## U.S. NUCLEAN REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 50-320/78-32			
Docket No. 50-320			
License No. DPR-73 Priority		Category	B2
Licensee:Metropolitan Edison Com	Dany		
P. O. Box 542			
Reading, Pennsylvania	19603		
Facility Name: Three Mile Island Nuc	lear Station, Unit	2	
Inspection at: Middletown, Pennsylv	ania		
Inspection conducted: October 16-20,	1978		11
Inspectors: D. R. Haverkamp, Reactor	Inspector	date	7/78 signed
		date	e signed
111		date	e signed
Approved by: R. R. Keiner, Chief, Beau Section 10. 1, RO208 Br	ctor Projects anch	date	7-78 signed

Inspection Summary:

Inspection on October 16-20, 1978 (Report No. 50-320/78-32)

<u>Areas Inspected</u>: Routine, unannounced inspection by a regional based inspector of startup test results; power level plateau data; plant operations including shift logs and records and facility tour; licensee followup actions concerning selected previous inspection findings; licensee events; IE Circulars; and, selected licensee periodic reports. The inspection involved 32 inspector-hours onsite by one NRC regional based inspector.

<u>Results</u>: Of the eight areas inspected, one item of noncompliance was found in one area (Deficiency - failure to comply with administrative controls for jumpers and lifted leads, Paragraph 5.a).

Region I Form 12 (Rev. April 77) 7901050 329

-8 246

## DETAILS

## 1. Persons Contacted

### Metropolitan Edison Company

Mr. C. Adams, Unit 2 Shift Foreman
\*Mr. M. Bezilla, Unit 2 PORC Secretary
\*Mr. J. Floyd, Unit 2 Supervisor of Operations
Mr. B. Mehler, Shift Supervisor
Mr. T. Mulleavy, Radiation Protection Supervisor
Mr. F. Scheimann, Jr., Unit 2 Shift Foreman
\*Mr. J. Seelinger, Unit 2 Superintendent - Technical Support
Mr. A. Stowe, Record Retention Administrator
Mr. R. Warren, Unit 2 Lead Mechanical Engineer
Mr. W. Zewe, Shift Supervisor

### General Public Utilities Service Corporation

Mr. C. Gatto, Lead Mechanical Test Engineer Mr. R. Toole, Test Superintendent

#### Babcock and Wilcox

Mr. J. Flint, Startup Test Engineer

The inspector also interviewed several other licensee employees during the inspection. They included control room operators, technical and engineering staff personnel and general office personnel.

\* denotes those present at the exit interview on October 20, 1978

## 2. Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (320/78-10-04): OA Record Index. An index of quality assurance records has been issued for Unit 2 per the requirements of Generation Procedure GP-0063, Change Memo #4, and ANSI N45.2.9. Information contained in the index includes record type, retention periods, storage location and responsible organization. The inspector had no further questions concerning this item. (Closed) Unresolved Item (320/78-18-01): Turnover of test program records. TMI Station Superintendent letter to GPUSC, dated June 1, 1978, designates the authorized recipient of records which are being turned over to MEC from the construction project. Acceptable arrangements have been made for interim storage of the test program related records until permanent facilities are available. The inspector had no further questions concerning this item.

(Closed) Noncompliance (320/78-26-01): Failure to update emergency procedures. The licensee's corrective measures have been completed, as described in MEC letter to NRC:Region I, Serial GQL 1481, dated September 6, 1978. The Controlled Procedures Distribution List has been revised to include appropriate distribution of changes and revisions to HPP 1670.6 and HPP 1670.12 for the emergency monitoring kits. Recently completed quarterly surveillance of these kits, per HPP 1778, included verification that the information book in each kit had up-to-date procedures. The inspector had no further questions concerning this item.

3. Startup Test Results Evaluation

The inspector conducted an evaluation of the following startup tests.

- -- TP 800/11 (MTX 147.21), Core Power Distribution (15% and 40% power level plateau testing completed on September 19 and October 7, 1978)
- -- TP 800/32 (MTX 147.33), Loss of Off-Site Power (15% power level plateau results approved by TWG on May 19, 1978)
- -- TP 800/31 (MTX 147.32), Pseudo Dropped Rod (40% power level plateau testing completed on October 4, 1978)

The test records were evaluated to verify the following items.

