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

REGION IV

Report No. 50-445/79-18; 50-446/79-18

Docket No. 50-445; 50-446 Category A2

Licensee: Texas Utilties Generating Company
2001 Bryan Tower
Dallas, Texas 75201

Facility Name: Comanche Peak, Units 1 & 2

Inspection at: Comanche Peak Steam Electric Station, Glen Rose, Texas

Inspection conducted: August and September 1979

Inspector: W. J. Hubach 10/17/79
for R. G. Taylor, Resident Reactor Inspector, Projects Section Date

Approved: W A Crossman 10/17/79
W. A. Crossman, Chief, Projects Section Date

Inspection Summary:

Inspection for August and September 1979 (Report No. 50-445/79-18; 50-446/79-18)
Areas Inspected: Routine inspection by the Resident Reactor Inspector (RRI) of safety related construction activities including installation and welding of reactor coolant and other piping systems; electrical cable and component installation and testing; placement of containment concrete; equipment maintenance and storage; Authorized Nuclear Inspector activities; calibration of tools and equipment; and follow up on previously identified inspection findings. The inspection involved one hundred forty-seven inspector-hours by the RRI.
Results: Of the nine areas inspected, no items of noncompliance were identified in six. Four items of noncompliance were identified in three areas (infraction - failure to follow procedures for calibration of welding machines - paragraph 9.b.(2); infraction - failure to train and indoctrinate QC personnel - paragraph 6.a.; deficiency - failure to properly record inspections - paragraph 8.b.; and deficiency - failure to control QC inspection stamps - paragraph 8.c.).

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DETAILS

1. Persons Contacted

Principal Licensee Employees

*R. G. Tolson, TUGCO, Site QA Supervisor
*D. N. Chapman, TUGCO, QA Manager
*J. B. George, TUSI, Project General Manager
*J. R. Merritt, TUSI, Construction & Engineering Manager

Other Persons

*U. D. Douglas, Brown & Root Construction Project Manager
*J. P. Clark, Brown & Root Project QA Manager
*J. V. Hawkins, Brown & Root QC Supervisor

The RRI also interviewed other licensee and contractor employees during the inspection period. The RRI also interviewed one of the Authorized Nuclear Inspectors assigned to the site by Hartford Steam Boiler.

*Denotes those persons with whom the RRI held on-site management interviews.

2. Action on Previous Inspection Findings

(Open) Infraction (50-445/79-11): Failure to Implement the Quality Assurance Program for Civil Construction. The licensee notified RIV by letter dated June 12, 1979, that action had been taken to instruct construction concrete supervisory personnel of their responsibilities for involvement in concrete activities in the future. The RRI interviewed the appropriate supervisory personnel involved and ascertained that necessary specific instructions have been issued and emphasized. The item remains open pending completion of the investigation of the in-place concrete by the licensee's consultant.

(Closed) Infraction (50-445/79-04; 50-446/79-04): Failure to Follow Equipment Maintenance Instructions. The licensee notified RIV by letters dated March 20 and April 12, 1979, of the immediate and long term preventive and corrective actions related to this infraction. The RRI verified that all measures committed to in the letters have been implemented and, therefore had no further questions.

3. ASME Certification System

The RRI verified that the licensee and his contractor have been authorized to accomplish piping system fabrication and installation by the American Society of Mechanical Engineers (ASME) as follows:

a. The FSAR, in Section 3.2, indicates the applicable Code version in effect for piping systems to be ASME Section III, 1974. The actual Code in effect is the 1974 version through the Summer 1974.

Addenda. This was the Code version in effect when the Construction Permit was issued and is reflected through the various applicable project specifications.

b. The licensee has obtained ASME Certificates of Authorization, N-1395 and N-1396, for CPSES Units 1 and 2, respectively. The licensee has required, through appropriate project specifications, that on-site fabricators and installers of piping system components be in full compliance with the ASME Codes.

c. Brown & Root, Inc., the site fabricator and installer of piping system components, has obtained Certificates of Authorization, N-2222-2 for installation of Class 1, 2, and 3 and Class CS components, parts and appurtenances; and N-2223-3 for fabrication of component parts and piping subassemblies.

d. Both Certificates of Authorization, indicated in c. above, are site specific extensions based on an ASME survey of site activities.

