

UNITED STATES  
NUCLEAR REGULATORY COMMISSIC  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

REACTOR FACILITIES BRANCH

FILE COPY

NOV 5 1975

Niagara Mohawk Power Corporation  
Attention: Mr. R. R. Schneider  
Vice President, Electric Operations  
300 Erie Boulevard West  
Syracuse, NY 13202

License No. DPR-17  
Inspection No. 75-21  
Docket No. 50-220

Gentlemen:

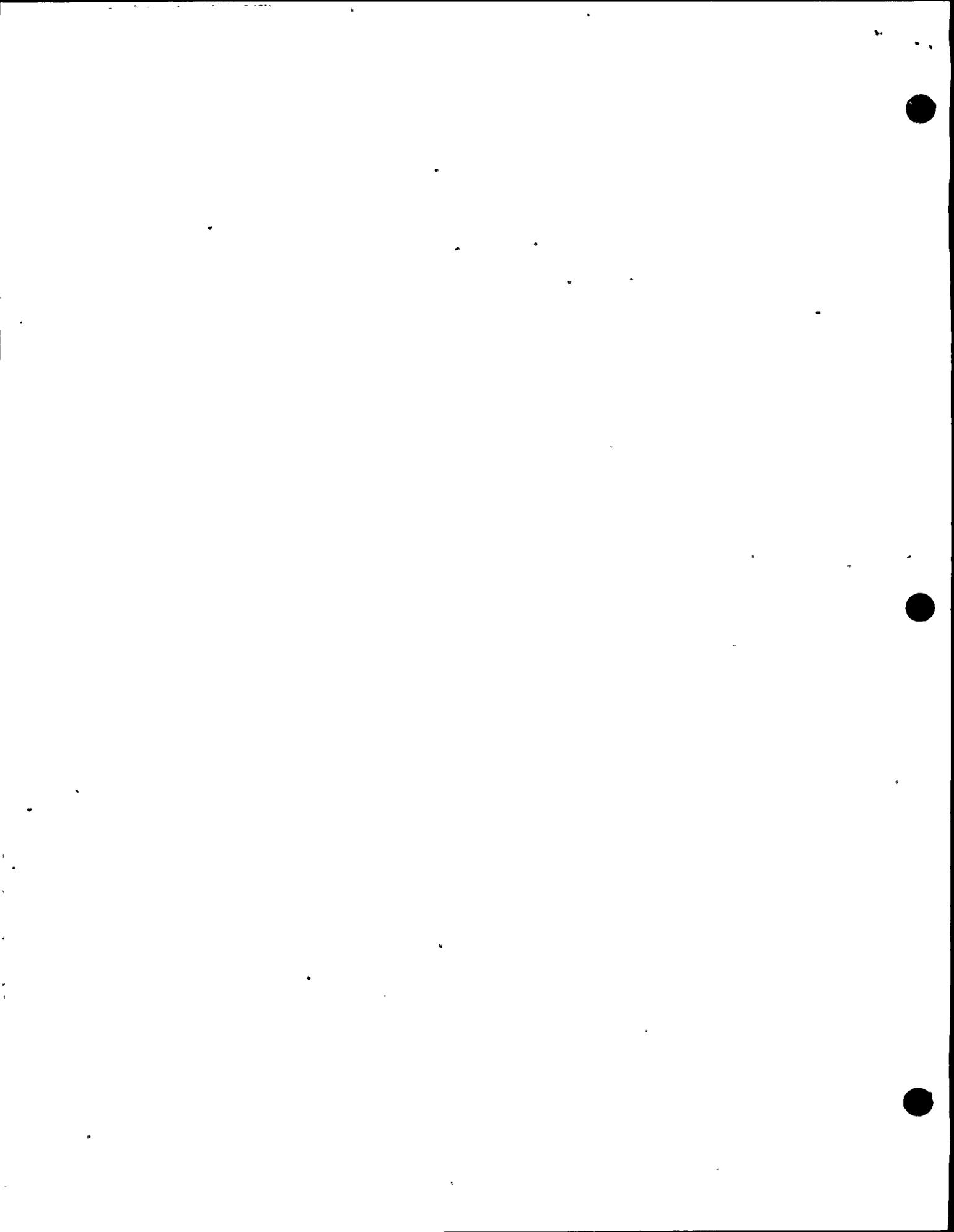
This refers to the inspection conducted by Mr. T. Martin of this office on September 26 to October 2, 1975 at the Nine Mile Point Station, Oswego, New York of activities authorized by NRC License No. DPR-17 and to the discussions of our findings held by Mr. Martin with Mr. T. Perkins of your staff at the conclusion of the inspection, and to a subsequent telephone discussion between Mr. Martin and Mr. Perkins on October 21, 1975.

Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements as set forth in the Notice of Violation, enclosed herewith as Appendix A. These items of noncompliance have been categorized into the levels as described in our correspondence to you dated December 31, 1974. 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 (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. In addition to the need for corrective action regarding these specific items of noncompliance, we are concerned about the implementation of your management control systems that permitted them to occur. Consequently, in your reply, you should describe in particular, those actions taken or planned to improve the effectiveness of your management control systems.



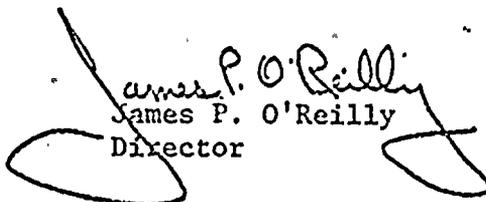
A handwritten signature in dark ink, appearing to be "J. H. J.", is located at the bottom right of the page.



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 the enclosures will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

  
James P. O'Reilly  
Director

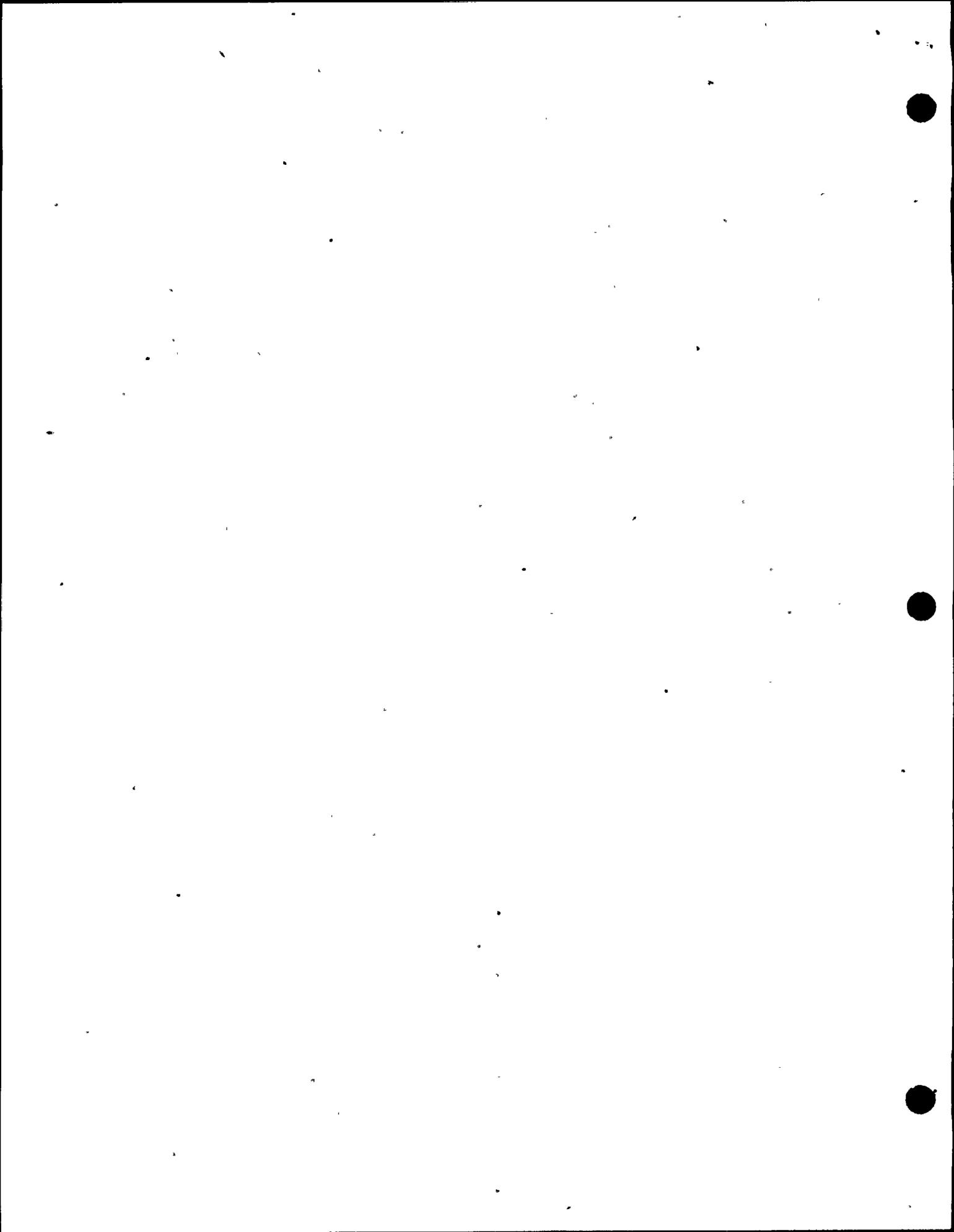
Enclosures:

1. Appendix A, Notice of Violation
2. Region I Inspection Report No. 50-220/75-21

cc: T. E. Lempges, General Superintendent, Nuclear Generation  
T. J. Perkins, Plant Superintendent  
C. L. Stuart, Operations Supervisor  
E. B. Thomas, Jr., Esquire  
A. Z. Roisman, Counsel for Citizens Committee for  
Protection of the Environment (Without Report)

bcc:

IE Mail & Files (For Appropriate Distribution)  
PDR  
Local PDR  
NSIC  
TIC  
REG:I Reading Room  
Region Directors (II, III, IV) (Report Only)  
State of New York  
A. Z. Roisman, Counsel for Citizens Committee for  
Protection of the Environment



APPENDIX A.

NOTICE OF VIOLATIONS

Based on the results of an NRC inspection conducted September 26 through October 2, 1975, it appears that certain of your activities were not conducted in full compliance with conditions of your license as indicated below:

- A. Contrary to Technical Specification 6.8.1 and Refueling Procedure OP-34, the Control Operator did not continuously monitor nuclear instrumentation during fuel insertion into the core.

This is an Infraction.

- B. Contrary to Technical Specification 6.8.1 and Administrative Procedure AP-5, the Master Copy of the Refueling Procedure (OP-34) was incomplete; in that Section B, Plant Operating Requirements, and Section C, Preparation for Fuel Movement, were missing.

This is an Infraction.

- C. Contrary to 10 CFR 50, Appendix J, Section II.H.2, automatic Oxygen Sample Containment Isolation Valves were not tested for leakage as required.

This is an Infraction.

- D. Contrary to 10 CFR 50, Appendix J, Section II.H.4, Feedwater Containment Isolation Valves were not tested for leakage as required.

