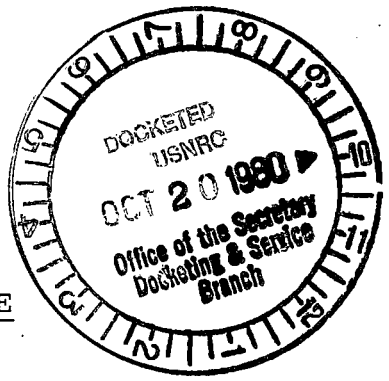


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ADMINISTRATIVE LAW JUDGE

In the Matter of:	)	
	)	Docket No. 50-255
CONSUMERS POWER COMPANY	)	License No. DPR-20
(Palisades Nuclear Power Facility)	)	
	)	

16 OCT 80

CONSUMERS POWER COMPANY'S RESPONSE
TO THE NRC STAFF'S SECOND ROUND OF
INTERROGATORIES AND DOCUMENT REQUESTS

Consumers Power Company hereby submits its responses to the "NRC Staff's Second Round of Interrogatories and Requests for Production of Documents", dated September 9, 1980.

Interrogatory No. 1

1. In Consumers Power Company's (CPC) response to interrogatory 4 of the Staff's first round of interrogatories, CPC states that Richard D. Story installed the replacement HEPA filter in penetration 4a. on April 5, 1978.

   a. Describe the steps Mr. Story took when he replaced the filter. Your description should include an identification of the administrative approvals of the proposed replacement, the physical acts he undertook in replacing the filter, and the administrative concurrences in or approvals of the completed replacement.

DS03
S
1/1

G

b. Did Mr. Story functionally test the replacement filter in order to demonstrate its operability? If Mr. Story did not so test the filter, identify the person who did test the filter.

c. Describe the steps taken by the person who functionally tested the filter to demonstrate its operability. This description should identify the manner in which the air flow required for the test was provided.

d. Identify the documents which refer or relate to the matters described in response to a. and c. above.

e. Provide a copy of all documents identified in response to d. above.

Answer

a. Mr. Story does not specifically recall each of the steps taken in replacing either the HEPA or the charcoal filters. The actual maintenance operation of replacing the filters would not involve the opening of the valves. Indeed, procedure M-VAS-3 (Attachment A hereto), which is the applicable Maintenance Department procedure used for replacing the charcoal filters, requires that the filter system be isolated. Isolation of the filter system is accomplished by ensuring that the manual isolation valves are tagged shut as a precaution to workmen performing the filter replacement. Equipment Outage Request, initiated 4/5/78, completed 4/7/78 (Attachement E to Consumers' Response to the Staff's First Round of Interrogatories) indicates that these valves were tagged shut for the filter replacement operation. This same

Equipment Outage Request also indicates that following the completion of the filter replacement, the tags were removed.

b. No.

Mr. Fred Leckie, Nuclear Containment Systems, Inc., 1225 Dublin Road, Columbus, Ohio, 43215 (614)486-7113. Mr. Leckie, an outside contractor who was employed by Nuclear Containment Systems at the time the tests were performed, was supervised by Thomas P. Neal.

c. The steps taken in functionally testing the filter are set forth in procedure NCS-375, Rev. 1., 8/22/75 (Attachment D to Consumers Responses to the Staff's First Round of Interrogatories.) Air flow required for the test may have been provided by opening the manual isolation valves in question which permits suction on the main exhaust plenum to provide the necessary motor force to draw air through the filters. Alternatively, if the filter housing unit was open at the time the test was performed, air flow may have been supplied by leaving the valves in a closed position and drawing auxilliary building air through the filter system. The possibility that this alternative method of drawing air through the filter system may have been used has only recently come to light. Mr. Neal does not recall which method was used for the April, 1978 filter tests. Consumers' investigation with respect to this issue continues. Previous answers by Consumers to the Staff earlier discovery requests which may be viewed as inconsistant with the newly discovered information should be viewed as modified accordingly.

d. M-VAS-3, "Ventilation System Carbon Trays Emptying" (Attachment A hereto.) The remaining documents are identified above and have been provided to the Staff in Consumers' Responses to the Staff's First Round of Interrogatories.

e. See answer to d. above.

Interrogatory No. 2

2. In CPC's response to subparts (b) and (e) of interrogatory 7 of the Staff's first round of interrogatories, CPC states that "[e]xisting documentation would suggest that valves were opened and closed on April 6, 1978."

   a. On what basis does CPC conclude that the valves were closed after being opened on that date?

   b. In what manner do the documents identified in response to interrogatory 7(e) indicate that the valves were closed on April 6, 1978?

Answer

a. Our answers to the Staff's Interrogatory 7(b) and (e) did not suggest that Consumers has reached any conclusions regarding the dates on which the valves were opened and closed. Consumers continues to investigate these matters and will not reach any conclusion until the investigations have been completed.

b. The relevant portions of existing documentation available as of June 23, 1980 which suggested that the valves were closed on April 6, 1978 are: 1) Procedure H.P.

6.27 (Attachment C to Consumers' Response to Staff's First Round of Interrogatories) outlines the steps followed in performing the inplace HEPA and charcoal filter tests on the filters in penetration 4a. H.P. 6.27 requires that procedure NCS-375 Rev. 1, 8/22/75 (Attachment D to Consumers' Response to Staff's First Round of Interrogatories) be followed in performing the tests. 2) Section 4.1.11 of NCS-375 requires that the system be closed after testing, and that the person performing the test "notify designated plant personnel that test is completed and system may be put in normal operation.". 3) Equipment Outage Request, initiated 4/5/78, completed 4/7/78 (Attachment E to Consumers' response to Staff's First Round of Interrogatories) documents that the functional tests were completed no later than 4/6/78. 4) NCS-375 Rev. 1 does not require that the valves be opened to perform the tests.