e. The RRI has verified that the Brown & Root activities at CPSES are consistent with the functions required of and allowed to an NA and NPT Certificate holder.

f. Both the licensee and Brown & Root have inspection agreements with Hartford Steam Boiler Insurance and Inspection Co. (HSB) to provide code required inspections. There are currently four Authorized Nuclear Inspectors assigned by HSB to the site.

g. The RRI interviewed one of the Authorized Nuclear Inspectors (ANI) assigned to the site to ascertain his assessment of the effectiveness of the Brown and Root program for fabrication and installation of the ASME Code controlled piping systems and how the ANIs interfaced with this program. The interview was also undertaken to ascertain underlying problems alluded to in a newspaper article.[1/] The article indicated that the ANI group was very "upset" with Brown and Root operations and as a result did not perform their function early in August 1979 which was in part manifested by playing of dominoes and watching TV rather than performing their mission. The ANI interviewed stated that the group frequently played dominoes during their lunch period and sometimes a little beyond to finish a game. He indicated that, on an occasional Saturday, they had been called in to review documentation (with no direct inspection effort required) and that they had brought

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1/ "Morale Blamed in N-Plant Problems," Fort Worth Star-Telegram, September 8, 1979.

in a TV set to watch a ballgame while doing their work. He stated that nothing occurred early in August that was particularily "upsetting".

He further stated that there had been differences of opinion between his group and Brown and Root over interpretations of the Code and the approved Brown and Root QA manual, but that these were being resolved. He also indicated that his group perceived a lack of attention to small, but necessary, details in the welding documentation that caused his group to often have to review the documentation several times in order to obtain satisfactory correction.

The RRI had no further questions relative to the functioning of the ANI group at the site.

4. Reorganization of Quality Assurance

The licensee and Brown & Root have recently implemented several changes in personnel assignments, some of which have caused the organizational structures to change.

The licensee's Product Assurance group has been abolished with all the group personnel assigned to staff functions in support of the Brown & Root QC Supervisor. Brown & Root has subcontracted with Gibbs & Hill for the services of one their employees to fill the position of QC Supervisor with the stated expectation that this person has the background of experience and knowledge to better train and motivate the some two hundred Brown & Root personnel assigned to perform QC functions.

In addition, Brown & Root has expanded the role of the QA Engineering group and has assigned additional qualified personnel in an effort to provide more explicit direction in the QA/QC procedures and instructions. These changes have not affected Chapter 17.1 of the Final Safety Analysis Report. Site QA/QC procedures describing these changes in functions and responsibilities are currently being changed to reflect the actions.

The RRI has been fully informed of the above changes before the fact and has no questions on the matter to date.

5. Site Tours

The RRI toured one or more plant areas several times each week during the inspection period to observe the progress of construction and the practices

involved. Five of these tours were made during a portion of the labor force second shift which is now significantly different in makeup than it has been for the past year. Previously, the labor makeup on the second shift consisted of essentially all of the applicable craft types and was on the order of being nearly one-third of the entire labor force. Recently construction management altered the makeup by making the second shift significantly smaller with a very heavy emphasis on electrical type work, along with some concrete reinforcing steel and form-work installation.

The second shift now appears to be ten to fifteen percent of the total labor force. Several of the inspection findings, particularly those relating to electrical installation activities, were based on observations of second shift work.

No items of noncompliance or deviations were identified.

6. Electrical Cable Installation and Testing

a. Installation, Testing and Documentation of Tests

The RRI observed the installation of several safety related electrical cables during the period. The bulk of these cables observed were being installed between field run cable termination cabinets in the Unit 1 cable spread room and the Unit 1 control room area. The cables observed were hand placed in the cable tray or conduit, hand dressed for final position and tied individually into their final positions.

The work accomplished by the electricians appeared to be in compliance with site Procedure EEI-7, "Cable Pulling," and was documented on engineer furnished "Cable Pull Cards" as required by Procedure EEI-6, "Cable Pull Cards and Vault Control." The QC personnel inspecting the work in progress appeared to be knowledgeable of requirements as delineated by their Procedure QI-QP-11.3-15, "Electrical Cable Installation Inspection."

The RRI visually traced selected portions of each cable and verified that the cable had been run through tray and conduit sections specified on the appropriate cable pull card. The RRI also verified that randomly selected sections of cable tray were smooth and free of burrs which might damage the cable. The RRI observed the electricians verifying that conduit was ready for use by pulling a swab through the conduit.

