U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-315/89007(DRS); 50-316/89007(DRS)

Docket Nos. 50-315; 50-316

Licenses No. DPR-58; DPR-74

Licensee: Indiana Michigan Power Company 1 Riverside Plaza Columbus, OH 43216

Facility Name: D.C. Cook Nuclear Power Station, Units 1 and 2

Inspection At: Bridgman, MI 49106

Inspection Conducted: February 9-15, 1989

Inspectors: F. A. Maura

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Approved By: M. P. Phillips, Chief Operational Programs Section

Inspection Summary

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Inspection on February 9-15, 1989 (Reports No. 50-315/89007(DRS); 50-316/89007(DRS))

<u>Areas Inspected:</u> Routine, announced integrated leak rate test (CILRT) procedure; CILRT performance witnessing, review of CILRT and Appendix J Type B and C testing results; and review of licensee actions on previous inspection findings. NRC modules utilized during this inspection include 70307, 70313, 70323, 61720, 92701, and 92702.

<u>Results</u>: Of the five areas inspected, no violations or deviations were identified in three areas. In the remaining two areas, three violations were identified: (failure to follow procedure/inadequate corrective action - Paragraph 4.b, failure to calculate the combined Type B and C test results in accordance with Appendix J requirements - Paragraph 6.a.(1), and failure to maintain penetration pressure at Pa during Type B and C tests - Paragraph 6.b).

1. Persons Contacted

Indiana Michigan Power Company

- *K. Baker, Operations Superintendent
- +D. Climer, Performance Engineer
- +*D. McWethy, Performance Engineer
- +*T. Postlewait, Technical Engineering Superintendent *J. Rutkowski, Assistant Plant Manager
- *J. Sampson, Safety and Assessment Superintendent *W. Smith, Plant Manager
- +*J. St. Amand, Performance Engineering, Mechanical Superintendent
- *B. Svensson, Licensing Actions Coordinator
- *J. Wokik, Technical Performance Superintendent

AEPSC

*S. Farlow, Electrical Assistant Manager

- *D. Moeller, Nuclear Safety and Licensing
- *S. Wolf, Site Quality Assurance Auditor

TER -

T. Renton, Consultant

United States Nuclear Regulatory Commission

*M. Farber, Reactor Inspector *R. Landsman, Reactor Inspector +*D. Passehl, Resident Inspector

The inspectors also interviewed other licensee employees including members of the technical and operations staff.

*Denotes those attending interim exit meeting on February 14, 1989. +Denotes those attending exit meeting on February 15, 1989.

- 2. Action on Previous Inspection Items
 - (Closed) LER (316/85005-LL) and Open Item (315/85025-07(DRS)): a. Licensee's use of the minimum pathway methodology to compare Type B and C tests results to 10 CFR 50, Appendix J/0.6 La acceptance criteria. These items are discussed in Paragraph 6.a.(1) and have been upgraded to a violation.
 - (Closed) Open Item (315/85025-01(DRS)): Maintain steam generator b. level at post LOCA conditions. As discussed in Paragraph 3.b.(9), the purpose of requiring steam generator level control during the

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CILRT is to prevent the flooding of the main steam lines and the resultant water sealing of the MSIVs, unless that is the configuration called for in the post LOCA emergency procedures. The inspectors verified that the water level is maintained below the MSL. In addition, the licensee vented the steam generators outside of containment for the CILRT. This item is considered closed.

- c. <u>(Closed) Open Item (315/85025-02(DRS))</u>: Penetrations No. 97 and 98, containment instrumentation is not exposed to the Type A test pressure. The inspectors determined that the licensee has performed a review of containment instrumentation and has included their Type C local leak rate (minimum pathway) as a penalty to the CILRT test results at the 95% UCL. This item is considered closed.
- d. (Closed) Unresolved Item (315/85025-03(DRS)): Lack of temperature survey to justify location of sensors and weight fraction. By letter M. P. Alexich to J. G. Keppler, dated November 18, 1985, the licensee acknowledged that they could not document that a temperature survey had ever been performed prior to a CILRT. Prior to this CILRT the licensee relocated several sensors (to within 25 ft of their previous position) to avoid possible local heat sinks or heat sources. The new locations were not well documented in drawings or sketches of sensor location. A two point temperature survey (three points for 28% of the RTDs) was conducted. The maximum recorded temperature differential (sensors vs area average temperature).was 2.64 °F. An after the fact procedure was prepared to describe how the temperature survey was conducted. The licensee agreed to conduct a more detailed temperature survey prior to the next station CILRT which would document:
 - (1) The actual location of all sensors.
 - (2) A procedure, prepared in advance, which would indicate the number of readings to be taken based on the size of the subvolume in question, and the acceptance criteria.
 - (3) The containment conditions for which the survey was applicable (fans running or shutdown, CILRT at beginning or end of outage, etc.).