- -- Test changes had been approved in accordance with administrative procedures, properly entered into the procedure, accomplished if actions were necessary, and did not change the basic objective of the test.
- -- Test deficiencies had been resolved, accepted by appropriate management, retest conducted if required, and any system or process changes necessitated have been properly documented and reviewed.

3 248

- -- Test summaries and evaluations had been performed by the cognizant engineers, and test results had been compared with established acceptance criteria.
- -- "As-run" copies of the test procedures contain completed data sheets (sample), data are recorded where required and are within acceptance tolerances (sample), test deficiencies noted receive appropriate review and evaluation, and individual test steps and \_ata sheets have been properly initialed and dated.
- -- Quality Assurance inspection records have been completed to document the adequacy of the test package contents, to indicate independent review of test records and data package contents, and an independent audit was performed during test performance, as required by administrative procedures.
- -- Approval of the test results by those personnel charged with responsibility for review and acceptance has been documented, and if the off site review committee has audited the test package, that their comments are included and corrective action has been taken if required.

The inspector used one or more of the following acceptance criteria for the above items.

- -- Final Safety Analysis Report
- -- Technical Specifications
- -- Test Instruction 7, GPU Startup Problem Report
- -- Test Instruction 9, Conduct of Test
- -- Test Instruction 13, Test Interface Instructions
- -- Test Instruction 18, Test Procedure Documents
- -- Regulatory Guides
- -- Inspector Judgment
- -- Quality Assurance Program

Findings were acceptable, except as noted below.

- -- During performance of TP 800/31, the runback rate did not meet the acceptance criteria. This item is unresolved pending an acceptable retest at the 75% power level plateau (320/78-32-01).
- -- TP 800/11 and TP 800/31 have been approved by TWG as acceptable for proceding to the 75% power level plateau, but have not yet received final approval. This item is unresolved pending final TWG approval of these TPs (320/78-32-02).
- 4. Power Level Plateau Data Review
  - a. Verification of Licensee Evaluation of Test Results

The inspector conducted a review of the following startup tests.

- TP 800/5 (MTX 147.19), Reactivity Coefficient at Power (40% power level plateau testing completed on October 2, 1978)
- -- TP 800/35 (MTX 147.36), Effluent and Effluent Monitoring System Test (15% and 40% power level plateau testing completed on April 23 and September 29, 1978)
- -- TP 800/18 (MTX 147.27), Power Imbalance Detector Correlation Test (40% power level plateau testing completed on October 7, 1978)
- -- TP 800/36 (MTX 147.37), Shutdown from Outside the Control Room (15% power level plateau testing completed on September 19, 1978)
- -- SP 800/8 (MTX 91.4), ICS Tuning at Power (15% and 40% power level plateau testing completed on September 20 and October 5, 1978)
- -- TP 800/23 (MTX 147.31), Unit 'bad Transient Test (40% power level plateau testing completed on October 17, 1978)
- -- TP 800/2 (MTX 108.7), Nuclear Instrument Calibration at Power (15% and 40% power level plateau testing completed on September 18 and October 1, 1978)

- TP 800/12 (MTX 147.22), Unit Load Steady State Test (15% and 40% power level plateau testing completed on September 19 and September 30, 1978)
- -- TP 800/22 (MTX 147.30), NSS Heat Balance (15% and 40% power level plateau testing completed on September 18 and September 29, 1978)

The test records were reviewed to verify the following items.

- -- Test summaries and evaluations had been performed by the cognizant engineers, and test results had been compared with established acceptance criteria.
- -- Approval of the test results by those personnel charged with responsibility for review and acceptance has been documented, and if the off site committee has audited the test package, that their comments are included and corrective action has been taken if required.

The inspector used one or more of the following acceptance criteria for the above items.

- -- Final Safety Analysis Report
- -- Technical Specifications
- -- Test Instruction 18, Test Procedure Documents
- -- Regulatory Guides
- -- Inspector Judgment
- -- Quality Assurance Program

Findings were acceptable, except as noted below.

- -- TP 800/33, Psec Rod Ejection Test was not performed. Deletion of this test from the power escalation testing program was approved by NRR letter to MEC, dated June 12, 1978.
- -- All of the above tests have been approved by TWG as acceptable for proceeding to the 75% power level plateau, but the test results have not yet received final approval. This item is unresolved pending final TWG approval of the test results (320/73-32-03).