The RRI observed several safety related cables in the control room being tested for dielectric resistance with a Biddle Co. "megger". This activity, which is controlled by Instruction EEI-5, "Meggering of Class IE Cable," and QI-QP-11.3-17, "Inspection of Class IE Cable Meggering and Continuity," was performed by two electricians and observed by two QC inspectors. The RRI observed that the electricians were accomplishing their activities in accordance with the procedure and good practices, while the QC inspectors were verifying that each wire

in the cable was tested. The RRI observed, however, that the QC inspectors were not verifying the identification of the cables in test. The RRI subsequently determined that two of the five cables observed being tested had been inadvertently misidentified, a fact that neither the electricians nor the QC inspectors had detected. After a brief discussion with the inspectors and their immediate supervisor, the RRI determined that inspectors appeared not to have been given proper instruction.

The RRI brought the matter to the attention of the licensee as an item of noncompliance with a basic requirement of Criterion II of Appendix B, to 10 CFR 50, i.e., that personnel must be trained and indoctrinated in their activities if they affect quality.

b. Calibration of Test Equipment

The RRI selected the Biddle "megger" used in the above test to use as a vehicle for an inspection of the Brown & Root operated calibration laboratory for various tools, gages and electrical measurement devices used to assure proper installation of equipment and/or measure proper performance of installed equipment. Concurrent with this selection, the RRI was made aware of allegations of "downgrading" in the laboratory made to another IE inspector. The RRI visited the laboratory and examined the records pertaining to the selected Biddle "megger" which was still in the field. The record indicated that the device had been calibrated to a laboratory procedure and was well within the calibration span period. The RRI randomly selected another identical "megger" that was still in the laboratory and asked the calibration technician of record to demonstrate the procedure. This the technician did immediately and without hesitation.

Discussions with the calibration technician indicated that he has a substantial background in electronic technician training and experience. A subsequent review of his resume' correlated well with the discussion and with the RRI's observation of his individual proficiency.

During the discussions, the technician related that he was in the process of changing the calibration procedures for some equipment, including the "megger", since the existing procedure placed more severe tolerances on the accuracy of the equipment than had been guaranteed by the manufacturer. The technician indicated that this situation had developed because Brown & Root had obtained the calibration procedures for the equipment from the LTV Corporation and they had been prepared originally for more precise equipment than is used on site. The RRI compared the existing procedural tolerances with those contained in the manufacturer's manual for the "megger" and noted the situation

was as stated by the technician. The RRI had no question as to propriety of the decision to change the tolerance requirements for the equipment since neither the project specification nor industry practice place tight tolerances on equipment used for such activities as "meggering". The technician assured the RRI that the changes in the procedures had the full approval of his supervision and when officially accomplished would have the signature approval of supervision.

The RRI had no further questions regarding the calibration program but will pursue the activity as a routine inspection matter.

7. Reactor Vessel & Vessel Internals Storage and Maintenance

The RRI observed, several times during the inspection period, that both the Unit 1 and 2 reactor vessels were adequately protected from damage and from contamination. The Unit 1 reactor vessel internals remain in their special enclosures which appear to provide adequate protection.

8. Installation of Electrical Components

a. Pre-installation Handling of Hot Shutdown Panel

The RRI observed a portion of the pre-installation handling of the Hot Shutdown panel in the Unit 1 Safeguards Building. The portion observed was primarily that of hoisting the panel from the ground floor through an opening in the second floor and onto the second floor where the panel would be installed.

The RRI reviewed the "Operation Traveler" for the operation and examined the hoisting equipment. The RRI initially observed that the "traveler" contained only a minimum of instruction to the working personnel and that these personnel had exceeded these instructions by providing more lifting capacity. The RRI observed that only four of eight lifting eyes on the top of the cabinet were being utilized to hoist the equipment and observed that the "traveler" was silent in this matter. The RRI subsequently researched the vendor data on the cabinet and found that the vendor was also silent on the lifting requirements.

The RRI pointed out the apparent inconsistency of having eight lifting eyes available on the Unit but only using the center four and questioned what effect this might have on the structural integrity of the panel.