Interrogatory No. 3

3. If the two manual containment isolation valves were not left in a locked-open condition on April 6, 1978, on what date does CPC contend that the valves were left in a locked-open condition prior to the discovery of the valves in this condition on September 11, 1979? If CPC cannot identify the specific date on which the valves were opened, then identify the time period before August up to September 11, 1979, during which CPC believes the locked-open condition of the valves existed.

a. On what basis does CPC conclude that the valves were left in a locked-open condition on that alternative date or during that time period?

b. Identify all documents which show or on which CPC relies to show that the valves were open on this alternative date or during this time period.

c. Provide a copy of all documents identified in response to b. above.

Answer

As related in Consumers' answer to the Staff's First Round of Interrogatories, Consumers' attorneys and other representatives have been conducting investigations regarding the date the valves may have been locked-open. These investigations continue, and we have not reached any definite conclusions regarding the date which the valves were opened.

a. Not applicable.

b. Not applicable.

c. Not applicable.

Interrogatory No. 4

4. Identify and describe all operations, including but not limited to repairs and tests, that were conducted in penetration 4a between April 6, 1978 (the date by which the HEPA filter in the line had been replaced and the new filter tested) and September 11, 1979.

a. Identify all documents which concern such operations.

b. Provide a copy of all documents identified in response to a. above.

Answer

As of this date, we are aware of these "operations" conducted in penetration 4a between April 6, 1978 and September 11, 1979. These operations are:

1. The April 6, 1978 functional test of the filters which is described in Consumers answer to Interrogatory 1.
2. A containment integrity check of the penetration 4a test port was conducted on May 16, 1979.
3. A local leak test of containment penetration 4a performed on September 11, 1979.

Other operations may have occurred regarding this penetration during cold shutdown which would not necessarily have been documented, and which would not necessarily be recalled by the particular individual who may have opened or closed the valves in question.

a. The Containment Integrity check list which documents the operation identified in 2. above is attached as Attachment "B".

b. See a. above.

Interrogatory 5

5. In CPC's response to interrogatory 5 of the Staff's first round of interrogatories, CPC states that James McEwen inspected the test port in penetration 4a. during completion of Containment Integrity Checklist C.L. 3.3. CPC also states Mr. McEwen's inspection of penetration 4a. "may have been done on April 1 or 2, 1978, between 10:00 a.m. and 4:00 p.m."

   a. Identify the documents which indicate that Mr. McEwen inspected the penetration on April 1 or 2, 1978.

   b. Provide a copy of the documents identified in response to a. above.

   c. Provide a copy of the checklist which Mr. McEwen completed.

Answer

   a. Containment Integrity Check List CL 3.3 which consists of four pages dated respectively April 4, 1978, April 2, 1978, April 2, 1978, April 6, 1978. In particular, see page 4 line 2 entitled "C.B. Purge Exhaust Bypass Penet No. 4a Test."

   b. The Check List is attached hereto as Attachment C.

   c. See b. above.

Interrogatory 6

6. Identify all occasions after April 1, 1978, but before September 11, 1979, on which CPC completed a containment integrity checklist that included an inspection of penetration 4a.

a. Identify the persons who inspected penetration 4a. during completion of any such checklist.

b. Provide a copy of the checklists that were actually completed on the dates so identified.

Answer

6. Based upon our investigations to date, we have identified the following occasions on which a containment integrity checklist which included an inspection of the penetration 4a test port were performed after April 1, 1978 but before September 11, 1979:

1. Between April 1, 1978 and April 6, 1978.

2. Between May 16, 1979 and May 17, 1979.

a. The April, 1978 check of the penetration 4a test port was performed by James McEwen. The May, 1979 check of the penetration 4a test port was performed by Thomas Neil Stevenson.

b. With respect to the April, 1978 checklist see answer to 5b. above.

The May, 1979 checklist is attached hereto as Attachment "B".

Interrogatory 7

7. Identify the facts on which CPC will rely in support of the position that the manual containment isolation valves were not in a locked-open condition between April 6, 1978, and September 11, 1979.

Answer

Inasmuch as the NRC Staff has the burden of proof with respect to establishing that the valves in question were in a locked-open condition between April 6, 1978 and September 11, 1979, Consumers has not determined at this time whether there will be any need to introduce any evidence whatever with respect to this issue. See also the answer to Interrogatory 3 above.

Interrogatory 8

8. Identify each witness, and describe the matters to which he or she will testify that CPC will present with respect to whether or not the valves were in a locked open condition between April 6, 1978, and September 11, 1979.

Answer

See answer to Interrogatory 7 above.

Interrogatory 9

9. Identify the evidence, factors, or criteria on which CPC will rely and which CPC will present in support of its position that the noncompliances cited in Item 1 of the Notice of Violation should not be classified in the "violation" category under the Commission's enforcement criteria.

Answer

The NRC Staff has the burden of proof with respect to this issue. Consequently, Consumers has not determined at this time whether there will be any need to introduce any

evidence whatever with respect to this issue. See also the answer to Interrogatory 3 above.

Interrogatory 10

10. Identify each witness and describe the matters to which he or she will testify in support of CPC's position that the noncompliances cited in Item 1 of the Notice of Violation should not be classified in the "violation" category under the Commission's enforcement criteria.

Answer

See answer to Interrogatory 9 above.

Interrogatory 11

11. Identify the evidence, factors, or criteria on which CPC will rely and which CPC will present in support of its position that civil penalties should not be imposed for each day of the breach of containment integrity cited in Item 1 of the Notice of Violation.

Answer

The Staff has the burden of proof with respect to this issue. Consequently, we have not determined at this time whether there will be any need to introduce any evidence whatever with respect to this issue. See also our response to Interrogatory 3 above.