This item is considered closed based on the licensee's commitment to perform a well documented temperature survey during the next CILRT, the results of the less detailed survey performed prior to this CILRT, and the large number of sensors used during the test.

e. <u>(Closed) Violation (315/85025-04(DRS))</u>: Failure to control the calibrated condition of the flowmeter used for the supplemental test. By letter M. P. Alexich to J. G. Keppler, dated November 18, 1985, the licensee acknowledged the violation and described the actions taken at that time to correct the violation and to prevent similar violations. The inspectors determined the licensee had taken adequate corrective actions. The two flowmeters used during this CILRT were properly calibrated and installed. This item is considered closed.

- f. <u>(Closed) Open Item (315/85025-05(DRS))</u>: Technical Specification Paragraph 4.6.1.2.c requirement for superimposed leak rate size is not consistent with ANSI N45.4-1972, ANSI 56.8-1981, or NRC's position. While the Technical Specification paragraph in question is misleading, the licensee is aware of the requirement that the magnitude of the superimposed leak rate during the supplemental test be close to La as described in Paragraph 3.b.(7) of this report. This item is considered closed.
- g. <u>(Closed) Open Item (315/85025-08(DRS))</u>: Ensure correct methodology is used to calculate as found Type A test penalty whenever repairs or adjustments are done to penetrations prior to the CILRT. The inspectors reviewed the methodology to be used to obtain the as found Type A test results with members of the licensee's staff throughout the inspection. The methodology discussed is described in Paragraph 3.b.(2) of this report. The inspectors reviewed the licensee's calculated penalties. The results of this review appears in Paragraph 5.d. This item is considered closed.
- 3. <u>Containment Integrated Leak Rate Test Procedure Review</u>
 - a. .. Procedure Review

The inspectors reviewed Surveillance Procedure No. 2 THP 4030 STP.202, Rev. 0, dated January 13, 1989, "CILRT," relative to the requirements of 10 CFR 50, Appendix J, ANSI N45.4-1972; and the Technical Specifications. All inspectors comments were satisfactorily resolved.

b. <u>Clarifications of Appendix J Requirements</u>

To ensure the licensee's understanding of Appendix J requirements, the inspectors conducted numerous discussions with licensee personnel during the course of the inspection. The following is a summary of the clarifications discussed with the licensee.

- (1) The Type A test length must be 24 hours or longer to use the mass point method of data reduction. If tests of less than 24 hours are planned, the Bechtel Topical Report, BN-TOP-1, must be followed in its entirety except for any Section which conflicts with Appendix J or Technical Specification requirements. For either methodology, the acceptance criteria is that the measured leakage at the 95% upper confidence limit must be less than 75% of the maximum allowable leak rate for the pressure at which the test was performed.
- (2) Periodic Type A, B, and C tests must include as-found results as well as as-left. If Type B and C tests are conducted prior

to a Type A, the as-found condition of the containment must be calculated by adding any improvements in leakage rates, which are the results of repairs and adjustments (RA), to the Type A test results using the "minimum pathway leakage" methodology. This method requires that:

- (a) In the case where individual leak rates are assigned to two valves in series (both before and after the RA), the penetration through leakage would simply be the smaller of the two valves' leak rates.
- (b) In the case where a leak rate is obtained by pressurizing between two isolation valves and the individual valve's leak rate is not quantified, the as-found and as-left penetration through-leakage for each valve would be 50% of the measured leak rate if both valves are repaired.
- (c) In the case where a leak rate is obtained by pressurizing between two isolation valves and only one valve is repaired, the as-found penetration leak rate would conservatively be the final measured leak rate, and the as-left penetration through leak rate would be zero (this assumes the repaired valve leaks zero).
- (3) Penetrations which are required to be Type C tested, as described in the FSAR and SER, must be vented inside and outside the containment during the CILRT. All vented penetrations must be drained of water inside the containment and between the penetration valves to ënsure exposure of the containment isolation valves to containment air test pressure. The degree of draining of vented penetration outside of containment is controlled by the requirement that the valves be subjected to the post-accident differential pressure, or proof that the system was built to stringent quality assurance standards comparable to those required for a seismic system.
- (4) Whenever penetration configurations during a CILRT deviate from the ideal, the results of the LLRTs for such penetrations must be added as a penalty to the CILRT results at the 95% confidence level. This penetration leakage penalty is determined using the "minimum pathway leakage" methodology. This methodology is defined as the minimum leakage value that can be quantified through a penetration leakage path (e.g., the smallest leakage through two valves in series). This assumes no single active failure of redundant leakage barriers. Additionally, any increase in containment sump, fuel pool, reactor water, or suppression pool level during the course of the CILRT must be taken as a penalty to the CILRT results. If penalties exist, they must be added (subtraction is never permitted) to the upper confidence level of the CILRT results.