This matter will be considered as unresolved.

b. Record of Inspection

The RRI also observed that the racks for holding the Class IE batteries in place appeared to be complete. The RRI inquired of the licensee representative as to what instructions had been followed and how the inspection had been documented. The representative informed the RRI that all of this data should be on an "Operations Traveler" and since the work was complete, the "traveler" should be in the QA records vault, which proved not to be the case. After approximately two days, the representative found the "traveler" and provided a copy to the RRI. The copy indicated that CPSES QC Inspector Number 16 had stamped and dated the record as indicating the inspection had been accomplished on September 5, 1979. The RRI verified by interview that the work had actually been accomplished six to eight weeks earlier but that the "traveler" had apparently been lost and was not available to the QC inspector when the work was in progress.

The RRI pointed out that this condition was in violation of Criteria V and XVII and a Notice of Violation would be issued.

c. QC Inspector Stamp

Although not specifically connected with the matter of electrical equipment installation, the above series of events brought to light another matter involving the QA/QC activities. Approximately one year ago the licensee purchased and distributed numbered stamps to the Brown & Root QC personnel to be used as a means of identification of the person making an inspection rather than using the initials of the inspector which on occasion are nearly illegible. Procedure CP-QP-15.1 discussed the controls to be implemented to prevent the stamps from falling into the hands of unauthorized personnel. The RRI discovered, that while the procedure had been initially implemented properly, it had fallen into disuse during the past few months. One specific instance that became apparent involved a person who had been issued a stamp while he was a member of the QC organization but had not been required to surrender the stamp when he was reassigned to the site engineering organization nor had he been required to surrender it when he terminated his employment at the site, both of which are requirements of the procedure.

It was pointed out that this matter was contrary to the requirements of Criterion V and will be contained in the Notice of Violation.

9. Reactor Coolant and Safety Related Piping System Installation & Welding

a. Observation of Piping Systems Welding

The RRI observed a portion of the manually performed repair welding of Field Weld (FW) 19 in the reactor coolant loop. The welder appeared to be adquately skilled for the activity and was complying with the weld procedure parameters. The RRI verified that the welder, the welding procedure, and the weld filler metal were qualified as required by the applicable ASME code governing the work.

The RRI also observed a portion of the welding of FW-4a as identified on isometric drawing BRP-SI-1-RB-038a in line 10-SI-106-2501R2. This weld, which was being made using a Dimetrics welding machine, was being made in very close confinement. The RRI was of the initial opinion that the limited access to the weld area might well place the weld within the purview of Regulatory Guide, 1.71, "Welder Qualification for Areas of Limited Accessibility," to which the licensee is committed in the FSAR. Initial discussions with the welders indicated that the close quarters were making the welding somewhat more than usually difficult. The RRI reviewed the "Weld Data Card" for the weld and found no evidence of a decision by QC as to whether the weld was considered to be limited access as is required by procedure where there is a question. The RRI discussed the matter with representatives of the license QC organization and with members of the welding engineering group. These persons stated that they had considered the weld for application of the Regulatory Guide but had determined that as long as the welding machine could travel around the joint, the joint could not be considered limited access. The RRI again observed the welding of the joint and had no further questions.

The RRI examined radiographs of the following welds during the period:

a. FW-2 on isometric RH-1-RB-002 in line 12-RH-1-022-2501R1

b. Fw-6 on isometric RH-1-RB-002 in line 12-RH-1-900-2501R2

c. Shop weld W-17 on isometric RC-1-RB-028B in line 6-RC-1-098-2501R1

d. FW-7 on isometric SW-2-FB-FB-04 in line 30-SW-2-012-150-3

The above radiographs indicated weld quality commensurate with the requirements of ASME Section III with radiographic quality as required by ASME Section V.

b. Investigation of Allegations in Regard to Piping Activities

The RRI also looked into two allegations related to piping activities. The allegations, while not directly safety related, could have a bearing on the effectiveness of construction management and reflect upon the site QA/QC program implementation.

(1) Grinder Trapped in Pipe

One of the allegations which appeared in the September 13, 1979, issue of Fort Worth Star-Telegram dealt with a story of craft personnel using the piping system as a "bedroom". In an instance related in the news article, one of the craft personnel had allegedly been welded into a pipe section after having fallen asleep in the pipe. The RRI initially heard the allegation from the alleger involved in Inspection Report 50-445/79-12; 50-446/79-12.