### b. Authorization to Raise Power

The inspector reviewed the licensee's evaluation of the 15% and 40% plateau test results and the authorization for proceeding to the next test plateau. This review included discussions with licensee and startup group representatives, observation of PORC Meeting No. 290 on October 17, 1978, and review of the following items.

-- Startup tests listed in Paragraphs 3 and 4.a

- -- SP 800/21 (MTX 147.29), Unit Startup and Power Escalation Test (TWG approval received to escalate power to 40% and 75% on September 20, 1978 and October 17, 1978)
- -- Minutes of PORC Meetings Nos. 268, 286 and 290

The review was conducted to assure or confirm the following items.

- -- All applicable testing has been completed.
- All testing anomalies have been evaluated and resolved by the licensee.
- -- The licenses has reviewed Technical Specification requirements applicable to the next higher power level and has fully implemented them.
- -- The licensee performed core and plant surveys to assure safe operation during the increase of power level and arrival at the next plateau; including examination of flux distribution, core performance, reactor heat balance, unexpected radioactivity and radiation leakage, pressure boundary leakage, and reactor coolant chemistry.
- -- The licensee has extrapolated the results of tests to applicable plateaus in the power ascension program, has compared the extrapolation with predicted plant performance, and has determined that it is reasonable and prudent to continue the testing program to the next planned power level plateau.

8 252

The inspector used one or more of the following acceptance criteria for the above items.

- -- Final Safety Analysis Report
- -- Technical Specifications
- -- Test Instruction 9, Conduct of Test
- -- Regulatory Guides
- -- Inspector Judgment

Findings were acceptable.

### 5. Review of Plant Operations

#### a. Shift Logs and Operating Records

The inspector reviewed the following logs and records.

- -- Shift Foreman Log, Control Room Log Book, Control Room Operator's Log Sheets, Primary Auxiliary Operator's Log-Tour Readings, Primary Auxiliary Operator's Log-Liquid Waste Disposal Panels, Secondary Auxiliary Operator's Log Sheets, and Auxiliary Operator Log Sheets-Out-Building Tour, dated August 1 - October 15, 1978
- -- Shift and Daily Checks, dated July 26 October 15, 1978
- -- Jumper, Lifted Lead, and Mechanical Modifications Log (active and cleared); entries made during August 1 -October 15, 1978, and selected active entries
- -- Fire System Removal from Service Notification Log; entries made during August 1 - October 15, 1978
- -- Applications for Apparatus to be Taken Out of Service; those active on October 20, 1978, and those cleared, dated October 1-19, 1978
- -- Do Not Operate and Caution Tag Log; entries made during August 1 - October 15, 1978

- Transient Cycle Log Book; entries made during August 1 -October 15, 1978
- -- Unit 2 Operations Department Memos 2-78-16 through 2-78-20

The logs and records were reviewed to verify the following items.

- Logkeeping practices and log book reviews are conducted in accordance with established administrative controls.
- -- Log entries involving abnormal conditions are sufficiently detailed.
- -- Operating orders do not conflict with Technical Specifications (TSs).
- -- Jumper Log and tagging log entries do not conflict with TSs.
- -- Jumper/lifted lead/mechanical modification and tagging operations are conducted in conformance with established administrative controls.
- -- Problem identification reports confirm compliance with TS reporting and LCO requirements.

Acceptance criteria for the above review included inspector judgment and requirements of applicable Technical Specifications and the following procedures.

- -- Station Administrative Procedure (SAP) 1002, "Rules for the Protection of Employees Working on Electrical and Mechanical Apparatus," Revision 13
- -- SAP 1010, "Technical Specification Surveillance Program," Revision 12, TCN 2-78-624
- -- SAP 1011, "Controlled Key Locker Control," Revision 16
- -- SAP 1012, "Shift Relief and Log Entries," Revision 8
- -- SAP 1013, "Bypass of Safety Functions and Jumper Control," Revision 7

-- SAP 1016, "Operations Surveillance Program," Revision 12

-- SAP 1033, "Operating Memos and Standing Orders," Original

- SAP 1037, "Control of Caution and DNO Tags," Revision 1

Findings were acceptable, except as noted below.