Moreover, given the Staff's refusal to identify any of the factors or criteria which the Staff generally relies upon in determining whether to classify an item of

noncompliance as a continuing violation, we are not in a position to determine what evidence, if any, should be adduced with respect to this issue.

Interrogatory 12

12. Identify each witness and describe the matters to which he or she will testify in support of CPC's position that civil penalties should not be imposed for each day of the violation of containment integrity cited in Item 1 of the Notice of Violation.

Answer

See answer to Interrogatory 11 above.

Interrogatory 13

13. Identify the evidence, factors, or criteria on which CPC will rely and which CPC will present in support of its position that Item 2 of the Notice of Violation should not be classified in the "violation" category under the Commission's enforcement criteria.

Answer

The NRC Staff has the burden of proof with respect to this issue. Consequently, we have not determined at this time whether there will be any need to introduce any evidence whatever with respect to this issue. See also answer to Interrogatory 3 above.

Interrogatory 14

14. Identify each witness and describe the matters to which he or she will testify in support of CPC's

position that Item 2 of the Notice of Violation should not be classified in the "violation" category under the Commission's enforcement criteria.

Answer

See Answer to Interrogatory 13 above.

Interrogatory 15

15. Identify the evidence, factors, or criteria on which CPC will rely and which CPC will present in support of its position that the civil penalties imposed under the Director of the Office of Inspection and Enforcement's Order of December 20, 1979 should be mitigated or remitted.

Answer

The question of whether or not civil penalties should be mitigated or remitted presupposes a finding that Consumers actually commmitted an item of noncompliance. Accordingly, Consumers has not determined at this time whether there will be any need to introduce any evidence whatever with respect to this issue.

Interrogatory 16

16. Identify each witness and describe the matters to which he or she will testify in support of CPC's position that the civil penalties imposed under the Director's Order should be mitigated or remitted.

Answer

See our answer to Interrogatory 15 above.

Interrogotary 17

17. If any of the persons identified in response to interrogatories 8, 10, 12, 14 and 16 will be presented as expert witnesses, identify the following with respect to each witness:

a. The witness' field of expertise and the facts which qualify the witness as an expert in that field; and

b. any other administrative or judicial proceeding in which the witness has been granted status as an expert witness.

Answer

Not applicable.

Interrogatory 18

18. If CPC intends to present witnesses other than those identified in response to interrogatories 8, 10, 12, 13 and 16, identify each such witness and the matters to which he or she will testify. If any such witness will be presented as an expert witness, provide the information requested in interrogatory 17 as part of the identification of any additional expert witness.

Answer

Since the NRC Staff carries the burden of proof with respect to all issues in this matter, except possibly the issues relating to mitigation and remission of fines (see answer to Interrogatory 15 above), Consumers has not determined at this time whether there will be any need to introduce anv evidence whatever at the hearing. Consequently, Consumers has not determined what witnesses, if any, it intends to produce at the hearing.

Interrogatory 19

19. Identify and describe all of the evidence, documentary or otherwise, which CPC intends to present at the hearing.

Answer

Since the NRC Staff carries the burden of establishing that the alleged noncompliances occurred and that civil penalties are warranted, Consumers has not determined at this time whether there will be any need to introduce any evidence whatever at the hearing.

Interrogatory 20

20. Identify the document referred to as MARU 63-79 in CPC's internal document RWS 168-79, dated December 5, 1979. Provide a copy of the document identified as MARU 63-79.

Answer

MARU 63-79 is a Consumers Power internal memorandum from R.M. Marusich to R. W. Sinderman, dated December 4, 1979 entitled "Ability of the Filter Bank In The Containment Exhaust Value Bypass Line To Withstand The Effects of Blowdown" Rev. 1. This document has already been provided to the Staff as an enclosure to the December 6, 1979 letter from Mr. Youngdahl to Mr. Stello regarding the Notice of Proposed Violation, and immediately follows RWS 168-79 referred to in Interrogatory 20.

Interrogatory 21

21. Provide a copy of the document identified as CPC internal memorandum JLB 74-79, dated December 5, 1979. The reference is made in CPC's answer to interrogatory 3 of the Staff's first round of interrogatories.

Answer

JLB 74-79 is a Consumers Power internal memo from J. L. Beer to R. W. Sinderman dated December 5, 1979 entitled "Technical Review of Radiation Dose Estimates Post-DBA With Containment Purge Filter Valves Open (RWS 168-79)." As with the document requested in the previous interrogatory, JLB 74-79 was provided to the Staff as an enclosure to the December 6, 1979 letter from Mr. Youngdahl to Mr. Stello.

The persons who prepared or contributed to the preparation of the answers to these interrogatories are as follows:

Interrogatory 1

Richard D. Story, Assistant Mechanical Maintenance Supervisor, Palisades Nuclear Plant, Covert, Michigan 49403 (616) 764-8913;

Thomas P. Neal, Senior Technical Analyst, Consumers Power Company, 212 West Michigan Avenue, Jackson, Michigan 49201 (517) 788-1603;

Paul M. Murphy, Outside Counsel to Consumers Power Company, Isham, Lincoln & Beale, One First National Plaza,

Chicago, Illinois 60603, (312) 558-7500;

Alan P. Bielawski, Outside Counsel To Consumers Power Company, Isham, Lincoln & Beale, One First National Plaza, Chicago, Illinois 60603, (312) 558-7500.

Interrogatory 2

Alan P. Bielawski.

Paul M. Murphy.

Interrogatory 3

Alan P. Bielawski.

Paul M. Murphy.

Interrogatory 4

Thomas P. Neal.

James McEwen, Auxilliary Operator, Palisades Nuclear Plant, Covert, Michigan 49403 (616) 764-8913.

Thomas N. Stevenson, Auxilliary Operator, Palisades Nuclear Plant, Covert, Michigan 49403 (616) 764-8913.

Alan P. Bielawski.

Interrogatory 5

Alan P. Bielawski.

