



METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

June 14, 1976
GQL 0870

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

Docket No. 50-289
Operation License No. DPR-50
Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Inspection Report No. 50-289/76-10

This letter and the attached enclosure are in response to your inspection letter of May 24, 1976, concerning Mr. L. Spessard's and Mr. P. Kellogg's inspection of TMI-1 and the resultant finding of two apparent deficiencies.

Sincerely,

R. C. Arnold
Vice President

RCA:JJM:tas

Enclosure

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Metropolitan Edison Company
Three Mile Island Nuclear Station Unit 1 (TMI-1)
Docket No. 50-289
License No. DPR-50
Inspection No. 76-10

RESPONSE TO DESCRIPTION OF APPARENT VIOLATIONS

APPARENT VIOLATION A

10 CFR 50, Appendix B, Criterion XVI states in part, "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected." The FSAR Appendix 1A, Operational Quality Assurance Plan Section 6.7 states in part, "The Station Superintendent is directly responsible for...insuring that conditions adverse to quality, when identified, are corrected for all activities involving operations, maintenance, repair, refueling, testing and site engineering."

Contrary to the above, the corrective action delineated in Reportable Occurrence Reports ER 76-03/10 and ER 76-8/40 relative to revision of procedures had not been completed as of April 30, 1976, although PORC minutes for meetings 76-318 and 76-324 indicated that this corrective action had been completed.

RESPONSE

PORC revised its methods of tracking outstanding action items in order to more closely follow each outstanding item. The method of closing out an item was also changed to prevent the recurrence of the NRC identified infraction above. For example, an item will not be closed out until the procedure is revised, vice procedure change request submitted (note: this was cause of above situation, and compliance has now been achieved).

APPARENT VIOLATION B

Technical Specification 6.5.1.6.e (2) states in part, "The PORC shall be responsible for...review of violations of...internal station procedures and instructions having nuclear safety significance."

Contrary to the above, fourteen cases of failure to follow procedures related to nuclear safety, occurring in the period of January 1 through February 29, 1976 and identified in Station Nonconformance Reports, were not reviewed by the PORC.

RESPONSE

The Supervisor of Quality Control, or his designated alternate, will forward a copy of each Station Nonconformance Report having nuclear safety significance to the PORC for review.

The above actions should insure future compliance.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

MAY 24 1976

Metropolitan Edison Company
Attention: Mr. R. C. Arnold
Vice President
P. O. Box 542
Reading, Pennsylvania 19603

License No. DPR-50
Inspection No. 76-10
Docket No. 50-289

Gentlemen:

This refers to the inspection conducted by Messrs. L. Spessard and P. Kellogg of this office on April 28-30 and May 3, 1976 at Three Mile Island 1, Middletown, Pennsylvania and the Metropolitan Edison Company Corporate Office, Reading, Pennsylvania of activities authorized by NRC License No. DPR-50 and to the discussions of our findings held by Messrs. Spessard and Kellogg with Mr. Colitz and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These items of noncompliance have been categorized into the levels as described in our correspondence to you dated December 31, 1974. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must be accompanied by an affidavit

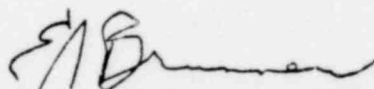


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executed by the owner of the information, which identifies the document or part sought to be withheld, and which contains a statement of reasons which addresses with specificity the items which will be considered by the Commission as listed in subparagraph (b)(4) of Section 2.790. The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

Enclosure:

1. Appendix A, Notice of Violation
2. IE Inspection Report No. 50-289/76-10

cc: J. G. Herbein, Manager, Generation Operations - Nuclear
R. W. Heward, Project Manager, GPUSC
Miss Mary V. Southard, Chairman, Citizens for a Safe Environment
(Without Report)

APPENDIX A
NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on April 28-30 and May 3, 1976, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC License No. DPR-50 as indicated below. These items are Infractions.

