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OCT 23 1987

Docket No. 50-261
License No. DPR-23

1987 OCT 29 A 9 48

USNRC-03

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Senior Executive Vice President
Power Supply and Engineering
and Construction
P. O. Box 1551
Raleigh, NC 27602

Gentlemen:

SUBJECT: ENFORCEMENT CONFERENCE SUMMARY
(NRC INSPECTION REPORT NO. 50-261/87-10)

This letter refers to the Enforcement Conference held at our request on September 17, 1987. This meeting concerned activities authorized for your H. B. Robinson Steam Electric Plant. The issues discussed at this conference related to environmental qualification of electrical equipment. A summary, a list of attendees, and a copy of your handout are enclosed.

It is our opinion that this meeting was beneficial and has provided a better understanding of the inspection findings, the enforcement issues, and the status of your corrective actions. We are continuing our review of these issues to determine the appropriate enforcement action.

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 letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this matter, please contact us.

Sincerely,

ORIGINAL FILED IN
J. NELSON GRACE

J. Nelson Grace
Regional Administrator

Enclosures:

- 1. Enforcement Conference Summary
- 2. List of Attendees
- 3. Handout

cc w/encls: (See page 2)

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OCT 23 1987

Carolina Power and Light Company

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cc w/encls:

G. P. Beatty, Jr., Vice President
Robinson Nuclear Project Department
R. E. Morgan, Plant General Manager

bcc w/encls:

J. Lieberman, DOE
G. R. Jenkins, EICS
NRC Resident Inspector
Document Control Desk
State of South Carolina

RII *mm*
NMerriweather:lb
10/16/87

RII *TE*
TEConlon
10/16/87

RII *AH*
AHerdt
10/16/87

RII *AG*
AGibson
10/16/87

RII *DV*
DVerrëlli
10/20/87

RII *J*
Jenkins
10/20/87

RII *ME*
MErnst
10/20/87

ENCLOSURE 1

ENFORCEMENT CONFERENCE SUMMARY

The licensee did not take exception to any of the information described in the inspection report. The licensee acknowledged that the potential enforcement issues identified in the inspection report did, in fact, constitute violations of NRC requirements but considered that three of the items did not merit NRC enforcement action. A description of the items and the basis for the licensee's positions are outlined on pages 14-19 of the licensee's handout. In addition, CP&L stated that a detailed write-up of their position and presentation would be submitted to the NRC within 30 days.

ENCLOSURE 2

ENFORCEMENT CONFERENCE
LIST OF ATTENDEES

Licensee: Carolina Power & Light Company
Facility: H. B. Robinson Steam Electric
 Plant Unit 2
Location: NRC Region II Office
 Atlanta, Georgia

Date: September 17, 1987
IR No.: 50-261/87-10

Carolina Power & Light Company

E. E. Utley, Senior Executive Vice President, CP&L
M. A. McDuffie, Senior Vice President Nuclear Generation, CP&L
L. Eury, Senior Vice President, Operations Support
S. R. Zimmerman, Manager, Nuclear Licensing
R. B. Richey, Manager, Licensing and Nuclear Manager
P. Salas, Senior Licensing Engineer
G. Beatty, Vice President, H. B. Robinson Nuclear Project
A. R. Wallace, Manager, Technical Support, H. B. Robinson Steam Electric Plant
(RSEP)
P. W. Howe, Vice President Brunswick Nuclear Project, CP&L
C. R. Dietz, General Manager, BSEP, CP&L
E. R. Eckstein, Manager - Technical Support, BSEP, CP&L
K. Enzor, Director, Regulatory Compliance, BSEP
B. Parks, Jr., Engineer Supervisor, BSEP, CP&L

USNRC Region II

M. L. Ernst, Deputy Regional Administrator, RII
L. A. Reyes, Director, Division of Reactor Projects, RII
A. F. Gibson, Director, Division of Reactor Safety, RII
G. R. Jenkins, Director, Enforcement and Investigation Coordination
Staff (EICS)
D. M. Verrelli, Chief, Reactor Projects Branch 1, DRP
A. R. Herdt, Chief, Engineering Branch, DRS
H. C. Dance, Chief, Reactor Projects Section 1B, DRP
T. E. Conlon, Chief, Plant Systems Section, DRS
P. E. Fredrickson, Chief, Reactor Projects Section 1A, DRP
H. J. Krug, Senior Resident Inspector, RSEP
W. H. Ruland, Senior Resident Inspector, BSEP
A. B. Ruff, Reactor Inspector, DRS
S. J. Vias, Project Engineer, DRP
B. Uryc, Enforcement Coordinator, EICS