Interrogatory 6

James McEwen.

Thomas N. Stevenson.

Alan P. Bielawski.

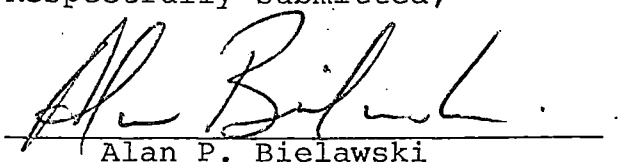
Paul M. Murphy.

Interrogatories 7-21

Alan P. Bielawski.

Paul M. Murphy.

Respectfully submitted,



Alan P. Bielawski

DATED: October 16, 1980.

One of the Attorneys for
Consumers Power Company

Michael I. Miller
Paul M. Murphy
ISHAM, LINCOLN & BEALE
One First National Plaza
Suite 4200
Chicago, Illinois 60603
(312) 558-7500

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE NUCLEAR REGULATORY COMMISSION

In the Matter of:	)	
	)	
CONSUMERS POWER COMPANY	)	Docket No. 50-255
(Palisades Nuclear Power Facility)	)	License No. DPR-20
	)	

CERTIFICATE OF SERVICE

I, Alan P. Bielawski, one of the attorneys for Consumers Power Company, certify that copies of "Consumers Power Company's Response to the NRC Staff's Second Round of Interrogatories and Document Requests" have been served in the above-captioned matter on all parties on the attached service list by United States mail, postage prepaid, this 16 day of October, 1980.

Alan P. Bielawski

DATED: October 16, 1980.

Honorable Ivan W. Smith
Administrative Law Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

James P. Murray, Esq.
Director and Chief Counsel
Rulemaking and Enforcement Division
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

James Lieberman, Esq.
U.S. Nuclear Regulatory Commission
Office of Executive Legal Director
Washington, D.C. 20555

Stephen G. Burns, Esq.
U.S. Nuclear Regulatory Commission
Office of Executive Legal Director
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Judd L. Bacon, Esq.
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Attachment A

Ventillation System Carbon Trays Emptying

1.0 Purpose

To remove ventillation carbon trays and prepare them for shipment to vendor for refill.

2.0 Initial Conditions

The filter system has been isolated for removal of the trays.

3.0 Appliciability

Any portion of this procedure that does not apply to a particular filter media shall be denoted by the abbreviation of "not appliciable." (N/A).

4.0 Precautions

4.1 Clearance must be obtained from the Shift Supervisor before allowing work to begin in the filter housing.

4.2 A radiation and contamination survey should be conducted on the carbon trays before removal and prior to shipment for refilling.

4.3 Adequate ventillation or suitable contamination control of the area is required as charcoal will dust to some extent and may pose a clean up problem. Check with Radiation Protection for an area, clothing and respiratory requirements.

4.4 Use care in all steps to avoid damage to the stainless steel trays.

4.5 No fuel with less than 60 days decay may be moved in the spent fuel pool or reactor cavity with the spent fuel pool carbon trays removed.

5.0 Procedure

5.1 Clearance for working with the filter trays is received from the shift Supervisor. S.S. D. Kaupa Date 3/10/78.

5.2 A survey has been conducted by Radiation Protection pripr to starting work. Date 3-10-78 (1800) RLS.

5.3 Unbolt the carbon trays and remove carefully from the filter housing.

Caution: Preform steps 5.4, 5.5, and 5.6 in an adequately ventillated area. Provide suitable contamination control as directed by Radiation Protection.

5.4 With the carbon trays flat on a table or other smooth surface drill out the two sealing plate rivets with a No. 30 drill (2 plates per tray assembly). Be careful to drill only the rivet head and not the tray wall. Save the plates for return to the vendor with the empty trays. (See attached sketch).

Alternate: With the carbon trays flat on a table or other smooth surface insert a sharp bladed thin chisel between the rivet head and the plate or between the plate and the tray wall. Be careful not to punch a hole in the tray wall. Tap sharply with a hammer to sheer the rivit. Save the plates for return to the vendor with the empty trays. (See attached sketch).

5.5 Open the tray over a suitable container and allow the charcoal to flow out. Charcoal should flow out with little difficulty. Tip the tray to remove as much of the carbon as possible. (A 55 gallon DOT drum may be used as the container.)

5.6 Using a water hose flush out any carbon remaining in the cells.

5.7 A radiation and contamination survey of <u>each tray</u> is required prior to loading for shipment. Record the tray serial numbers and survey result for each tray.

Note: Preform decontamination of trays as required to meet exempt shipment status. (400 dpm/100cm^2 β-γ--Smearable).