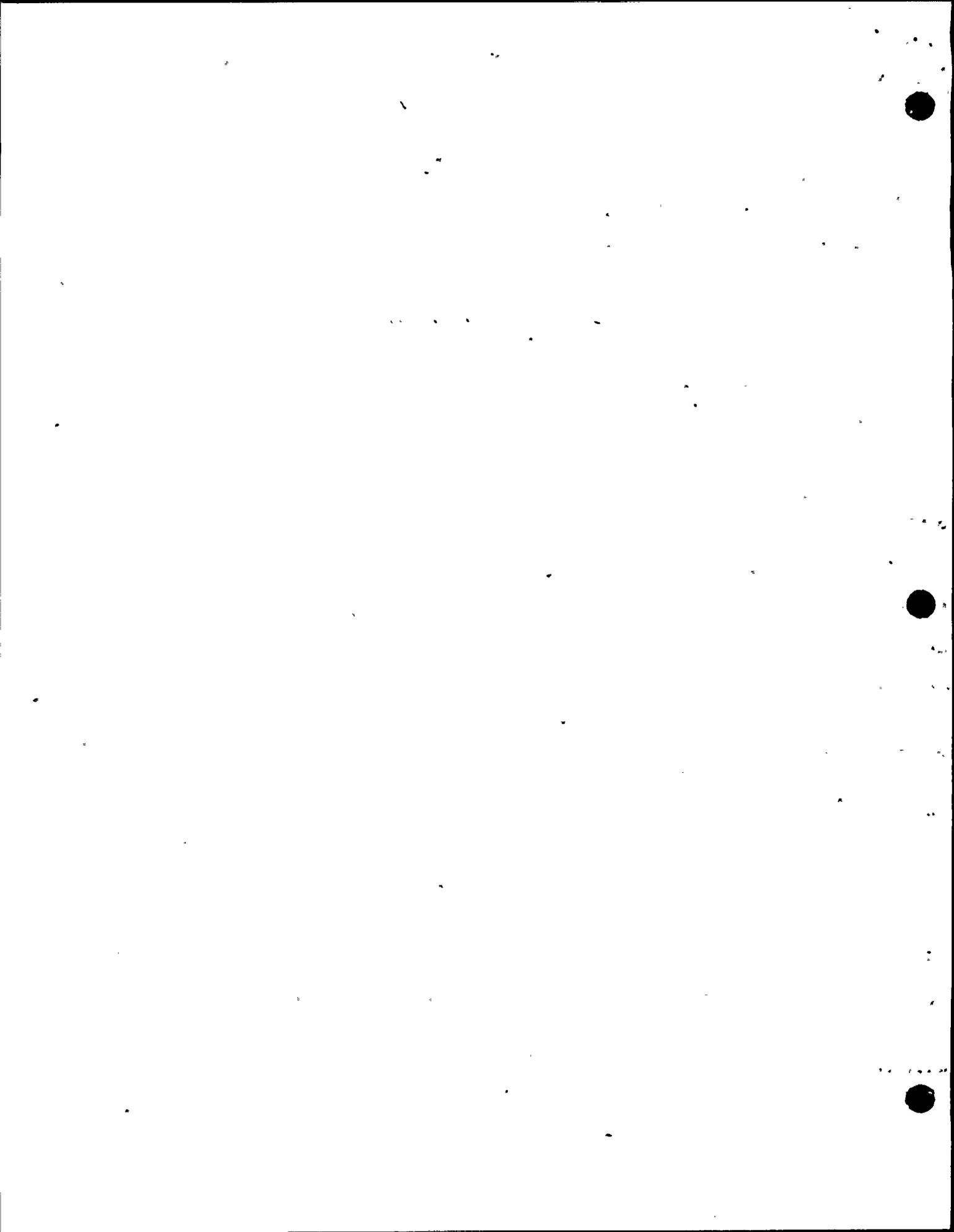
This is an Infraction.

- E. Contrary to Technical Specification 6.8.1 and ANSI N18.7-1972, outdated refueling equipment check procedures were in use.

This item is a Deficiency.

- F. Contrary to Technical Specification 6.8.1 and ANSI N18.7-1972, Surveillance Test Procedure W-3 was not present when the test was improperly performed.

This item is a Deficiency.



U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT  
REGION I

Inspection Report No: 50-220/75-21

Docket No: 50-220

Licensee: Niagara Mohawk Power Corporation

License No: DPR-17

300 Erie Boulevard, West

Priority: \_\_\_\_\_

Syracuse, New York 13202

Category: C

Location: Nine Mile Point 1, Oswego, New York

Safeguards  
Group: \_\_\_\_\_

Type of Licensee: 1850 Mwt, BWR (GE)

Type of Inspection: Routine, Unannounced

Dates of Inspection: September 26-October 2, 1975

Dates of Previous Inspection: September 22-26, 1975

Reporting Inspector: *T. Martin*  
T. Martin, Reactor Inspector

10/23/75  
DATE

Accompanying Inspectors: *R. Hurd*  
R. Hurd, Reactor Inspector

10/23/75  
DATE

\_\_\_\_\_  
DATE

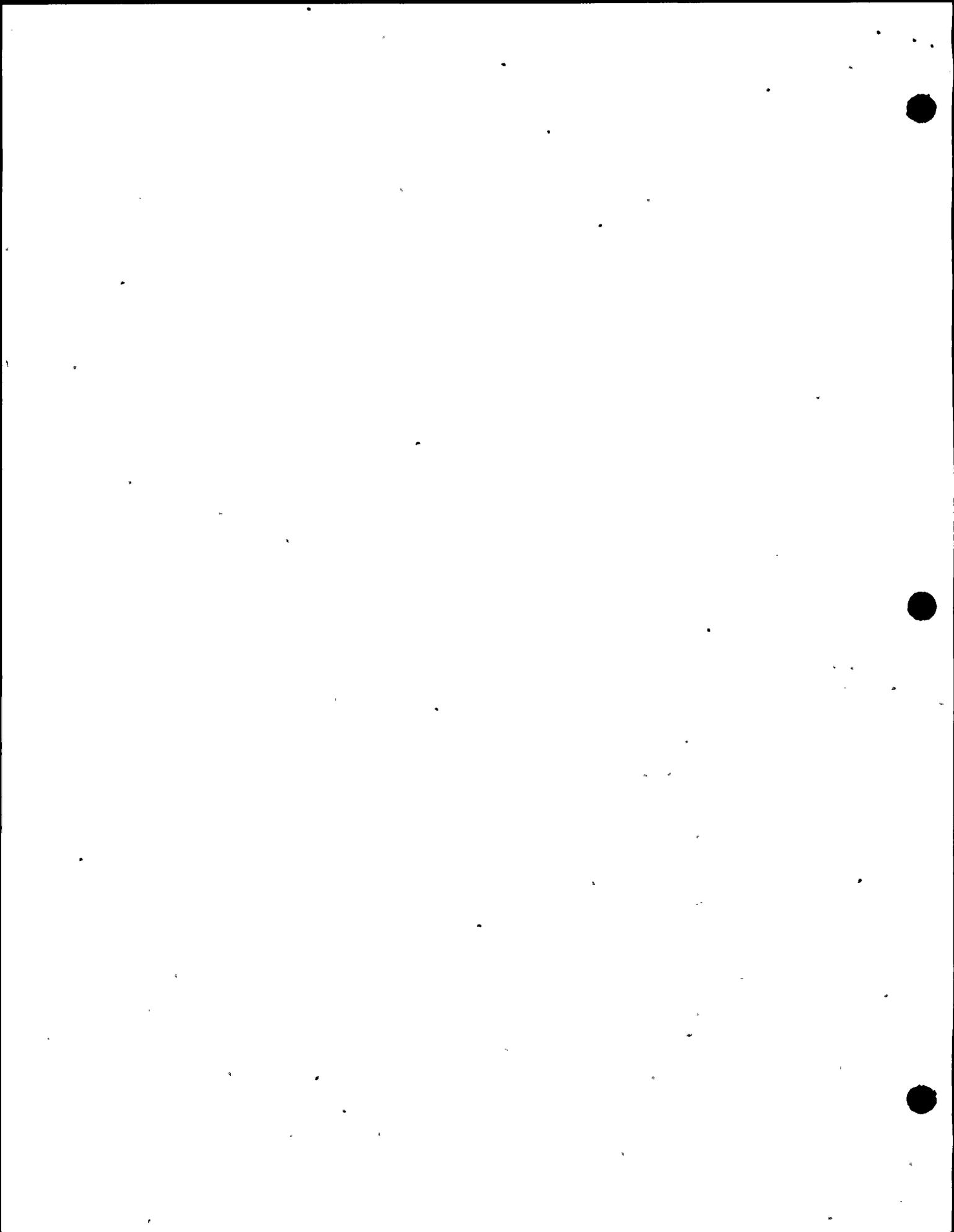
\_\_\_\_\_  
DATE

Other Accompanying Personnel: None

\_\_\_\_\_  
DATE

Reviewed By: *E. C. McCabe, Jr*  
E. C. McCabe, Senior Reactor Inspector  
Nuclear Support Section, Reactor Operations Branch

10/23/75  
DATE



## SUMMARY OF FINDINGS

### Enforcement Action

#### A. Infractions

1. Contrary to Technical Specification 6.8.1 and Refueling Procedure OP-34, the Control Operator did not continuously monitor nuclear instrumentation during fuel insertion into the core. (Detail 7.a)
2. Contrary to Technical Specification 6.8.1 and Administrative Procedure AP-5, the Master Copy of the Refueling Procedure (OP-34) was incomplete. (Detail 6.a)
3. Contrary to 10 CFR 50, Appendix J, Section II.H.2, automatic Oxygen Sample Containment Isolation Valves are not being tested for leakage. (Detail 3.b(5)(a))
4. Contrary to 10 CFR 50, Appendix J, Section II.H.4, Feedwater Containment Isolation Valves are not being tested for leakage. (Detail 3.b(5)(b))

#### B. Deficiencies

1. Contrary to Technical Specification 6.8.1 and ANSI N18.7-1972, outdated refueling equipment check procedures were in use. (Detail 7.c(1))
2. Contrary to Technical Specification 6.8.1 and ANSI N18.7-1972, Surveillance Test Procedure W-3 was not present when the test was improperly performed. (Detail 4.a)

