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

Region I

Report No.	50-333/79-02			
Docket No.	50-333			
License No.	DPR-59	Priority		CategoryC
Licensee:	Power Authority of the STate of New York			
	10 Columbus Circle			
	New York, New York 10019			
Facility Na	me: <u>James A</u> .	FitzPatrick		
Inspection	at: Scriba,	New York		
Inspection	conducted: Ma	rch 13-16, 1979		
Inspectors:	R. J. Conte, R	Reactor Inspacto	for,	date signe
				date signe

Approved by:

H. B. Kister, Chief, Nuclear Support Section No. 2 ROANS Branch

#### Inspection Summary:

Inspection on March 13-16, 1979 (Report No. 50-333/79-02)

Areas Inspected: Routine, unannounced inspection by a regional based inspector of compliance with show cause order to be in cold shutdown condition; administrative controls for surveillance testing, surveillance test content and data; performance of surveillance testing; technician qualifications; system operating/annunciator response procedures upgrading; calibrations required by technical specifications of components and equipment associated with safety related systems and/or functions; and licensee action on previous inspection findings. The inspection involved 34 inspector-hours by one regional based inspector.

Results: Of the eight areas reviewed no items of noncompliance were identified in six areas, two items of noncompliance were identified in 23 two areas (Infraction - failure to properly complete valve line-ups paragraph 8.b; Deficiency - failure to continuously monitor and log suppression pool temperature during the addition of heat - paragraph 5.c). 7907310(30

Region I Form 12 (Rev. April 77)

date signed signed

### DETAILS

### 1. Persons Contacted

- \*E. Abbott, Operations Superintendent
- \*V. Childs, Assistant to the Resident Manager
- \*M. Cosgrove, Quality Assurance Supervisor
- \*J. Ford, Instrument and Control Superintendent
- J. Leonard, Jr., Resident Manager
- \*R. Pasternak, Superintendent of Power

Other members of the operations and, instrument and control staffs were also interviewed.

\* denotes those present at the exit interview.

# 2. Licensee Action on Previous Inspection Findings

(Closed) Unresolved item (333/77-13-02): Technical Specifications (TS) Table 4-2-1 to be revised to recognize Condenser Low Vacuum Actuation of Primary Containment Isolation System. License Amendment No. 37 incorporates this revision to the Technical Specifications. The licensee has been testing/calibrating this function on a periodic basis.

1

(Closed) Unresolved item (333/77-33-03): Documentation of review of LER. The completed sign-off sheet was presented to the inspector indicating review of LER No. 77-50, Nonconservative Setpoint Drift of No. 2 Turbine Stop Valve Closure Instrument Channel, by licensed operators.

(Closed) Unresolved item (333/78-01-03): Upgrading Annunciator Response Procedures. The review of these procedures are being accomplished in conjunction with the upgrading of System Operating Procedures. Details are discussed in paragraph 8.a.

(Open) Unresolved item (333/78-04-03): Establishment of Calibration Program for Technical Specification Balance of Plant Instrumentation. Discrepancies were noted with respect to instruments selected from operation's department surveillance procedures and the Balance of Plant Schedule. Details are discussed in paragraph 9.b and c.

428 31D

(Open) Unresolved item (333/78-04-04): Scheduling of monthly Fire Extinguisher Inspections. Inspection Procedure IP-033, Fire Extinguishers, has been issued but not yet formally scheduled. The licensee representative stated that this procedure will be scheduled on the Preventive Maintenance Schedule. This remains open pending the incorporation of IP-033 on the Preventive Maintenance Schedule.

(Closed) Noncompliance (333/78-13-01): Tolerances to be added to Calibration Procedure. Revision 1, dated January 1979, to F-ISP-27. Drywell and Suppression Pool Temperature Instrument Calibrations, incorporates tolerances to the acceptance criteria for the calibration of these instruments. No data has been acquired since the issuance of Revision 1.