NRC Headquarters

E. Merschhoff, Chief, Vendor Inspection Branch, Office of Nuclear Reactor
Regulation (NRR)
H. J. Wong, Senior Enforcement Specialist, Office of Enforcement
E. Eccleston, Senior Project Manager, NRR
R. C. Wilson, Engineer, NRR

ENCLOSURE 3

H. B. ROBINSON STEAM ELECTRIC PLANT
UNIT NO. 2

REVIEW OF FINDINGS
RELATED TO
ENVIRONMENTAL QUALIFICATION

AT
NRC REGION II
HEADQUARTERS

SEPTEMBER 17, 1987

MIS:87-4282(1)

AGENDA

1. DESCRIPTION OF PROGRAM
2. OVERVIEW OF FINDINGS
3. FINDINGS INVOLVING EXTENUATING CIRCUMSTANCES
4. FINDINGS CP&L BELIEVES DO NOT MERIT ENFORCEMENT ACTION
5. PROGRAM IMPROVEMENTS
6. PROGRAM ASSESSMENT

H. B. ROBINSON EQ PROGRAM

DEVELOPMENT

- VINTAGE PLANT, PRIOR TO APPX. B QA PROGRAM
- DOR GUIDELINES
- CONSISTENT WITH INDUSTRY PRACTICE
- PERCEPTION OF EQ REQUIREMENTS HAS BROADENED
- COSTLY, CHANGING ENVIRONMENT

REVIEW

- INITIAL INTERNAL PROCESS
- SUBMITTAL TO NRC
- INTERNAL AUDITORS
- NRC INSPECTIONS

IMPLEMENTATION

- FILE DEVELOPMENT
- EQ COORDINATOR AT SITE
- SITE PROCEDURES UPGRADED
- TRAINING COMPLETED

COMMITMENT

- ACTIVE IN INDUSTRY GROUPS
- PROACTIVE REVIEW
- PROMPT RESOLUTION OF DEFICIENCIES
- CONSERVATIVE CORRECTIVE ACTION
- PROMPT REPORTING PER NRC GUIDELINES

STATUS

- FINDINGS RESOLVED IN CV
- ADDITIONAL REVIEW UNDERWAY
- TESTING PROGRAM COMPLETED
- EQUIPMENT FULLY QUALIFIED

STAFF FINDINGS

CABLE QUALIFICATION (87-10-01)

CROUSE-HINDS PENETRATIONS (87-10-02)

LIMITORQUE MOTOR OPERATORS (87-10-03)

CABLE ENTRANCE SEALS (87-10-04)

RAYCHEM SPLICES - CP&L IDENTIFIED FAILURE TO FOLLOW
PROCEDURE (87-10-05)

LOOP ACCURACY (87-10-06)

TAPED SPLICES - CP&L IDENTIFIED (87-10-07)

FINDINGS INVOLVING EXTENUATING CIRCUMSTANCES

QUALIFICATION OF CABLE (87-10-01)

- STAFF FINDING
 - CABLE IDENTIFICATION - TYPE AND USE
 - QUALIFICATION DOCUMENTATION - INSULATION RESISTANCE

- CP&L'S PERSPECTIVE
 - METHODOLOGY OF IDENTIFICATION VALID, IMPLEMENTATION WAS DEFICIENT
 - QUALIFICATION OF CABLE WAS CONSISTENT WITH INDUSTRY TESTING STANDARDS AT THE TIME
 - DEFICIENCY EXISTED IN THAT UNDOCUMENTED PVC CABLE FOUND IN CP&L WALKDOWN
 - SAMUEL MOORE CABLE A R.G. 1.97 ISSUE ONLY
 - ENVIRONMENT OUTSIDE CV REQUIRED NO SPECIAL QUALIFICATION

- BACKGROUND
 - CABLE LIST DEVELOPED FROM ORIGINAL PROCUREMENT DOCUMENTATION; KERITE AND CONTINENTAL
 - 1980 SAMPLE WALKDOWN SUPPORTED DOCUMENTATION REVIEW
 - CP&L 90 DAY REPORT IDENTIFIES CABLE AND DOCUMENTATION
 - NRC MAY 21, 1981 SER REQUESTS FURTHER INFORMATION
 - NRC SER/FRANKLIN TER JANUARY 5, 1983 ACCEPTS KERITE; CITES CONTINENTAL DEFICIENCIES
 - CP&L MAY 20, 1983 RESPONSE TO 10CFR50.49 CLOSES CONTINENTAL DEFICIENCIES
 - CP&L MARCH 2, 1984 LETTER CONFIRMS CONTINENTAL QUALIFICATION
 - NRC MARCH 19, 1985 SER: "THE PROPOSED RESOLUTION FOR EACH OF THE ENVIRONMENTAL QUALIFICATION DEFICIENCIES IDENTIFIED FOR ROBINSON 2 IS ACCEPTABLE"