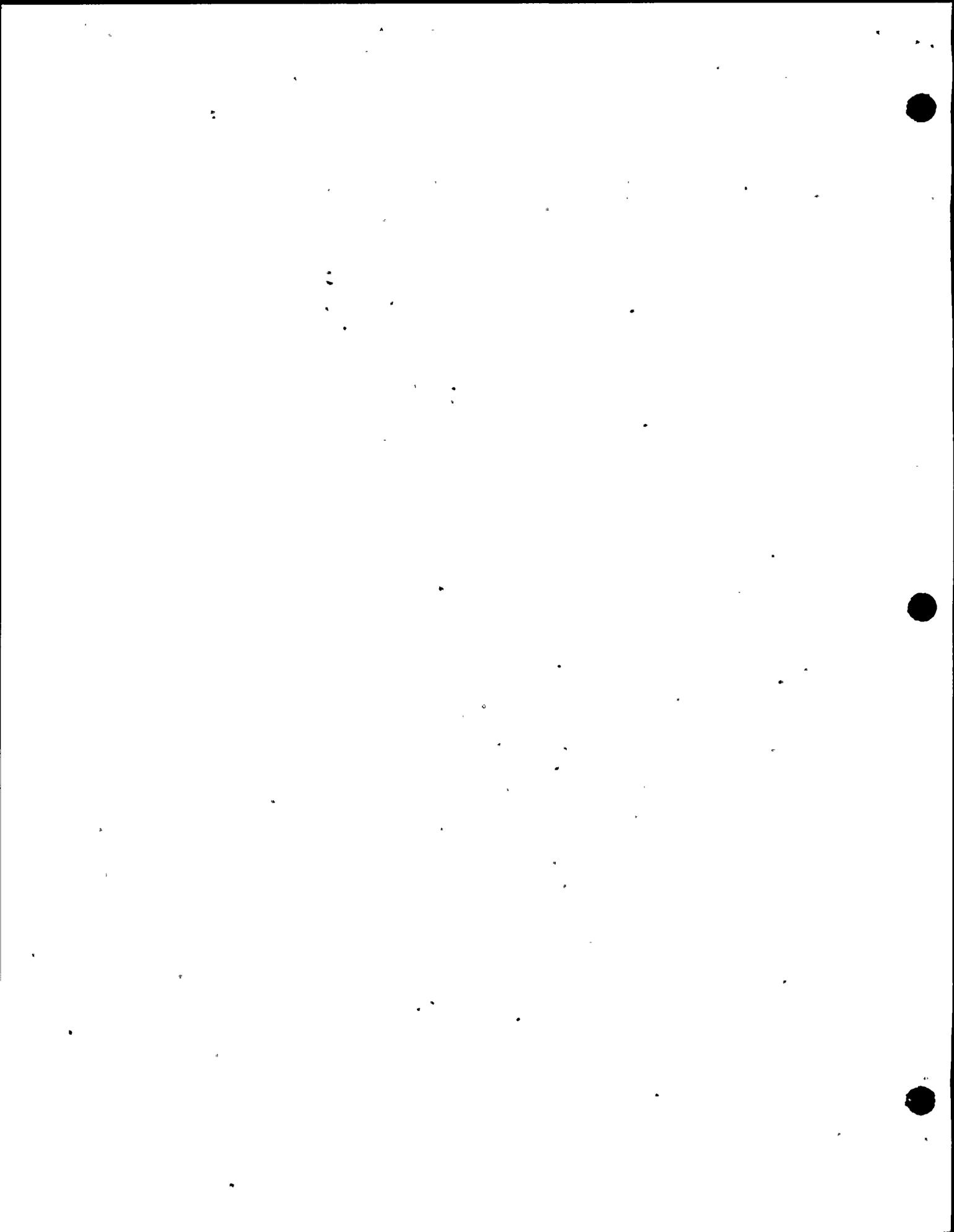
### Other Significant Findings

#### A. Current Findings

##### 1. Acceptable Items

These are areas which were inspected on a sampling basis and findings did not involve an Item of Noncompliance, Deviation or Unresolved Item.

- a. Personnel Air Lock Leakage Testing. (Detail 3.b(2))
- b. Prerrefueling Activities. (Detail 5)



- c. Refueling Area Tour. (Detail 7.b)
- d. Plans for Startup. (Detail 8)
- e. Refueling Maintenance. (Detail 9)

2. Unresolved Items

These are items for which more information is required in order to determine whether the items are acceptable or Items of Noncompliance.

- a. Local Leak Rate Test Pressure. (Detail 3.b(1))
- b. Penetration Leakage Test Results. (Detail 3.b(4))
- c. Containment Isolation Valves. (Detail 3.b(5)(c))
- d. Procedure Familiarity. (Detail 4.b)
- e. Periodic Subcritical Checks. (Detail 6.b)
- f. Emergency Light Repair. (Detail 7.b)
- g. Recirc Pump Trip Jumpers. (Detail 10)

B. Status of Previously Unresolved Items

Not inspected

Management Interview

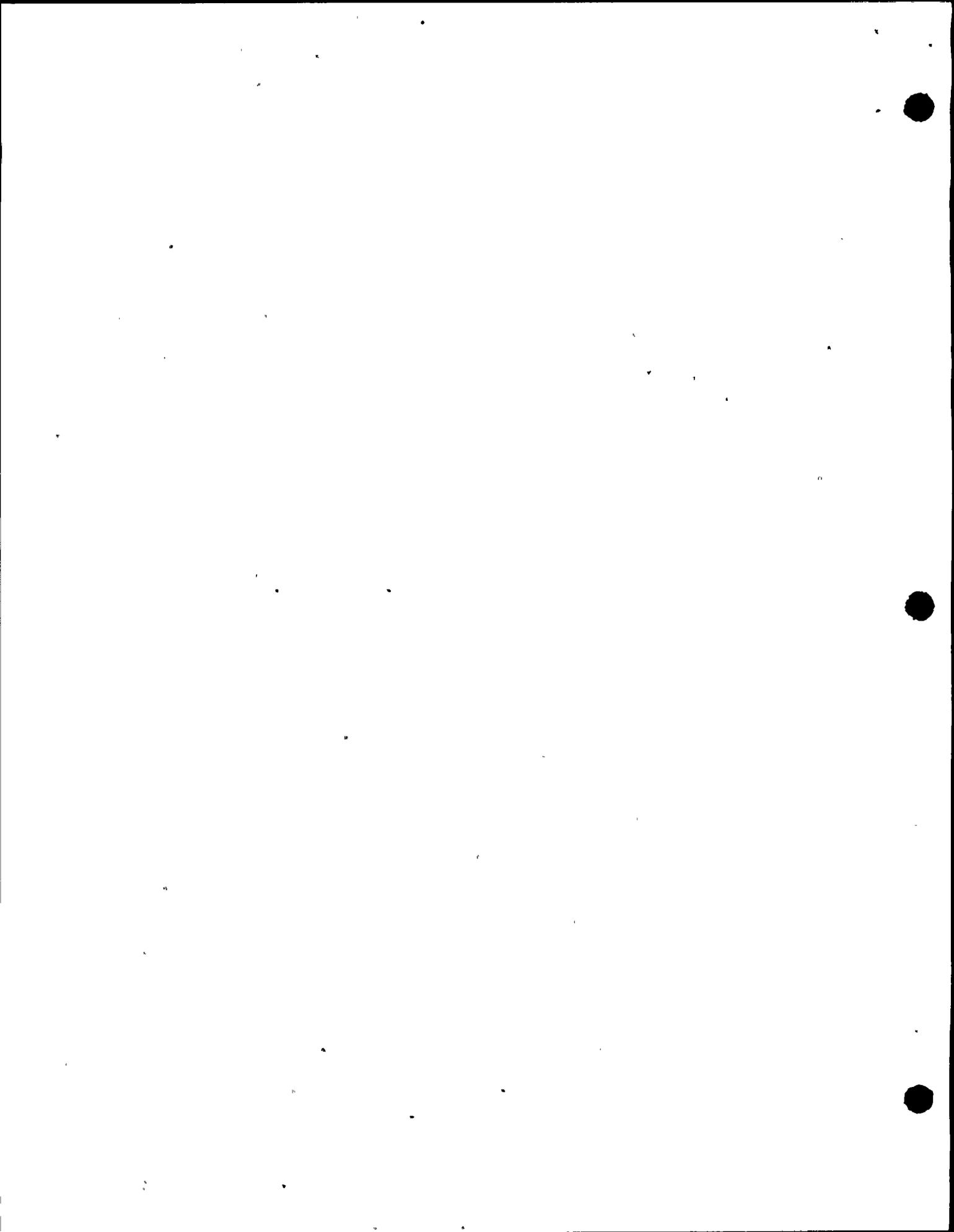
A management interview was held at the site on October 2, 1975.

Persons Present

Mr. R. Baker, Site Maintenance Supervisor  
Mr. R. Burns, Site Radiochemistry and Radiation Protection Supervisor  
Mr. T. Dente, Site Reactor Analyst Supervisor  
Mr. J. Duell, Assistant Radiochemistry and Radiation Protection Supervisor  
Mr. E. Leach, Assistant Radiochemistry and Radiation Protection Supervisor  
Mr. T. Perkins, Station Superintendent  
Mr. C. Stuart, Jr., Operations Supervisor

Items Discussed

- A. Purpose of Inspection. (Detail 2)
- B. Containment Leak Rate Testing. (Detail 3)
- C. Implementation of Refueling Procedures. (Details 4, 6, and 7)
- D. Prerrefueling Activities. (Detail 5)
- E. Recirc Pump Trip Jumper. (Detail 10)