- A. 10 CFR 50, Appendix B, Criterion XVI states in part, "Measures shall be established to assure that conditions adverse to quality . . . are promptly identified and corrected." The FSAR Appendix 1A, Operational Quality Assurance Plan Section 6.7 states in part, "The Station Superintendent is directly responsible for . . . insuring that conditions adverse to quality, when identified, are corrected for all activities involving operations, maintenance, repair, refueling, testing and site engineering."

Contrary to the above, the corrective action delineated in Reportable Occurrence reports ER 76-03/10 and ER 76-8/40 relative to revision of procedures had not been completed as of April 30, 1976, although PORC minutes for meetings 76-318 and 76-324 indicated that this corrective action had been completed.

- B. Technical Specification 6.5.1.6.e(2) states in part, "The PORC shall be responsible for . . . review of violations of . . . internal station procedures and instructions having nuclear safety significance."

Contrary to the above, fourteen cases of failure to follow procedures related to nuclear safety, occurring in the period of January 1 through February 29, 1976 and identified in Station Nonconformance Reports, were not reviewed by the PORC.

Other Infractions identified through your internal audit program and which were corrected, or corrective action was initiated, are set out in the inspection report. No additional information is needed for these items at this time.

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

IE Inspection Report No: 50-289/76-10

Docket No: 50-289

Licensee: Metropolitan Edison Company

License No: DPR-50

P. O. Box 542

Priority: _____

Reading, Pennsylvania 19603

Category: C

Safeguards
Group: _____

Location: Three Mile Island 1 - Middletown, Pa.

Type of Licensee: PWR, 2535 Mwt, B&W

Type of Inspection: Routine, Unannounced

Dates of Inspection: April 28-30 and May 3, 1976

Dates of Previous Inspection: April 6-9, 12-14 and 21, 1976

Reporting Inspector: R. L. Spessard

5/21/76
DATE

R. L. Spessard, Reactor Inspector

Accompanying Inspectors: P. J. Kalllogg

5/21/76
DATE

P. J. Kalllogg, Reactor Inspector

DATE

DATE

Other Accompanying Personnel: None

DATE

Reviewed By: A. B. Davis

5/21/76
DATE

A. B. Davis, Section Chief,
Reactor Projects Section No. 1

SUMMARY OF FINDINGS

Enforcement Action

Infractions

- A. Contrary to 10CFR50, Appendix B, Criterion XVI and the FSAR Appendix 1A, Operational Quality Assurance Plan Section 6.7, the corrective action delineated in two Reportable Occurrence reports had not been completed although the PORC's review indicated the action had been completed. (Detail 3.b.(5)).
- B. Contrary to T.S. 6.5.1.6.e.(2), the PORC failed to review fourteen (14) cases of failure to follow procedures related to nuclear safety as identified in Station Nonconformance Reports. (Detail 10.b.(3)).

Licensee Action on Previously Identified Enforcement Items

Not inspected

Design Changes

Not inspected

Unusual Occurrences

None identified

Other Significant Findings

A. Current Findings

1. Acceptable Areas

- a. Refueling Activities. (Detail 2)
- b. Nonroutine Event Reports with the exception of the Items of Noncompliance and Unresolved Items. (Detail 3).
- c. Licensee Plans for Coping with Strikes. (Detail 4).
- d. Station Manning Requirements. (Detail 7).

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- e. GORB Activities with the exception of the Unresolved Item. (Detail 8).
- f. Unit Superintendent Test and Experiment Responsibilities. (Detail 9).
- g. PORC Activities with the exception of the Item of Noncompliance. (Detail 10).
- h. CTSS Activities. (Detail 12).

2. Unresolved Items

- a. Radiation Chemistry Technician Training on Procedure HP 1631. (Detail 3.b.(1).(b)).
- b. Revision of Surveillance Procedure 1303-11.10. (Detail 3.b.(3).(a)).
- c. Preventive Maintenance Procedures for Control Room Console Meters. (Detail 3.b.(4)(b)).
- d. GORB Review of Nonroutine Event Report ER 76-10/3L. (Detail 3.b.(6)).
- e. Administrative Control of System Lineups. (Detail 5).
- f. Seismic Qualification of Steam Generator Level and Pressure Indications. (Detail 6).
- g. GORB Review of Proposed T.S. Changes 29 and 32 and Violations of T.S. and License Requirements. (Detail 8.b.(4)).

