UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report Nos.: 50-280/88-26 and 50-281/88-26

Licensee: Virginia Electric and Power Company
Richmond, Virginia 23261

Docket Nos.: 50-280 and 50-281 License Nos.: DPR-32 and DPR-37

Facility Name: Surry 1 and 2

Inspection Conducted: June 5 through July 2, 1988.

Inspectors: Mike Scott for 7-28-88
W. E. Holland, Senior Resident Inspector Date Signed

Mike Scott for 7-28-88
L. E. Nicholson, Resident Inspector Date Signed

Approved by: [signature] 8/11/88
F. S. Cantrell, 2A Section Chief Date Signed
Division of Reactor Projects

SUMMARY

Scope: This routine resident inspection was conducted on site in the areas of licensee action on previous enforcement matters, plant operations, plant maintenance, plant surveillance, and licensee event report closeout.

Results: One violation was identified in this inspection report. The following new items were identified in this inspection report.

One violation (paragraph 6) was identified for failure to provide an adequate procedure for installation of non-reversible flow orifices (280; 281/88-26-01).

One unresolved item (paragraph 6) was identified with regards to cleanliness controls and foreign material exclusion (280; 281/88-26-02).

One licensee identified violation (paragraph 8) was identified with regards to failure to maintain proper configuration control of a containment isolation valve as required by Technical Specification (280/88-26-03).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

J. Bailey, Superintendent of Operations
*D. Benson, Station Manager
*H. Blake, Superintendent of Site Services
R. Blount, Superintendent of Technical Services
*E. Grecheck, Assistant Station Manager
R. Johnson, Operations Supervisor
G. Miller, Licensing Coordinator, Surry
*H. Miller, Assistant Station Manager
*F. Mone, Supervisor, Quality, Quality Assurance
*J. Ogren, Superintendent of Maintenance
J. Price, Site Quality Assurance Manager
S. Sarver, Superintendent of Health Physics

*Attended exit meeting.

Other licensee employees contacted included control room operators, shift technical advisors, shift supervisors and other plant personnel.

2. Plant Status

Unit 1

Unit 1 began the reporting period in day 59 of a maintenance/refueling outage. During this period, all reactor coolant pump work was completed, the reactor coolant system was filled and vented, and the containment integrated leak rate test was completed. The unit ended the inspection period in cold shutdown making preparations to complete required testing on safety-related pumps.

Unit 2

Unit 2 began the reporting period in cold shutdown with repairs being made to the "A" reactor coolant pump. Repairs were completed to the pump on June 12; however, the discovery of foreign material in the containment sump, and cleaning delayed leaving cold shutdown until June 18. The unit was critical on June 19, and resumed power operations late the same day. The unit operated at power for the remainder of the inspection period.

3. Licensee Action on Previous Enforcement Matters (92702)

(Closed) Unresolved Item 280; 281/88-18-02, Review the controls and procedure regarding installation of flow orifices. This item was the subject of a specific maintenance inspection discussed in paragraph 6 and is being identified as a violation for failure to have adequate maintenance procedures. This unresolved item is therefore closed.

(Closed) Violation 280; 281/ 87-21-B (02), Failure to adequately perform safety injection undervoltage functional tests. The inspector reviewed the licensee response to this violation dated January 28, 1988, and verified compliance with that response during the Unit 1 refueling outage testing which occurred during this period. Testing to demonstrate that the loss of voltage protection is defeated and subsequently reinstated whenever the emergency diesel generator is the sole source of power to the emergency bus was included, and was performed as part of the refueling test program. The inspector witnessed testing and documentation of test discrepancies during this outage (see paragraph 7) and considers the licensee corrective actions to be adequate. This violation is closed.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. One new unresolved item (paragraph 6) was identified for review of the licensee's program for control of cleanliness and foreign material exclusion in safety-related systems or components.

