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SUBJECT: Responds to NRC 870512 ltr re violations noted in Insp Rept
 50-333/87-11 on 870330-0403. Corrective actions: validation of
 vendor technical manuals used for maint will be completed by
 Dec 1988, Form DCAR 87-160 issued & QA staff counseled.

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Radford J. Converse
Resident Manager

June 11, 1987
JAAP 87-0476

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
INSPECTION NO. 87-11

Reference: 1. NRC letter, William V. Johnston to R. J. Converse
dated May 12, 1987, transmitting Inspection Report
50-333/87-11

Enclosure: 1. Response to Notice of Violation

Gentlemen:

In accordance with the provisions of 10 CFR 2.201, Enclosure 1 provides our response to Appendix A, Notice of Violation, transmitted by Reference 1. This refers to the inspection conducted by Mr. G. Napuda of the Region 1 office on March 30 - April 3, 1987, at the James A. FitzPatrick Nuclear Power Plant.

Reference 1 requested that the Authority evaluate its present plans regarding the validation of Vendor Technical Manuals as part of our current 1989-90 schedule for completion.

In 1984-85, the Authority developed a comprehensive plan to upgrade the overall maintenance program at FitzPatrick. The implementation schedule for this program involves several years due to the magnitude of the overall effort which includes activities like: the initiation of performance monitoring programs; the generation of detailed maintenance procedures which do not use technical manuals for active reference; the establishment of a library which controls the vendor technical manuals (completed); the generation of a detailed and comprehensive master equipment list; the initiation of formal apprenticeship training and; the systematic review of plant components to determine periodic maintenance requirements (above those presently identified) and to validate spare parts and vendor technical manuals. The validation of vendor technical manuals was incorporated within this overall program plan to ensure efficiency and completeness.

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To: U. S. Nuclear Regulatory Commission
From: Radford J. Converse
Subject: NRCI 87-11

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The preliminary project team necessary for completing the systematic review effort has been established and the initial orientation and mobilization effort is in progress. After re-evaluation, priority of their work will be with safety related components. Based on our present projections, the validation of those vendor technical manuals actually used for maintenance on safety related components shall be completed by December 1988.



RADFORD J. CONVERSE

RJC:WF:fah
Att.

CC: NRC Region 1 Office
Attn: Mr. W. V. Johnston
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NRC Resident Inspector
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NOTICE OF VIOLATION

- A. 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, states in part, "Measures shall be established to assure that conditions adverse to quality, such as....defective material and equipment....are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition...the cause of the condition, and the corresponding action taken shall be documented...." The licensee's Quality Assurance Procedure 16-1, Corrective Action Control-Plant, Revision 2, requires the nonconformances which are identified by inspection be documented on a Nonconformance and Corrective Action (NCA) form or a Deficiency and Corrective Action Report (DCAR) form.

Contrary to the above, as of April 3, 1987, neither an NCA nor DCAR form had been initiated to document the cause and corrective action associated with defective material and equipment caused by significant pitting of the internal surfaces of the three inch carbon steel piping connected to the inlet and outlet sides of Core Spray System Valves 14-MOV-5A and 5B and which exceeded the ANSI B31.1 allowable tolerance of 12.5% for surface imperfections.

This is a Severity Level IV violation (Supplement I)

- B. Technical Specification 6.8(A), states in part, "Written procedures...shall be established and implemented...that meet or exceed the requirements and recommendations of...Appendix A of Regulatory Guide 1.33, November 1972". Appendix A, paragraphs I.5 and H, (of RG 1.33) require procedures for modification work and for measuring and test equipment control.
1. Licensee Procedure No. 10, Engineering and Change Requests (ECR), Revision 3, requires that Quality Assurance/Quality Control (QA/QC) review and concur with an ECR that affects a QA requirement or revises a QC inspection requirement.

Contrary to the above, as of April 3, 1987:

- ECR No. 5 to Modification FI-82-33, dated January 29, 1985, that added QC inspection requirements for penetrant testing and post-weld heat treating was not reviewed and concurred to by QA/QC.