(Closed) Unresolved item (333/78-14-01): Procedure to be issued covering Technical Specification Amendment. An endment No. 30, dated September 16, 1977, required an operating cycle performance discharge test for the Low Pressure Coolant Injection (LPCI) Motor Operated Valve (MOV) Independent Power Supply Batteries. Amendment No. 41, dated November 16, 1978, superseded Amendment No. 30 and required a service test in accordance with Regulatory Guide 1.129 each operating cycle. Surveillance Procedure ST-2F, LPCI Motor Operated Valve Power Supply Simulated Automatic Actuation Test and LPCI Battery Service Test, was issued to implement the latest requirements in this area. Data was reviewed for test conducted November 28, 1978. No items of noncompliance were identified.

(Closed) Noncompliance (333/78-14-02): Failure to implement Technical Specification (TS) Amendment. Revision 5, dated June 1978, to ISP-6, Pump Discharge Pressure Interlock (RHR, LPCI) Instrument Functional Test/Calibration, incorporated the new setpoint for this interlock at 125 psig + 20 psig. A review of data acquired from July 1978 to December 1978 indicated proper implementation of ISP-6 and the amendment TS in this area. No additional items of noncompliance were identified.

Further, the licensee has issued a Plant Standing Order for the implementation of Technical Specification Amendments. The inspector had no comments on this document.

(Closed) Unresolved item (333/78-27-02): Implementation of valve line-ups associated with 1978 Refueling Outage. A review of these valve line-ups indicated noncompliance with established administrative controls for procedure temporary changes and handling valve deviations. Details are discussed in paragraph 8.b.

Further, based on this review, it appears the valve line-up lists associated with System Operating Procedures are in need of revision. This is being accomplished in conjunction with the upgrading of System Operating Procedures. Details are discussed in paragraph 8.a.

(Closed) Unresolved item (333/78-27-03): Upgrading System Operating Procedures. The licensee has reviewed this area and has concluded that extensive work is needed for an adequate job to be accomplished in upgrading these procedures along with annunciator response procedures and associated valve line-up lists. Details are discussed in paragraph 8.a.

# 3. Show Cruse Order on Stress Analyses for Safety Related Piping

During the conduct of the inspection the licensee received a Show Cause Order with respect to questionable seismic stress design in safety related piping systems performed by the architect-engineer. The order required the station to be in a cold shutdown condition within 48 hours or show cause why continued operation should be allowed. The order was in effect as of 9:30 p.m. March 13, 1979.

The licensee commenced a shutdown of the plant at approximately 2:00 a.m., March 15, 1979 to provide sufficient time for the conduct of various required surveillance tests, inspections and cooldown of the plant by 9:30 p.m., March 15, 1979. During the shutdown the licensee determined that the Rod Sequence Control System was in-operable with reactor power above 20%. Since Technical Specifications require this system to be operable less than 20% power, the licensee manually scrammed the reactor at 3:15 p.m., March 15, 1979, to support cooldown of plant by 9:30 p.m. that same day.

At 8:30 p.m., March 15, 1979, the inspector verified the facility was in a Cold Shutdown condition as defined by TS 1.I.3. (Reactor Mode Switch in SHUTDOWN position, Reactor Coolant Temperature less than 212°F, and Reactor Vessel Head Vents Open).

No items of noncompliance were identified.

# 4. Administrative Controls for Surveillance Testing

Administrative controls were reviewed to determine the licensee's pr im for implementing requirements associated with the control

428 31

of surveillance testing, as specified in Technical Specifications, Section 6, Regulatory Guide 1.33-1972, Quality Assurance Requirements; and, ANSI N18.7-1972, Administrative Control for Nuclear Power Plants.

The following documents were reviewed.

- AP 1.6, Procedure for Fire Protection Program, Revision 0, March 30, 1977
- -- AP 2.4, Procedure for Operability Tests, Revision 3, August 9, 1978
- AP 3.3, Procedure for Instrument Maintenance, Revision 0, April 1, 1977
- -- AP 4.1, Procedure for Department Surveillance Tests, Revision 1, May 19, 1977
- -- AP 4.2, Control of Measuring and Test Equipment, Revision 1, October 16, 1978
- -- AP 4.3, Test and Inspection System, Revision 0, April 1, 1977
- -- AP 4.4, Control of Permanent Plant Instruments, Revision 0, October 16, 1978

No items of noncompliance were identified, however, the following unresolved item was noted.

