

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos. 50-528/88-42, 50-529/88-41 and 50-530/88-40

License Nos. NPF-41, NPF-51 and NPF-74

Licensee: Arizona Nuclear Power Project
P. O. Box 52034
Phoenix, Arizona 85072-2034

Facility Name: Palo Verde Nuclear Generating Station - Units 1, 2 and 3

Inspection at: Palo Verde Site - Wintersburg, Arizona

Inspection Conducted: November 28 - December 2, 1988

Inspection by: *C. A. Hooker for*
M. Cillis, Senior Radiation Specialist

12/20/88
Date Signed

Approved by: *C. A. Hooker for*
H. S. North, Acting Chief
Facilities Radiological Protection Section

12/20/88
Date Signed

Summary:

a. Areas Inspected

Routine unannounced inspection of radwaste management, shipping and transportation activities, followup of enforcement items, followup items, management meeting, review of licensee reports and a tour of the licensee's facilities. Inspection procedures 30702, 30703, 83750, 84850, 86721, 86740, 92700, 92701 and 92702 were addressed.

Results:

In the areas inspected, the licensee's programs exhibited weaknesses as described in paragraphs 3(b), 3(c), 6, and 7(e). Item 7(e) may be a carry over from the concerns raised in Region V Inspection Report 50-528/88-33 dated November 15, 1988. Of particular concern in paragraph 3, is the licensee's training and Quality Assurance/Quality Control (QA/QC) programs for personnel involved in the packaging, shipping and transportation of radioactive materials. However, areas examined during this inspection appeared adequate to accomplish their safety objectives. No violations or deviations were identified.

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Details

1. Persons Contacted

a. Licensee Staff

D. B. Karner, Executive Vice President
*W. E. Ide, Unit 1 Plant Manager
*O. J. Zeringue, Unit 2 Plant Manager
*R. M. Butler, Standards and Technical Support Director
*T. P. Hillmer, Radwaste Support Manager
*T. D. Shriver, Compliance Manager
*K. R. Oberdorf, Unit 1 Radiation Protection Manager
J. W. Kester, Radwaste Services Supervisor
H. D. Ingalsby, Radwaste Processing Supervisor
*D. A. Hackbert, Quality Assurance Supervisor
*J. E. Kirby, Director, Nuclear Production Support
*A. Ogurek, Unit 2 Radiation Protection Manager
L. A. Souza, Quality Assurance and Monitoring Supervisor
*J. R. Mann, Central Radiation Protection Manager
D. T. Leith, Radwaste Processing Technician
K. A. Byers, Lead Technician Training
D. Nichols, General Training Supervisor
*W. F. Fernow, Nuclear Training Manager
D. Goodman, Training and Development, Lead Analyst
*J. C. Schlag, Radwaste Standards Supervisor
S. J. Punch, Radwaste Engineer, Standards

b. Contractor Staff

Bartlett Nuclear, Inc.

*W. H. Barley, Acting ANPP Radiation Protection Manager, C.R.H.P.

*Denotes attendance at the December 2, 1988, exit interview.

In addition, the inspector met and held discussions with other licensee and contractor personnel.

2. Radioactive Waste Management (84850)

a. Management Controls

Licensee procedure 76PR-ORW01, "Radwaste Support Program," and lower tier procedure "Radwaste Support, Organization and Responsibility Policy," were reviewed.

The review disclosed that the procedures identify individuals and organizations assigned responsibility in this area with clear delineation of responsibility and authority for the implementation of the licensee's radioactive waste processing, packing and shipping program.



b. Quality Control

Radwaste Directive No. 24, "Reviews and Monitoring of Radwaste Department Activities," Rev. 2, prescribes the QA/QC program for assuring compliance with shipment of radioactive materials. Additional QC requirements are factored into other radwaste directives that have been established for sampling waste streams, waste classification, processing waste and transportation activities in accordance with their NRC Process Control Program and programs regarding the packaging and shipping of radwaste. The primary QA/QC functions are performed by the Radwaste Support group staff as described in paragraph 9 of Region V Inspection Report 50-528/86-36. Audits by the licensee's QA staff of radioactive waste transportation activities were conducted at approximately two year intervals. Audits of the Process Control Program activities were conducted at a more frequent interval (see paragraph 3, herein). The inspector noted that the licensee's Radwaste Standards group also perform surveillances of the Radwaste Support group functions on a lesser frequency. The inspector also noted that the licensee's site QC group does not appear to be included in the review of the Radwaste Support group activities and the site QA group is only minimally involved in the review of transportation activities. The internal QA/QC functions performed by the Radwaste Support group appeared to provide the licensee with a viable QA/QC tool for ensuring compliance with the regulatory requirements but lacked the independence recommended by 10 CFR Part 50, Appendix B and 10 CFR Part 71.137. This observation was brought to the licensee's attention at the exit interview. The licensee informed the inspector that they would evaluate the inspectors concerns with respect to the independence of QA/QC functions in the Radwaste Support group.