The RRI inquired of QA/QC and construction management in regard to any incidents of this type which may have occurred during the spring of 1979. (The time period it had to have occurred for the alleger to have this knowledge.) Subsequently, a pipefitter came to the RRI and related an incident which might have given rise to the story. The fitter related that he had volunteered to go into a fourteen inch pipe to grind the inside of a weld joint that had been rejected by radiographic test. This involved entering a 90^{o} elbow, descending about twenty feet, turning over and going through another elbow and a valve to reach the joint. When he was about half finished with the joint, he decided to get out to rest only to discover that he could not turn his body as required to come backwards through both of the elbows and was effectively trapped in the pipe.

The fitter related that the people with him on the outside were ready to cut a joint to let him out but soon found a valve further down the pipe where he could get out with the valve bonnet removed, which was done. The time frame for this incident coincides with the original alleger's employment on the site and may have been the basis for the allegation, even though out of context with the facts.

(2) Calibration of Automatic Welding Machines

The RRI investigated another allegation that had been received through another IE inspector regarding the calibration of the

Dimetrics automatic welding machines. (Calibration of welding machines is not an ASME Code nor NRC requirement unless such calibration is necessary in the control of the welding process.) Many machines in use, in and out of the nuclear field, do not have an instrumentation on them. When knowledge of the measurable welding parameters is required, separate calibrated instruments are connected to the welding leads to measure the welding parameters in order to verify that the welder is welding within the weld procedure requirements, not to verify that the machine is operating properly. The licensee is committed to and has implemented such a program which is applicable to all welding of a safety related nature whether accomplished by machines or manually.

The Dimetrics machines are sophisticated, electronically controlled units which have the capability of adjusting themselves to accommodate several variables usually encountered in welding. (During manual welding, these variables are usually adjusted by welder technique.) The machine operator has control facilities available to him to adjust the center point of the automatic correction range and it is desirable that these adjustments be accurately indicated. The RRI found that a select group of pipefitters had been charged with the responsibility for maintaining, adjusting and calibrating the machines. Discussions with several of these personnel indicated that, in reality, they were electronic technicians administratively assigned to the pipe department.

The RRI reviewed the procedures of the group, which are the recommended manufacturer's procedures, and reviewed records of the calibrations. The lead pipefitter-technician indicated to the RRI that he has taken care of the machines almost since their receipt at the site, but that he previously was under the Welding Engineering Department where the work had been performed under Procedure WCP-6. Now that he worked in the Pipe Department, he worked entirely to the manufacturer's procedure.

The RRI reviewed a copy of WCP-6 entitled, "Electronic Alignment, Performance Verification and Maintenance of Dimetrics Automatic Welding System." It was determined that the Brown and Root, Houston based welding engineering center had established requirements that the steps of performance verification (calibration) be accomplished by QA/QC and that the site welding engineering also verify, at a relatively high frequency, that the machine output correlate accurately with manual adjustment indications on the machine control unit. Further discussions with QA/QC management personnel revealed that they have not accomplished the requirements of the procedure, nor has welding

engineering. It appeared to the RRI that the groups were not aware of the requirements of the procedure and/or that they thought that the procedure had been cancelled.

The RRI determined that the weld parameter monitoring program discussed above verifies with adequate frequency that the machine output is within the range allowed by the qualified weld procedure even though this may not be accurately indicated by the machine control unit.

The RRI pointed out to the licensee that he was in noncompliance with Criterion V of Appendix B in that a procedure was issued by the licensee's agent for application at the site and that it was not being followed.

10. Installation of Unit 1 Containment Electrical Penetrations

The RRI observed the installation effort relative to electrical penetration IE-60 which was the seventh of approximately seventy-five to be installed.

The RRI observed the uncrating of the component, (which is manufactured by Amphenol-Sams), the pre-installation inspection by assigned QC personnel, and the insertion of the component into the designated containment nozzle. The craft and QC personnel were performing the required activities in accordance with a detailed "Operations Traveler" specifically prepared for the unit. The two QC personnel assigned to the activity appeared to be both diligent and knowledgeable of requirements.

No items of noncompliance or deviations were identified.

11. Equipment Maintenance

The RRI selected four identical components for inspection of the Brown & Root equipment maintenance effort during the period. These items were the Unit 1 containment spray pumps and their electric drivers. The pumps and three of the drivers were observed to have been installed during several tours of site at an earlier time. The pumps are maintained by the millwright group of construction, while the drivers are in part maintained by electricians and in part by the same millwright group caring for the pumps.

