleanliness, clothing requirements, material cleanliness, supply air requirements, and accountability requirements in the various areas are not provided in accordance with ANSI N45.2.3 - 1973 which is the standard specified by Regulatory Guide 1.39, Housekeeping Requirements. It was noted that DAEC is committed to follow the guidance of "Quality Assurance Requirements for Operating Plants (WASH-1284) which includes Regulatory Guide 1.39.

This item is discussed further in the Corporate Management Meeting section of the report and is included as a deviation.

5. Training for Plant Personnel not Requiring NRC Licenses

The inspector reviewed the DAEC nonlicensed training program which is delineated in Quality Directive 1301.5, ACP 1401.5 and Section 6.4 of the Technical Specifications.

The inspector noted that the Basic General Training Program is included in the Plant Radiation Protection Manual, however, areas, such as Industrial Safety and Appropriate Plans and Procedures, apparently are not included. The licensee indicated that the above areas more appropriately belong in the particular department training programs where it can be tailored to fit the needs of each department.

The inspector attempted to review the programs for training, retraining, and replacement training in the Maintenance, Quality, and Radiation Protection Department. No formal programs were evident in the Maintenance and Radiation Protection Departments. ACP 1401.5, Paragraph 5 requires that a program for continuing indoctrination and training shall be established, documented and approved. Also, Plant Supervisors shall annually review the training programs to assure it is in keeping with plant, corporate and regulatory requirements. Furthermore ANSI 18.1 - 1971, which is referenced in Section 6.4 of the Technical Specifications states in Paragraph 5.5 that "a training program shall be established which maintains the proficiency of the operating organization". The licensee stated that the plant staff was essentially present during the plant startup and benefited from experience gained during the final construction

efforts and the test program. The inspector stated that a continuing training program is required to maintain proficiency and prepare personnel for more responsible positions and provide for training of new personnel. In conclusion it is considered that the present DAEC Training Program is not in compliance with Section 6.4, of the Technical Specifications, QAD 1301.5 and ACP 1401.5.

6. Work Inspection

The inspector reviewed the licensee's work inspection program for maintenance activities to determine conformance to DAEC Quality Directive 1310.1 and to the licensee commitment to comply with ANSI N45.2.6-1973.

a. Work Inspection Program

During discussions, with the Quality Control Engineer, Quality Assurance Manager and the Chief Engineer, it was determined that a formal work inspection program had not been instituted in accordance with DAEC Quality Directive 1310.1.

Informal work inspection utilizing the Maintenance Supervisors and journeymen as inspectors has been documented in such maintenance procedures as RP 62/ie-5+6 "Reactor Head Removal and Installation," performed in July 1975.

The inspector stated that the failure to implement the formal work inspection program stated in the DAEC Quality Directive 1310.1 was considered to be an item of noncompliance.

b. Qualification of Inspectors

During January 1975 the licensee committed in a letter to NRR (January 31, 1975) to follow the guidance of three WASH documents (WASH 1284 October 26, 1974, "Guidance on Quality Assurance Requirements During the Operating Phase of Nuclear Power Plants"; WASH 1309, May 10, 1974, "Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants" and WASH 1283, May 24, 1974, Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plant Revision").

In reviewing the requirements of ANSI N45.2.6 (requirement included in WASH 1284) with site personnel, it was determined that personnel performing the informal work inspection of maintenance activities were not trained and certified as inspectors as required by the ANSI standard. The inspector stated that the failure to provide trained, certified inspectors was considered to be a deviation from a commitment made to the NRC.

During discussions with site and corporate personnel, it was stated by the licensee that the work inspection issue was being actively pursued and that the matter would continue to receive priority review. This item was discussed further during the exit interview.

During other discussions with the licensee, the inspector discussed the following points related to the work inspection program:

(1) In the response to Question D1.15 of the FSAR the licensee had stated "The plant Quality Engineer verifies that the work is performed in accordance with approved procedures using properly qualified equipment and material."