5. Plant Operations

Operational Safety Verification (71707)

The inspectors conducted daily inspections in the following areas: control room staffing, access, and operator behavior; operator adherence to approved procedures, technical specifications, and limiting conditions for operations; examination of panels containing instrumentation and other reactor protection system elements to determine that required channels are operable; and review of control room operator logs, operating orders, plant deviation reports, tagout logs, jumper logs, and tags on components to verify compliance with approved procedures.

The inspectors conducted weekly inspections in the following areas: verification of operability of selected emergency safety features systems by valve alignment, breaker positions, condition of equipment or component(s), and operability of instrumentation and support items essential to system actuation or performance.

Plant tours which included observation of general plant/equipment conditions, fire protection and preventative measures, control of activities in progress, radiation protection controls, physical security controls, plant housekeeping conditions/cleanliness, and missile hazards.

The inspectors routinely monitor the temperature of the auxiliary feedwater pump discharge piping to ensure steam binding is prevented.

The inspectors conducted biweekly inspections in the following areas: verification review and walkdown of safety-related tagout(s) in effect; review of sampling program (e.g., primary and secondary coolant samples, boric acid tank samples, plant liquid and gaseous samples); observation of control room shift turnover; review of implementation of the plant problem identification system; verification of selected portions of containment isolation lineup(s); and verification that notices to workers are posted as required by 10 CFR 19.

Certain tours were conducted on backshifts or weekends. Backshift or weekend tours were conducted on June 7, 10, 12, 13, 14, 19, 26, 27, 30, and July 2. Inspections included areas in the Units 1 and 2 cable vaults, Units 1 and 2 containments, vital battery rooms, steam safeguards areas, emergency switchgear rooms, diesel generator rooms, control room, auxiliary building, cable penetration areas, independent spent fuel storage facility, low level intake structure, and the safeguards valve pit and pump pit areas. Reactor coolant system leak rates were reviewed to ensure that detected or suspected leakage from the system was recorded, investigated, and evaluated; and that appropriate actions were taken, if required. The inspectors routinely independently calculated RCS leak rates using the NRC Independent Measurements Leak Rate Program (RCSLK9). On a regular basis, radiation work permits (RWPs) were reviewed and specific work activities were monitored to assure they were being conducted per the RWPs. Selected radiation protection instruments were periodically checked, and equipment operability and calibration frequency were verified.

In the course of monthly activities, the inspectors included a review of the licensee's physical security program. The performance of various shifts of the security force was observed in the conduct of daily activities to include: protected and vital areas access controls; searching of personnel, packages and vehicles; badge issuance and retrieval; escorting of visitors; and patrols and compensatory posts.

On June 19, the inspector observed the restart of Unit 2 after completion of a forced outage that lasted over 30 days. The inspector reviewed the appropriate procedures and watched selected startup activities including taking the reactor critical. No discrepancies were noted.

Engineered Safety Feature System Walkdown (71710)

The inspector performed a walkdown of the vital and emergency electrical distribution system. This verification also included the following: confirmation that the licensee's system lineup procedure matches plant drawings and actual plant configuration; hangers and supports are operable; housekeeping is adequate; valves and/or breakers in the system are installed correctly and appear to be operable; fire protection/ prevention is adequate; major system components are properly labeled and

appear to be operable; instrumentation is properly installed, calibrated, and functioning; and valves and/or breakers are in correct position as required by plant procedure and unit status.

Within the areas inspected, no violations or deviations were identified.

6. Maintenance Inspections (62703)

During the reporting period, the inspectors reviewed maintenance activities to assure compliance with the appropriate procedures. Inspection areas included the following:

ASSEMBLY OF FLANGED JOINTS

The inspector reviewed the licensee program for reassembly of flanged joints. This inspection was initiated in part due to the discovery of flow orifices in the auxiliary feedwater (AFW) system being found backward as discussed in Inspection Report 280;281/88-18. The scope of this inspection included the following procedures:

- MMP-C-G-201 dated 2/3/86, Corrective Maintenance Procedure For Flanged Joints In General.