c. Waste Manifests

At least eight waste manifests for the period of January - October, 1988, were examined. Manifests supplied by U. S. Ecology were used. The manifests contained the information required by 10 CFR 20.311(b) and (c).

d. Waste Classification, Waste Form and Characterization

Licensee procedures for assuring compliance with 10 CFR 61.55 and 10 CFR 61.56 were examined. The documentation provided reasonable assurance that wastes were being properly classified and characterized.

e. Waste Shipping Labels

The review of four shipping manifests and Radwaste Directive No. 16, "Packaging, Marking, and Labeling of Radioactive Material," Rev. 4, indicated that the licensee's program was consistent with 10 CFR Part 61.57.



f. Tracking of Waste Shipments

The inspector verified that the licensee has implemented a program for tracking the status of radioactive material shipments. The program which is described in the licensee's Radwaste Directives manual, appeared to provide reasonable assurance of compliance with 10 CFR Part 20.311 and Department of Transportation (DOT) requirements. The licensee reported that all shipments conducted in 1988 had reached their final destination without incident.

g. Disposal Site License Conditions

The licensee maintained current copies of disposal site license conditions both through contract provisions requiring copies from the disposal site operator and through direct mail from the licensing state. The inspector noted that the licensee also maintained current copies of DOT regulations.

In the area inspected, the licensee's program appeared adequate to accomplish their safety objectives. No violations or deviations were identified.

3. Shipping and Transportation (83750, 86721 and 86740)

a. Management Controls

The licensee's system of management controls for transportation activities is described in paragraph 2(a) above.

b. Introduction and Training

It should be noted that 49 CFR Part 173.1(3)(b) states, in part, that it is the duty of each persons who offers hazardous materials for transportation to instruct each of his officers, agents and employees having any responsibility for preparing hazardous materials for shipment as to applicable regulations in this subchapter. Additionally, IE Bulletin No. 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial," identified several examples of problems associated with disregard of rules governing the shipment of low-level radioactive wastes to burial facilities. The bulletin stated that, to assure the safe transfer, packaging and transport of low-level radioactive waste, each licensee was expected to:

- o Provide training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements, and in your instructions and operating procedures for all personnel involved in the transfer, packaging and transport of radioactive material. Maintain a record of training dates, attendees, and subject material for future inspections by NRC personnel.
- o Provide training and periodic retraining to those employees who operate the processes which generate waste to assure that the



volume of low-level radioactive waste is minimized and that such waste is processed into acceptable chemical and physical form for transfer and shipment to a low-level radioactive waste burial facility.

Discussions were held with the licensee's staff. Licensee procedures TPD-RADW, "Training Program Description for the Radwaste Technician," Rev. 2, and Radwaste Instructions No. 006, "Radwaste Technician Training and Qualification," and training records for managers, supervisors, engineers and technicians involved in the packing, transfer and shipping of radioactive wastes were reviewed. Also reviewed was ANPP Quality Assurance Audit Report - No. 88-024, "Training and Qualification."