- (5) The start of a CILRT must be noted in the test log at the time the licensee determines that the containment stabilization has been satisfactorily completed. Reinitializing a test in progress must be "forward looking," that is, the new start time must be that time at which the decision to restart is made. This also implies that the licensee has determined that the test has failed, and has enough data to quantify the leakage rate. Any deviation from these positions should be discussed, and documented, with the NRC inspector (ILRT Specialist) as they occur to avoid later invalidations of the test results. Examples of acceptable deviations of reinitializing the start time of the test in the past are: time at which a leaking penetration which has an obvious effect on the test data was secured, accidental opening and later closing of a valve which has an obvious effect on the test data, the time at which an airlock outer door was closed and the inner door was open.
- (6) The supplemental or verification test should start within one hour after the completion of the CILRT. If problems are encountered in the start of the supplemental test, data recording must continue and be considered part of the CILRT until the problems are corrected and the supplemental test can begin.
- (7) For the supplemental test, the size of the superimposed leak rate must be between 0.75 and 1.25 time the maximum allowable leak rate La. The higher the value, the better. The supplemental test must be of sufficient duration to demonstrate the accuracy of the test. The NRC looks for the results to stabilize within the acceptance criteria rather than the results being within the acceptance criteria. Whenever the BN-TOP-1 methodology is being used, the length of the supplemental test cannot be less than approximately one-half the length of the CILRT.
- (8) During a CILRT, it may become necessary to reject or delete specific sensors or data points due to drifting or erroneous sensors, or data outliers. Data rejection criteria should be developed and used so that there is a consistent, technical basis for data rejection. One example of an acceptable method for data outliers is described in an Appendix to ANSI/ANS 56.8-1981. Sensor data rejection criteria should be plant specific and based upon a sensor's trend relative to the average scatter, slope and/or absolute output of the sensor.
- (9) The water level in the steam generators during the CILRT must be low enough to ensure it does not enter the main steam lines unless flooding of the main steam lines is called for in the loss of coolant emergency procedure.

- (10) An acceptable method for determining if the sum of Type B and C tests exceeds the 0.60 La Appendix J limits is to utilize the "maximum pathway leakage" method. This methodology is defined as the maximum leakage value that can be quantified through a penetration leakage path (e.g., the larger, not total, leakage of two valves in series). This assumes a single active failure to the better of two leakage barriers in series when performing Type B or C tests.
- (11) Test connections between containment isolation valves must be administratively controlled to ensure their leak tightness or otherwise be subject to Type C testing. One way to ensure their leak tightness is to cap, with a good seal, the test connection after its use. Proper administrative controls should ensure valve closure and cap re-installation within the local leak rate testing procedure, and with a checklist prior to unit restart.
- (12) Whenever a valve is replaced, repaired, or repacked during an outage for which Type A, B, and/or C surveillance testing was scheduled, local leak rate testing for the as-found as well as the as-left condition must be performed on that penetration. In the case of a replaced valve, the as-found test can be waived if no other containment isolation valve of similar design exists at the site.
- (13) The periodic retest schedule for <u>each penetration</u> subject to Type B or Type C testing, except for airlocks and penetration employing a continuous leakage monitoring system, shall be every refueling outage, but in no case shall the interval be greater than two years.

4. <u>Containment Integrated Leak Rate Test Witnessing</u>

a. The inspectors reviewed the calibration data and determined all the instruments used in the CILRT had been properly calibrated and that the correct weighting factors had been placed in the computer program as required. The following instrumentation was used throughout the test:

Туре	<u>Quantity</u>
RTDs	46
Humidity	· 7
Pressure gauges	6
Flowmeter	2

b. <u>Witness of Test</u>

The inspectors witnessed portions of the CILRT on February 11-12, 1989, and noted that test prerequisites were met and that the appropriate revision to the surveillance procedure was followed by test personnel. Valve lineup for the following systems were verified correct except as noted, to insure that no fluid could enter the containment atmosphere and that proper venting and draining was provided.