5.8 Wrap each tray in a plastic bag.

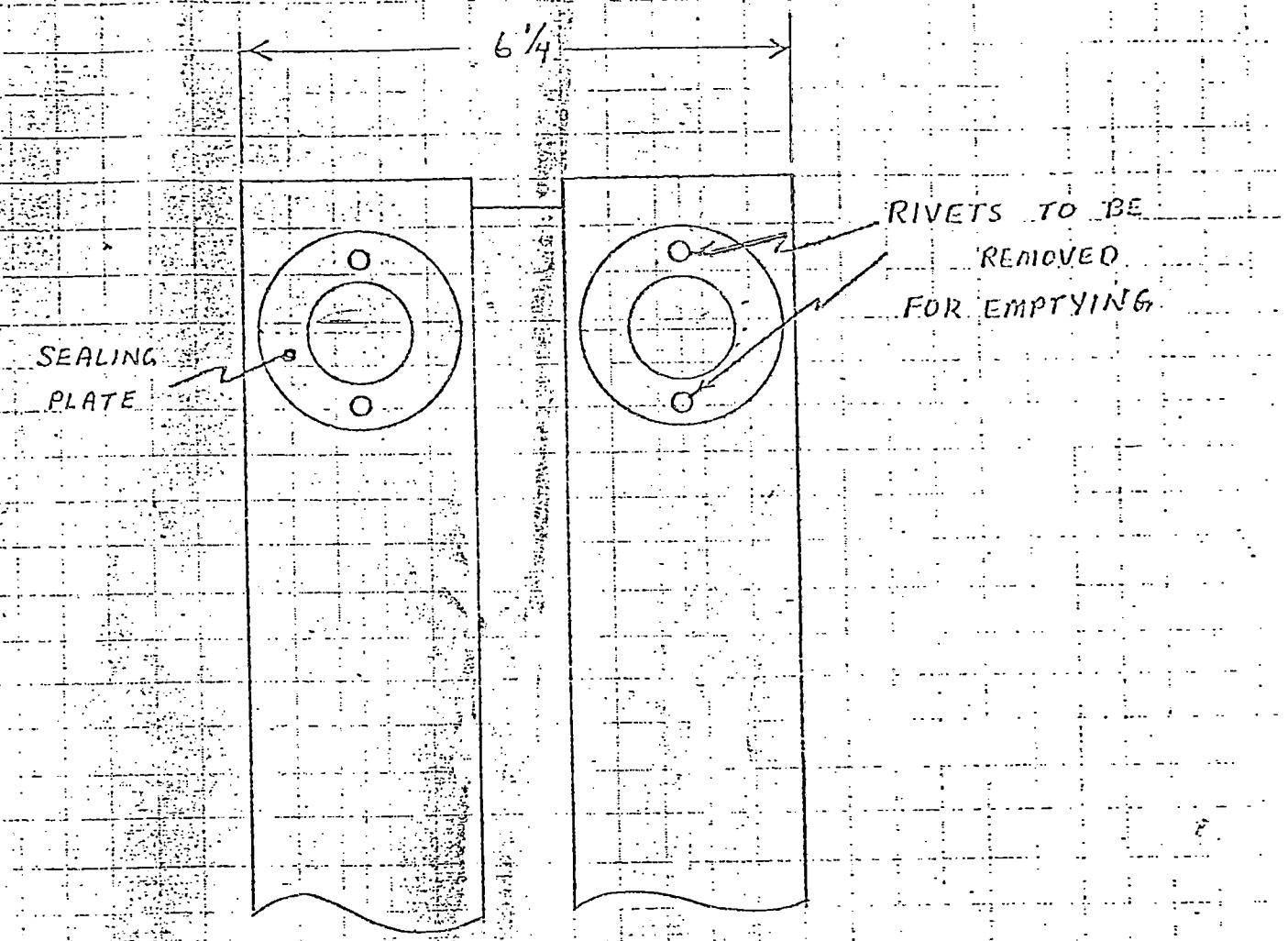
5.9 Load the carbon trays in the shipping container. Also include the removed plates.

5.10 Notify RMC when shipping containers are loaded.

AAF CARBON TRAYS

(105-840967 & 105-888495)

BACK END VIEW



DATE	TIME	TRAY SERIAL NO.	MR/HR B-8	dpm/100cm^2 B-8	INITIAL
3-10-78	1800	057942	<0.1 mr./hr.	<100 dpm/100cm^2	
3-10-78	1800	057943	<0.1 mr./hr.	<100 dpm/100cm^2	
3-10-78	1800	057944	<0.1 mr./hr.	<100 dpm/100cm^2	

Form Admin. 10.3.5-1
Rev. 0, 1/76

TEMPORARY CHANGE TO A PROCEDURE

e No. M-78-118 Change Date 3/13/78 Expiration Date 4/15/78 4-1-78

dure Type ~~Temp~~ Permanent Procedure No. M-VAS-3 Rev. No./Date 0 5/19/75

edure Title Ventilation System Carbon tray Emptying Procedure

graph No. 5.4 Figure/Table No. Other

is procedure being changed? Different type of tray. These have no access plates

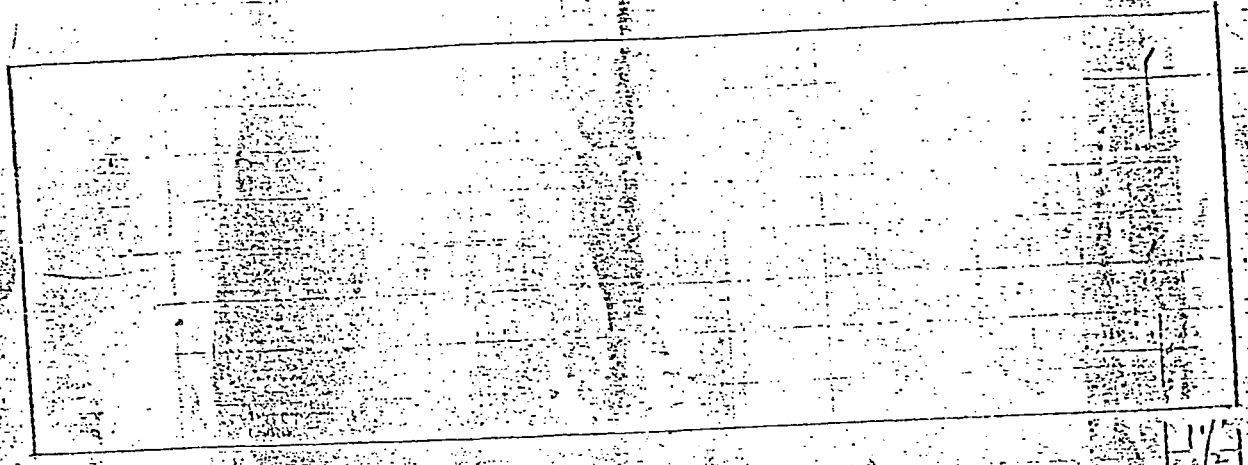
ge Change step 5.4 to:

"Drill two holes as shown in attached sketch. AAF will refit with access plate at factory."