## DETAILS

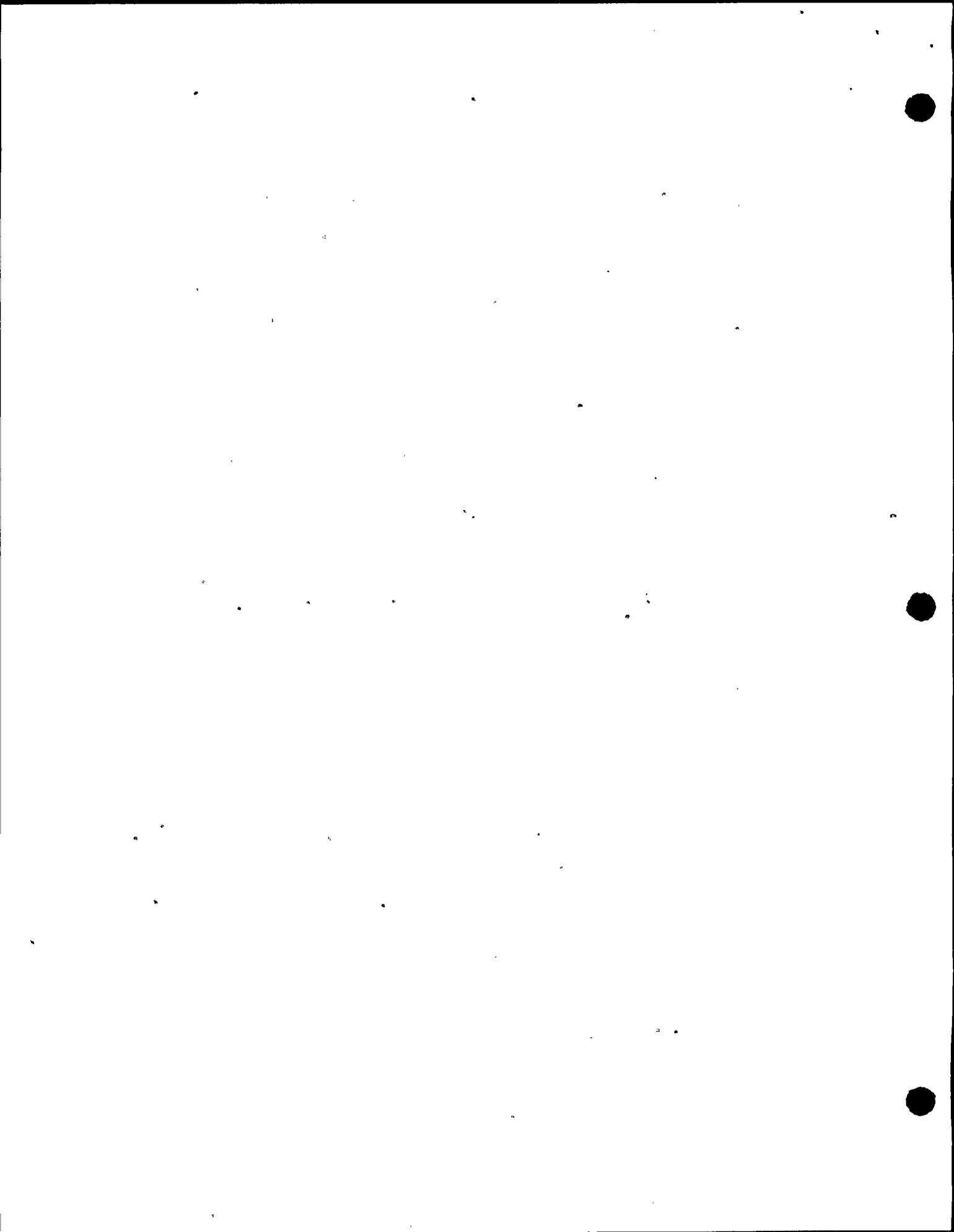
### 1. Persons Contacted

Mr. V. AuClair, Shift Operating Foreman  
Mr. R. Baker, Site Maintenance Supervisor  
Mr. R. Burns, Site Radiochemistry and Radiation Protection Supervisor  
Mr. T. Dente, Site Reactor Analyst Supervisor  
Mr. J. Duell, Assistant Radiochemistry and Radiation Protection  
Supervisor  
Mr. J. Earl, Control Operator  
Mr. C. Hawksley, Shift Operating Foreman  
Mr. M. Jones, Station Shift Supervisor  
Mr. E. Leach, Assistant Radiochemistry and Radiation Protection  
Supervisor  
Mr. T. Lempges, Site General Superintendent  
Mr. C. Lilly, Station Shift Supervisor  
Mr. B. Murtha, Shift Operator  
Mr. D. Neild, Shift Operating Foreman  
Mr. T. Perkins, Station Superintendent  
Mr. D. Pike, Assistant to the General Superintendent  
Mr. R. Raymond, Station Shift Supervisor  
Mr. M. Silliman, Site Results Supervisor  
Mr. M. Stancliffe, Control Operator  
Mr. C. Stuart, Jr., Operations Supervisor  
Mr. M. Turner, Shift Operator

### 2. Inspection Purpose

The inspection was performed:

- a. To verify the licensee's compliance with Appendix J to 10 CFR 50 and applicable portions of his Technical Specifications related to local leak rate testing;
- b. To verify by record review, discussion, and observation, that the licensee was ready to refuel;
- c. To verify by log and work sheet review, discussion, and observation, that refueling was being conducted in compliance with licensee procedures, Technical Specifications, and the Code of Federal Regulations;
- d. To verify by check sheet and procedure review, that plans and approved procedures existed to return systems disturbed during the refueling outage to normal conditions; and



- e. To verify by outage schedule and procedure review, that maintenance was being conducted using effective and approved procedures.

3. Local Leak Rate Testing

The inspector reviewed the licensee's Technical Specifications and records of local leak rate testing for the past year and a half. Based on that review, the following items were identified.

a. Type A Test

Technical Specification (TS) 4.3.3.a, b, c, and e(3) specify the surveillance requirements for Integrated Primary Containment Leakage Rate Tests, which are identified as Type A Tests in Appendix J to 10 CFR 50.

The licensee informed the inspector that a Type A Test will be performed during the 1975 Refueling Outage and the procedures for performing the test are now being drafted.

The inspector had no questions on this item.

b. Local Leak Rate Tests

(1) Test Pressure

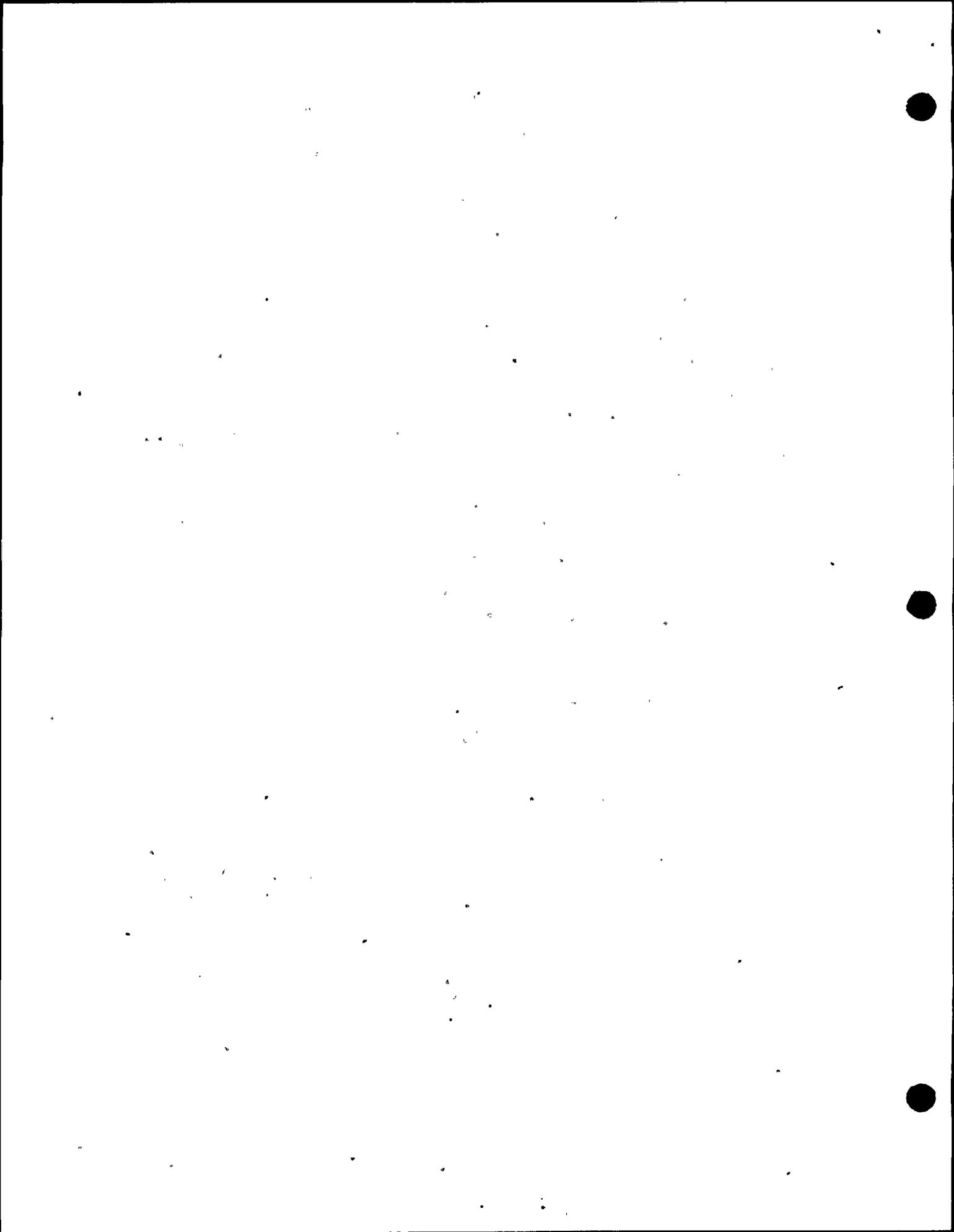
TS 4.3.3.e(1) requires that Primary Containment testable penetrations and isolation valves shall be tested for leakage at a pressure of 36 psig. A review of local leak rate test results showed that 1974 Refueling Outage testing was performed at 35 psig.

When questioned, the licensee explained that he assumed the 36 psig was a typographical error, since the peak accident pressure was 35 psig, and that test pressure was used for the air lock seals, main steam isolation valves, and the Type A Test.

This item is unresolved and has been referred to NRC Headquarters for action.

(2) Personnel Air Lock

TS 4.3.3.e(2) specifies the leak rate testing to be performed on the Personnel Air Lock.



The inspector's review of Personnel Air Lock leak rate test data indicated the licensee is complying with the requirement for surveillance tests of the door seals as required by the Tech Specs. ....

The inspector had no further questions on this item.

(3) Main Steam Isolation Valves

TS 4.3.3.e(4) requires that Main Steam Isolation Valves (MSIV's) be tested for leakage at 35 psig.

The inspector reviewed records from the 1974 Refueling Outage, and verified that Technical Specification acceptance criteria for test leakage had been met prior to resumption of power operations.

The inspector had no further questions on this item.

(4) Acceptance Criteria

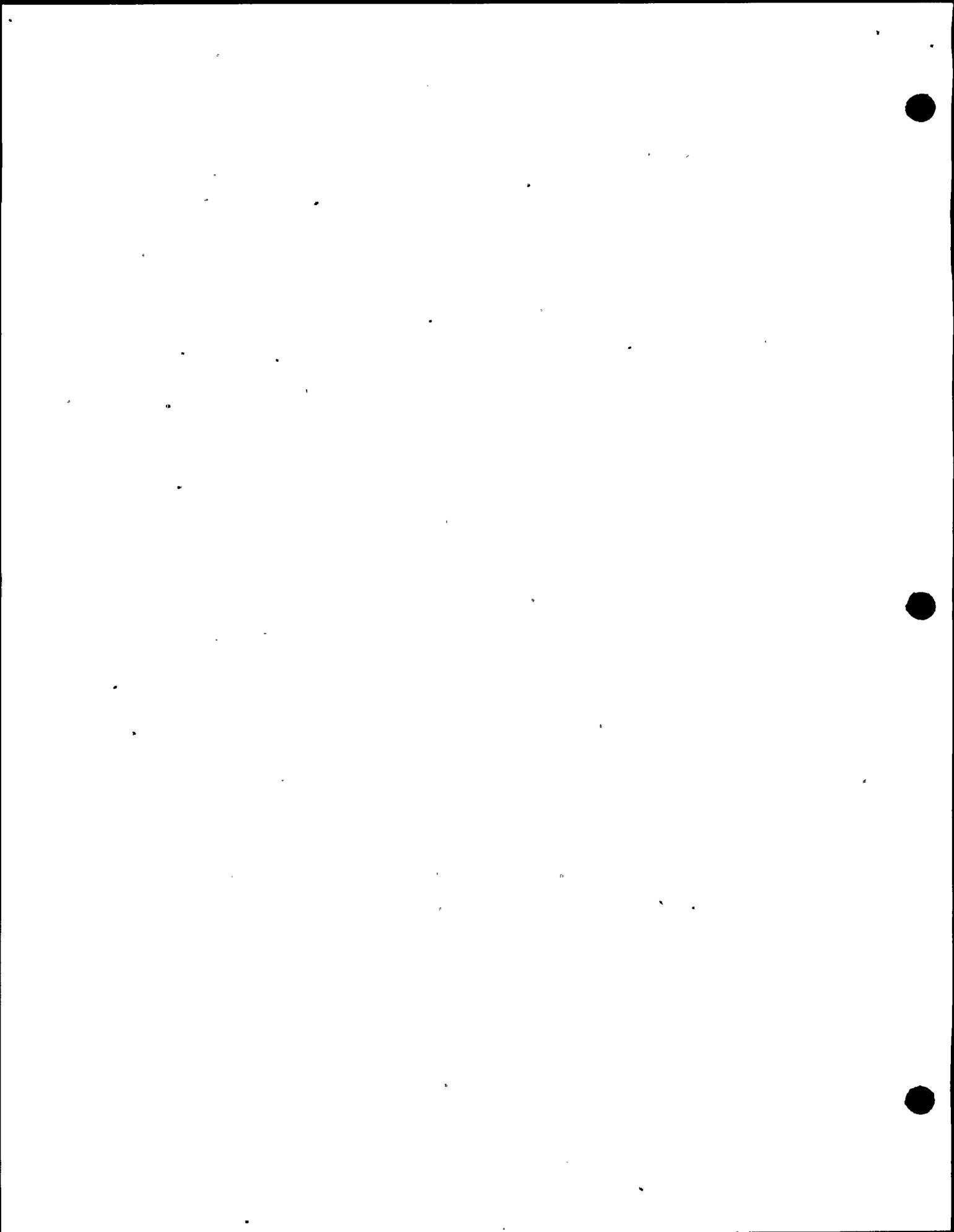
TS 4.3.3.f specifies the acceptable limits on total leakage rates measured during local leak rate testing.