The review and discussions disclosed the following:

- TPD-RADW and Radwaste Instruction No. 006 are only applicable to technicians. TPD-RADW addresses training requirements to satisfy IE Bulletin 79-19 recommendations and Radwaste Instruction No. 006 addresses on-the-job training requirements for technicians. Neither procedure addresses training for managers or supervisors. Procedure TPD-RADW does not prescribe a frequency for retraining.
- The licensee's staff stated that the initial training course provided to the staff was contracted through a vendor. The course was first given in 1983 and 1984. Subsequently, the licensee developed their own training course outline using the material provided by the vendor. The staff added that a policy had been established to require personnel to attend the training course every two years; however, the Radwaste Support group had never fully supported the initial/retraining program that was developed.
- The inspector reviewed the training course outline that was developed and concluded that the contents were consistent with the recommendations of IE Bulletin 79-19 and 49 CFR 173.1(3)(b) requirements.
- On-the-job training records were reviewed. The inspector noted that personnel were only provided assignments in the areas for which they were qualified. The inspector noted that the Radwaste supervisor maintains records on the qualification status of each worker.
- One individual informed the inspector that retraining was required annually, another individual stated retraining was required every two years and a third individual said personnel were required to attend every three years.
- The review of training records revealed that the on-the-job training records were being maintained as current as practical while training programs established to satisfy IE Bulletin 79-19 recommendations revealed that most individuals from the



Radwaste Support group had not attended the initial training or retraining since 1983 to 1985.

Audit Report No. 88-024 dated November 16, 1988, identified that five different licensee groups were not supporting "Initial/Continuing" training as identified in the applicable Training Program Descriptions. One of these groups was the Radwaste Support group. The Audit Report documented the deficient condition on Corrective Action Reports (CARs) CA88-0092 through CA88-096. Response to the CARs was due on December 2, 1988. It should be noted that the NRC inspector had discussed the potential for various groups not supporting the established training programs during a previous inspection. This was discussed with the licensee's staff during the review of TS 6.5.3.5(b) as described in paragraph 3 of Inspection Report 50-529/88-22.

It should be noted that TS 6.5.3.5(b) requires that audits shall encompass the performance, training and qualification of the Unit staff once per 12 months. The licensee's QA staff had previously indicated that it was not necessary that they check all of these areas for each worker, each Unit and each activity (i.e. Chemistry, Radiation Protection, Maintenance, etc). The inspector was not in agreement with the licensee's interpretation. The staff subsequently indicated that they thought they had records available to show that they had examined the training, performance and qualifications of each Units' staff and each activity; therefore, the item was categorized as unresolved item no. 50-529/88-22-05, pending the review of the additional documentation. The inspector had informed the licensee's staff at the time of the inspection that one reason for verifying TS 6.5.3.5(b) for each activity was because all activities may not be able to support the qualification and training program requirements.

The inspector also noted that four of five personnel in the Radwaste Standards group that develop procedures for the Radwaste Support group did not attend any of the initial or retraining programs that were established to satisfy IE Bulletin 79-19 and 49 CFR 173.1 requirements.

The inspector also noted that the training records for the Radwaste Support Group Manager did not include all the Radwaste training courses and conferences that he had attended over the past several years.

The above observations were discussed with the licensee's staff and brought to the licensee's attention at the exit interview. The inspector informed the licensee that this item will be examined after they have had the opportunity to review and respond to their internal Audit Report No. 88-024. This item will be followed under the unresolved item identified in Inspection Report 50-529/88-22.



c. Audit Program

The following audit and monitoring reports were reviewed for accuracy, content and timeliness of corrective action:

<u>Audits</u>	<u>Dated</u>
Audit No. 87-010, "Process Control Program"	October 9, 1987
Audit No. 88-06, "Gaseous Effluents, Process Control Program"	April 13, 1988
Audit No. 88-024, "Training and Qualification"	November 16, 1988

Monitoring Report

ST-88-0625 - Radwaste, "Package Binding To Transport Trailer 26b-1, 26b-2"	June 1-6, 1988
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Internal Audits

1. Fourth Quarter Audit 1987	March 25, 1987
2. First Quarter Audit, 1988	June 30, 1988
3. Second Quarter Audit, 1988	July 15, 1988
4. Third Quarter Audit, 1988	October 15, 1988
5. Radioactive Material Shipping Standards Evaluation Checksheet	November 10, 1988

The above audits and reports appeared to have been conducted in accordance with the applicable standards and guides. Audit report 88-024 disclosed that the Radwaste Support group staff, involved in the transfer, packaging and transport of radioactive material, have not attended required initial/continuing training. The report identified four other groups that had not supported the licensee's training programs.