	<u>Penetratior</u>
Fuel Transfer	1
Control Air to Containment	29/74
Plant Air	29
Lower Containment Airborne	32
Nitrogen to Accumulators	32
Nitrogen to PRT	32
Accumulator Sample Isolation	81
RCDT Gas Sample	81
Weld Channel Pressurization	83
Plant Air, Post Accident Sampling	93/94

The following valve lineup discrepancies were identified:

Valve	Required Test Position	As-found Position
XPX-110-V1 •(Test Connection, •	Open, Uncapped Control Air)	Closed, Capped, Tagged
2-CA-171 (Control Air)	Closed	Opened .
ZPZ-100-V1 (Test Connection,	Open, Uncapped Control Air)	Closed, Capped
CA-266 (Drain, Containment	Open, Uncapped Penetration Pressurizatio	Closed, Capped, Tagged

CA-308 Open, Uncapped Closed, Capped, Tagged (Drain, Containment Penetration Pressurization)

Discussions with the licensee showed that the system lineups were not complete at the time of the inspectors walkdowns. The inspectors noted that three of the discrepant valves were administratively tagged and were concerned with potential valve misalignments due to tagging prior to placing the valve in the desired test position. The licensee explained that the tags for these valves were placed during the operators valve lineup per Procedure 2-OHP-4021.034.001, which was a prerequisite for the CILRT Procedure 2-THP-4030 STP.202. The 'tags were used to identify systems and components which were impacted by the leak rate test. During the last containment test performed on Unit 1 in late 1985, the licensee experienced numerous difficulties with valve lineups due to procedural inadequacies and the lack of administrative controls as stated in Inspection Reports No. 50-315/85025 and No. 50-315/85027. In response to the violations, the licensee committed to implementing formal administrative controls which included tagging components and personnel training on their responsibilities related to these controls. The inspectors reviewed Procedure 2-THP-4030. STP.202 and directives related to the test and determined that the corrective actions were adequate.

On February 11, 1989 during the temperature stabilization period, the inspector reverified the position of the deficient valves. Valves, CA-266 and CA-308 identified previously and CA-345, Zone 4 isolation valve, were found mispositioned. The weld channel pressurization system was found pressurized to 12 psig which would have masked any potential leakage paths. Upon further investigation by the licensee, an additional mispositioned valve, CA-246, Zone 3 isolation valve, was identified. Review of the procedure showed these components had been independently verified to be in the correct test position. Failure to maintain the proper valve lineup as described in the CILRT test procedure is contrary to 10 CFR 50, Appendix B, Criterion V, which states in part, that activities affecting quality shall be prescribed in documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. This is considered a violation (316/89007-01(DRS)).

As a result of the discrepancies and history of their past CILRT performance, the licensee committed to reverify the positions of all valves involved in the test and the valves stated above were placed in their proper test configuration. The verification of all outside containment valves was completed prior to the start of the supplemental test. After depressurization, the inspector performed a walkdown of selected vent and drain pathways inside containment and found no problems. The complete reverification by the licensee identified no other discrepancies.

5. Test Results Evaluation

a. CILRT Data Evaluation

A 24 hour CILRT was performed during February 11-12, 1989, at 26.5 psia following satisfactory completion of the required temperature stabilization period. Data was collected every 15 minutes. The inspectors independently monitored and evaluated leak rate data using mass point time formulas to verify the licensee's calculations of the leak rate and instrument performance. There was good agreement between the inspectors' and licensee's results as indicated by the following summary (units are in weight percent per day).

Measurement	Licensee	Inspectors
Leak rate measured during CILRT (Lam)	0.013	0.012
Lam at upper 95% confidence level	0.015	0.015

Appendix J acceptance criteria at 95% UCL: < 0.75 La = < 0.1975 weight percent per day.

At the completion of the CILRT and the supplemental test, the changes in sump and reactor vessel water levels were calculated. No correction to the calculated Lam at the 95% UCL, for volume change, was required.

b. <u>Supplemental Test Data Evaluation</u>

After the satisfactory completion of the CILRT a known leakage rate (based on the inspectors' independent readings and calculations) of 4.13 scfm, equivalent to 0.268 weight percent per day was induced. Data was collected and analyzed by the licensee every 15 minutes. The`inspectors independently monitored and evaluated leak rate data to verify the licensee's results. After four hours, the supplemental test was terminated with satisfactory results as indicated by the following summary (units are in weight percent per day). The results were stable within the acceptable criteria.