- MMP-C-G-201 dated 5/5/88, Corrective Maintenance Procedure Flanged Joints In General.

- MMP-C-G-201.1 dated 6/10/88, Corrective Maintenance Procedure For Blank Flanges, Spectacle Flanges And Orifice Plate Flanges.

The inspector submitted the following comment applicable to all the above procedures:

- A step in the front of the procedures requires the verification that all bolt or studs have at least one and one-half threads above the top of the nut prior to disassembly of the flange, yet no step verifies the as-left thread standout meets any criteria. Prior to beginning of the outage, the inspector discussed this item with the licensee and identified several fasteners on the Unit 1 service water flanges to the recirculation spray heat exchangers that were much less than flush with the top of the nut. These flanges with insufficient bolt thread standout/engagement were removed and repaired during the current refueling outage. The licensee agreed with the inspection findings, and stated that all craft personnel had been reinstructed on proper thread standout. The licensee considers that thread standout falls within "skill of the craft" requirements.

The inspectors also researched the problem of installing flow orifices backward as identified in unresolved item 280;281/88-18-02. Prior to June 10, 1988, orifice flanges were reassembled in accordance with the general flange procedure MMP-C-G-201. This procedure made no reference or provisions for special cases such as orifice installation or blank and spectacle flange installation. As a result, on March 31, 1988, station

deviation S2-88-161 identified that AFW flow orifice 2-FW-FE-200A was installed backward. The corrective action documented on the deviation was to reverse the orifice. Subsequent blockage of the AFW system required further work on this system; and on June 7, 1988, it was discovered that the same flow orifice was again installed backward.

The licensee performed an extensive field walkdown and identified the following six flow orifices that were installed backward:

2-CH-FE-2127	"B" RCP Seal Injection
1-CC-FE-130B	1-CC-P-2A Discharge to HHSI Pump Seal Cooler
1-SW-FE-120A	1-SW-P-10A Flow to Intermediate Seal Cooler
1-SW-FE-120B	1-SW-P-10B Flow to Intermediate Seal Cooler
2-RS-RO-210A	Outside RS Pump Restricting Orifice
2-RS-RO-210B	Outside RS Pump Restricting Orifice

Engineering Work Request (EWR) 88-252 documented the field inspection findings, and concluded that the incorrect orientation of the above orifices did not constitute an operational concern. The EWR states that reversing the orifice, resulting in the beveled edge oriented upstream, moves the vena contracta in relation to the downstream pressure tap and causes an approximately 5 percent lower than actual indicated flow.

The inspectors reviewed the findings and the corrective actions performed to date and consider them acceptable. The licensee has performed extensive work to recover from the lack of adequate controls, including issuing maintenance procedure MMP-C-G-201.1 dated June 10, 1988, to specifically address the installation of flow orifices, and prevent this problem from recurring. The failure to have an adequate maintenance procedure that included instructions and verification that flow orifices were installed correctly constitutes a violation of Technical Specification 6.4.A.7. (280; 281/88-26-01). Based on the NRC's review of this violation and review of the corrective action, this violation is closed.

UNIT 1 AND 2 CONTAINMENT SUMP INSPECTIONS AND CORRECTIVE ACTIONS

The screen assembly that surrounds the containment sump is designed to exclude debris large enough to cause clogged spray nozzles or to affect the operability of the systems. The first stage of the screen assembly consists of inclined bars, which act as trash screens to prevent large pieces of debris from reaching the sump. Inside the bars, there are two layers of screening, the first consists of a roughing mesh, and the second of a final mesh with an opening approximately the size of the smallest nozzle orifice in the recirculation spray header. The second stage of screens consists of cylindrical screens of fine mesh over each pump suction point. This sump arrangement provides suction for the inside and outside recirculation spray pumps as well as the low head safety injection pumps.