APPROVED COPY
EXPIRATION DATE 4-1-78

hould Change Be Permanent? ☐ Yes ☑ No Initiator

Approved: PRC Member Approved: SRO-PRC Member



Charcoal Trays

Drill holes as shown blank end holes - 3/4" dia

M-VAS-3

3/13/78

PRC APR 6, 1976

APPR. Hain

Attachment B

CONTAINMENT INTEGRITY CHECK LIST

Rev. 2

Check whether the following valves are verified operable (stroke & observe position lights), or are LOCKED CLOSED:

VALVE NO.	C13 PANEL	OPERATES NORMALLY	LOCKED CLOSED
CV 1911	Containment Bldg. Selected Samples	JAL	
CV 1503	Containment Heating Steam	JAL	
CV 0738	S-G No. 2 Top Blowdown	JAL	
CV 0739	S-G No. 1 Top Blowdown	JAL	
CV 0939	Shield Cooling Surge Tank	JAL	
CV 1004	Clean Waste Recvr. Tks. Inlet	JAL	
CV 1037	Clean Waste Recvr. Tks. Recirc.	JAL	
CV 1358	Nitrogen Supply	JAL	
CV 1001	Primary Sys. Drn. Tank Recirc.	JAL	
CV 1910	Containment Bldg. Selected Samples	JAL	
CV 1808	Containment Purge Supply	CAUTION TAGGED Shut/JGL	K
CV 1814	Air Room Supply		
CV 1806	Containment Purge Exhaust		
CV 1501	Containment Heating Steam Return	JAL	
CV 1101	Containment Vent Header	JAL	
CV 1064	Clean Waste Recvr. Tks. Vent	JAL	
CV 1103	Containment Sump Drain	JAL	
CV 1002	Primary Sys. Drain Tank Outlet	JAL	
CV 1036	Clean Waste Recvr. Tanks Recirc.	JAL	
CV 1044	Clean Waste Recvr. Tanks Outlet	JAL	
CV 0120	Pressurizer Instr. Test	JAL	
CV 0770	S-G No. 2 Bottom Blowdown	JAL	
CV 0771	S-G No. 1 Bottom Blowdown	JAL	
CV 1807	Containment Purge Supply	CAUTION TAGGED Shut/JGL	K
CV 1813	Air Room Supply		
CV 1805	Containment Purge Exhaust		
CV 1803	Containment Purge Exhaust		
CV 1502	Containment Heating Steam Return	JAL	
CV 1102	Containment Vent Header	JAL	
CV 1104	Sump Drain	JAL	

Completed by: K Kunichi Date 5-16-99

Pages 1-4 reviewed by REMurray 5/21/9

APPR. Illegible

CV 1007	Prim. Syst. Drain Tank Outlet	JHL
CV 1038	Clean Waste Recur. Tanks Recir.	JHL
CV 1045	Clean Waste Recur. Tanks Outlet	JHL
CV 1065	Clean Waste Recur. Tanks Vent	JHL
CV 0767	S-G No. 1 Bottom Blowdown	JHL
CV 0768	S-G No. 2 Bottom Blowdown	JHL
CV 0121	Pressurizer Instr. Test	JHL
	Console	
CV 0910	Containment Component Cooling Inlet	JHL
CV 0911	Containment Component Cooling Outlet	JHL
CV 0940	Containment Component Cooling Outlet	JHL
CV 2009	Letdown	JHL
CV 2083	PCP Controlled Bleedoff	JHL
CV 0155	Quench Tank Spray	JHL
	ILRT PANEL	
MOV P-1	Containment test header isolation	Ok

RCM 4.1.1

Check the following Valves LOCKED CLOSED, and test connections capped. (Test valves may be lock-wired closed)

		Room No.	
120SFP	Reactor Cavity Fill (Outside)	121B/150	JBJ 5-16-7
118SFP	Reactor Cavity Drain (Outside)	121B/150	JBJ 5-16-7
512CRW	CWRT Vent Penet. No. 25 Test	121B/150	JBJ 5-16-7
1170 A 1170 B	NSSS Selected Samples Penet No. 21 Test	121B/150	JBJ 5-16-7
581 N_2	Containment N_2 Supply Penet No. 26 Test	121B/150	JBJ 5-16
501 V A	ILRT Fill Line Penet No. 27 Test	121B/150	JBJ 5-16
2320 CVC	Letdown Penet No. 36 Test	121B/150	JBJ 5-16
503 CRW	PDT Pps Recirc. Penet No. 37 Test	121B/150	JBJ 5-16
502 VA	C.B. Heating Condensate Penet. No. 38 Test	121B/150	JBJ 5-16