(2) ANSI N45.2 1971, (Requirement of WASH Document 1283), Section II, states in part, inspection activities to verify the quality of work being performed by persons other than those who performed the activity being inspected. Such persons shall not report directly to the immediate supervisors who are responsible for the work being inspected.

The licensee acknowledged the inspector's comments and stated that these matters would be included in their review.

7. Quality Assurance Program Boundary

The inspector reviewed the licensee's control for determining the safety related status of structures, systems and components.

During discussion with site personnel, it was determined that a formal, detailed listing had not yet been established in accordance with Quality Directive 1301.4 Titled, "Quality Assurance Program Boundary."

In the interim the plant is using the safety related list contained in the FSAR. The licensee stated that all components within the systems described in this list are treated as safety related. The licensee has also supplemented the listing in the FSAR with a computer run that details the components in the safety related systems described in the FSAR.

During a subsequent telecon with Mr. Liu on February 6, 1976, he stated that all items requested for procurement are reviewed for safety related status by the Engineering Staff and the Quality Assurance Department.

The inspector stated that the control of status of safety related items etc., would be reviewed during a subsequent inspection and is considered to be an unresolved item.

8. Cleaning of Fluid Systems and Assoicated Components.

Quality Assurance Requirements for the Operating Phase of Nuclear Power Plants (WASH 1284) provides guidance in the form of Regulatory Guide 1.37 and ANSI N45.2.1-1973 for cleaning of Fluid System and Associated Components. The inspector attempted to review DAEC's program in this area. It was noted that, although requirements for maintaining cleanliness during refueling operations are generally covered in the refueling documents, no general program, as delineated in the above guide and standard, was evident. In discussion, the licensee stated that program requirements in this area had not yet been implemented. This area is further discussed in Management Interview and Deviation section of this report.

9. Miscellaneous

The inspector reviewed several inspection items that remain outstanding from previous inspection reports. The items reviewed and comments are as follows:

a. HPCI Room Ventilation Deficiencies, Inspection Report No. 75-13

Design Change No. 478 modified some penetrations in the HPCI Room walls which increased the normal ventilation supply and lowered the HPCI room ambient temperature sufficiently to permit the Safeguards Ventilation system to be secured. The continuous operation of the system was not the normal mode and was resulting in abnormal degradation of the Emergency Service Water System pumps. Summer temperatures may cause additional problems however, so this item will be reviewed again at a later date.

b. ESW Sump Level Alarms, Inspection Report No. 75-13

An analysis was performed to determine the effect of the sump level on the ESW pump rated capacity. As a result, the sump level alarms were set at 20 feet and a caution was added to Operating Instruction 54 with regard to the effects of sump level on the operability of the ESW pumps. This item is considered closed.

c. Inoperable Floor Drain Valve

Inspection Report No. 75-09 noted a deviation from a commitment in AO Report No. 75-16 in that additional surveillance on a troublesome floor drain valve (CV 3705A) was not performed. During a subsequent test the valve failed again. Review of the maintenance records and subsequent surveillance records indicated the valve is presently working satisfactorily. This item is considered closed.

d. Main Steam Relief Valve Testing

Inspection Report No. 75-09 noted that a design change to the main steam relief valves did not include requirements for testing. Engineering subsequently provided testing requirements. The inspector reviewed STP 46004 dated July 18, 1975, which performed the required tests. This item is considered closed.

e. Dropped Fuel Bundle

Inspection Report No. 75-07 identified a dropped fuel bundle incident. Part of the permanent fix included a grapple design change which would provide a positive method to ensure that the grapple is engaged to the fuel bundle bail. Design Change No. 437 has been completed on the grapple and it will be used during the upcoming refueling outage.

f. H_2O in the Off-Gas System

Inspection Reports No. 75-02 and No. 75-04 noted a problem with water in the off-gas system. The inspector reviewed the subsequent investigation conducted by the licensee and noted that the problem had been caused by some steam

cut carbon steel orifices in the recombiner continuous vents. This condition had caused overpressurization of the drain system which prevented the condensers from draining properly thus causing water to collect in the system. The orifices were replaced with new orifices of stainless steel. The problem has not recurred. This item is considered closed.