During the 1974 Refueling Outage, mechanical and electrical penetrations were tested as required by TS 4.3.3.e(1), but the licensee was unable to present evidence that the results of the sealed system pressure drop tests had been converted to equivalent leakage, summed, and then compared to the acceptance criteria of TS 4.3.3.f(1)(b)(i). With initial pressure at 35 psig, pressure drops of one half to one psig were observed during the hour test period.

At the licensee's request, this item remains unresolved awaiting an attempt to locate records showing that the indicated leakage was computed and compared to the acceptance criteria.

(5) Valves Not Tested

The inspector reviewed Containment Isolation Valve local leak rate testing data sheets from the 1974 Refueling Outage. The following findings are based on that review.



(a) Automatic Isolation Valves

The licensee identifies all automatic Containment Isolation Valves that require testing, in his response to question 2 in the document titled, "Amendment No. 1 to Application to Convert Provisional Operating License to Full Term License," dated November 21, 1973.

10 CFR 50, Appendix J, Section II.H.2, defines one type of Containment Isolation Valve subject to local leak rate testing requirements as those valves that: "are required to close automatically upon receipt of a containment isolation signal in response to controls intended to effect containment isolation." Eight Containment Isolation Valves associated with Oxygen Sample lines leaving the Containment and identified by the licensee as requiring testing, were not tested. The remaining isolation valves were documented as having been tested.

Failure to subject the automatic Oxygen Sample Containment Isolation Valves to local leak rate testing is an Infraction level Item of Noncompliance with Appendix J to 10 CFR 50.

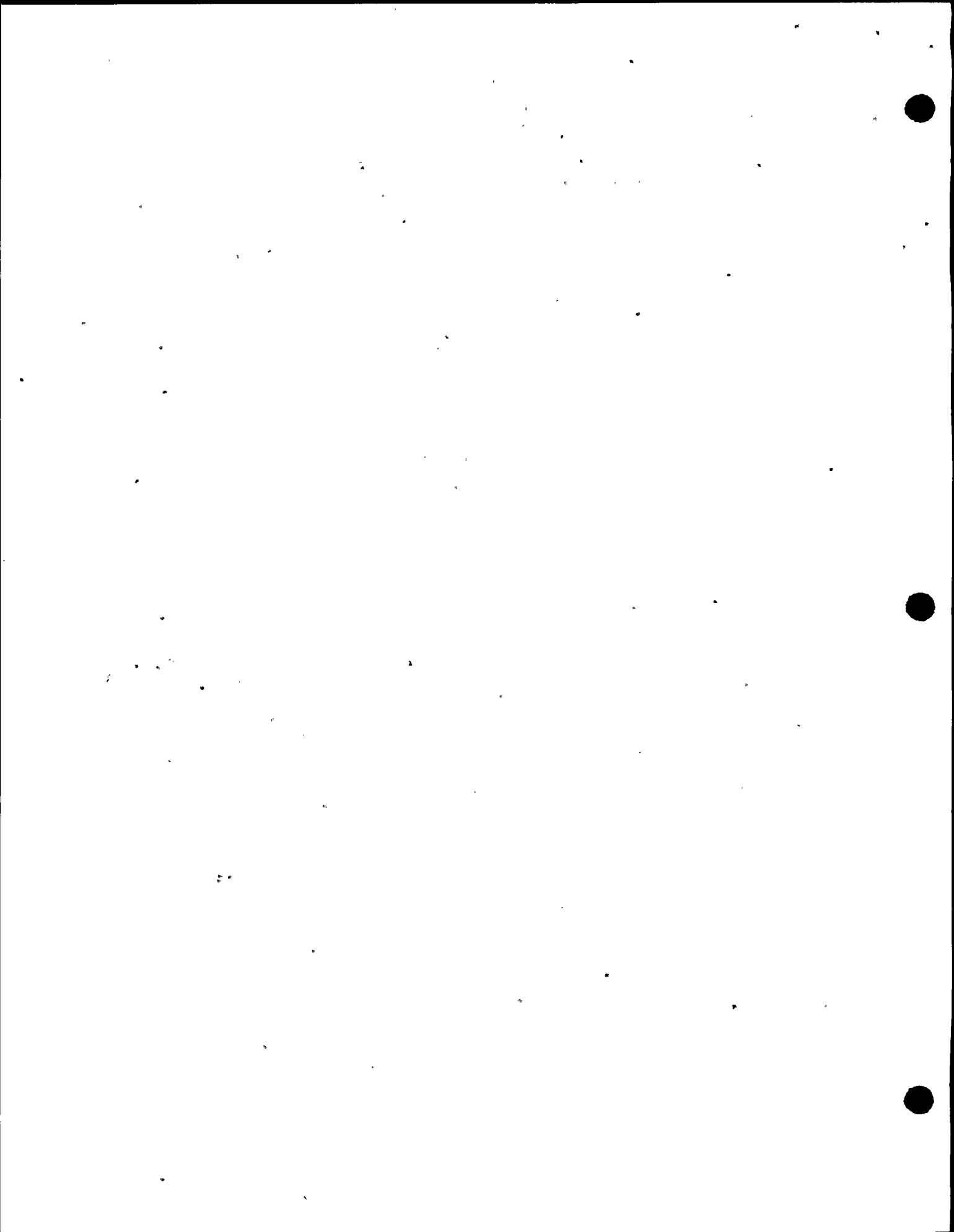
(b) Feedwater Valves

10 CFR 50, Appendix J, Section II.H.4, defines another type of containment isolation valve requiring local leak rate testing as those valves that: "are in the main steam and feedwater piping and other systems which penetrate containment of direct-cycle boiling water power reactors."

Contrary to this requirement, feedwater stop-check containment isolation valves were not tested as required. This is an Infraction level Item of Noncompliance with Appendix J to 10 CFR 50.

(c) Other Valves

Containment Isolation Valves not receiving local leak rate tests and questioned by the inspector include the following.



- (i) Control Rod Drive System Exhaust.
- (ii) Emergency Condenser Isolation.
- (iii) Shutdown Cooling Isolation.
- (iv) Reactor Cleanup Isolation.
- (v) Recirc Pump Cooler Isolations.
- (vi) Nitrogen Inerting Supply.
- (vii) Drywell Cooler Isolations.
- (viii) Various Safeguard Suctions.

This item is unresolved and has been referred to NRC management for resolution.

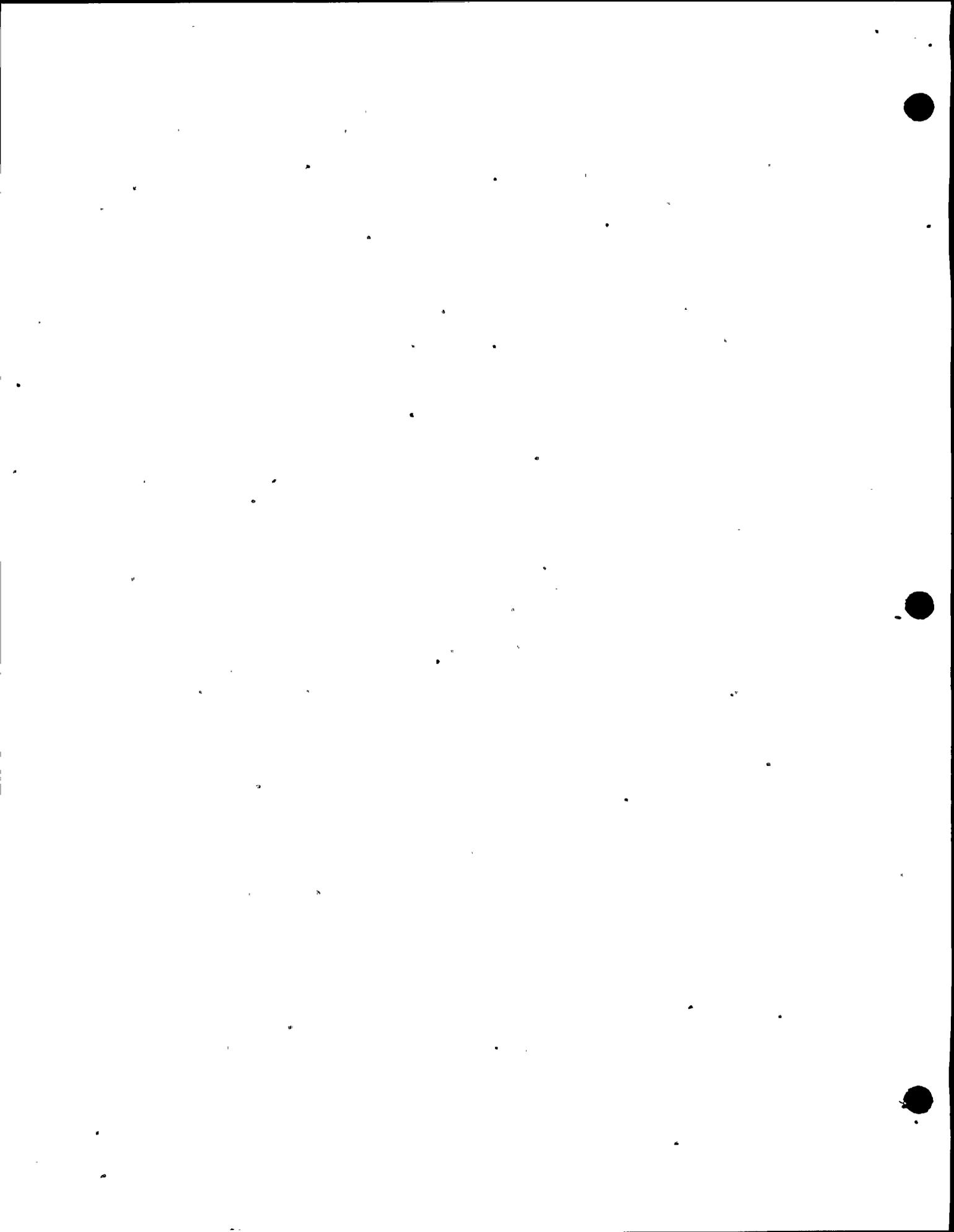
#### 4. Refueling Interlocks

The inspector reviewed Surveillance Test W3, "Refueling Platform Interlocks," to determine how Technical Specification 4.5.2 is met. The inspector witnessed the performance of this test in the Control Room and on the Refueling Bridge.

##### a. Test Performance

While witnessing the Control Operator's performance of this test, the inspector noted that the procedural steps to verify that only one rod could be withdrawn, while in the "Refueling" mode, had been improperly performed. The Control Operator had withdrawn one rod, as required; but where the procedure then called for the attempted withdrawal of a second rod, the Control Operator had attempted to withdraw the initial rod again. The Control Operator performed the test using the procedure's checkoff list, without referring to the parent procedure. When the procedure was presented to the Station Shift Supervisor for his approval, the inspector pointed out the error, and the Control Operator was required to repeat the surveillance test.