AP's 3.3, 4.1, and 4.4 specify procedural format requirements for calibration and surveillance test procedures. These format requirements are not consistent with ANSI 18.7-1972, paragraph 6.2.5 and 6.4. Also, AP 3.3, 4.1 and 4.4 do not have provisions for specifying restoration of the system to normal operating conditions. Further, AP 4.4 does not have provisions for specifying procedural prerequisites and/or acceptance criteria for calibrations.

The inspector observed that for operation's department surveillance procedures (in use procedures) the format is consistent with ANSI 18.7-1972. The licensee representative agreed to review the area with respect to consistency of administrative procedures and implementing procedures.

This is unresolved rending completion of licensee action as stated above and subseque c NRC:RI review (333/79-02-01).

### 5. Surveillance Test Content and Data

- a. Surveillance procedures and associated data were reviewed on a sampling basis to verify the following.
  - -- Properly approved procedures are issued for tests required by Technical Specifications (TS) or by the Inservice Inspection Program (ISI) for Pump and Valve, and that the format for these procedures are in accordance with ANSI 18.7-1972, Administrative Controls for Nuclear Power Plants, including the specification of prerequisites, acceptance criteria, and restoration of systems to normal operation.
  - -- Technical Content is adequate to assure compliance with the requirements specified in TS or the ISI Program.
  - Completed test records indicate conformance with TS, ISI Program and Procedural Requirements at required frequencies.
  - Test results were reviewed in accordance with Administrative Requirements, and appropriate action was taken for nonconformance with test acceptance criteria.
- b. The selected surveillance requirements, procedures, test data (indicated by date of performance) are listed below.
  - -- F-ST-24, ISI RCIC Valve Testing, Revision 0, December 1, 1978 (TS 4.5.E.1.c and e) - recently issued procedure; no data obtained yet.
  - -- F-ST-24B, RCIC MOV Valve Operability Test, Revision 3, November 15, 1977 (TS 4.7.D.1.c) - Data: December 6, September 17, August 19, July 15, June 24, June 17, May 20, 1978.
  - -- ST-2A, RHR Pump Flow Rate Test, Revision 3, December 1, 1978 (TS 4.5.A.2.b and TS 4.11.B.1) - Data: November 21, September 15, August 5, May 6, April 8, March 2, and February 21, 1978.
  - -- ST-2B, RHR Pump Operability Test, Revision 1, December 1, 1978 (TS 4.5.A.2.c) - Data: December 27, December 25, December 21, November 21, September 2, August 5, July 1, June 3 and May 6, 1978.

- ST-76B, Electric Fire Pump Operational Check, Revision 0, January 5, 1979 (TS 4.12.A.1.b) - Data: December 30, November 30, October 31, October 1, September 1, August 1, July 1, June 6, and May 1, 1978.
- ST-76C, Diesel Fire Pump Operational Check, Revision 0, January 5, 1979 (TS 4.12.A.1.b) - Data: December 74, December 3, November 13, October 14, September 15, August 15, July 15, June 15, and May 15, 1978.
- -- ST-16D, 125V D-C Battery Test Discharge, Revision 3, March 21, 1978 (TS 4.9.E.3 and 5) - Data: October 22, 1978 and September 8, 1977.
- -- ST-2F, LPCI Motor Operated Valve Power Supply Simulated Automatic Actuation Test and LPCI Battery Service Test (TS 4.9.F.3) - Data: November 28, 1978.
- ST-15E, Fressure Suppression Chamber Drywell Vacuum Breaker Valve Visual Inspection, Revision 0, August 13, 1974 (TS 4.7.A.5.g) - Data: December 4, 1978 and August 28, 1977.
- ST-15F, Pressure Suppression Chamber Drywell Vacuum Breaker Differential Simulated Automatic Actuation Test (TS 4.7.A.5.g)
  Data: December 3, 1978 and August 27, 1977.
- -- ST-27B, ADS Manual Relief Valve Operation, Revision 4, August 3, 1978 (TS 4.5.D.1.b) - Data: December 8, April 28, and September 23, 1977.
- -- ST-22D, Nitrogen System Pressure Sensor Functional Check, Revision 1, May 4, 1976 (TS 4.6.E.4) - Data: November 5, August 7, May 1, and February 6, 1978.
- -- ST-6C, Standby Liquid Control Relief Valve Test, Revision 1, August 31, 1977 (TS 4.4.A.2) - Data: November 28, 1978 and July 22, 1977.