Completed by: [illegible] Date 5/17/79

503 VA	C.B. Heating Steam Penet, No. 39 Test	121B/150	JBJ 5-16-7
506 CRW	CWRT inlet Penet No. 41 Test	121B/150	JBJ 5-16-7
1126 PC	PMW to Quench tank Penet No. 42 Test	121B/150	JBJ 5-16-7
500 WG	C. B. Vent Header Penet. No. 46 Test	121B/150	JBJ 5-16-7
514 SFP	Reactor Cavity Fill Penet No. 64 Test	121B/150	JBJ 5-16-7
515SFP	Reactor Cavity Drain Penet No. 72 Test	121B/150	JBJ 5-16-7
515 CRW	CWRT Recir. Inlet Penet No. 67 Test	ISO 118	TNS 5-16-79
505 VA	Air Room Purge Supply Penet No. 68 Test	121B/150	JBJ 5-16-7
518 CRW	CWRT Outlet Penet No. 69 Test	118	TNS 5-16-79
604 VA	FI Header Isolation	121B/150	DCT 5/17/79
3344 ES	C. B. Spray Penet. No. 30 Test	121A	TNS 5-16-7
3227 ES	C. B. Spray Recirculation	121A	TNS 5-16-7
3346 ES	C. B. Spray Penet No. 31 test	121A	TNS 5-16-7
3217 ES	C. B. Spray Recirculation	121A	TNS 5-16-7
3348 ES	S. I. Tanks Drain Penet No. 33 Test	121A	TNS 5-16-7
3234 ES	Inj. Recirc. Isolation	121A	TNS 5-16-7
3236 ES	Inj. Sample Flush to EDT	121A	TNS 5-16-7
3237 ES	Inj. Recirc. Isolation	121A	TNS 5-16-7
500 DRW	C.B. Sump Drain Penet No. 52 Test	1	TNS 5-16-79
502 CRW	PDT Outlet Penet. No. 47 Test	118	TNS 5-16-79
513 CRW	CWRT Recirc. Outlet Penet No. 49 test	118	TNS 5-16-79
507 CC	C. B. Component Cooling Inlet Penet No. 14 Test	123	TNS 5-16-79
508 CC	C. B. Component Cooling Outlet Penet No. 15 Test	123	TNS 5-16-7
122CA	Service Air to Containment	238	TNS 5-16-79
142 CA	C. B. Service Air Penet No. 10 Test	238	TNS 5-16-79

Completed by: DCT Date 5/17/79

		Room No.	
506 VA	C.B. Purge Exhaust Penet No. 4 Test	238	TNS 5-16-79
507 VA	C.B. Purge Exhaust Bypass Penet No. 4 a Test	238	TNS 5-16-79
567 MS	S-G No. 1 Bottom B-D Penet No. 5 Test	238	TNS 5-16-79
568 MS	S-G No. 2 Bottom B-D Penet No. 6 Test	238	TNS 5-16-79
*536 CD	Shield Cooling Surge Tank Fill Penet No. 11 Test	238	TNS 5-16-79
508 VA	C. B. Purge Supply Penet. No. 1 Test	338	TNS 5-16-79
X117SFP	Reactor Cavity Drain (Inside)	142	JAL 5-16-79
X121SFP	Reactor Cavity Fill (Inside)	142A	JAL 5-16-79
X601VA	PI header isolation - inside	142A	JAL 5-16-79
P-5VA	Personnel Lock pressure test	233	Det 5/17/79
1129 PC	PZR. Inst. Test penet No. 20 Test	233	Det 5/17/79
602VA	PI header test	227	Det 5/17/79
P-6VA	Escape Lock Pressure test	341	Det 5/17/79
L-6VA	PI header isolation - outside	223	Det 5/17/79
603VA	PI header drip leg	223	Det 5/17/79

X Fuel Transfer Tube and threading cable Blind Flanges Bolted in Place — ET 5/17/79

Personnel Emergency Escape Lock Door(s) Closed — ET 5/17/79

Date of Latest Leak Test: — ET 11/29/79

Personnel Lock Door(s) Closed — ET 5/17/79

Date of Latest Leak Test: — ET 11/28/79

Equipment Door Bolted in Place & Leak Tested, & Test connection capped — ET 5/17/79

Date of Latest Leak Test: — ET Work Control

Containment Test Header Blind Flange Bolted in place (penetration No. 27, immediately beneath Personnel Lock) — ET 5/17/79

NOTE: During Refueling or Cold Shutdown both doors of the Personnel Lock may be open at the same time if the equipment as required in Check Sheet B28-6 and the SFP charcoal filters are in operation.

Completed by: ET Date 5/17/79

PRC APR 6, 1976

APPR.

Attachment C original

OR 79-47

CL3.3

CONTAINMENT INTEGRITY CHECK LIST

Rev. 2

Check whether the following valves are verified operable (stroke & observe position lights), or are LOCKED CLOSED:

VALVE NO.	C13 PANEL	OPERATES NORMALLY	LOCKED CLOSED
CV 1911	Containment Bldg. Selected Samples	✓	
CV 1503	Containment Heating Steam	✓	
CV 0738	S-G No. 2 Top Blowdown	✓	
CV 0739	S-G No. 1 Top Blowdown	✓	
CV 0939	Shield Cooling Surge Tank	✓	
CV 1004	Clean Waste Recvr. Tks. Inlet	JK 4-3-78 OK	
CV 1037	Clean Waste Recvr. Tks. Recirc.	✓	
CV 1358	Nitrogen Supply	✓	
CV 1001	Primary Sys. Drn. Tank Recirc.	✓	
CV 1910	Containment Bldg. Selected Samples	✓	
CV 1808	Containment Purge Supply	✓	
CV 1814	Air Room Supply	✓	
CV 1806	Containment Purge Exhaust	JK 4-3-78 OK	
CV 1501	Containment Heating Steam Return	✓	
CV 1101	Containment Vent Header	✓	
CV 1064	Clean Waste Recvr. Tks. Vent	✓	
CV 1103	Containment Sump Drain	✓	
CV 1002	Primary Sys. Drain Tank Outlet	✓	
CV 1036	Clean Waste Recvr. Tanks Recirc.	JK ✓ 4-3-78 OK	
CV 1044	Clean Waste Recvr. Tanks Outlet	[illegible]	
CV 0120	Pressurizer Instr. Test	✓	
CV 0770	S-G No. 2 Bottom Blowdown	✓	
CV 0771	S-G No. 1 Bottom Blowdown	✓	
CV 1807	Containment Purge Supply	✓	
CV 1813	Air Room Supply	✓	
CV 1805	Containment Purge Exhaust	✓	
CV 1803	Containment Purge Exhaust	✓	
CV 1502	Containment Heating Steam Return	✓	
CV 1102	Containment Vent Header	✓	
CV 1104	Sump Drain	✓	

Completed by: [illegible] Date 4-7-78

APPR. [signature]