The inspector expressed to the licensee his concern that check-off sheets were being used without benefit of the detailed precautions and limitations, notes, and procedural text available in the parent procedure. The inspector further stated that this incident appeared to be a direct consequence of the practice which allows operators to perform procedures using the checkoff sheets only. The licensee stated that the Control Operator did not need to have the text in front of him, since he was in continuous communications with the Refueling Bridge Operator, who had the procedural text with him.



Technical Specification 6.8.1 states in part, "Written procedures...shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972...." ANSI N18.7, subparagraph 5.1.2 of Section 5.1, states in part, "...If documentation of an action is required, the procedure should be present and followed step by step, and necessary data should be recorded as the task is performed...."

This is a Deficiency level Item of Noncompliance with Technical Specification 6.8.1.

b. Procedure Familiarity

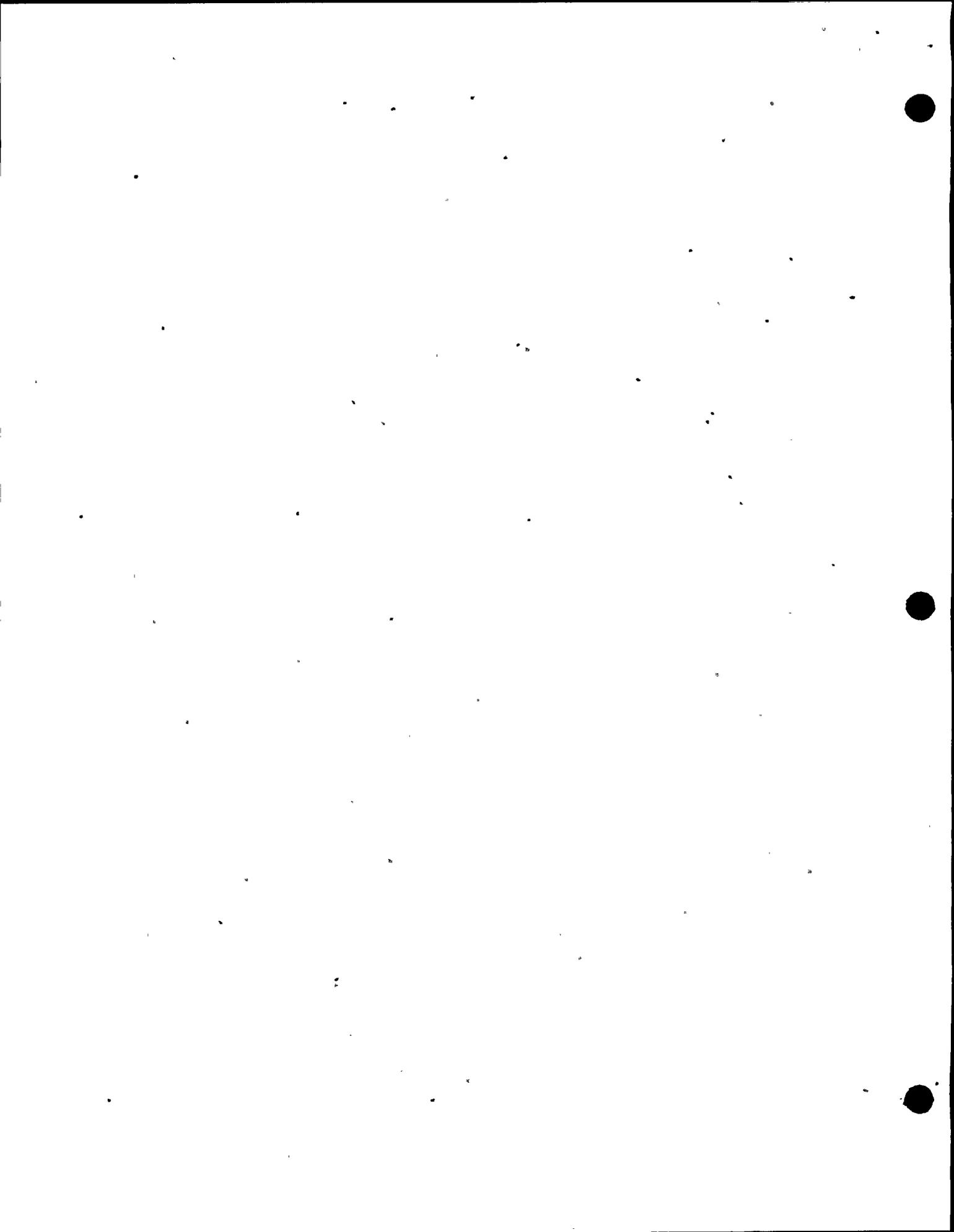
Since this Surveillance Test had been issued only three days before initial fuel movement, the inspector examined the procedure transmittal sheet to determine if the operators using the procedure had read it previously. At the time of the inspector's review of the transmittal sheet, all shifts had signed the sheet. By comparing the signature dates to the date of the above incident, the inspector noted that the shift on duty during the incident had not signed the sheet, certifying they had read and understood the procedure.

The licensee informed the inspector that emphasis would be placed on ensuring the operators were knowledgeable of the procedures before they are used. This is an unresolved item.

c. Failure of Rod Block Interlock Limit Switch

During the inspection period, the licensee repeated Surveillance Test W3, "Refueling Platform Interlocks," a total of three times, due to repeated failures of the limit switch used to provide a rod block signal when the loaded refueling platform is over the reactor cavity. The limit switch is mounted on the traveling refueling platform. The switch is actuated by a raised section of metal stripping on the floor which corresponds to the platform being over the reactor cavity.

The repeated failure of this switch was corrected by adding an additional length to the metal strip. The licensee stated that the recent modifications to the refueling platform had altered the position of this switch such that it was hanging up on the end of the metal strip. The licensee had no explanation of why the tests prior to refueling had not identified



this problem. However, since the problem was corrected before the surveillance test was accepted, the inspector had no further questions on this matter.

#### 5. Prerefueling Surveillance Activities

The inspector reviewed logs, check sheets, and completed surveillance test procedures to verify that Technical Specification requirements for refueling had been met. The inspector was unable to identify any inadequacies in meeting these requirements.

While examining the fueling equipment, the inspector was unable to locate the Low Range Area Radiation Monitor Detector associated with the Refueling Bridge. The Monitor is provided to alert the Fuel Manipulation Operator of an increasing radiation level associated with the fuel movements he is performing. The Monitor's purpose is personnel safety.

With the assistance of the Refueling Deck Coordinator, the detector was located under the bridge where it was strapped to the web of an "I" beam.

The as designed installation has the low range monitor move with the operator cab, with the detector unshielded from the radiation source. Positioned as it was, those design features were not provided.

Further investigation revealed that the detector had been temporarily moved during a bridge modification, and had not been returned to its designated place following modification completion.

Refueling was delayed for several hours as the detector was returned to its rightful location.

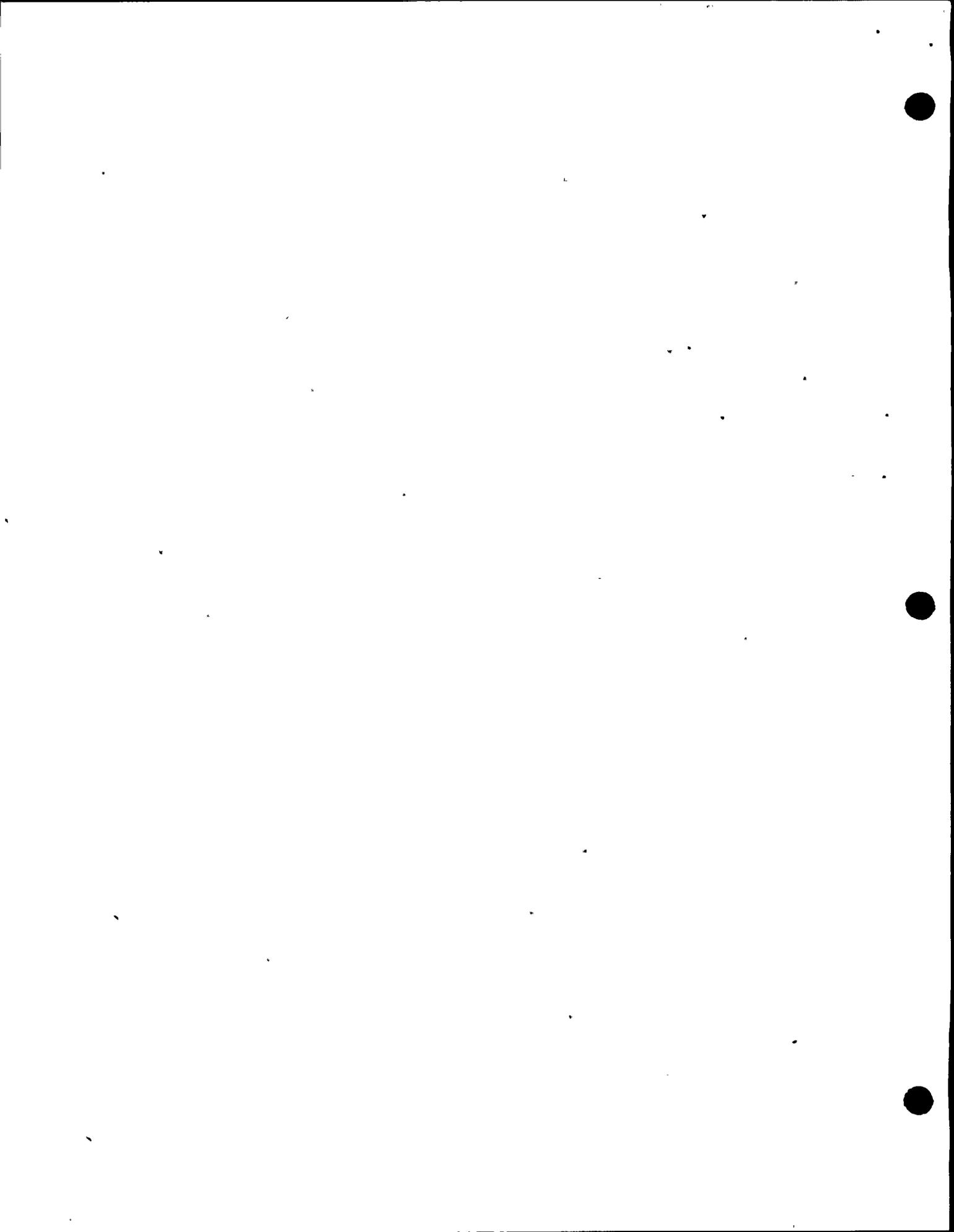
The inspector had no further questions on this item.

#### 6. Refueling Procedure

The inspector reviewed the Refueling Procedure (OP-34) for background information and specifics related to the Nine Mile Point Station systems.

##### a. Procedure Control

During the review of the "Control Room Master Copy" of OP-34, the inspector noted Sections B, "Plant Operating Requirements,"



and C, "Preparation for Fuel Movement," were missing. The licensee was informed of this fact and the missing sections were then added.

Section 4.2.2.2 of Administrative Procedure AP-5 states, "It shall be the responsibility of the Assistant to the Superintendent for Operations that the 'Master Copy' of all procedures maintained in the control room is up to date and contains all procedural material required by the control room operator."