QUALIFICATION OF CABLE (87-10-01)
(CONTINUED)

- ROOT CAUSE
 - INADEQUATE DOCUMENT REVIEW

- CORRECTIVE ACTION
 - WALKDOWN CONDUCTED DURING 1987 OUTAGE
 - ADDITIONAL DOCUMENT REVIEW COMPLETED
 - JCO DEVELOPED AND SUBMITTED
 - ADDITIONAL CABLE TEST CONDUCTED

- SAFETY SIGNIFICANCE
 - TESTING AND ADDITIONAL ANALYSIS HAVE CONFIRMED COMPONENTS WOULD HAVE PERFORMED THEIR SAFETY FUNCTION

- SUMMARY
 - A DOCUMENTATION DEFICIENCY EXISTED FOR PVC CABLE IDENTIFIED IN CP&L WALKDOWN
 - PROMPTLY REPORTED (LER 87-007)
 - UNDOCUMENTED CABLE REPLACED WITH KNOWN QUALIFIED CABLE PRIOR TO STARTUP
 - A SAMPLE OF SAMUEL MOORE PVC CABLE REMOVED HAS BEEN QUALIFIED BY TESTING
 - KERITE AND CONTINENTAL CABLE INSULATION RESISTANCE CONFIRMED ACCEPTABLE BY TESTING

CABLE ENTRANCE SEALS (87-10-04)

- STAFF FINDING
 - ASCO SOLENOID VALVES AND ROSEMOUNT 1153A TRANSMITTERS NOT QUALIFIED BECAUSE ELECTRICAL CONNECTION PENETRATIONS WERE NOT SEALED.
- CP&L'S PERSPECTIVE
 - DEFICIENCY EXISTED SINCE THE INSTALLED CONFIGURATION WAS NOT SUPPORTED BY QUALIFICATION DOCUMENTATION.
- BACKGROUND
 - ASCO TEST REPORT INADVERTENTLY MISINTERPRETED TO SUPPORT QUALIFICATION WITHOUT SEALS
 - ROSEMOUNT TESTING CONFIGURATION IMPLIED USE OF SEALS NOT NEEDED.
 - INSTALLED CONFIGURATION BASED ON CP&L INTERPRETATION OF TEST REPORTS.
- ROOT CAUSE
 - INADVERTENT MISINTERPRETATION OF TEST DATA.
- CORRECTIVE ACTION
 - SEALS INSTALLED ON ASCO SOLENOIDS AND ROSEMOUNT TRANSMITTERS DURING 1987 REFUELING OUTAGE.
 - INITIATED A SYSTEMATIC REVIEW OF EQ FILE DOCUMENTATION.
- SAFETY SIGNIFICANCE
 - ASCO SOLENOIDS WOULD HAVE PERFORMED THEIR SAFETY FUNCTION.
 - ROSEMOUNT TRANSMITTERS REQUIRED SEALS.

CABLE ENTRANCE SEALS (87-10-04)
(CONTINUED)

- SUMMARY
 - DEFICIENCY EXISTED.
 - PROMPTLY REPORTED (LER 87-007)
 - DEFICIENCY CORRECTED BY INSTALLATION OF SEALS PRIOR TO STARTUP.

QUALIFICATION OF RAYCHEM SPLICES (87-10-05)
(CP&L IDENTIFIED)

- STAFF FINDING
 - CP&L FILES DID NOT ADEQUATELY DOCUMENT QUALIFICATION OF NUMEROUS ELECTRICAL SPLICES USING RAYCHEM SLEEVING.

- CP&L'S PERSPECTIVE
 - A DEFICIENCY EXISTED IN THAT THE SPLICES DID NOT COMPLY WITH INSTALLATION PROCEDURES.
 - WITH ONE EXCEPTION, ALL SPLICES QUALIFIABLE.

