

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

Region I

Report No. 50-485/78-02

Docket No. 50-485

License No. CPPR-156 Priority -- Category A

Licensee: Rochester Gas and Electric Company

89 East Avenue

Rochester, New York 14649

Facility Name: Sterling Power Project Nuclear Unit No. 1

Inspection at: SNUPPS Home Office, Gaithersburg, Maryland

Inspection conducted: November 20-22, 1978

Inspectors: J. C. Mattia
J. Mattia, Reactor Inspector, RI

12/18/78
date signed

R. W. McGaughy
R. W. McGaughy, Reactor Inspector, RIV

12/21/78
date signed

E. Schweibinz
E. Schweibinz, Reactor Inspector, RIII

12/21/78
date signed

Approved by: R. W. McGaughy
R. McGaughy, Chief, Projects Section,
Reactor Construction & Engineering Support Branch
Region I

December 21, 1978
date signed

Inspection Summary:

Inspection on November 20-22, 1978 (Report No. 50-485/78-02)

Areas Inspected: Routine, unannounced inspection by regional based inspectors of aspects of the Quality Assurance Program relating to the control of design and procurement, overall conduct of the audit program and document control. The inspection involved 48 in-office inspection-hours by three NRC regional based inspectors.

Results: Of the four areas inspected, no items of noncompliance were identified.

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DETAILS

1. Individuals Contacted

SNUPPS Organization

- *Mr. W. W. Baldwin, Administrator Manager
- *Mr. E. Beckett, Licensing Manager
- *Mr. N. A. Petrick, Executive Director
- *Mr. F. Schwoerer, Technical Director
- *Mr. S. J. Seiken, QA Manager

* denotes those present at the exit interview.

2. Management Reviews

The IE inspector reviewed the implementation of SNUPPS Staff Administrative Control Procedure (ACP) 2.5, Revision 2 (10/20/75), "Management Reviews of the Quality Assurance Program," by discussion with responsible staff members. Review of applicable documents was conducted including: (1) procedures (for administrative review and approval); (2) audit reports (for adequacy of management review and response); and (3) meeting minutes (for involvement of SNUPPS management in significant quality matters).

The IE inspector concluded that management is conducting reviews of the QA program as prescribed.

No items of noncompliance were identified.

3. Corrective Action Reports

The IE inspector reviewed the following documents pertaining to the Corrective Action System:

- a. SNUPPS Staff Administrative Control Procedure 10.1, Revision 1 (1/2/75), "Corrective Action System"
- b. SNUPPS Standard QA Manual, Section B-10, Revision 6 (12/9/77), "Corrective Action"
- c. SNUPPS Staff File 0491.10.1, "Corrective Action Reports and Log"

After discussion of the procedures and current activities with the appropriate SNUPPS Staff QA member, the following was determined:

- a. There is very low activity in this area. Corrective action reports, as defined in the above procedures, are only used by one utility.
- b. Activities affecting quality and in need of correction are handled in letters, audit reports and unique AE and utility corrective action reports.
- c. The scope and application of the corrective action system, as noted in the above procedures, are not clear and do not appear to be fully implemented. This is based on the apparent low level of reports from the utilities and AE and the use of an unauthorized form for the log.

The SNUPPS QA Manager stated that above procedures and their implementation would be reviewed during the next SNUPPS QA Committee meeting. The proper log form was utilized prior to the end of the inspection.