The inspector also found a looseleaf notebook titled, "General Procedure Relating to Core Work and Fuel Moves," which was on the desk top behind the Control Operator. That notebook contained an out of date copy of OP-34.

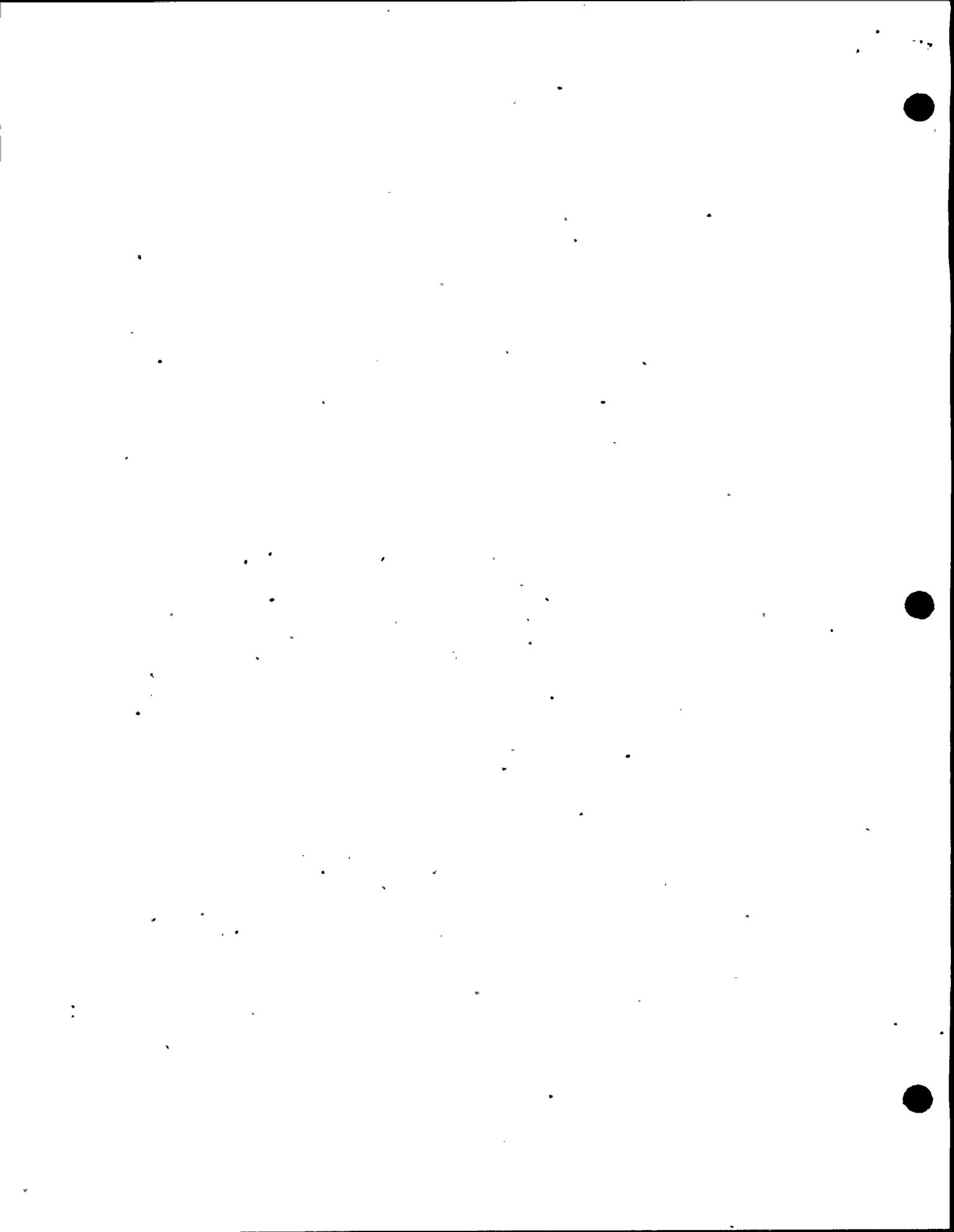
The operations associated with the missing and/or superseded procedures had been completed prior to the inspector's arrival. The inspector's review of check sheets applicable to these sections and discussions held with the licensee's operators did not identify any inadequacies in the performance of these operations.

The inspector expressed concern that the only procedures available to the Control Operator were either superseded or incomplete. Failure to maintain the Control Room Master Copy of OP-34 per AP-5 is an Item of Noncompliance with TS 6.8.1, which states in part, "Written procedures and administrative policies shall be established, implemented and maintained...."

This item is an Infraction.

b. Subcritical Checks

The inspector reviewed the step by step fuel loading procedure. The schedule did not contain subcritical checks required by subparagraph D.2 of OP-34. The inspector asked when these checks were planned and was told no checks were planned for this outage. When the inspector asked how the procedural statement was bypassed, it was suggested that OP-34 be amended by deleting D.2, since that reference was felt to be applicable to initial fueling only. When the inspector questioned such deletion, it was agreed to insert requirements for subcritical checks in the step by step fuel load procedure.



At the end of the inspection, pen and ink notations had been added to the step by step fuel load procedure to require these subcritical checks. The inspector reviewed a draft of the subcritical check procedure without comment. Implementation of this procedure will be verified later and is now an unresolved item.

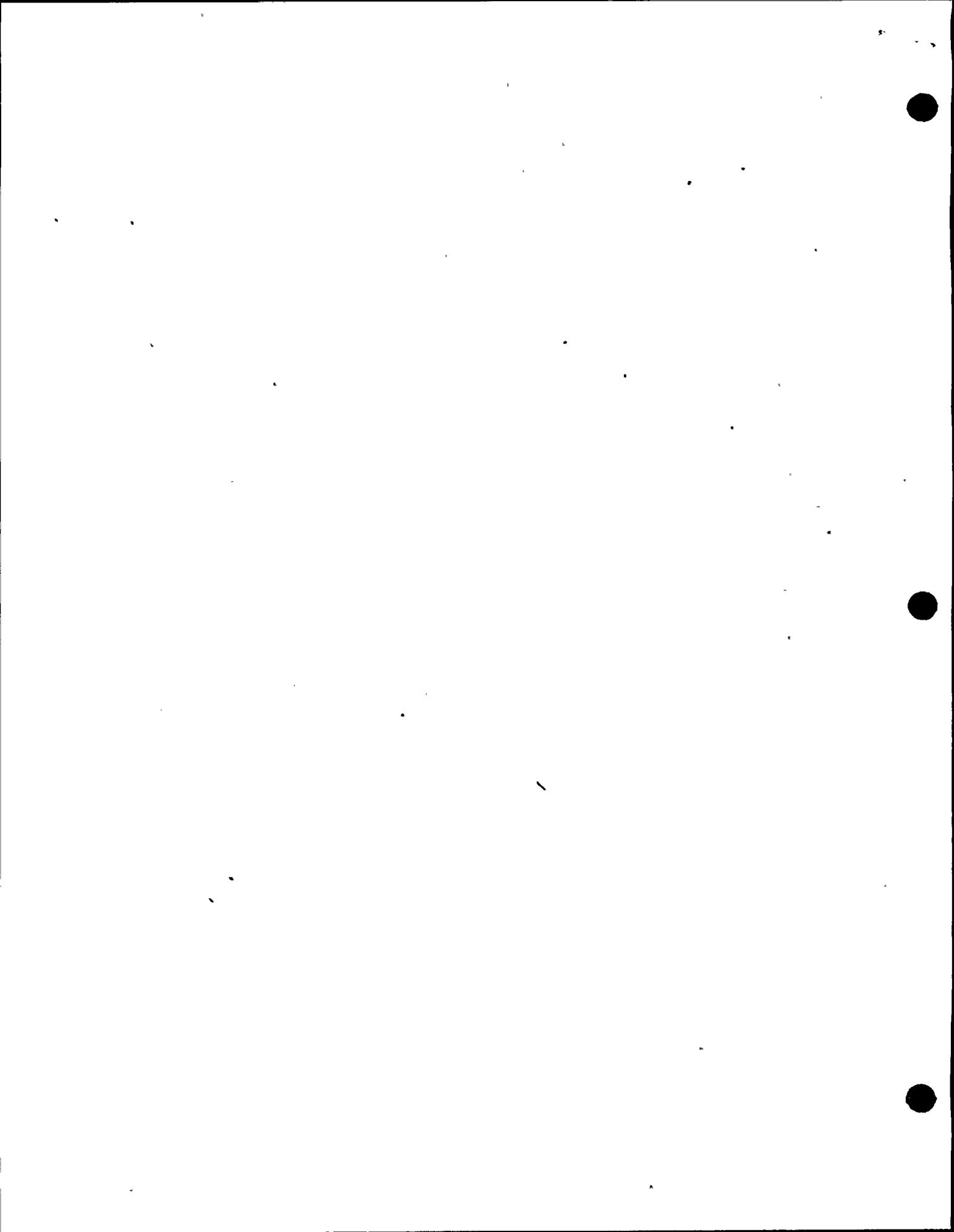
## 7. Refueling Operations

The inspector observed refueling operations from the Control Room and Refueling Floor, toured the refueling area, and reviewed selected refueling logs, procedures, and checklists. Based on these actions, the following findings were developed.

### a. Nuclear Instrumentation Monitoring

During fuel movement into or out of the core, the change in core reactivity and its degree of subcriticality is monitored only by the effect of such movement on the Incore Source Range Nuclear Instrumentation readings. During refueling, control rods are fully inserted and cannot provide an additional shutdown margin. Should an erroneous excessive addition of reactivity be caused by fuel insertion, the effect can only be countered by reversing fuel movement or manually initiating the Standby Liquid Control System. In recognition of the need for operator action to assure the safety of the refueling operation, the Refueling Procedure (OP-34), Detail Step D.7 states, "While fuel is being moved in the core, SRM readings should be continuously monitored."

While observing refueling operations in the Control Room, two NRC inspectors became concerned that the Control Operator was not continuously monitoring the Source Range Monitors. Both inspectors observed the Control Operator and the Source Range Monitors during two consecutive fuel bundle insertions into the core. The Control Operator was seated in front of the monitors, but was facing away from them. Four times during these moves, his eyes were forced to scan the area of the Source Range Monitors as he was required to push the alarm acknowledge button, located behind him and to his right. The alarms indicated the loaded refueling bridge was moving into position over the core or that the fuel had been released in the core. During the insertion of the two fuel bundles the operator did not continuously monitor the Source Range Monitors, and he only looked in their direction when acknowledging the alarms.



Upon this verification that a genuine safety hazard existed, the inspector informed the Station Shift Supervisor, who immediately took corrective action. The importance of continuously monitoring the Source Range Monitors was emphasized to the Control Operator, whose chair was repositioned in front of and facing the Source Range Monitors.

Subsequent observations during that shift, later that day, and on following days, demonstrated that, during fuel movement in the core, the Source Range Monitors were being continuously monitored.

Technical Specification 6.8.1 states in part, "Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972...." ANSI N18.7, subparagraph 5.1.2 of Section 5.1, states in part, "Procedures shall be followed...."