- SAP 1013 includes the following requirements for administrative control of jumpers and lifted leads.
  - No jumper shall be installed until it has been identified by tags placed upon the jumper at each end. All jumper tags shall be RED in color.
  - (2) Whenever lifted leads are replaced, the following information shall be filled in the Lifted Leads Log Sheet: date, time, replaced by.
  - (3) When a jumper is in effect greater than 12 months, it should be evaluated by the cognizant engineer for the affected system. The evaluation should document the reasons why the wiring change has not been made permanent (or removed) and what final disposition of the situation is intended.

The inspector observed the following discrepancies on October 18, 1978.

- Jumper #27, at ICS Terminal Board 10-5, was identified by one BLUE (lifted lead) tag vice two RED jumper tags.
- (2) Lifted leads #2 and #3, at Terminal Board 1T5, and lifted lead #20, at ICS Cabinet Terminal Board 8-1, were replaced and the respective log sheets were not filled in with applicable information.
- (3) Jumper #3, at the Hydrogen Seal Oil Cabinet 307, has been in effect since July 22, 1977, a period of 15 months, and no evaluation of the jumper has been made by the cognizant engineer.

The inspector stated that failure to conform with requirements of SAP 1013 was considered an item of noncompliance at the Deficiency level of severity. Prior to the end of the inspection, the specific discrepancies were corrected and evaluations were in-progress. In addition, a licensee audit of all jumpers and lifted leads was performed to assure that SAP 1013 implementation and log sheet status was correct. Licensee representatives stated that SAP 1013 would be reviewed and revised, if more stringent controls including periodic licensee audits were deemed necessary. The inspector stated that no response was required to the item of noncompliance and that the licensee's audit results and the need for additional corrective actions will be reviewed during a subsequent inspection (320/78-32-04).

- -- SAP 1013 contains administrative controls for temporary mechanical modifications, including installation or removal of blank flanges and use of spool pieces or temporary lines that are not a design part of the respective system. The inspector noted that SAP 1013 includes no specific controls for installation of gagging devices on safety or relief valves that are not a design part of the system. This item is unresolved pending licensee review of the need to include controls for gagging devices in SAP 1013 (320/78-32-05).
- b. Plant Tour

At various times on October 18-20, 1978, the inspector conducted tours of the following accessible plant areas.

- -- Auxiliary Building
- -- Turbine Building
- -- Fuel Handling Building
- -- Control and Service Building
- -- Control Room
- -- Circulating Water Pump House
- -- Switchgear Rooms
- -- Inverter and Battery Rooms
- -- Makeup Pump Rooms
- -- West Cooling Tower

The following observations/discussions/determinations were made.

- -- Control Room and local monitoring instrumentation for various components and parameters was observed.
- -- Radiation controls established by the licensee, including the posting of radiation and high radiation areas, the condition of step-off pads, and the disposal of protective clothing, were observed. Radiation Work Permits used for entry to radiation and controlled area, were reviewed.
- -- Plant housekeeping, including general cleanliness conditions and storage of materials and components to prevent safety and fire hazards, was observed.
- Systems and equipment in all areas toured were observed for the existence of fluid leaks and abnormal piping vibrations.
- -- Selected piping snubbers/restraints were observed for proper fluid level and condition/proper hanger settings.
- The indicated positions of electrical power supply breakers and selected control board equipment start switches and remote-operated valves and the actual positions of selected manual-operated valves were observed.
- Selected equipment lockout tags, caution tags, and Do-Not-Operate tags were observed for proper posting and the tagged equipment was observed for proper positioning, where applicable.
- Selected jumper and lifted lead markers were observed for proper identification and the effected wiring changes were observed for proper completion.
- -- The Control Board was observed for annunciators that normally should not be lighted during the existing plant conditions. The reasons for the annunciators were discussed with control room operators.
- The licensee's policy and practice regarding plant tours was reviewed.
- Control Room manning was observed on several occasions during the inspection.

Acceptance criteria for the above items included inspector judgment and requirements of 10 CFR 50.54(k), Regulatory Guide 1.114, applicable Technical Specifications, and the following procedures.