Internal Audit No. 5. identified two deficient conditions with a trailer used for shipment no. 88-RW-72. The individual who performed the inspection found that one of the deficient conditions was found to exist after the shipment had been completed to the burial site. The deficient conditions involved a bubble in the trailer's left rear tire and an inoperative right rear light. These were reported to the carrier by the licensee's staff prior to the shipment leaving a local truck stop located eight to ten miles from the licensee's facility. The carrier assured the licensee that the items would be repaired prior to transport. No verification was made by the licensee's staff that the repairs had been made nor do licensee procedures clearly state that such verifications of repair be made prior to allowing shipments to proceed. The licensee's staff reported that the carrier had examined the tire and repaired the light prior to departure. The carrier reported that the flaw in the tire would have no affect on its capability to function safely and, therefore, completed the shipment.



The above observations were brought to the attention of the licensee's staff. The inspector was informed that procedures would be revised to clearly require that actions to correct deficient conditions be verified prior to authorizing shipments for transport.

Monitoring report ST-88-0625, involving the shipment of a NUPAC CS210 liner to the burial site, identified six items of concern involving the licensee's procedure that is used for preparing the shipment. The six items of concern were related to accessories and parts used to provide protection against shifting of the liners. The inspector concluded that the monitoring report raised some valid questions.

The inspector noted that the frequency of audits related to packaging and shipment of radioactive waste by an independent QA group did not appear to be commensurate with the number of shipments that were conducted over the span of one year (i.e. over 100). There were only three independent audits between October 10, 1987, and December 1, 1988. Additionally, there was no involvement on the part of the licensee's QC Group.

The inspector concluded that the licensee's QA program met the minimal requirements of 10 CFR Part 71.137. 10 CFR Part 71.137, "Audits," states the following:

"The licensee shall carry out a comprehensive system of planned and periodic audits to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program. The audits must be performed in accordance with written procedures or checklists by appropriately trained personnel not having direct responsibilities in the areas being audited. Audited results must be documented and reviewed by management having responsibility in the area audited. Follow-up action, including re-audit of deficient areas, must be taken where indicated."

The inspector noted that the internal audit conducted during the fourth quarter of 1987 was comprehensive and self critical of the radwaste shipping and transport program. The audit report did not identify any violations of regulatory requirements.

The above observations were brought to the licensee's attention at the exit-interview. The licensee stated that the inspector's concerns would be evaluated. This item will be examined during a subsequent inspection (50-528/88-42-01).

d. Transportation Incidents

Discussions with the licensee established that there were no reported transportation incidents during the period of October, 1987, through November, 1988.



The licensee reported that they had recently received a warning from U. S. Ecology. The warning involved a waste transport vehicle that arrived at the disposal site with a damaged (torn) placard. This was the second reported occurrence related to "placards" during 1988. Inspection Report 50-528/88-09, paragraph 3, identified a similar event involving shipment No. 88-RW-008.

The licensee had been informed by telephone of the more recent event by the waste site operator. The licensee had not received any notice concerning this event. The licensee's investigation of the most recent event was still in progress at the time of this inspection. The licensee had already brought the warning they had received to the attention of their carrier and was in the process of reviewing the adequacy of Radwaste Instructions No. 017, "Shipping of Radioactive Material."

e. Shipping of Low-Level Wastes for Disposal and Transportation

The inspector reviewed eight manifests for shipments of radioactive wastes that were transported to the burial site for disposal in 1988. Discussions related to the shipping of low-level wastes were also held with the licensee's staff. The following areas were considered:

- o Radiation and contamination surveys of the package and vehicle.
- o Shipping paper documentation.
- o Package marking and labeling.
- o Vehicle placarding and drivers instructions.
- o Notification to state agencies, when required.
- o Use of NRC certified transport packages.
- o Loading and storage, blocking and bracing of packages.
- o Selection of packaging.

The inspector concluded that the shipments were consistent with the regulatory requirements prescribed in 10 CFR Part 20.311, 10 CFR Part 61, Department of Transportation requirements in 49 CFR Parts 172 and 173 and, as necessary, the NRC's certificate of compliance. The licensee's staff informed the inspector that approximately 26,870 cubic feet of Dry Active Wastes, Sludge, Resins and evaporator bottoms were shipped to the burial site for disposal in 1988 to date.

f. Receipt of Radioactive Material

Licensee's procedures and records of incoming shipments of radioactive material were examined. The inspector concluded that the licensee met the applicable requirements of 10 CFR Part 20.205 that is related to the receipt and safe opening of packages.

g. Conclusion

The inspector concluded that the licensee's program related to packaging, shipping and transportation activities appeared adequate to accomplish their safety objectives. However, improvements are



needed in assuring the comprehensive and independent QA/QC program is consistent with 10 CFR 71.137 and that personnel involved in activities related to this subject matter are provided with the initial training and retraining in accordance with 49 CFR Part 173.1(b) and IE Bulletin 79-19 requirements. Additional attention is needed in assuring deficient conditions involving transportation vehicles are corrected prior to approving the shipment for transportation.