This infraction is an Item of Noncompliance with Technical Specification 6.8.1.

b. Refueling Area Tour

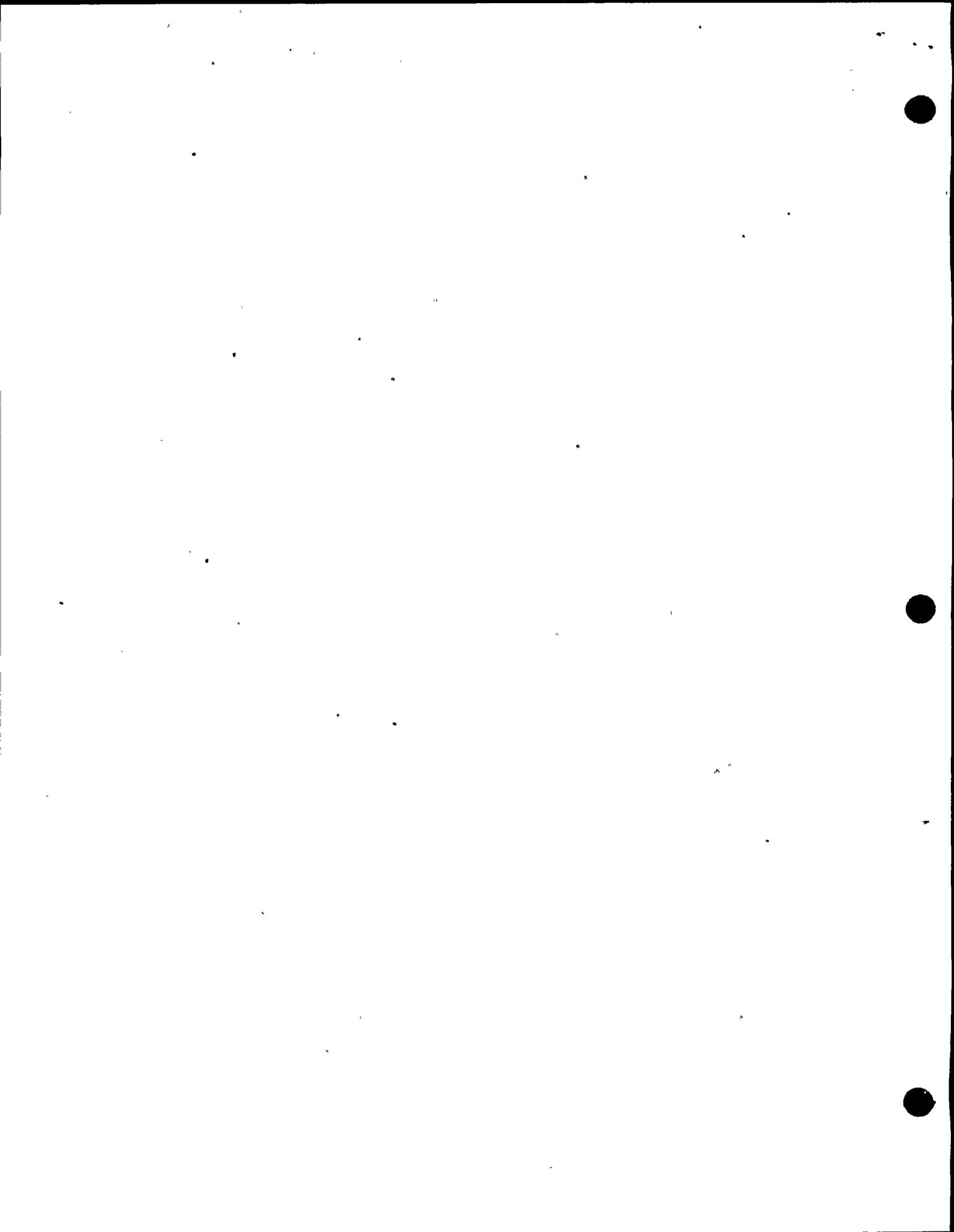
The inspector toured the fueling area with a licensee representative. The subjects of the inspector's endeavor were the licensee's storage of vessel components, general housekeeping, radiation protection practices, and conformance to industry practices.

During the tour, the inspector asked the licensee to demonstrate the operability of an emergency light. The fueling area is completely enclosed, and upon loss of AC power the emergency lights would allow the operators to leave the area without feeling their way. The light could not be made to operate. A written request for checking and repair of all fueling area emergency lights was prepared by the Station Shift Supervisor. The status of this item is unresolved.

No other inadequacies were identified during this tour.

c. Routine Bridge and Grapple Checks

The inspector reviewed the "Routine Bridge and Grapple Checks to be Made During Fuel Handling at Start of Each Shift" (9-R-2). The inspector witnessed the performance of the procedure from the Control Room and the Refueling Bridge.



(1) Outdated Checkoff Sheet

While observing the execution of this procedure in the Control Room, the inspector noted the checkoff sheet being used was revised in April 1973, and was not consistent with the current September 1975 revision. The inspector alerted the licensee of the problem and the procedure was then conducted as required by the current revision, which was available.

The licensee informed the inspector that the outdated checkoff sheet revision had been inadvertently placed in the Control Room files.

TS 6.8.1 requires that written procedures shall be maintained that meet or exceed the requirements of Section 5.1 of ANSI N18.7-1972.

Section 5.1 of N18.7 covers "Rules of Practice" and states in part, that "these policies shall assure that documents, including revisions or changes...are distributed to and used by the personnel performing the prescribed activity."

Because the 1975 revision involved only a reduction in the frequency for testing the integrity of the fuel grapple, this particular usage of an outdated revision presented no safety hazard. The generic question of use of outdated directives is, however, an important concern.

This is a Deficiency level Item of Noncompliance with Technical Specification 6.8.1.

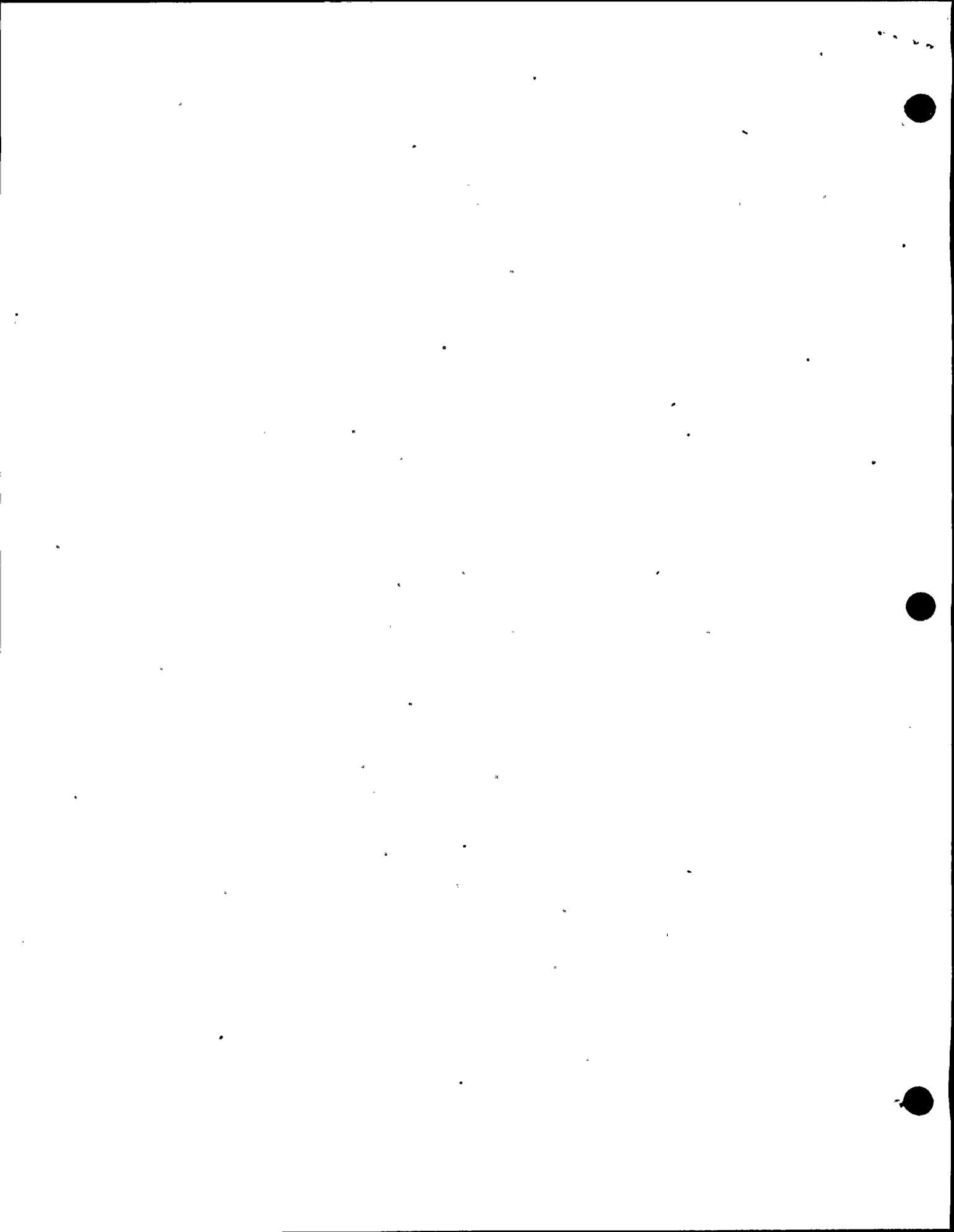
(2) Overtravel Limit Switch

While observing the performance of the procedure from the Refueling Bridge, the inspector noted that the telescoping mast overtravel limit switch was not checked as required by the procedure. The inspector made his concern known and the oversight was corrected prior to use of the bridge.

The inspector had no further questions on this item.

8. Review of Plans Pertaining to Return to Operational Status

The inspector reviewed the "Refueling Procedure" (OP-34) and "Master Refueling Outage Checkoff List" (9-R-1) to ascertain if systems which



were disturbed during the refueling outages will be returned to operating status prior to plant startup. No inadequacies were identified and the inspector had no further questions on this item.

9. Major Maintenance Items

The inspector reviewed documentation relating to three major maintenance items which were planned during the refueling outage. The purpose was to ascertain if the maintenance items were being performed in accordance with approved procedures. The maintenance items reviewed were EPR Sensor Line relocation (ANA 270687), Electromatic Relief Valve repair (ANA 270683) and Control Rod Drive inspection (ANA 270684). No inadequacies were identified and the inspector had no further questions on this item.

10. Jumper Log

The licensee is presently transposing the previously used "Electric Jumper Log Book" to the "Jumper Log," which will contain more detailed jumper information. The inspector reviewed both of these logs and found them consistent.

The inspector discussed with the licensee the December 1, 1973 Jumper Log entry which stated, "Permanent jumpers on relays, 11K3, 11K4, 12K3 and 12K4 to render inoperable the five Reactor Recirculation Pump trips on a reactor high pressure scram." The licensee had committed to having a recirculation pump trip on scram in the "July 1972 Technical Supplement to the Petition for Conversion from Provisional Operating License to Full-Term Operating License." However, further analysis indicated that this function was not desirable and the licensee notified the AEC by letter of November 30, 1973 that this function would be rendered inoperable. The requirement for the pump trip on scram is still under consideration as part of the Anticipated Transient Without Scram analysis. The licensee stated that resolution was expected within the next three months and the jumper would be removed or the pump trip on scram circuit would be removed depending on the resolution. This is an unresolved item which will be reviewed during subsequent inspections.