428 315

ST-27, Recirculation Pump Trip Logic System Functional, Revision 0, November 15, 1974 (TS Table 4.2-7) - Data: December 3, 1978 and September 19, 1977. c. The following apparent noncompliance was identified. The conduct of ST-22B, Automatic Depressurization System (ADS) Manual Kelief Valve Operation adds heat to the suppression pool. TS 4.7.A.1 requires in part that whenever heat is added to the suppression pool, the pool temperature is to be continuously monitored, observed, and logged every 5 minutes. ST-22B does not have provisions for this TS requirement. This parameter has an indicator in the control room with a local recorder which is manually set to record this temperature once per hour. Based on a review of associated documentation of ST-22B and on discussions with the licensee representatives, it appeared that the monitoring and logging requirements of TS were not implemented during the conduct of ST-22B at the required frequencies.

This represents noncompliance (deficiency level) with TS 4.7.A.1 (333/79-02-02).

- d. The below listed unresolved items were identified.
  - (1) ST-2A, Residual Heat Removal (RHR) Pump Flow Rate Test, specifies acceptance criteria for one or two pumps per loop operation. TS 4.5.A.3 specifies that 3 pumps are to deliver 23,100 gpm at a Reactor Pressure of 20 psig. The surveillance procedure did not have a correlation of the two acceptance criterion. The licensee representatives stated that the TS requirement is outdated in light of the Low Pressure Coolant Injection (LPCI) Loop Selection Modification, and that a proposed TS change has been submitted in this area. The inspector verified the proposed TS change has been submitted via the corporate office.

This is unresolved pending disposition of the subject TS change by the Office of Nuclear Reactor Regulation (NRR) and subsequent NRC:RI review (333/79-02-03).

(2) ST-2A, RHR Pump Flow Rate Test, implements operability requirements of TS for the Crescent Area Ventilation System (area ventilation for various safety related pumps). During this review it was determined that differential pressure (d/p) switches for this system do not exist. TS 4.11.B.2 requires that the system's d/p switches are to be calibrated once/operating cycle. This was identified in a Quality Assurance Audit No. 271 conducted July 21 through 31, 1978. It was further determined that a proposed TS change has been submitted to delete the requirement to calibrate d/p switches for the system.

428 316

This is unresolved pending NRR disposition of the subject TS change and subsequent NRC:RI review (333/79-02-04).

(3) The acceptance criteria for ST 76C, Diesel Fire Pump Operational Check, references a figure which does not exist in the procedure. The intended figure to be used is the Tank Curve for the Fuel Oil Tank for the Diesel Fire Pump. Not all of the data reviewed had this figure attached. The figure has been reproduced in a book posted in the control room for operator use. Review of data for fuel oil tank level indicated compliance with TS 4.12.A.1 in this area. The licensee representative stated that the appropriate Tank Curve figure would be incorporated into ST 76C.

This is unresolved pending completion of licensee action as stated above and subsequent review by NRC:RI (333/79-02-05).

(4) ST-15F, Pressure Suppression Chamber - Drywell Vacuum Breaker Differential Simulated Automatic Actuation Test, require the use of a torque wrench for measurement of valve opening force; however, no provisions exist to identify the particular wrench used. The licensee representative stated that only one or two wrenches are capable of being used for this test. The licensee stated that provisions will be established in ST-15F to identify the specific torque wrench used.

The review of calibration data for these torque wrenches is being followed as an unresolved item (333/78-04-02) (paragraph 9).

This is unresolved pending completion of licensee action as stated above and subsequent review by NRC:RI (333,79-02-06).