After discovery of foreign material in the Unit 1 inside recirculation spray pump 1A test strainer, (see paragraph 7), the licensee decided to inspect the Unit 2 containment sump for similar problems. The unit was in cold shutdown while repairs were being accomplished on the "A" reactor coolant pump motor. On June 9, the licensee commenced the inspections of the Unit 2 containment sump and gained full access to the six suction areas on June 11. Damage and/or improper configuration of screening was observed during removal of the screen sections. The licensee contracted for Westinghouse personnel to conduct visual inspections using fiber optic equipment in order to survey the six sump areas, and determine if foreign material was located in these areas. The inspection scope included the two inside recirculation spray pump containers, the two outside recirculation spray pump suction lines from the sump to the pump suction isolation valves, and the two low head safety injection pump suction lines from the sump to the pump suction isolation valves. The inspection revealed that foreign objects were present in the two inside recirculation spray pump containers, and the two low head safety injection pump suction lines. No foreign objects were found in the outside recirculation spray pump suction lines during the initial inspection; however, one foreign object was found during the final closeout inspection.

Licensee actions to correct these deficiencies included removal of all foreign objects that were found in the pump containers or suction lines. Additional actions included repairing of the sump screens, (both circular and roughing), and maintaining foreign material exclusion during the reassembly process. The inspectors monitored licensee actions and also monitored the repair work in the Unit 2 containment sump area.

Also, the licensee performed an engineering evaluation of all materials and conditions found, and concluded that the operability of the sump screens, recirculation spray, and safety injection systems were not seriously impacted by the discrepancies found. The licensee provided copies of the report to NRC Region II and Headquarters staffs. The resident inspector reviewed the report and all corrective actions accomplished by the licensee, and considers that the foreign material issue in the containment sump for Unit 2 has been resolved.

However, the inspectors conducted a review of the station programs which allowed this condition to occur. That review concentrated on appropriate procedures or controls which should have insured exclusion of foreign material, and required that cleanliness was maintained. During this inspection period, the inspectors reviewed the following procedures:

- Engineering and Construction Work Procedure WP-G08 dated 3-31-88, Confinded Entry and Tool Control.

- Engineering and Construction Work Procedure WP-M01 dated 11-20-87, Shop Fabrication and Installation of Piping Systems.

- Surry Power Station Administrative Procedure SUADM-M-03 dated April 28, 1988, Cleanliness Control of Plant Systems and Components.

During the review of the procedures, the inspectors noted that cleanliness and accountability controls had been addressed. SUADM-M-03 requires controls for primary systems, steam generators, and feedwater piping from feedwater regulating valves to the steam generators. However, the procedure did not specifically address any other systems or areas other than those deemed by station management as requiring cleanliness or access control. WP-G08 also requires controls for basically the same systems listed above. However, this procedure also does not specifically address any other systems or areas other than those deemed by engineering and construction as requiring cleanliness or access control. WP-M01 requires that open ends of pipe, pipe-fittings, valves, and connections be temporarily capped to maintain proper cleanliness until ready for fitup; however, no reference is made to identify proper cleanliness requirements.

The inspector then reviewed the following work orders which were performed in the past two years to determine if appropriate controls were in place with regards to cleanliness and/or accountability.

- Work Order Job Number (WOJN) 3800040809, Rem./Inst. RS Sump Grating dated 10/10/86.

- WOJN 3800040816, Inst/Remv 12" Suct Fng Pen 68 dated 10/10/86.

- WOJN 3800040817, Inst/Remv Suct Fng Pen 69 dated 10/10/86.

- WOJN 3800046068, Inst. RS Sump Grating dated 11/24/86.

The inspector noted that all of the above work orders were classified as being safety related; however, all of the work was done without a formal procedure. The inspector did note that each work order cover sheet identified the work as minor maintenance which he concluded was the licensee's reasoning for not using procedure to perform the work. The inspector concluded that the above work involved some form of entry into the containment sump for Unit 2 during the refueling outage in the fall of 1986. From review of the available information, the inspector also independently concluded that no controls were placed on these maintenance activities with regard to cleanliness in the sump(s) nor was tool/material accountability control documented during these evolutions.