- -- SAP 1002, "Riles for the Protection of Employees Working on Electrica and Mechanical Apparatus," Revision 13
- -- SAP 1003, "Ridiation Protection Manual," Revisior. 12
- -- SAP 1008, "Good Housekeeping," Revision 4
- -- SAP 1009, "Station Organization and Chain of Command," Revision 3
- -- SAP 1028, "Operator at the Controls," Original
- -- SAP 1037, "Control of Caution and DNO Tags," Revision 1
- -- SAP 1034, "Control of Combustible Materials," Original

The inspector findings were acceptable, except as noted below.

- Several discrepancies concerning the identification and control of jumpers and lifted leads were observed, as described in Paragraph 5.a.
- Plant housekeeping conditions have improved since previous inspections.

### 6. In-Office Review of Licensee Event Reports (LERs)

The LERs listed below were reviewed in the Region I office promptly following receipt to verify that details of the event were clearly reported including the accuracy of the description of cause and the adequacy of corrective action. The LERs were also reviewed to determine whether further information was required from the licensee, whether generic implications were involved, whether the event should be classified as an Abnormal Occurrence, and whether the event warranted onsite followup.

The following LERs were reviewed.

\*-- LER 78-50/1T, dated August 28, 19/8 (Excessive R.B. personnel airlock leakage, due to 1/4" hole drilled through airlock bulkhead during installation of supports for electrical cabling)

\* denotes those LERs for onsite followup

-8-258

- \*-- LER 78-51/1T, dated September 6, 1978, and Update LER 78-51/1T, dated September 19, 1978 (Certain safety-related valves did not have cable splices installed per the FSAR, due to being overlooked by the A/E at the time splicing modifications were being performed)
- \*-- LER 78-52/1T, dated September 11, 1978 (Main steam lines were determined to be incapable of withstanding a turbine trip from 100% power, due to undersized installed restraints which could not suppress faster closure (50 msec) of turbine stop valves than originally specified (150 msec))
- -- LER 78-53/3L, dated September 26, 1978 (Safety injection channel "C" did not trip during cooldown at the required RCS pressure setpoint, due to instrument bi-stable failure)
- \*-- LER 78-54/3L, dated September 27, 1978 (R. B. sump pump discharge valve to miscellaneous waste holdup tank (WDL-V271) was not supplied with containment grade limit switches, torque switch and motor, due to a purchasing error by the A/E)
  - -- LER 78-55/3L, dated October 5, 1978 (Control room emergency air handling system damper 4092C failed to close during surveillance testing, due to improper orientation of certain instrument air tubing components)
- -- LER 78-56/3L, dated October 16, 1978 (Inoperable absolute position indicator for control rod 6-11, due to improperly operating reed switch)
- -- LER 78-57/3L, dated September 29, 1978 (Remote shutdown display instrumentation was inoperable in Mode 3, due to inadvertent grounding of the patch panel power supply during maintenance work)
- -- LER 78-58/3L, dated October 4, 1978 (Containment isolation valve WDL-V1125 failed to close on manual initiation test signal, believed to be due to a dirty control relay contact)
- \*-- LER 78-59/3L, dated October 2, 1978 (Bolted motor lead connections on containment isolation valves MU-V2A/B were not taped per environmentally qualified methods, due to a personnel error during construction)

denotes those LERs selected for onsite followup

- \*\*-- NPDES Permit 0009920 Update Noncompliance Notifications 78-05 through 78-07
- \*\*-- NPDES Permit 0009920 Noncompliance Notifications 78-08 through 78-15
- \*\*-- NPDES Permit 00099201 Noncompliance Notifications 78-16 through 78-21

The above LERs were closed based on satisfactory review in the Region I office, except those LERs selected for onsite followup.

# 7. Onsite Licensee Event Followup

For those LERs selected for onsite followup (denoted in Paragraph 6), the inspector verified that the reporting requirements of Technical Specifications and GP 4703 (Original) had teen met, that appropriate corrective action had been taken, that the event was reviewed by the licensee as required by Technical Specifications, and that continued operation of the facility was conducted in conformance with Technical Specification limits.

The inspector's findings regarding these licensee events were acceptable, unless otherwise noted below.

-- LER 78-54/3L described a purchasing error by the unit A/E which resulted in WDL-V271 being supplied with non-containment grade components. The LER stated that all other safetyrelated, motor-operated valves inside containment were being inspected for similar errors. This corrective action is being tracked by PORC Action Item #2-78-051, which is scheduled for completion by October 31, 1978. Licensee closeout of PAI #2-78-051 will be reviewed during a subsequent inspection.