(5) ST-16D, 125V D-C Battery Test Discharge, requires a test discharge at 281 amperes for approximately 8 hours to determine battery capacity. For the test conducted October 22, 1978, the station batteries appear to be in excess of 100% capacity. However, a recent License Amendment changed TS requirements in this area to include a service test in accordance with Regulatory Guide 1.129, Maintenance, Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants, which references IEEE Standard 450-1975. This standard requires that the service test be conducted at critical loads.

For the station batteries critical loads would occur on a loss of coolant accident coincident with a loss of off-site power. A review of records in this area indicated that various current plateaus occur at the critical load situa' on starting from approximately 1000 amperes. The inspector stated that ST-16D did not appear to meet the service test requirements. The licensee representative acknowledged the above and agreed to review this area for any procedural changes needed.

The inspector stated that since this service test is due during the next refueling outage (late 1979) NRC:RI will review this area within six months, subsequent to the licensee's review.

This is unresolved pending completion of licensee action as stated above and subsequent NRC:RI review (333/79-02-07).

### Performance of Surveillance Testing

- a. The conduct of ST-26J, Heatup and Cooldown, Revision 1, July 16, 1976. (Cooldown Portion) was witnessed to verify performance consistent with the approved procedure, including test prerequisites met, and to verify special test equipment was calibrated and in service. This test was performed on Mirch 15, 1979 in association with the Show Cause Order to be in Cold Shutiown (paragraph 3).
- b. No items of noncompliance were identified; however, the following unresolved items were noted.
  - (1) The control room operator recorded the cooldown rates based on plant computer data provided every 15 minutes. ST-26J provides the operator with the option of recording computer points, or data from individual temperature recorders. The inspector made inquiries with respect to the calibration data associated with the computer instrumentation which provides the rooldown rate data. The licensee representative could not readily provide information associated with periodic computer checks. The inspector stated that the licensee's use of computer data to support surveillance testing is considered an unresolved issue, and will be reviewed in conjunction with calibration program of components and equipment associated with safety related systems and/or functions (paragraph 9). (333/79-02-08)

(2) Review of data for ST-26J indicated that during four 15 minute periods (4:15 p.m. to 5:15 p.m.), the cooldown rate computed out to be 100.96°F per hour. The TS limit is 100°F/hour. The control room operator had initiated an occurrence report for management review of this situation. The inspector questioned licensee management as to the reportability of this event. Subsequent to this inspection, the licensee representative reviewed the recorder traces for temperatures (Reactor Vessel and Rec roulation Loops) used for a manual calculation of cooldown rate. The review indicated that the TS limit was not exceeded.

The inspector stated this area is unresolved perting NRC:RI review of a sociated recorded traces for the subject event and review of the licensee's method of maintaining records to substantiate cooldown (or heatup) rates measured in conjunction with ST-26J (333/79-02-09).

7. Technician Qualifications

Qualification records of selected technicians having responsibility for surveillance testing of safety related systems, and components were reviewed to verify that the individual's experience level and training were in accordance with the guidelines of ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel, Section 4.

No items of noncompliance were identified.

# 8. System Operating/Annunicator Response Procedures Upgrading

a. During the review of previous inspection findings regarding the Annunciator Response Proredures and System Operating Procedures (Unresolved items 333/78-01-03 and 333/78-27-02), it was determined that the upgrading program for these procedures had not been completed by February 1979. The licensee representative stated that this target completion date became outdated once the review of these procedures started and other discrepancies were noted.

During the review of previous inspection findings on completed valve line-ups, it became evident to the inspector that these check-off lists were in need of revision due to the numerous temporary changes and deviations noted. The licensee representative stated the upgrading of these valve line-up lists (associated with System Operating Procedures) are included in the review program for System Operating Procedures.

428

The licensee representative stated that, with respect to these three areas, (System Operating Procedures and associated Valve Line-ups, and Annunciator Response Procedures) it would be better to do a complete and adequate review on each procedure rather than issue revisions to clear up isolated discrepancies on a case-bycase basis. Based on the above the licensee representatives stated that a reasonable target completion date would be the end of the next refueling outage (end of 1979).