This item is considered unresolved pending review of the procedure by the SNUPPS QA Committee. (485/78-02-01)

4. Quality Assurance Records

The IE inspector reviewed the implementation of the Quality assurance record system by discussion with responsible SNUPPS staff members, inspection of record keeping facilities, and examination of appropriate documents as listed below:

- ACP 12.2, "Quality Assurance Records," Revision 3 (3/18/77)
- Surveillance Report: Control of Design Documents SLS 78-109 (File 0491.4.1) of 11/16/78
- Review of Bechtel Control Logs (August, September and October 1978), SLS 78-116 (File 0491.4.1) of 11/13/78
- QA Records Index, SLS 7-36 (Interoffice Memo File 0491.12) of 2/17/77

The IE inspector determined that the QA records are being maintained in accordance with the requirements of ANSI N45.2.9 - 1974 and ACP 12.2 in that:

- a. An index is provided specifying record title, date, retention times and file location.
- b. QA records to be controlled are identified.
- c. Audits have been conducted that verify accurate records are identified, stored and maintained.
- d. A plan is being developed for turnover of appropriate records to the SNUPPS utilities.
- e. Records are stored in a secure area which protected the records against possible destruction.
- f. Monthly survey surveillances and monitoring of records are conducted to assure records are logged in, available and properly stored, to assure control system is adequate, and to ensure facilities are in good functional condition.

No items of noncompliance were identified.

5. Audit Program

The IE inspector reviewed the implementation of the internal and external audit program being conducted by the SNUPPS staff. Discussions were held with appropriate staff members involved in audits. The following documents were examined:

- a. ACP 13.1, "Audit Program," Revision 4 (1/13/77)
- b. SNUPPS Standard QAM B-13, "Audit and Surveillance," Revision 4 (5/12/75)
- c. Surveillance Report, Implementation of ACP 13.1, SLS 78-118 (File 0491.13.3) of 11/14/78
- d. Audit Schedules September 1978 - August 1979 for: (1) SNUPPS Audit Program for Bechtel; (2) SNUPPS Internal Audit Program; and (3) Nuclear Projects Incorporated (NPI) Procurements; SLS 78-87 (File 0491.13.3)
- e. External Audit Log 11/73 - 11/78
- f. Internal Audit Log 6/74 - 8/78

- g. Other Audits Involving SNUPPS Participation (Log) 7/73 - 11/78
- h. SNUPPS Audit of Bechtel Internal Audit Program 9/27/78 - 10/18/78
SLBM 78-381 (File 0492.13.1) of 10/23/78

The IE inspector concluded that the SNUPPS audit program is being conducted in accordance with the requirements of ANSI N45.2.12-1973 and applicable SNUPPS procedures. Specifically:

- a. Audits are planned.
- b. Audit team members are qualified.
- c. Audits are scheduled and concluded as required. One instance of a lack of audit coverage was identified during an internal audit.
- d. Audit reports are complete. Responses and resolutions to identified problems are received and evaluated.
- e. Copies of audit reports are sent to the audited organization and records are maintained of audits conducted.

No items of noncompliance were identified.

6. Processing of Nonconformance Reports

During the inspection, the IE inspector reviewed Section B-9, "Nonconforming Material Control," Revision 8 (10/27/78). This procedure requires all nonconformance reports, within the SNUPPS concept, to be forwarded to the lead A/E or NSSS supplier for action. In practice, beginning about July 1978, the site representative for Bechtel (the lead A/E) is now reviewing and dispositioning a larger portion of the NCRs. Specific guidelines and agreements are identified in various letters and meeting minutes. Emphasis on a field dispositioning system has decreased the time required for dispositioning. Approximately 16% of all NCRs are now sent to the Gaithersburg office of the lead A/E versus approximately 60% earlier.

No items of noncompliance were identified.

7. Review of Standard Plan PSAR Revisions

The following procedure was reviewed for its adequacy and to establish the commitments by which the chosen records would be audited: SNUPPS.

Staff Administrative Control Procedure (ACP) No. 3.3, Revision 3, dated February 10, 1977, titled, Revision of the Standard Plan PSAR, Site Addenda and Environmental Reports.

