

Results (Units 1, 2, and 3):

- Plant Operations
Not applicable during this inspection.
- Maintenance
Not applicable during this inspection.
- Engineering

Although generally untimely, engineering decisions related to revised core physics limits were technically appropriate. There were no technical inadequacies found in the licensee's revised administrative limits that had supplanted Technical Specification limits (Section 1.2).

There were missed opportunities to identify and correct deficiencies. The issue of subcritical control element assembly bank withdrawal reanalysis internally reported on March 17, 1994, was originally recognized by the licensee's staff in November 1993. The issue of moderator temperature coefficient discrepancy could have been identified during the development of previous core reload analyses and 10 CFR 50.59 reviews by the fuel vendor and the licensee staffs. This issue of Mode 6 boron concentration had the potential to be discovered at each of 14 reloads before it was found (Section 1.2.1, 1.2.2, and 1.2.5).

The licensee's staff did not consider analytical inputs and reload analyses assumptions for matters such as core azimuthal tilt accident analyses, which had led to plant operational limits such as 3 percent core azimuthal tilt, to constitute design bases (Section 1.2.3).

The licensee's staff inappropriately derived an NRC staff viewpoint from reviewing other licensee correspondence, rather than pursuing its own Technical Specification change. When the licensee determined that certain Technical Specification limits were inadequate, more restrictive administrative limits were established to control safety analysis assumptions. This situation existed for a prolonged period of time before the licensee requested NRC review and revision of Technical Specification limits. The licensee's implementation of its reportability process and its frequent requests to the NRC for time extensions related to licensee correspondence, was an area in need of significant improvement (Section 1.2.4).

The licensee's program for evaluating vendor technical information inappropriately exempted fuel vendor information (Section 1.3.1).



In March 1989, the licensee's fuel vendor, in reviewing the licensee's administrative controls, recommended that the appropriate Technical Specification revision should be submitted to "eliminate the need for this complex interim approach." In making a decision whether to request an amendment, the licensee's staff evaluated other similar vintage Combustion Engineering nuclear steam supply system licensee correspondence to change related Technical Specification limits. For a variety of reasons, several of those submittals were unacceptable to the NRC staff, and the licensee's staff inappropriately derived an NRC staff viewpoint from those transactions rather than pursuing its own Technical Specification change.

The use of administrative controls that are more restrictive than Technical Specification limits is a common practice to protect against violating the Technical Specification limits. When the licensee determined that certain Technical Specification limits were inadequate, more restrictive administrative limits were established to control safety analysis assumptions. This situation existed for a prolonged period of time before the licensee requested NRC review and revision of Technical Specification limits in accordance with 10 CFR 50.36.

As stated in Section 1.1 of this report, the licensee had recently determined on June 7, 1994, that this issue was reportable. That determination of reportability had been initiated as early as May 24, 1994, during a revision to Condition Report/Disposition Request 9-4-0338. The reportability determination was again confirmed in an internal memorandum dated June 9, 1994, wherein it was stated that the report was to be made in Supplement 1 to LER 528; 529; 530/94-002-00. Supplement 1 to LER 528; 529; 530/94-002-00, though, was not issued until August 8, 1994. Consequently, the licensee's report was technically more than a month overdue. However, Supplement 2 to LER 528; 529; 530/94-002-00, issued on October 28, 1994, stated that this issue involving the core protection calculator power calculations had now been determined not to be reportable.

During discussions with the inspectors, the licensee's representatives explained that their best recollection was that they had received telephonic approval from the Walnut Creek Field Office for an extension to the reporting timeliness for Supplement 1 to LER 528; 529; 530/94-002-00; however, the licensee and NRC personnel could not identify a record of the extension approval. This reportability review was also confusing to the NRC inspectors because on November 15, 1994, the licensee's staff made a presentation to the inspectors, during which a handout indicated that this issue was reportable and did not acknowledge the prior October 28, 1994, determination.

The inspectors believed that the licensee's implementation of its reportability process, as indicated by this example and its frequent requests to the NRC for time extensions related to licensee correspondence, was in need of significant improvement.