Measurement	Licensee	Inspectors
Measured leakage rate, Lc, during supplemental test	0.270	0.270
Induced leakage rate, Lo	0.244	0.268
Lc-(Lo + Lam)	+0.013	-0.010

Appendix J acceptance criteria: -0.0625 < [Lc-(Lo + Lam)] < +0.0625.

c. CILRT Valve Lineup Penalties

Due to valve configurations which deviated from the ideal penetration valve lineup requirements for the CILRT, the results of local leak rate tests for such penetrations must be added as a penalty to Lam at the 95% UCL. The following penalties must be added using the minimum pathway leakage method:

<u>Penetrati</u>	on	Local Leak Rate Test Value (Units are in SCCM)
11-14	Reactor Coolant Pump Seal Water Lines	20.1
15	ECCS Relief Valve Discharges	20.1
35	CVCS Charging Lines	155.4
37	Seal Water Return	30.15
44	Boron Injection Tank Outlet Valve, ICM-250	403.4
44	Boron Injection Tank Outlet Valve, ICM-251	352.35
96	Containment Pressure Instrumer PPA 312 and PPA 313	nts: 20.1
	Non-essential Service Water to and from containment	478.8
	Total Type C Leakage Penalty	1480.4

After taking these local penalties into account, the upper confidence value for containment leakage is equal to 0.028 weight percent per day, well within the acceptable value of <0.1875 weight percent per day.

d. As-Found Condition of CILRT

The as-found condition is the condition of the containment at the beginning of the outage prior to any repairs or adjustments to the containment boundary. The inspector reviewed the licensee's summary of the containment penetration local leak rate tests (Type B and C) performed prior to the CILRT in order to determine the amount of leakage rate improvement due to repairs and adjustments. Based on the results reviewed, it was determined that the amount of leakage improvement prior to the CILRT equaled 6922.6 sccm, or the equivalent of 0.063 wt %/day. The as-found CILRT results for the containment was 0.091 wt %/day which is within the allowable limit of <0.1875 weight percent per day.

No violations or deviations were identified.

- 6. Review of Local Leak Rate Testing (Type B and C) Program
 - a. Procedure

The inspectors reviewed Surveillance Procedure 2 THP 4030 STP.203, Rev. 10, "Surveillance Test Procedure Type B and C Leak Rate Test Unit 2," relative to the requirements of 10 CFR 50, Appendix J, and the Technical Specifications. The inspectors' comments were satisfactorily resolved except as noted below:

(1) During the Unit 1 CILRT performed in 1985 (Inspection Report No. 50-315/85025(DRS)), the Region III inspector discussed with the licensee (Paragraph 4.b.(4)) the use of the "maximum pathway leakage" methodology as an acceptable method for determining if the sum of Type B and C tests exceeded the < 0.60 La Appendix J limit. Later while reviewing the 1985 Type B and C results (Paragraph 7.b) the inspector again noted that the licensee was incorrectly summing the test results using of the minimum pathway methodology.

A review of Procedure 2THP 4030 STP.203, Rev. 10, (Steps 4.8, 5.8.17, 5.9.2, and 5.9.3) showed that the licensee has continued to use the maximum pathway method for determining if the Type B and C test results exceeded the 10 CFR 50, Appendix J limit. Appendix J Paragraphs III.B.3.(a) and III.C.3 require that the combined leakage rate of all penetrations and valves subject to Type B and C tests shall be less than 0.6 La. The NRC accepts the use of the "maximum pathway method" as satisfying the requirement for ". . . the combined leakage rate of all penetrations and valves . . . " The licensee's continued use of the minimum pathway method for determining if the Type B and C test results exceeded the Appendix J acceptance criteria is considered a violation (315/89007-01(DRS); 316/89007-02(DRS)) of 10 CFR 50, Appendix J. The licensee has been requested to recalculate the combined leakage rate of as-found and as-left Type B and C tests, using the correct methodology for the last Unit 1 refueling outage and for the present and previous Unit 2 refueling outages. This is an Open Item (315/89007-02; 316/89007-03(DRS)) pending NRC review of the submitted results.