The inspector also reviewed the following design change packages which were recently accomplished during the Unit 1 refueling/maintenance outage in the Spring of 1988.

- Design Change (DC) -86-13-1 which was approved by the station safety committee on 3-24-87, R.G. 1.97 - CONTAINMENT SPRAY FLOW AND PRESSURIZER HEATER STATUS/SURRY/1.

- DC-87-22-01 which was approved by the station safety committee on 3-29-88, REPLACEMENT OF CONTAINMENT RECIRCULATION SPRAY COOLERS/ SURRY/1.

The inspector noted in DC-86-13-1 that a precaution step was included in the procedure which required system cleanliness to be maintained during installation. However, no steps in the procedure documented any conditions for maintenance of system cleanliness or accountability. This area was discussed with engineering personnel, and the reply was that craft and quality control personnel are trained to maintain appropriate cleanliness during evolutions in which systems are open for repair. Discussions with quality control supervision indicated that while quality control personnel will do inspections for foreign materials during fitup and welding evolutions requiring quality control verifications, inspections are not normally made for cleanliness or material accountability during the entire time that systems are open for maintenance unless specifically required by procedure.

The inspector noted in DC-87-22-1 that no mention of cleanliness or accountability requirements was made in the precautions or body of the procedures. This condition was also discussed with engineering and the reply was that cleanliness was controlled by WP-M01, which requires open ends of pipe, pipe-fittings, valves, and connections be temporarily capped to maintain proper cleanliness until fit-up. The inspector concluded that although administrative procedure does require temporary capping, the cleanliness or foreign material exclusion consideration was not adequately addressed to ensure foreign material exclusion was being maintained.

At the end of the inspection period, the inspector discussed his concerns with station management and requested any additional information which would provide assurances that appropriate cleanliness or foreign material exclusion was being maintained during maintenance on safety-related systems or components. This item is identified as unresolved (280; 281/88-26-02) pending the inspector's review of additional information concerning the issue.

HEAT TRANSFER CAPABILITY OF UNIT 2 RECIRCULATION SPRAY HEAT EXCHANGERS

During this inspection period, a concern was identified regarding operability of the Unit 2 recirculation spray heat exchangers due to fouling of the heat exchanger tubes thereby reducing the heat transfer capability. The fouling was due to service water leakage into the heat exchangers when the design considerations assumed that the heat exchangers would be maintained dry. Unit 1 was not immediately affected by the concern due to the fact that it was in the middle of a refueling outage in which new recirculation spray heat exchangers were being installed. At the time the concern was identified, Unit 2 was in cold shutdown while repairs were being accomplished to a reactor coolant pump motor. The licensee had conducted an engineering evaluation of this condition in 1984. That evaluation concluded that sufficient design margin existed with

regard to fouling factor to conclude that the heat exchangers could perform their safety function with higher values than was originally considered during design. These values were larger than 0.001, but less than 0.0015.

The licensee, because of the concern, decided to open and inspect the service water side of the four recirculation spray heat exchangers prior to Unit 2 restart. The licensee also contracted a heat exchanger specialist for these inspections. Although initial inspections concluded that the fouling factor was approximately 0.001, the licensee decided to clean the tubes of the four heat exchangers in order to further reduce the fouling. Cleaning was accomplished, and the final inspections estimated that the fouling factor was less than 0.001. The licensee issued a report, (TECHNICAL REPORT NO. ME-0166) dated June 10, 1988, which concluded that the Unit 2 recirculation spray heat exchangers, after cleaning, are capable of performing their design function as stated in the Final Safety Analysis Report.