- BACKGROUND
 - MID-1986 SEVERAL UTILITIES NOTED RAYCHEM SPLICE PROBLEMS.
 - CP&L PROACTIVE IN WORKING WITH NRC AND INDUSTRY ON THE RAYCHEM ISSUE.
 - NRC ISSUED IEN 86-53 ON JUNE 26, 1986.
 - CP&L SCHEDULED INSPECTIONS AT NEXT REFUELING OUTAGE.
 - CP&L DISCOVERED QUESTIONABLE RAYCHEM INSTALLATION. (LER 87-003)
 - INSPECTION SUBSTANTIALLY COMPLETE BEFORE AUDIT.
 - INSPECTION TEAM FOUND SPLICE INSPECTION CRITERIA AND PROGRAM ACCEPTABLE.

- ROOT CAUSE
 - INADEQUATE TRAINING IN SELECTION AND INSTALLATION OF SPLICES.

- SAFETY SIGNIFICANCE
 - WITH ONE EXCEPTION, ALL COMPONENTS WOULD HAVE PERFORMED THEIR SAFETY FUNCTION.

QUALIFICATION OF RAYCHEM SPLICES (87-10-05)
(CONTINUED)

- CORRECTIVE ACTION
 - INSPECTION PROGRAM ESTABLISHED TO ADDRESS ALL SPLICES.
 - SPLICES REPLACED WITH KNOWN QUALIFIED SPLICES.
 - PROCEDURE REVISED TO INCLUDE ADDITIONAL INDEPENDENT VERIFICATION.
 - ADDITIONAL PERSONNEL TRAINING PROVIDED

- SUMMARY
 - DEFICIENCY EXISTED IN THAT INSTALLATION PROCEDURE NOT PRECISELY FOLLOWED.
 - SELF-IDENTIFIED; PROACTIVE RESPONSE.
 - PROMPTLY REPORTED (LER 87-003).
 - EXTENSIVE CORRECTIVE ACTION; SPLICES REPLACED FOR CONSERVATISM.
 - INSPECTION TEAM CONCURRED WITH CP&L ACTION.

LIMITORQUE MOTOR OPERATORS (87-10-03)

- STAFF FINDING
 - UNQUALIFIED GREASE USED IN VALVE OPERATORS (744A & B, 866A & B).
 - T-DRAINS AND GREASE RELIEF VALVES WERE MISSING (744A & B, 866A & B).
 - UNQUALIFIED MOTOR LEAD SPLICES (866A & B).
 - UNQUALIFIED INTERNAL WIRING (744A & B).
 - UNQUALIFIED TERMINAL BLOCK (744A & B).
 - UNQUALIFIED MOTOR BRAKE (744A & B).

- CP&L'S PERSPECTIVE
 - DEFICIENCIES EXISTED ON 866A & B.
 - 744A & B QUALIFIED AS IS DUE TO SHORT DURATION OF SERVICE.

- BACKGROUND
 - ORIGINAL MOTOR OPERATORS NOT CONSIDERED QUALIFIED BY STAFF.
 - 866A & B UPGRADED TO QUALIFIED CONFIGURATION.
 - 744A & B SAFETY FUNCTIONS REDEFINED.
 - GREASE SELECTED PER CONSULTATION WITH TEXACO AND LIMITORQUE.
 - INTERNAL WIRING REPLACED IN 866A & B IN RESPONSE TO IEN 86-03.
 - TAG FILE FOR 744A & B REMOVED DUE TO CHANGE IN STATUS.

- ROOT CAUSE
 - INADEQUATE CONTROL OF MODIFICATIONS OF EQ EQUIPMENT.
 - INADEQUATE PROCEDURES FOR MAINTAINING EQUIPMENT QUALIFIED.

LIMITORQUE MOTOR OPERATORS (87-10-03)
(CONTINUED)

- CORRECTIVE ACTION
 - DEFICIENCIES IN 866A & B RESOLVED BY HARDWARE CHANGES
 - DEFICIENCIES IN 744A & B RESOLVED BY DOCUMENTATION OF ADEQUACY
 - ADDITIONAL PROCEDURAL GUIDANCE PROVIDED FOR MODIFICATION AND MAINTENANCE CONTROL OF EQ EQUIPMENT

- SAFETY SIGNIFICANCE
 - 744A & B WOULD HAVE PERFORMED THEIR SAFETY FUNCTION
 - REASONABLE ASSURANCE EXISTS THAT 866A & B WOULD HAVE PERFORMED THEIR SAFETY FUNCTIONS

