

justification given. The use of "N/A" was not permitted without a change sheet at the time this step was marked "N/A." However, based on the inspector's review of the corrective action which included documentation of the justification for the "N/A," the justification was reasonable and there was no safety significance to skipping this step and the associated data sheets. In addition, generic corrective actions were taken. Several Plant Manager and Department Head Instructions, Procedures, and Associated Indexes," and PMI-6040, "Performance/Engineering Test Procedures." Step 3.1.2 of PMI-2010 stated, in part, that "It is expected that as procedures are revised, instructions for partial completion will be addressed on a case by case basis." The inspector discussed this with the Nuclear Engineering Supervisor who indicated that the procedures used by the Nuclear Group had been reviewed and, where appropriate, revised to identify procedure steps that are optional under certain conditions and can, therefore, be marked "N/A." The inspector reviewed numerous examples of procedures used by the Nuclear Group which had been revised to address the use of "N/A." There was a statement that appeared in several Nuclear Group procedures (for example: \*\*THP 6040.PER.356, "Reactivity Computer Checkout") that concerned the inspector because it might be misinterpreted as giving unlimited authority to Test Engineers as opposed to controlling the use of "N/A" through procedural allowances as described in PMI 2010. The statement was: "Only those sections deemed appropriate by the test engineer need be completed for each specific test." The licensee committed to look into clarification of that statement. This is considered an open item (325/86006-02(DRS); 316/86006-02(DRS)) pending licensee action and subsequent NRC review.

No violations or deviations were identified; however, two areas require further review and will be followed as open items.

### 3. Licensee Event Reports

Through discussions with licensee personnel and review of records, the following Licensee Event Report (LER) was reviewed to determine that reportability requirements were met, and corrective and preventive actions were accomplished in accordance with Technical Specifications.

The following LER is considered closed:

- LER 315/84009: A flux map taken at 99% power on March 21, 1984, indicated that the heat flux hot channel factor ( $F_Q$ ) Technical Specification limit was exceeded by approximately 0.4%. Power level was subsequently reduced to 96% power. Reanalysis demonstrated that this was an indicated rather than actual violation based on conservatism incorporated in the original flux map analysis. The reanalysis indicated that it would be permissible to return to 99.7% power. Further reanalysis utilizing a burnup dependent  $V(z)$  indicated that it would be possible to return to 103% power without violating the  $F_Q$  Technical

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