4. Followup of Enforcement Items (92702)

(Closed) 50-528/88-27-02, 50-529/88-26-02 and 50-530/88-25-02:

The inspection reports listed above identified that a safety evaluation had not been conducted pursuant to 10 CFR 50.59 requirements for changes made to Trailer 3-2 which had been converted into a facility for processing radioactively contaminated respiratory devices.

The inspector verified the corrective actions documented in the licensee's response to the Notice of Violation (NOV), ANPP letter no. 102-00968-DBK/TDS/KLMC, dated October 7, 1988, had been implemented. The inspector concluded that actions taken by the licensee to prevent a recurrence were satisfactory. This matter is closed.

(Closed) 50-529/88-14-01:

The inspection report identified that the licensee vented 15.3 curies of noble gas from various portions of the gaseous radwaste system without prior evaluation of the release.

The inspector verified the corrective actions documented in the licensee's response to the NOV, ANPP letter no. 102-00892-DBK/TDS/RJR, dated August 1, 1988, had been implemented. The inspector concluded that the licensee's actions to prevent a recurrence of a similar event was satisfactory. This matter is closed.

The licensee seemed to be maintaining their previous level of performance and their program for resolving enforcement items appeared adequate to accomplish its safety objectives. No violations or deviations were identified.

5. Followup (92701)

(Closed) 50-529/88-14-02: Inspection Report 50-529/88-14 identified that there was an apparent lack of knowledge retention by workers in the area of high radiation area posting and control.

Discussions held with the licensee's staff and a review of ANPP letter nos. 052-01721-DCN/CFB, dated July 27, 1988, and 052-01870-WFF/CB, dated July 27, 1988, and a review of PVNGS Safety News Letter, dated July 5, 1988, revealed that the licensee's immediate and long term corrective actions are satisfactory. This matter is closed.



(Closed) 50-528/88-22-06: Inspection Report 50-528/88-22 identified that the licensee's Dry Active Waste Processing (DAWP) facility did not appear to be addressed as a potential release path in the Technical Specifications (TS), Final Safety Analysis Report (FSAR) or the Off Site Dose Calculation (ODCM) manual. Additionally, the facility exhaust was not identified as a release point in Section 5, "Design Features," of the TS.

Discussions related to this subject were held with the licensee's staff during the inspection. Additionally, the following documents were reviewed:

- a. ANPP correspondence no. 222-00413-JMS/PHG
- b. Procedure 76RW-9ZY01, "Operation of the Dry Active Waste Processing and Storage Facility (DAWPS)-HVAC," Rev. 0, dated November 3, 1988
- c. Lower tier procedure CRP-007, "Operation of the General Dynamics Respiratory Cleaning System", Rev. 1, dated October 24, 1988.
- d. Lower tier procedure RP9-004, "AMS Monitor Operations", Rev. 0, dated October 24, 1988.
- e. Proposed draft revision to the ODCM, dated October 27, 1988
- f. ANPP correspondence no. 161-01344-ACR/JRP, dated September 26, 1988.

The discussions and review of the above documents disclosed that the licensee's resolutions were satisfactory. The next revision to the ODCM will include the DAWPS and new Respiratory Processing Facility as "nuisance" pathways. This matter is closed.

The licensee seemed to be maintaining their previous level of performance and their program for resolving open items appeared adequate to accomplish its safety objectives. No violations or deviations were identified.

6. Review of Licensee Reports (92700)

The licensee's Special Plant Event Evaluation Report (SPEER) No. 88-03-05, date October 20, 1988, was examined. The report was related to an unauthorized entry into a locked high radiation area by a contract worker on September 8, 1988, which is described in Region V Inspection Report 50-530/88-33. Licensee Event Report (LER) No. 3-88-005-00, dated October 12, 1988, was also reviewed.