- SUMMARY
 - DEFICIENCIES EXISTED IN 866A & B
 - PROMPTLY REPORTED (LER 87-007)
 - DEFICIENCIES CORRECTED BEFORE STARTUP
 - 744A & B QUALIFIED AS INSTALLED
 - GREASE PREVIOUSLY USED CONFIRMED QUALIFIED BY TEST

FINDINGS CP&L BELIEVES DO NOT MERIT
ENFORCEMENT ACTION

CROUSE-HINDS PENETRATIONS (87-10-02)

- STAFF FINDING
 - PENETRATION ELECTRICAL CONNECTORS AND SHRINK-FIT SLEEVE SPLICES NOT TYPE-TESTED AND NOT QUALIFIED BY SIMILARITY ANALYSIS

- CP&L'S PERSPECTIVE
 - EVOLVING ISSUE
 - CROUSE-HINDS PENETRATIONS (INCLUDING PIGTAIL ASSEMBLIES) PURCHASED AS A UNIT
 - SHRINK-FIT SLEEVE SPLICES QUALIFIED AS A PART OF QUALIFIED PENETRATION ASSEMBLY
 - ELECTRICAL CONNECTOR FURTHER QUALIFIED BY SIMILARITY ANALYSIS
 - DEFICIENCIES NOT IDENTIFIED IN PRIOR REVIEWS
 - SIMILAR PENETRATION ASSEMBLIES ACCEPTED AT OTHER PLANTS

- BACKGROUND
 - CP&L 45-DAY REPORT (1980) IDENTIFIES PENETRATIONS
 - NRC SEPTEMBER 30, 1980 INSPECTION REPORT QUESTIONED CONNECTORS
 - CP&L 90-DAY REPORT SUPPLEMENTED INFORMATION ON CABLE AND CONNECTOR
 - NRC MAY 21, 1981 SER REQUESTS ADDITIONAL INFORMATION
 - NRC SER/FRANKLIN TER (JANUARY 5, 1983) REPORTED NO DOCUMENTATION PROVIDED
 - CP&L MAY 20, 1983 RESUBMITS DOCUMENTATION PROVIDED FRANKLIN
 - CP&L MARCH 2, 1984 LETTER OUTLINES RESOLUTIONS TO ALL FRANKLIN ITEMS
 - NRC MARCH 19, 1985 SER FINDS EQ RESOLUTIONS ACCEPTABLE

CROUSE-HINDS PENETRATIONS (87-10-02)
(CONTINUED)

- ACTIONS TAKEN
 - ALTHOUGH PREVIOUSLY CONSIDERED QUALIFIED, PENETRATION CONNECTORS AND HEAT-SHRINK SLEEVING WERE REPLACED WITH RAYCHEM SPLICES

- SUMMARY
 - SPLICES AND CONNECTORS PURCHASED AS PART OF QUALIFIED PENETRATION ASSEMBLY
 - CONNECTOR SIMILARITY ANALYSIS IN ACCORDANCE WITH DOR GUIDELINES
 - PENETRATIONS EXTENSIVELY REVIEWED BY NRC WITHOUT DEFICIENCY
 - BASED ON ANALYSES AND STAFF REVIEWS, CP&L REASONABLY BELIEVED THAT THERE WERE NO OUTSTANDING QUALIFICATION DEFICIENCIES
 - CONNECTORS, HEAT-SHRINK SLEEVES REPLACED PRIOR TO STARTUP
 - PROMPTLY REPORTED (LER 87-007)

LOOP ACCURACY (87-10-06)

- STAFF FINDING
 - REQUIRED LOOP ACCURACIES NOT DOCUMENTED AND SHOWN TO BE SATISFIED

- CP&L'S PERSPECTIVE
 - DOR REQUIREMENTS FOR INSTRUMENT ACCURACY MET
 - INSTRUMENT LOOP ACCURACY IS AN EMERGING ISSUE

- BACKGROUND
 - CP&L 45-DAY REPORT DETAILS USE OF ROSEMOUNT 176KF RTD'S AND MODEL 1153A TRANSMITTERS
 - INSTRUMENT ACCURACY SPECIFIED PER VENDOR DOCUMENTS
 - ACCURACY PROACTIVELY ADDRESSED

- ACTIONS TAKEN
 - LOOP ACCURACY CALCULATIONS BEING ADDED TO EQ FILE
 - CALCULATIONS BASED ON ACTUAL CABLE TEST DATA

- SUMMARY
 - LOOP ACCURACY IS A NEW STAFF POSITION THAT SHOULD NOT BE SUBJECT TO ENFORCEMENT ACTION

INADEQUATE QUALIFICATION OF TAPED SPLICES (87-10-07)
(CP&L IDENTIFIED)