The RRI initially reviewed the Ingersoll-Rand manual for the pumps and the Westinghouse manual for the drivers to obtain the manufacturer's recommended storage maintenance procedures. The cards in the files of the millwrights, for both the pumps and their portion of the work on the drivers, reflected these manufacturers' requirements accurately and appeared to have been accomplished in accordance with these instructions. The records of the electricians likewise reflected the accomplishment of their scope of required work. The single driver not installed was identified through the records as not yet having arrived on the site and therefore as not being within the program.

The RRI interviewed the QC personnel of record for the most recent maintenance actions and found them to be knowledgeable of the requirements for the units.

No items of noncompliance or deviations were identified.

12. Unit 2 Containment Concrete Placement Activities

a. Placement 201-5805-026

Early in the inspection period, the RRI observed, over a span of several days, the activities involved in preparing for and the placing approximately 460 cubic yards of concrete in the wall of the Unit 2 containment between elevations 955 to 961 feet. The placement is identified in the construction documentation as 201-5805-026.

The RRI selectively verified that reinforcing steel in accordance with the design drawings had been installed in the area of examination. Several "Cadwelds" were examined by the RRI and gave the visual appearance of having been satisfactorily made. The qualification data and the sequential test records for the "Cadwelders" were inspected and found to meet requirements. The RRI examined the form work for clearance and cleanliness at the initiation of placement of the concrete and also found that requirements had been satisfied. The actual placement of concrete during the time of observation was accomplished in a workmanlike manner

The RRI visited the concrete batch plant and aggregate storage areas during the placement span and found everything in order with the exception that a portion of the automatic electronic control of the batch plant had failed. The batching facilities were, however, being properly manually controlled to provide the ingredients required for the grout and normal concrete mixes.

The RRI also verified that the licensee QC personnel assigned to the actual placement, to the concrete test stations and to the batch plant were present and attentive to the activities for which they were responsible.

No items of noncompliance or deviations were identified.

b. Placement 201-5805-032

On September 4, 1979, the licensee Site QA Supervisor notified the RRI that a quantity of shear tie reinforcing steel (cross-connecting the reinforcing steel on the inside face of the wall to the outside face steel) had been omitted from placement 201-5805-032. The omission was reported by an ironworker foreman. The shear ties are additional steel comparable to reinforcement utilized throughout the entire elevation and were called for in the design to take localized stresses just below the springline of the wall to the building hemispherical dome.

The licensee stated that the engineer had directed the placement of the missing steel in the next placement (201-5805-033) and that the structural integrity of the containment was not affected. The RRI inquired as to why this matter had not been reported to the RRI as a "potential" significant construction deficiency in accordance with 10 CFR 50.55(e) at the time of initial identification of the problem on August 27 rather than after the fact on September 4, 1979.

The licensee informed the RRI that he had applied the various judgemental factors involved in 50.55(e) and had determined that the matter was not significant and therefore, not reportable. The RRI reviewed the documentation and reported the situation to Region IV management. Subsequent discussions between licensee and NRC management resulted in the licensee issuing a stop-work order on further concrete placement in the Unit 2 wall and dome pending a thorough technical review of the matter. These discussions and confirmation of the stop-work order were documented in a Region IV letter to the licensee dated September 7, 1979.

The licensee's Architect/Engineer developed an engineering analysis indicating that the additional steel placed into concrete placement zone 201-5805-033 adequately compensated for the added steel missing in 201-5805-032.

The licensee and personnel representing the A/E met with NRC personnel on September 14, 1979, to discuss the technical details of the engineer's analysis and to discuss the measures proposed by the licensee to prevent such occurrences in the future. The licensee proposed to augment his normal QC operation, which had missed the original reinforcing steel shear tie omission through human error, with a documented special inspection by the ironworker supervision and an additional ironworker steel detailer.

The licensee released the stop-work order on September 18, 1979, after the RRI verified that the committed additional actions had taken place.

13. 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. One such unresolved item is discussed in paragraph 8 of this report.

14. Management Interviews

The RRI had interviews with one or more of the licensee and construction management persons designated in paragraph 1 on September 4, 6, 7, 11, 12 and 13, 1979. The RRI's inspection findings and certain licensee actions within the period were discussed.