The inspector acknowledged the licensee's position as stated above. It was noted that an extensive tracking system had been established to monitor the completion of this upgrading program. This tracking system is addressed in an internal memorandum (E. Abbott to R. Pasternak of February 1, 1979). A review of the tracking system indicated that approximately 66 procedures had been identified for upgrading, 18 had been started, 13 were greater than 50% complete and 2 were 100% complete. The inspector stated that progress in this area will be monitored by NRC:RI throughout the year.

The inspector further stated that since the three unresolved items addressed above deal with the same set of procedures and since resolution of these items is dependent upon the Procedures Upgrading Program, these items are considered closed, administratively, and will be followed by NRC:RI monitoring of the System Operating Procedures Upgrading Program. To provide a base for subsequent inspections in the area, findings are summarized below.

- -- Adequacy of procedural coverage for Annunciator Response Procedure with respect to the system 1 st in Regulatory Guide RG 1.33. Procedures had not beer issued for all annunciators of the 125KV Offsite Access Circuit, Condensate and Feedwater System.
- -- Adequacy of procedural content for Annunciator Response Procedures with respect to requirements of RG 1.33. Discrepancies in this area were noted for Fuel Pool Cooling Temperature High, Flow Low Annunciators and Core Spray Subsystem and LPCI Subsystem Discharge Pipe Not Vented Annunciator.
- Temporary Changes of a permanent nature dating back to 1975 and 1975 need to be incorporated into System Operating Procedure revisions.

428 320

- -- OP-9, Revision 1, July 14, 1975, Main Turbine and Auxiliaries, requires major revisions in the area of format and technical content. Much of the procedure is system description with minimal procedural aspects coordinating the operations of components.
- -- System valve line-ups in need of revision based on completed line-ups for the sefueling. The deletion and addition of many valves were noted for the following procedures: OP-1, Main Steam; OP-2A, Feedwater; OP-24, Core Spray; OP-27, Recirculation; OP-28, Reactor Water Cleanup.

This area is unresolved pending NRC: RI review of licensee progress in upgrading System Operating Procedures and associated Valve Line-ups and Annunciator Response Procedure (333/79-02-10).

b. During the review of valve line-ups completed for the startup following the 1978 Refueling Outage (Unresolved item 333/78-27-02), it was determined that temporary changes were made to some of these valve line-ups without documentation in accordance with established administrative controls. Therefore, these emporary changes were not subsequently reviewed by the Plant Oper tions Review Committee (PORC) and approved by the Resident Manager. Further, administrative controls were not followed for certain valve line-ups with respect to documentation of reasons for valves in positions that deviate from the normal operating line-up.

Examples of failure to document temporary changes occurred in line-ups for OP-1, Main Steam System, OP-2A, Feedwater System, OP-14, Core Spray System, and OP-27, Recirculation System. Examples of failure to document easons for valve positions being off normal operating position occurred in OP-13, Residual Heat Removal System; OP-15, High Pressure Coolant Injection System; OP-20, Standby Gas Treatment System.

This represents noncompliance (infraction level) with Technical Specification 6.8(A) and 6.8(C) and AP-1.4, Control of Plant Procedures, Revision 2, February 16, 1978, paragraph 7.4.1, and Operations Department Standing Order No. 5, Valve (Electrical) Line-up Check-off Lists Review, Revision 0, July 7, 1978, paragraph 7.1 and 7.2 (333/79-02-11).

## 9. <u>Calibration Required by Technical Specifications of Components and</u> Equipment Associated with Safety-Related Systems and/or Functions