## 8. IE Circular Followup

The inspector reviewed the licensee's followup actions regarding the IE Circulars listed below.

- -- IEC 73-06, "Potential Common Mode Flooding of ECCS Equipment Rooms at BWR Facilities," dated May 31, 1978
- -- IEC 78-13, "Inoperability of Multiple Service Water Pumps," dated July 10, 1978
- -- IEC 78-15, "Tilting Disk Check Valves Fail to Close with Gravity in Vertical Position," dated July 24, 1978
- -- IEC 78-16, "Limitorque Valve Actuators," dated July 26, 1978

\*\* denotes those environmental reports subject to generic and selective onsite followup during a subsequent environmental inspection -3-260 This review included discussions with licensee personnel, review of selected facility records, and observation of selected facility equipment and components.

With respect to the above Circulars, the inspector verified that the circular was received by appropriate licensee management, a review for applicability was performed, and that action taken or planned is appropriate.

Acceptance criteria for the above review included inspector judgment and requirements of applicable Technical Specifications and facility procedures.

Licensee followup to the above Circulars was acceptable, unless otherwise noted below.

- PORC review of IE Circular 78-06 is being tracked by PORC Action Item (PAI) #2-78-033, rescheduled for completion by November 1, 1978. Field Questionnaire #2617 was submitted to Burns and Roe to obtain information on the design of the decay heat and building spray vaults, for which no watertight coverings are provided. In the event of a major pipe break on nuclear services river water piping, these vaults might be subject to simultaneous flooding. This item is unresolved pending completion of PORC review of PAI #2-78-033 (320/78-32-08).
- -- PORC review of IE Circular 78-13 was documented and closed by PAI #2-78-047. PORC determined that TMI Unit 2 has adequate approved operating and surveillance procedures to mitigate the problems of surface ice, low river water level and silting, as described in IEC 78-13.
- -- PORC review of IE Circular 78-15 was documented and closed by PAI #2-78-044. All tilting disk type containment isolation check valves and check valves under ISI scope were installed in a horizontal piping run, except NS-VIIA-C. The valve vendor informed the licensee that the tilting disk check valves supplied should be installed in a horizontal piping run for maximum operational reliability, however, the valves should function properly in a vertical piping run. Valves NS-VIIA-C have been satisfactorily tested on a quarterly basis per SP 2303-M30. No piping modifications were considered necessary.

PORC review of TE Circular 78-16 was documented and closed by PAI #2-78-045. Four SBM-3 and four SMB-2 Limitorque valve actuators with 3600 rpm motors are used in engineered safety systems at TMI Unit 2. The valves are only operated manually during a loss of power, when placing the valve on its backseat for a packing adjustment, or for a limit switch adjustment. Thus, the potential for failure of the actuators, resulting from manual operation, is minimal. Applicable maintenance and operating procedures require the actuator to be cycled automatically after manual valve operation. Four of the valves are electrically cycled monthly for E. S. System Testing. Two of the valves are locked opened at RCS pressure above 700 psig and are only closed for cold shutdown. The remaining two valves are closed at RCS pressure above 320 psig and are only opened for decay heat removal or for post-LOCA long term cooling. No additional actions for minimizing manual valve operation or procedures for verifying actuator operability were considered necessary.

## 9. In-Office Review of Periodic Reports

The periodic reports listed below were reviewed in the Region I office to verify that the report included information required to be reported and that test results and/or supporting information discussed in the report were consistent with design predictions and performance specifications, as applicable. The reports were also received to ascertain whether planned corrective action was adequate for recolution of identified problems, where applicable, and to determine whether any information contained in the report should be classified as an Abnormal Occurrence.

The following TMI 2 periodic reports were reviewed.

- -- July Operating Report, dated August 11, 1978
- -- August Operating Report, dated September 11, 1978
- -- September Operating Report, dated October 10, 1978

The above reports were closed based on satisfactory review at the Region I office.

10. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items disclosed during this inspection are discussed in Paragraphs 3, 4.a, 5.a and 8. The inspector met with the licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on October 20, 1978. The inspector summarized the purpose and scope of the inspection and the findings.