(2) A review of station drawings against the number of penetrations being local leak rate tested did not identify any discrepancies in the testing program. However, the inspectors were not able to assure that all penetrations requiring Type B or C testing are being tested, since the licensee's Technical Specifications do not include a listing of all containment isolation valves, and neither penetration numbers nor the requirement for Type C testing are listed in Table 5.4-1 in the USAR. The inspectors did notice that the licensee performs Type C testing on penetrations which by their nature could be exempted from such testing (water sealed, closed loop inside containment, etc. on safety grade systems). The inspectors suggested to the licensee the desirability to perform a review of all containment penetrations and an updating of USAR Table 5.4-1 in line with the table presented in FSARs of more recent vintage.

b. Type B and C Test Pressure

The inspectors reviewed the licensee's procedure and test practices and the leak rate monitor (LRM) used to pressurize the penetration and Leasure its leakage rate. The penetration test pressure is monitored at the LRM. According to the licensee, the longest length of 1/8" poly tubing used to connect the LRM to the component being tested is ~30 ft. using ~30 ft of tubing connected to a LRM the inspector measured a pressure drop of 1 psi at a flow rate of ~5000 sccm and 2 psi at ~17,000 sccm. The inspector determined that the licensee has no method to ensure the test pressure is maintained at Pa (12 psig) as the flow rate (penetration leakage rate) through the LRM increases. It is the licensee's practice to determine the penetration pressure by isolating the air supply to the LRM and recording the pressure at the LRM gauge, however, a review of the test performed on penetration CPN-74 on December 15, 1988, showed a recorded test pressure of 12 psig for a penetration leaking at a rate of 34,000 sccm. Appendix J requires that the test pressure at the penetration or valve under test be at Pa. Failure to ensure the pressure is maintained at Pa throughout the local leak rate test is a violation (315/89007-03; 316/89007-04(DRS)) of 10 CFR 50, Appendix J.

7. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. An open item disclosed during the inspection is discussed in Paragraph 6.a.(1).

8. Exit Interview

The inspector met with the licensee representatives (denoted in Paragraph 1) on February 14 and 15, 1989. The inspector summarized the scope and findings of the inspection. The licensee acknowledged the statements made by the inspectors. The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspectors during the inspection. The licensee did not identify any such documents/processes as proprietary.

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	NO. (BY PRODUCT) (13 digits) NO. SEO. 5 6 87 2 101
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RP 12018

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INSPECTION PL	_ANNER
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Facility: D.C. COOK In Inspection Date(s): Feb 10-15,1989 Inspection Type: Routine X Reactive Other (specify) Announced X Unanno SALP Weaknesses address	spection Report Resident Not e Team unced ed X	50-3 t No.: <u>50-3</u> ified: <u>Feb</u> Allegat	15 \$9- (6 89-c 7,1989 ion	00-1- 0-7 (+2/1+2/8
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Project Section Chie	f	Uate: <u>2/2/</u>	0/	

Attachment 2 Rev. 07/07/88



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Submitter: F. MAURA	OUTSTANDING ITE	M LIST (OIL) TRACKING FORM	Sec. Chief Approval	m.
Item No. 315185035-07 (Unit 1)	Type Code OPN LER	Func. Area	Date Entered	•
<u>316/85005-22</u> (Unit 2) Original Inspector	Resp. Sec.	Note		
Responsible Inspector	. <u>065</u>	Closed D21 151 89	Final Report	
Interim Insp. Reports	· , ', 		<u> </u>	
Followup Date .		Remarks: .		
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TYPE COD)Ę		FUNCTIONAL AREA	SECTION
AEO - ABNORM. ENVIR. OCC. ALG - ALLEGATION BUL - BULLETIN CAL - CONFIR. ACTION LTR. CIR - CIRCULAR DEV - DEVIATION GLR - GENERIC LETTER IAL - IMMEDIATE ACTION LETTER INF - INFORMATION NOTICE LER - LIGENSEE EVENT REPORT NC - NON-COMPLIANCE (1-2-3-4-5) NVZ - NO VIOLATION 10 CFR 2, APP. C SEC. V.A OPN - OPEN ITEM	ORD - ORDERS TO OTH - OTHER P20 - 10 CFR PAF P21 - 10 CFR PAF R3R - REGION 111 REC - RECOMMENDA RIP - REGULATORY SEP - SAFETY EVA SER - SAFETY EVA SER - SIGNIFICAN TMI - THREE-MILE UNR - UNRESOLVEC WDN - WITHDRAWN 55E - 10 CFR 50.	LICENSEE RT 20 RT 21 I REQUESTS ATIONS Y IMPROVEMENT PROGRAM AL. REPORT EGUARDS' REPORTS NT SAFETY FINDING E ISLAND ACTION ITEMS D ITEMS	1. OPERATIONS 2. RAD - CHEM 3. MAINTENANCE 4. SURVEILLANCE 5. EMERGENCY PREP 6. SEC/SAFEGUARDS 7. OUTAGES 8. TRAINING 9. LICENSING 10. QUALITY ASSURANCE 11. OTHER 12. FIRE PROT/H-K Attachment 1 t Revised 12/04/	EPS PIA FRP PIB MLS P2A HOS P2B MPS P3A NM1 P3B NM2 PSS OL1 REC OL2 SCS OPS TSS