- a. The calibration program (addressed in Regulatory Guide 1.33 and ANSI N18.7) for components associated with safety-related systems was reviewed on a sampling basis. These components are used to monitor system parameters to comply with Technical Specification (TS) safety limits, limiting conditions of operation and surveillance requirements. Review of the sampled records verified the following.
  - -- Specific requirements have been established for the above calibrations including schedules and frequencies.
  - -- Procedures have been reviewed and approved in accordance with the Technical Specifications, contain acceptance criteria consistent with the Technical Specifications, and contain detailed instructions commensurate with the complexity of the calibration.
  - Technical content of procedures are adequate to perform a satisfactory calibration.
- b. The selected TS parameter, associated instrument calibration procedures (where appropriate) and data (indicated by date of performance), are listed below. A majority of the sample was selected from Operations Department Surveillance Procedures which are used to verify compliance with TS Surveillance Requirements. These Surveillance Tests (ST) are noted below by test number.
  - -- Vibration Meter (for Inservice Testing of Residual Heat Removal Pumps (RHR) - TS 4.5.A.2.b and c) (ST-2A) Model 306, s/n B330517179 - Data: February 9, 1979.
  - -- Nitrogen System Pressure for Automatic Depressurization System (TS 4.5.D.1.b) (ST-22B) 27-PI-122 used to verify setpoint of 27-PS-100 - Procedure CP-064, PM Instruction, Pressure Switch Barksdale, Revision 1, February 28, 1978 -Data: October 27, 1978.
  - Electric and Diesel Fire Pump Discharge Pressure (TS 4.12.A.1.b) (ST-76B and C) 76-PI-104 and 103 respectively - Procedure 1M<sup>2</sup>-G1, Pressure Indicator, Revision 0, February 7, 1977 -Data: March 7, 1977 and November 16, 1977 respectively.

- 18 322

- RHR Pump Discharge Pressure Gages (TS 4.5.A.2.b and c) (ST-2A) - Gages 106A, B, C, D Discharge and Suction Procedure IMP-G7, Balance of Plant Pressure Gauge Calibration, Revision 0, January 18, 1977 - Data: January 18, 1977 and February 18, 1977. RHR Flow (TS 4.5.A.2.b) (ST-2A, 10-FT-109A and B and 10-FI-133A and B - Procedure F-IMP-10.1, Residual Heat Removal System RHR Loop A. Revision 3, August 1978, and F-IMP-10.2, Residual Heat Removal System RHR Loop B, Revision 2, August 1978 -Data: March 15 through 17, 1977. Reactor Vessel Temperature Recorder (TS 4.6.A.1) 2-3-TR89 -Procedure F-IMP-2-3.5, Reactor Vessel Instrumentation Temperature. Scheduled but no data available for review Turbine Bypass Valve Position (TS 4.5.D.1.b) (ST-22B) Not scheduled and no data available for review. Pressure Indicator to verify Diesel and Electric Fire Pump -Start pressure switches (TS 4.12.A.1.b) (ST-76B and C) 76-PI-10 - Not scheduled and no data available for review. Emergency Service Water Pump Discharge Pressure (TS 4.11.D.1.b) - 46-PI-118A and B - Scheduled but no data available for review. Diesel Generator Loadmeters (TS 4.9.B.1) - Not scheduled and no data available for review.
- Emergency Service Water Intake Deicing Heater Ammeter (TS 4.11.E.1) - Not scheduled and no data available for review.
- -- Torque Wrench used in conjunction with ST-15-F, data available in Maintenance Department.
- c. As noted in the above listing not all of the sampled instruments were identified on the program schedule. Further, not all of the associated data was readily available for review. The inspector stated that these are preliminary findings in support of a more detailed review by NRC:RI of the established program schedule, procedures and completed data, and that this more detailed review would occur during a subsequent inspection.

This area (Unresolved item 333/78-04-03) remains open pending further review by NRC:RI.

It was further noted that Quality Assurance Audit No. 287 dated February 20, 1979 was conducted in this area and this audit did not identify similar findings.

10. Unresolved Items

Unresolved items are findings about which more information is needed to ascertain whether they are acceptable or items of noncompliance. Unresolved items reviewed/disclosed during this inspection are in paragraphs 2, 4.c, 5.d(1) through (5), 6.b.(1) and (2), 8.a and 9.c.

11. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on March 16, 1979. The scope and findings of the inspection were summarized. Subsequent discussions of the inspection findings occurred in telephone conversations between Mr. J. Leonard, Resident Manager, and Mr. R. Conte, NRC:RI on March 20, 1979 and April 25, 1979 and between Mr. V. Childs, Assistant to the Resident Manager, and Mr. Conte on March 21, 1979.

428 325