

RO 84-024-0
RO 84-025-0
RO 84-031-0
RO 84-032-0

These reports all involve Unit 2 low power or zero power RPS actuations (trips) which have been previously reviewed - the first two in IE Report 316/84-21, the other two in IE Report 316/84-24.

One item of noncompliance was identified involving a repetitive failure to collect timely compensatory samples when automatic equipment was inoperable.

7. Monthly Maintenance Observation

Station maintenance activities of safety related systems and components listed below were observed and/or reviewed to ascertain that they were conducted in accordance with approved procedures, regulatory guides and industry codes or standards, and in conformance with Technical Specifications.

The following items were considered during this review: The limiting conditions for operation were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures and were inspected as applicable; functional testing and/or calibrations were performed prior to returning components or systems to service; parts and materials used were properly certified; radiological controls were implemented; and, fire prevention controls were implemented.

The following maintenance activities were observed and/or reviewed:

**12 QHP 4050 Q.C. 001	Receipt, Inspection and Storage of New Fuel Assemblies.
**12 MHP 4030 STP.013	Maintenance Surveillance Test Procedure For Inspection of 250 Volt Plant Batteries AB and CD.
**12 MHP 5021.001.031	Installation of Fire Barrier Penetration Seals. (Penetrations F-6919 and F-6920 - Unit 2).
RFC 12-1860	Modify Control Circuitry For CO-2 Fire System. Replacement of Cell 108 For Unit 1 CD Battery Bank.

No items of noncompliance or deviations were identified.

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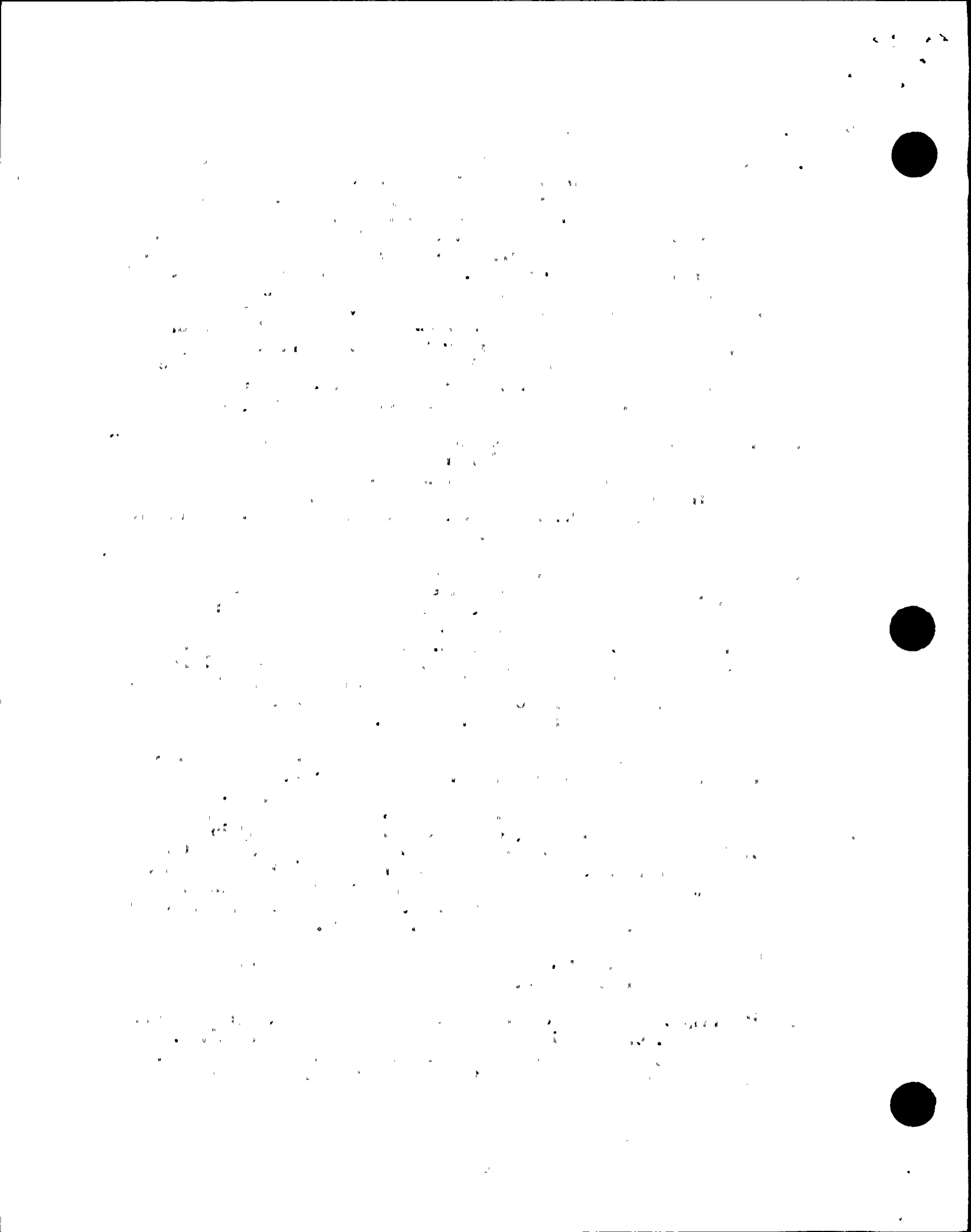
8. Independent Inspection Activities