The inspector noted that the licensee's SPEER did not address the inconsistencies in the statements made by the workers during the investigation conducted by the licensee's staff and NRC or the contributory cause for the event as was identified by the NRC and in the LER. The LER identified that a contributory factor in the event was the inadequate communications between Radiological Protection (RP) personnel and the involved contract workers. Additionally, neither the SPEER or the LER state the immediate measures taken to prevent a recurrence of the event at Units 1 and 2.

The inspector brought the above observations to the licensee's attention during the inspection. The inspector was informed that SPEER concern no. 4 was related to the poor communications between RP personnel and the



contract worker. The inspector reviewed concern no. 4 and came to the conclusion that it does not clearly identify the communication problem as a contributory factor related to the event.

The inspector concluded that the licensee's program for investigation of unusual or reportable events appeared to be weak and seemed marginally capable of meeting its safety objective. No violations or deviations were identified.

7. Tour and Independent Effort (83750)

The inspector toured various areas of the licensee's Unit 1 and 2 facilities on November 28, 1988, and November 30, 1988. The Region V Regional Administrator and Region V Senior Resident Inspector accompanied the inspector during the tour conducted on November 30, 1988. The inspector made independent radiation measurements using an Eberline R0-2 portable ion chamber radiation detection instrument, S/N 897, due for calibration on February 16, 1989. The following observations were made during the tours:

- ° Housekeeping, with the exception of the Unit 1 laundry and decontamination facility, was excellent.
- ° Observed radiation monitoring equipment was in current calibration.
- ° Posting and labeling practices were in compliance with 10 CFR 19.11 and 10 CFR 20.203. Posting of radiation and high radiation areas appeared to be consistent in Units 1 and 2. This represents an improvement from the observations documented in Region V Inspection Report 50-528/88-33, paragraph 6.
- ° At approximately 0210 a.m. PST, November 28, 1988, the inspector observed a ANPP contract worker who was in a relaxed position. The worker, a Fire watch, was fully awake; however, he was lying down in a prone position on top of an equipment locker. The worker was located in the Radioactive Material Storage Area on the 140' elevation of Unit 2's Auxiliary Building. The worker had established himself in a comfortable position by using laundered protective clothing as both head and foot rests. Radiation levels in the immediate area occupied by the worker were non-detectable.

The inspector reported his observations to the lead radiation protection technician, on shift, and to the Manager of Compliance.

The inspector was subsequently informed that appropriate action had been taken. The inspector commended the licensee's staff for taking prompt action.

- ° Inspection Report 50-528/88-33, paragraph 6(e), identified that, on three occasions, individual employees at Palo Verde were intimidated by ANPP supervisors by being cautioned not to talk freely to NRC inspectors. This observation was brought to the licensee's attention at the time of the inspection.



On November 28, 1988, the Vice President, Nuclear Production, issued a memorandum to all site personnel that they could talk freely to the NRC without any fear of recrimination. The memorandum provided instructions on the methodology to be followed for reporting their concerns to the NRC. The methodology recommended was consistent with the instructions provided on NRC Form 3, dated 5-88. At a management meeting held on December 1, 1988, between ANPP management and USNRC Region V management, the ANPP President made it clear that he had personally informed all site personnel that he had an open door policy such that workers could call him or visit him at any time of day or night to express their problems without fear of recrimination. The president added that workers are also instructed that they can report their concerns directly to the Hot Line if they wished to remain anonymous.

On November 29, 1988, the NRC inspector was again informed by another ANPP worker that he had been intimidated by his supervisor from talking freely to NRC inspectors. This was brought to the licensee's attention during the inspection and at the exit interview. The Executive Vice President, Nuclear, reiterated ANPP's policy discussed in the November 28 memorandum and as discussed by the President at the Management Meeting of December 1. The Executive Vice President and Manager of Compliance informed the inspector that he had requested that an independent investigation be started immediately to determine the validity of the allegations. The licensee's staff stated that the results of their independent investigation would be brought to the NRC's attention.

8. Exit Interview

The inspector met with those individuals denoted in paragraph 1 at the conclusion of the inspection, on December 2, 1988. The scope and findings of the inspection were summarized. The licensee was informed that no violations or deviations were identified.

The inspector informed the licensee of the weaknesses identified in paragraphs 3(b), 3(c) and 6, and of the observations identified in paragraph 7.