- STAFF FINDING
 - CP&L DID NOT ADEQUATELY EVALUATE UNDOCUMENTED TAPED SPLICES

- CP&L'S PERSPECTIVE
 - IDENTIFIED BY CP&L AS PART OF SURVEILLANCE PROGRAM
 - POTENTIAL DEFICIENCY PROMPTLY EVALUATED
 - REPORTABILITY DETERMINATION VALID

- BACKGROUND
 - CP&L IDENTIFIED TAPED SPLICES DURING MARCH 1986 SURVEILLANCE
 - SIMILARITY ANALYSIS INDICATED QUALIFIED
 - QUALIFIED TAPED SPLICES REPLACED WITH QUALIFIED RAYCHEM SPLICES
 - NOT REPORTABLE SINCE QUALIFIED AS NOTED
 - SIGNIFICANCE DOCUMENTED BY INTERNAL MEMORANDUM
 - JCO NOT REQUIRED SINCE DISCOVERED AND CORRECTED PRIOR TO POWER OPERATION

- ROOT CAUSE
 - INSTALLED BY MODIFICATION PRIOR TO EQ PROGRAM DEVELOPMENT
 - INADEQUATE MODIFICATION REVIEW

- CP&L CORRECTIVE ACTIONS
 - QUALIFIED TAPED SPLICES REPLACED WITH QUALIFIED RAYCHEM SPLICES
 - MODIFICATION REVIEW PERFORMED
 - INSTRUMENTATION INSPECTIONS

INADEQUATE QUALIFICATION OF TAPED SPLICES (87-10-07)
(CONTINUED)

- SAFETY SIGNIFICANCE
 - SIMILARITY ANALYSIS SHOWED TAPED SPLICES WERE ACCEPTABLE

- SUMMARY
 - DEFICIENCY IDENTIFIED BY CP&L
 - DEFICIENCY EVALUATED FOR REPORTABILITY AND SIGNIFICANCE
 - DEFICIENCY CORRECTED PROACTIVELY
 - SPLICES REPLACED WITH RAYCHEM FOR CONSERVATISM
 - JCO NOT REQUIRED SINCE PLANT IN OUTAGE

PROGRAM IMPROVEMENTS

- ENVIRONMENTAL QUALIFICATION REQUIREMENTS HAVE BEEN EVOLVING CONTINUOUSLY
- H. B. ROBINSON PROGRAM HAS CHANGED IN ANTICIPATION OF AND IN RESPONSE TO CHANGING REQUIREMENTS
- MOST RECENT INSPECTION BROUGHT FORTH LATEST PERSPECTIVES FOR ENSURING SAFE OPERATION
- CP&L IS TAKING ADVANTAGE OF THE NEW PERSPECTIVE WE HAVE GAINED TO FURTHER ENHANCE AN ALREADY ESTABLISHED EQ PROGRAM

COMPLETED

- CLEAR ACCOUNTABILITY AT SITE
- EQUIPMENT WALKDOWNS AND RESULTANT CHANGES
- ADDITIONAL PROCEDURAL GUIDANCE
- TRAINING

ONGOING

- SYSTEMATIC REVIEW OF QUALIFICATION DOCUMENTS
- CONTINUE TO MONITOR INDUSTRY
- ENHANCE PROCEDURES
- ADDITIONAL TRAINING

PROGRAM ASSESSMENT

- EQ PROGRAM MEETS REQUIREMENTS OF 10CFR50.49
- MASTER LIST OF EQUIPMENT ACCURATE AND COMPLETE
- EXTENSIVE AUDITS AND SURVEILLANCES
- POTENTIAL DEFICIENCIES EVALUATED PROMPTLY AND CONSISTENTLY REPORTED IN A TIMELY MANNER
- PROMPT CONSERVATIVE APPROACH TO IDENTIFIED DEFICIENCIES
 - RAYCHEM SPLICES
 - TEAM FINDINGS
 - JCO DEVELOPMENT
 - EQUIPMENT CHANGES
 - EQUIPMENT WALKDOWNS
 - DOCUMENT REVIEWS
 - TESTING INFORMATION
 - PLANT SHUTDOWN
 - EQUIPMENT CHANGES
 - EXTENSIVE DATA
- COMMITMENT TO CONTINUED REVIEW AND IMPROVEMENT