In addition, the licensee instituted new operational actions which monitor for leakage past the service water supply valves, and thereby allow for determination as to whether the heat exchangers are being maintained in dry layup. The inspectors monitored the licensee actions, reviewed the engineering report, and verified that procedures were in place to monitor for service water leakage prior to Unit 2 restart. Also, the NRC Region II and Headquarters offices were kept apprised of licensee actions, and were provided a copy of the licensee's technical report prior to Unit 2 restart. Additional reviews in this area are discussed in Inspection Report 280,281/88-27.

OVERHAUL OF AUXILIARY FEEDWATER PUMP

The inspector witnessed portions of the overhaul and preventive maintenance on motor-driven AFW pump 1-FW-P-3B. This work was performed under work order #3800067955 in accordance with procedure MMP-C-FW-092, Dissasembly, Inspect and Repair of Auxiliary Feedwater Pump 1-FW-P-2 & 2-FW-P-2. This procedure was written for the turbine-driven pump, and required deviating for work on the motor-driven pump. The inspector reviewed documentation for the parts that were replaced, and verified all measurements were within the acceptable range. The work package was complete and maintained up to date. No discrepancies were noted.

Within the areas inspected, one violation was identified.

7. Surveillance Inspections (61726)

During the reporting period, the inspectors reviewed various surveillance activities to assure compliance with the appropriate procedures as follows:

- Test prerequisites were met
- Tests were performed in accordance with approved procedures

- Test procedures appeared to perform their intended function
- Adequate coordination existed among personnel involved in the test
- Test data was properly collected and recorded

Inspection areas included the following:

Testing of the Unit 1 Inside Recirculation Spray Pumps (1-RS-P-1A and B)

During this inspection period, the inspectors witnessed testing of 1-RS-P-1A in accordance with special test 1-ST-214, Operability of IRS Pumps. The stated purpose of this test was to prove operability of the inside recirculation spray pumps, and to establish reference values for inside recirculation spray pump testing in accordance with ASME Section XI, Subsection IWP. The inspectors reviewed the test procedure prior to test performance, attended the shift briefing prior to test performance, and observed the initial testing of 1-RS-P-1A from the control room, and from inside containment.

The first series of test runs on the "A" pump occurred on June 7, 1988. During the first run, the pump was secured after approximately a three minute run due to the discharge strainer in the test line becoming partially clogged with debris from the sump. The second pump start was secured from the control room after the pump ran for approximately two minutes due to no flow indication output from the flow instrument. There had been actual flow, but due to communication problems, this was not understood in the control room. The third pump run lasted approximately 24 minutes, and the pump was secured after the discharge strainer again indicated partial blockage. The inspector noted that flow indication as specified in the test was not available during any of the runs. Also, the causes for the partial blockage of the strainers was debris including paint chips, nuts, bolts, washers, welding rods, and other material. The licensee conducted an inspection of the second stage sump screen, and found evidence of degradation that would allow passage of material as found in the strainer. Additional corrective actions for the condition of the sump cleanliness and screen repair are addressed in paragraph 6.

On June 16, 1988, the licensee tested the inside recirculation spray pump (2-RS-P-1A) in accordance with Unit 2 periodic test 2-PT-17.2, Containment Inside Recirculation Spray Pump. During that run, the pump was stopped after approximately 10 seconds due to high current readings.

The sump well in which the "1A" pump is located and, therefore, the pump itself, had been drained of water during inspection of the sump area (see paragraph 6). The well was not refilled with water prior to this short "bump" test (nor was it required by procedure). It was theorized that without the water acting as a lubricant, the motor drew much higher current. An engineering evaluation was written at this point and the sump well was refilled with water. On June 17, 1988, the inspector witnessed the retesting of the "1A" pump. Prior to the test, the inspector

independently verified that the pump would turn freely by hand, before and after the test. Also, the inspector reviewed the engineering evaluation of the "1A" pump due to an unsuccessful pump run on the "1A" pump the day before. The engineering evaluation was documented in Engineering Work Request (EWR) 88-256 dated June 17, 1988. The EWR was approved by the station safety committee on the same day. The EWR concluded that 2-RS-P-1A was operable based on the successful performance of the pump periodic test, and the statement by the pump representative that water in the pump can result in satisfactory pump operation. No discrepancies were noted.