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Submitted b F. MAURA			Sec. Chief Approval	Port.
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Original Inspector 5. HARL	`Resp.Sec. ©₽≦	Note ·		.
Responsible Inspector F. Maura		Closed D2115189	Final Report <i>& <u>9</u> <u>0</u> D 2</i>	
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EO - AUNORM. ENVIR. OCC.	ORDERS TO LICENSEE	
LC - ALLECATION P20 UL - BULLETIN P21	10 CFR PART 20 10 CFR PART 21 10 CFR PART 21 2. RADIOLOGICAL CONTROLS AND P2A 3. MAINTENANCE/SURVEILLANCE 4. EMERGENCY PREPAREDNESS	
IR - CIRCULAR EV - DEVIATION	REGION THE RECOMMENDATIONS 5. SECURITY 5. SECURITY NM1 P38 REGULATORY IMPROVEMENT PROGRAM 6. ENGINEERING/TECH. SUPPORT NM2 PSS	
LR - GENERIC LETTER	SAFETY EVAL. PROGRAM SAFETY EVAL. REPORT 8. OTHERS OL2 SGS	
CR - LICENSEE EVENT REPORT SSF C - NON-COHPLIANCE (1-2-3-4-5)	SIGNIFICANT SAFETY FINDING THREE-MILE ISLAND ACTION ITEMS	
VG - WO VIOLATION TO CHR 2, 4 UNR APP. C. SEC. V.A	UNRESOLVED ITEMS THINRAWN Revised 09/08/88	
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TYPE CODE			STATSECTION
FO - AUNORM. ENVIR. OCC.	- ORDERS TO LICENSEE	1. OPERATIONS	EPS P1A
LG - ALLECATION UL - BULLETIN CONFIRMACTION LTR	- ', 10 CFR PART 20 - 10 CFR PART 21	2. RADIOLOGICAL CONTROLS 3. MAINTENANCE/SURVEILLANCE 4 EMERGENCY PREPAREDNESS	MLS P2A MOS P2B
IR - CIRCULAR EV - DEVIATION	- RECOMMENDATIONS	5. SECURITY 6. ENGINEERING/TECH, SUPPORT 7. CASETY ASSESS/OUALITY/VERIE	NM1 P3B NM2, PSS
AL - GENERIC LETTER SEP	- SAFETY EVAL. PROGRAM - SAFETY EVAL. REPORT	8. OTHERS	OL1 REC OL2 SGS OPS TSS
CR	- SIGNIFICANT SAFETY FINDING THREE-MILE ISLAND ACTION ITEMS	Attachment 1	
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IR - CIRCULAR EV - DEVIATION IR - CINFRIC LETTER	RECOMMENDATIONS REGULATORY IMPROVEMENT PROGRAM	ENGINEERING/TECH. SUPPORT NM1 P3B SAFETY ASSESS/QUALITY VERIF
AL - IMMEDIATE ACTION LETTER SEP NF INFORMATION NOTICE SER SGR	SAFETY EVAL. REPORT 8. 73.71. SAFEGUARDS REPORTS	OTHERS OL2 SCS OPS ISS
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UL - BULLETIN P20 AL - CONFIR. ACTION LTR. P3R	10 CFR PART 21 REGION III REQUESTS	3. MAINTENANCE/SUR 4. EMERGENCY PREPA	VEILLANCE REDNESS	MOS P2B . MPS P3A
IR - CIRCULAR REC EV - DEVIATION RIP 'LR - CINERIC LETTER RIP 'LR - UNFOLATE ACTION LETTER SEP	- RECOMMENDATIONS - REGULATORY IMPROVEMENT PROGRAM - SAFETY EVAL, PROGRAM - SAFETY EVAL, PROBA	6. ENGINEERING/TEC 7. SAFETY ASSESS/C 8. OTHERS	H. SUPPORT UALITY VERIF.	NMI P38 NM2 PSS OL1 REC OL2 SCS

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- SAFETY EVAL. PROGRAM SAFETY EVAL. REPORT 73.71 SAFEGUARDS REPORTS SIGNIFICANT SAFETY FINDING THREE-MILE ISLAND ACTION ITEMS UNRESOLVED ITEMS WITHDRAWN 10.058 50.55(a) ITEMS SSF TMI UNR -
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IMMEDIATE ACTION LETTER