- ECR NO. 17 to Modification FI-82-33, dated March 26, 1985, that added QC inspection requirements for visual examination and penetrant testing of socket welds, was not reviewed and concurred to by QA/QC.
 - ECR No. 3 and 6 to Modification FI-85-09, dated February 20, 1987, that added QC inspection requirements for the removal and installation of a piping section in the "A" core Spray minimum flow line, was not reviewed or concurred to by QA/QC.
2. Licensee Administrative Procedure No. 4.2, Control of Measuring and Test Equipment, Revision 2, requires each test instrument to have a log (card) recording when and where that instrument was used and the initials of the user.

Contrary to the above, as of April 3, 1987, the following instrument usages were not recorded on the respective logs for:

- Biddle Megger E-817, used for measurements (PMWR 0730, January 18, 1987) on the QA Category IEH Reactor Core Isolation Cooling System inboard Steam Isolation Valve (13MOV-15) Motor.
- Biddle Megger E-817 and Fluke Multimeter E-808, used to perform measurements (WR-033055, October 2, 1986) on QA Category IEH High Pressure Coolant Injection System inboard Containment Isolation Valve (23MOV-15) Motor.

This is a Severity Level V violation. (Supplement I)

RESPONSE TO THE NOTICE OF VIOLATION

- A. The Authority agrees with this violation, however, it is an isolated case. To date in 1987, the Site Quality Assurance Department has issued approximately 500 DCARs, NCAs, Procurement Documentation Deficiency Reports (PDDRs) and Audit Findings. These deficiencies all require corrective action controls.

The fundamental cause of the violation was the failure of the QA staff to recognize that the ECR system was not a suitable means for providing corrective actions to resolve significant material deficiencies. The ECR system does not require identification of the cause of the condition nor the actions required to prevent recurrence.

The immediate corrective actions were:

- a) DCAR 87-160 was issued, which provides for appropriate corrective action and determination of a cause if possible.
- b) The QA staff member immediately involved in this incident was counseled as to the requirements of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, and Quality Assurance Procedure (QAP) 16.1, Corrective Action.

The permanent corrective actions were:

- a) This violation was critiqued with the QA staff during a department staff meeting held May 18, 1987.
- b) A copy of this violation, the applicable DCAR and QAP 16.1 is being routed to the entire QA staff as required reading. This will be completed by June 19, 1987.

B-1 The Authority agrees with this violation. The fundamental cause of this violation was an interpretation of what constitutes a change to a QC inspection requirement. In the case of both modifications, F1-82-33 and F1-85-09, the Responsible Engineers had previously established QC inspection requirements for non-destructive examination in the original issue of the installation procedures. These installation procedures were reviewed and concurred by the QA Department. During subsequent installation of the modification, new steps were added to the installation procedures via Engineering Change Requests (ECR's). These steps required additional similar work to be performed with the same QC inspection requirements that had been established in the original installation procedures. The Responsible Engineers, in both cases, felt the QC inspection philosophy had been previously established and that QC concurrence on the ECR's would be redundant. In all of the cases identified, applicable quality control inspection criteria were included in the modification installation documents and performed as part of the work activity.

The immediate corrective action was to revise Engineering and Design Procedure, EDP-10, to clarify the requirements for QA/QC concurrence on ECR's. The revision essentially states that QA/QC concurrence is required for ECR's that; add work steps to the procedures for which QC inspection is required or revise or delete QA/QC activities or requirements from the procedure. QA/QC concurrence will not be necessary if the ECR references or involves procedures which already specify required QC activities. Concurrence will also not be required if the ECR does not change the existing QC philosophy previously established for the specific modification.

The permanent corrective action is the training of the plant engineering staff on the revision to EDP-10 by June 19, 1987.

- B-2 The Authority agrees with the finding that the listed test equipment was not recorded on its specific usage log card although they were recorded on the appropriate work request documentation.

The cause of this violation was a misunderstanding of the procedural requirements by electrical maintenance personnel due to a lack of training.

The immediate corrective actions were:

- a) Entering the appropriate data on the usage cards.
- b) Conducting a training session on the requirements of the procedure, "Control of Measuring and Test Equipment", with the electrical maintenance personnel.

The long term corrective action will include control of measuring and test equipment within the Apprenticeship program training.

The results of the corrective actions will be assessed as part of the normally scheduled QA criterion audits (every 2 years).