- a. Licensee Condition Reports were routinely reviewed to provide an ongoing and current perception of the effectiveness of the licensee's corrective action program. Selected reports were reviewed in more detail on the basis of their potential implications or the particular interest of the inspector. Condition Report 2-12-84-2641 discussed lifting of an RHR safety valve during Unit 2 air sweeps on December 23, 1984. Procedure 2 OHP 4021.002.001 was used in a manner (higher RCS pressure) not contemplated and, as such, this event could be considered a consequence of violating an approved safety-related procedure. Condition Report 1-12-84-2598 involved "E" motor driven auxiliary feedwater pump emergency leakoff valve inoperability as a consequence of violating procedural controls on lifted leads. Under NRC Enforcement Policy, minor violations of this type identified and corrected by the licensee are not subject to NRC enforcement action.
- b. The licensee's response to IE Bulletin 84-03, "Refueling Cavity Water Seal", was subjected to preliminary review. Copies of this response distributed to the site were apparently transmitted without an oath or affirmation statement, though the copy sent to NRC Region III had such a statement. The inspector requested a copy of the affirmation statement be transmitted to the site.
- c. NUREG-0737, Item II.B.1, "Reactor Coolant System Vents", and 10 CFR 50.44 (c)(3)(iii) provided for installation and operability (including procedure preparation and operator training) of RCS vent systems for use in controlling potential noncondensable gas accumulation in the reactor coolant system. The licensee installed the vent system as discussed in IE Report 315/84-20 and 316/84-22, leaving "open" the completion of surveillance testing, procedure revisions, training, and conversion of the systems to full operability, pursuant to newly issued Technical Specifications.

During unit outages for each of the respective units during this inspection period, the licensee verified or performed current surveillance testing and energized and declared the respective vent systems "operable". Procedure revisions covering system operation were approved and issued (TP-1 to Revision 1, dated May 15, 1984, of Procedures 1 and 2 OHP 4023.001.015) prior to the operability declarations. Operator training was performed after installation of the actual modifications with a refresher memorandum to the shifts (October 19, 1984) relating to final elevation of the systems to full operability under the Technical Specifications.

The inspector having no further questions concerning this item, the item is considered closed.

- d. The inspector discussed internal NRC information potentially applicable to D. C. Cook with appropriate licensee representatives. On January 12, 1985 a reactor trip breaker at Sequoyah Unit 2 did not open automatically on demand due to a printed circuit board short



- (i.e. the breaker did not "fail safe"). The licensee was provided with available information and asked to review the matter for applicability. On a separate matter, the licensee was requested to review his records for possible historical procurement of safety-related components from a vendor (Familian Northwest) under investigation for falsification of material certifications. The licensee review indicated this vendor has not supplied safety-related components to D. C. Cook.

No items of noncompliance or deviations were identified.

9. Management Interview

A management interview (attended as indicated in Paragraph 1) was conducted at the completion of the inspection. The following items were discussed:

- a. The inspector summarized the scope and findings of the inspection as described in these details.
- b. The apparent item of noncompliance (partially affecting both Units was specifically identified and discussed (Paragraph 6).
- c. Events for which LERs (or supplemental information thereto) are anticipated and which may have NRC enforcement action implications were identified and discussed (Paragraph 3).
- d. A questionable PNSRC Technical Specification "interpretation" concerning cross-tieing station batteries was discussed - the licensee agreeing to re-examine the matter (Paragraph 3).
- e. The TMI Action Item (NUREG-0737 Item II B.1) involving reactor coolant vents was identified as "closed" on the basis of this inspection (Paragraph 8.c).
- f. The inspector asked the licensee representatives whether they considered any of the matters discussed to contain proprietary information or other information exempt from disclosure pursuant to 10 CFR 2.790. No such information was identified.

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