LICENSEE EVENT REPORT NON-COMPLIANCE (1-2-3-4-5) NO VIOLATION 10 CFR 2, APP. C SEC. V.A

INFORMATION NOTICE

HDN -55F -10 CFR 50.55(0) ITEMS Attachment 1 Revised 09/08/88

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	OUTSTANDING ITEM LIST OIL) TRA	ACKING FORM	
Submitted		Sec. Chief Approval	A A
Item No.	Type Code	ea	
<u>3/5/890070/</u> (Unit 1)	<u>NC4</u>		
316189007 -02 (Unit 2)			
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HLS RADIOLOGICAL CONTROLS ALLECATION 2. MAINTENANCE/SURVEILLANCE : P2A 10 CFR PART 20-P20 -3. EMERGENCY PREPAREDNESS SECURITY ENGINEERING/TECH. SUPPORT SAFETY ASSESS/QUALITY VERIF P28 MOS 10 CFR PART 21 - • , P21 - REGION III REQUESTS 4. CONFIR. ACTION LTR. . MPS P3A * R3R CIRCULAR DEVIATION GENERIC LETTER RECOMMENDATIONS 5. NM1 🖁 - 938 ٠. 2'REC **`. .** REGULATORY IMPROVEMENT PROGRAM 6. NM2 PSS ... DEVIATION RIP -7. SAFETY EVAL. PROGRAM SAFETY EVAL. REPORT 1.5 OLI REC SEP - 1 - IMMEDIATE ACTION LETTER 4 . Š 8. OTHERS A.-012 SCS SER SCR • ` • 73.71. SAFEGUARDS REPORTS OPS ISS -. . . . SIGNIFICANT SAFETY FINDING SSF THI NON-COMPLIANCE (1-2-3-4-5) NON-COMPLIANCE (1-2-3-4-5) NO VIOLATION 10 CFR 2, APP. C SEC. V.A • THREE-MILE ISLAND ACTION ITEMS Attachment 1 Revised 09/08/88 --- 24 '-UNRESOLVED ITEMS . • UNR WITHDRAWN WDN -•* • • * 10 CFR 50.55(0) ITEMS : • ł, 55F . . . ÷., وأداءته والمرات تتحاره الاتهم

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	OUTSTANDING ITEM LIST	CKING FORM
Submitted by <u>F. MAURA</u>		Sec. Chief Approval
Item No.	Type Code Func. Are	a
315189007-03 (Unit 1)	NC4 _3	
316189007-01 (Unit 2)		
Original Inspector	Resp. Sec.	Note
- F.MAURA	<u>OPs</u>	
Responsible Inspector	Closed	Final Report
F. MAURA	//	
Interim Insp. Reports		
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//TAILURE to	MAINTAIN penetration	pressure of Pa
during Lyp	<u>R - C - 72578. (1007</u>	RSO_APPJ
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TYPE CODE		SECTION SECTION
IO ABNORM. ENVIR. OCC. ORD IC ALLECATION OTH IL BULLETIN P20 IL CONFIR. ACTION LTR. P21 IL CONFIR. ACTION LTR. R3R IR CIRCULAR R1P IV DEVIATION REC IR GLNERIC LETTER R1P IF INFORMATION NOTICE SER IR LICENSEE EVENT REPORT SGR IR LICENSEE EVENT REPORT SF NON-COMPLIANCE (1-2-3-4-5) SF IO NO VIOLATION 10 CFR 2, UNR APP. C SEC. V.A WDN	ORDERS TO LICENSEE OTHER 10 CFR PART 20 10 CFR PART 21 REGION 111 REQUESTS RECOMMENDATIONS REGULATORY IMPROVEMENT PROGRAM SAFETY EVAL. PROCRAM SAFETY EVAL. REPORT 73.71 SAFEGUARDS REPORTS SIGNIFICANT SAFETY FINDING THREE-MILE ISLAND ACTION ITEMS UNRESOLVED ITEMS WITHDRAWN	FUNCTIONAL-AREAS1. OPERATIONS2. RADIOLOGICAL CONTROLS3. MAINTENANCE/SURVEILLANCE4. EMERGENCY PREPAREDNESS5. SECURITY6. ENGINEERING/TECH. SUPPORT7. SAFETY ASSESS/QUALITY VERIF.8. OTHERS0L1Attachment 1Revised 09/08/88