On June 27, 1988, the inspector witnessed part of testing of the safety injection system in accordance with 1-PT-18.1, High Steam Flow Test of Steam Line Trip and RWST Crossconnect Valves. This test simulates a high steam flow in conjunction with low Tave, verifies the main steam trip valves close, and the RWST crossconnect valves realign to the opposite unit. The inspector noted that the operators performing this test were knowledgeable, and communicated well with the control room. All equipment appeared to perform as required. No discrepancies were noted.

On June 29 & 30, 1988, the inspectors witnessed portions of the Unit 1 periodic test 1-PT-18.2A & B, Safety Injection Train A - H Bus Undervoltage Functional Test and Safety Injection Train B - J Bus Undervoltage Functional Test. This test verifies proper alignment and operation of the safety injection system, when initiated in conjunction with an undervoltage condition on the emergency bus. The inspector witnessed pre-job planning and noted that communications and assignments were adequate. Testing was well coordinated by two Senior Reactor Operators. The inspector reviewed the test results and documentation of discrepancies and found this area to be improved from previous tests of this nature. No discrepancies were noted.

On June 30, 1988, the inspector witnessed testing of the safety injection check valves per periodic test 1-PT-18.3A, Refueling Testing of High Head Safety Injection Check Valves to the Cold Legs. This test verifies flow from the refueling water storage tank to the cold leg. The inspector verified that testing was performed in accordance with the procedure, and that equipment performed as required. No discrepancies were noted.

Within the areas inspected, no violations or deviations were identified.

8. Licensee Event Report (LER) Review (92700)

The inspector reviewed the LERs listed below to ascertain whether NRC reporting requirements were being met, and to determine appropriateness of the corrective action(s). The inspector's review also included followup on implementation of corrective actions, and review of licensee documentation that all required corrective action(s) were complete.

LERs that identify violation(s) of regulation(s) and that meet the criteria of 10 CFR, Part 2, Appendix C, Section V are identified as Licensee Identified Violations (LIV) in the following closeout paragraphs.

LIVs are considered first-time occurrence violations which meet the NRC Enforcement Policy criteria for exemption from issuance of a Notice of Violation. These items are identified to allow for proper evaluation of corrective actions in the event that similar events occur in the future.

(Closed) LER 280/88-01, Containment Isolation Valve Not Properly Locked Under Administrative Control Due To Human Error. This report involved a non-automatic containment isolation valve (1-SI-150) that was not properly locked under administrative control, although the valve was found in the required closed position. The inspector verified that the valve is currently locked, and reviewed the licensee enhancements regarding control of keys. Technical Specification 1.0.H.1 requires that all non-automatic containment isolation valves be locked closed and under administrative control. Technical Specification Table 3.8-1 further identifies valve 1-SI-150 as a manual containment isolation valve. The failure to maintain this valve locked is a violation of technical specifications and is identified as a LIV (280/88-26-03). This item is closed.

9. Exit Interview

The inspection scope and findings were summarized on July 5, 1988, with those individuals identified by an asterisk in paragraph 1. The following new items were identified by the inspectors during this exit.

One violation (paragraph 6) was identified for failure to provide an adequate procedure for installation of non-reversible flow orifices (280; 281/88-26-01).

One unresolved item (paragraph 6) was identified with regard to cleanliness controls and foreign material exclusion (280; 281/88-26-02).

One licensee-identified violation (paragraph 8) was identified with regard to failure to maintain proper configuration control of a containment isolation valve as required by Technical Specification (280/88-26-03).

The licensee acknowledged the inspection findings with no dissenting comments. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.