The inspector selected records which pertained to review and approval of PSAR change notices. The handling of these documents was reviewed to verify compliance with the applicable procedures:

- a. PSAR Change Notice No. 1-78, with regard to reinforcing cover tolerances in the reactor building.
 - (1) Bechtel letter to SNUPPS proposing the change, BLSE 5526, dated February 7, 1978, transmitting this change as PSAR Change Notice No. 37-77.
 - (2) Bechtel letter to SNUPPS, BLSE 5575, dated February 24, 1978, reassigning PSAR Change Notice 37-77 to PSAR Change Notice No. 1-78.
 - (3) SNUPPS letter to NRC, SLNRC 78-03, dated February 13, 1978, requesting change to PSAR on the above subject.
 - (4) SNUPPS letter cancelling PSAR Change Notice No. 1-78, SLBE 78-349, dated April 10, 1978.
- b. PSAR Change Notice No. 32-77, in regard to revised descriptions on use of easily decontaminated coatings.
 - (1) Bechtel letter to SNUPPS proposing change, BLSE-5110, dated November 7, 1977.
 - (2) SNUPPS letter to Bechtel requesting evaluation of this change with regard to radiation exposure requirements. SLBE 78-116, dated February 8, 1978.
 - (3) Bechtel letter to SNUPPS providing evaluation of the above change and a cost savings estimate, BLSE 5788, dated April 3, 1978.

No items of noncompliance were identified.

8. Review of Correspondence Control

The following SNUPPS Administrative Control Procedure (ACP) was referred to during the course of the inspection for commitments made for the control of all outgoing correspondence: SNUPPS Staff Administrative Control Procedure No. 5.1, Revision 6, dated November 17, 1978, titled, Correspondence and Commitment Control.

It is a requirement of each cognizant member of the SNUPPS staff to obtain written concurrence of other staff members involved with or affected by proposed responses that involve outgoing correspondence. The concurrence of the Executive Director, or in his absence a staff member other than the author, shall be obtained for all outgoing correspondence. Such concurrence shall be reflected by the individual's initials on the initial Record Note Form, it shall also become part of the subject file copy.

Approximately 37 outgoing items of correspondence were reviewed to determine the above commitment was met. In all cases, the documentation reflected that a staff member or the Executive Director had concurred with the outgoing correspondence.

No items of noncompliance were identified.

8. Review of QA Program Related to Design & Procurement

a. Design QA Program

- (1) The inspector reviewed the following SNUPPS administrative control procedures (ACP) related to design control to verify compliance with regulatory requirements and PSAR commitments:

ACP 3.1, Revision 2
ACP 3.2, Revision 6 (Design Portion only)
ACP 3.5, Revision 2

No items of noncompliance were identified.

- (2) Various documents in the SNUPPS files were reviewed to verify compliance with the requirements of the above SNUPPS ACP 3.2 and 3.5 procedures. The files included the following:

-- Comments, resolution of comments and approval letters which were transmitted between the various utilities, SNUPPS organization and Bechtel which related to the approval of Bechtel Technical Specifications 10466-M-082, 10466-E-057, 10466-E-035, 10466-M-140, 10466-C-112 and 10466-C-103A.

No items of noncompliance were identified.

- (3) The inspector reviewed the following lists identifying the Design Documents to be reviewed and the level of review to be performed to verify compliance with the requirements of ACP 3.1:

- Callaway Site List dated 8/25/78
- Wolf Creek Site List dated 8/25/78
- Tyrone Site List dated 8/25/78
- Bechtel Specification List dated 8/25/78
- Bechtel Drawing List dated 10/20/78

The inspector also reviewed two SNUPPS letters (Code SLBE 4-294 and 4-259) relating to the Design Document Lists.

No items of noncompliance were identified.

b. Procurement Control QA Program

The inspector randomly selected various procurement documents (bid evaluations, purchase orders and recommended bidders) related to the following Technical Specifications 10466-M-140, M-082, E-057, E-035 and C-112 to verify compliance to SNUPPS ACP Procedure 4.1.

No items of noncompliance were identified.

9. 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 unresolved item disclosed during this inspection is discussed in paragraph 3.

10. Exit Interview

The inspector met with the licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on November 22, 1978. The inspector summarized the purpose and the scope of the inspection and the findings.