CV 1007	Prim. Syst. Drain Tank Outlet	✓	
CV 1038	Clean Waste Recur. Tanks Recir.	✓	
CV 1045	Clean Waste Recur. Tanks Outlet	4-5-78 Tested After maint. "C"	
CV 1065	Clean Waste Recur. Tanks Vent	✓	
CV 0767	S-G No. 1 Bottom Blowdown	✓	
CV 0768	S-G No. 2 Bottom Blowdown	4-3-78 OK	
CV 0121	Pressurizer Instr. Test	✓	

Console

CV 0910	Containment Component Cooling Inlet	✓ TAL	
CV 0911	Containment Component Cooling Outlet	✓ TAL	
CV 0940	Containment Component Cooling Outlet	✓ TAL	
CV 2009	Letdown	✓	
CV 2083	PCP Controlled Bleedoff	✓	
CV 0155	Quench Tank Spray	✓	

ILRT PANEL

MOV P-1	Containment test header isolation	Valved In	

Check The Following Valves LOCKED CLOSED, and test connections capped:
(Test valves may be lock wired closed)

		Room No.	
120SFP	Reactor Cavity Fill (Outside)	121B/150	
118SFP	Reactor Cavity Drain (Outside)	121B/150	
512CRW	CWRT Vent Penet. No. 25 Test	121B/150	
1170 A 1170 B	NSSS Selected Samples Penet No. 21 Test	121B/150	
581 N_2	Containment N_2 Supply Penet No. 26 Test	121B/150	
501 V A	ILRT Fill Line Penet No. 27 Test	121B/150	
2320 CVC	Letdown Penet No. 36 Test	121B/150	
503 CRW	PDT Pps Recirc. Penet No. 37 Test	121B/150	
502 VA	C.B. Heating Condensate Penet. No. 38 Test	121B/150	

4-7-78

		Room No.	
503 VA	C.B. Heating Steam Penet, No. 39 Test	121B/150	fm
506 CRW	CWRT inlet Penet No. 41 Test	121B/150	fm
1126 PC	PMW to Quench tank Penet No. 42 Test	121B/150	fm
500 WG	C. B. Vent Header Penet. No. 46 Test	121B/150	fm
514 SFP	Reactor Cavity Fill Penet No. 64 Test	121B/150	fm
515SFP	Reactor Cavity Drain Penet No. 72 Test	121B/150	fm
515 CRW	CWRT Recir. Inlet Penet No. 67 Test	~~150~~ Room 118	DAK
505 VA	Air Room Purge Supply Penet No. 68 Test	121B/150	fm
518 CRW	CWRT Outlet Penet No. 69 Test	118	DAK
604 VA	FI Header Isolation	121B/150	fm
3344 ES	C. B. Spray Penet. No. 30 Test	121A	fm
3227 ES	C. B. Spray Recirculation	121A	fm
3346 ES	C. B. Spray Penet No. 31 test	121A	fm
3217 ES	C. B. Spray Recirculation	121A	fm
3348 ES	S. I. Tanks Drain Penet No. 33 Test	121A	fm
3234 ES	Inj. Recirc. Isolation	121A	fm
3236 ES	Inj. Sample Flush to EDT	121A	fm
3237 ES	Inj. Recirc. Isolation	121A	fm
500 DRW	C.B. Sump Drain Penet No. 52 Test	1	DAK
502 CRW	PDT Outlet Penet. No. 47 Test	118	DAK
513 CRW	CWRT Recirc. Outlet Penet No. 49 test	118	DAK
507 CC	C. B. Component Cooling Inlet Penet No. 14 Test	123	DAK Cap # 42 NO CAP on test connect
508 CC	C. B. Component Cooling Outlet Penet No. 15 Test	123	DAK
122CA	Service Air to Containment	238	fm
142 CA	C. B. Service Air Penet No. 10 Test	238	fm

Completed by: D Kalenich Date 4-2-78

		Room No.	
506 VA	C.B. Purge Exhaust Penet No. 4 Test	238	dm
507 VA	C.B. Purge Exhaust Bypass Penet No. 4 a Test	238	dm
567 MS	S-G No. 1 Bottom B-D Penet No. 5 Test	238	dm
568 MS	S-G No. 2 Bottom B-D Penet No. 6 Test	238	dm
*536 CD	Shield Cooling Surge Tank Fill Penet No. 11 Test	238	DAK
508 VA	C. B. Purge Supply Penet. No. 1 Test	338	dm
117SFP	Reactor Cavity Drain (Inside)	142	DAK
121SFP	Reactor Cavity Fill (Inside)	142A	DAK
601VA	PI header isolation - inside CONT.	142A	DAK
P-5VA	Personnel Lock pressure test	233	DAK
1129 PC	PZR. Inst. Test penet No. 20 Test	233	DAK
602VA	PI header test	227	DAK
P-6VA	Escape Lock Pressure test	341	dm
L-6VA	PI header isolation - outside behind ILRT Panel	223	DAK
603VA	PI header drip leg	223	DAK

Fuel Transfer Tube and threading cable Blind Flanges Bolted in Place

Personnel Emergency Escape Lock Door(s) Closed dm

Date of Latest Leak Test: 12-4-77 JD

Personnel Lock Door(s) Closed

Date of Latest Leak Test: 1-27-75 JD

Equipment Door Bolted in Place & Leak Tested, & Test connection capped DK DK 4/6/78

Date of Latest Leak Test: DK 4/6/78

Containment Test Header Blind Flange Bolted in place (penetration No. 27, immediately beneath Personnel Lock) CS DK 4/6/78

NOTE: During Refueling or Cold Shutdown both doors of the Personnel Lock may be open at the same time if the equipment as required in Check Sheet B28-6 and the SFP charcoal filters are in operation.

Completed by: D. Kauffman Date 4/6/78