3. Licensee Identified Items of Noncompliance

Infractions

- a. Contrary to T.S. 3.1.6.7, on January 9-10 and February 4, 1976 the Reactor Building Atmosphere Monitor was out of service and alternate sampling was not performed each eight (8) hours. (Detail 3.b.(1)).

- b. Contrary to E.T.S. 2.3.2.A.4, on February 19, 1976 a gaseous waste release was initiated with the waste gas decay tank discharge valve incapable of closing on receipt of a high flow signal. (Detail 3.b.(2)).
- c. Contrary to T.S. 6.8.1, during January 1 through February 29, 1976 there were fourteen (14) instances where procedures related to nuclear safety were not followed. (Detail 11).

B. Status of Previously Identified Unresolved Items

The following item was reviewed and remains unresolved:

CTTS Review of Facility Procedure Changes. (Detail 13).

Management Meeting

An exit interview was held onsite on April 30, 1976 at the conclusion of the onsite portion of this inspection. The Unit Superintendent was informed of the results of the offsite portion of the inspection by telephone on May 3, 1976.

Personnel Attending

Mr. J. Colitz, Unit Superintendent
Mr. C. Hartman, Electrical Engineer
Mr. J. O'Hanlon, Engineer, Senior I - Nuclear
Mr. W. Potts, QC Supervisor
Mr. M. Shatto, Engineer, Associate I

Summary of Items Discussed

- A. The Infractions identified above.
- B. The Acceptable Areas identified above.
- C. The Unresolved Items identified above.
- D. The licensee identified Infractions identified above.
- E. The Status of a Previously Identified Unresolved Item identified above.

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DETAILS

1. Persons Contacted

Mr. R. Arnold, Vice President
Mr. M. Beers, Shift Supervisor
Ms. S. Bonneville, Administrative Assistant
Ms. R. Brown, Technical Analyst III
Mr. J. Colitz, Unit Superintendent
Mr. J. Fritzen, Engineer, Senior I
Mr. D. Good, Technical Analyst III
Mr. D. Grace, Section Head - Licensing
Mr. D. Harper, I&C Foreman
Mr. C. Hartman, Electrical Engineer
Mr. J. Herbein, Manager, Generation Operations - Nuclear
Mr. R. Klingaman, Manager, Generation Engineering
Mr. G. Kunder, Supervisor of Operations
Mr. L. Lawyer, Manager, Operational Quality Assurance
Mr. B. McCutcheon, Quality Assurance Engineer
Mr. H. Mitchell, Electrical Maintenance Supervisor
Mr. J. O'Hanlon, Engineer, Senior I - Nuclear
Mr. R. Porter, Shift Supervisor
Mr. W. Potts, QC Supervisor
Mr. J. Romanski, Supervisor, Health Physics and Chemistry
Mr. M. Ross, Shift Supervisor
Mr. W. Sawyer, Maintenance Engineer
Mr. M. Shatto, Engineer, Associate I
Mr. D. Shovlin, Supervisor Station Maintenance
Mr. J. Thorpe, GORB Chairman*
Mr. G. Wallace, Shift Supervisor

*Telephone contact only.

2. Refueling Activities

The inspector witnessed fuel handling activities that were in progress on April 28, 1976. During this period, the last two fuel assemblies were loaded. The inspector's review included applicable logs, records, and procedures and direct observations. The inspector verified that the following conditions existed and that identified activities were being conducted as required by Technical Specifications (T.S.) or approved procedures:

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- a. Core monitoring using Channels NI-1 and NI-2 was in accordance with T.S. 3.8.2, and 1/M plots were maintained in accordance with procedure requirements.
- b. Containment integrity was in accordance with T.S. 3.8.6 and 3.8.7.
- c. The insertion of the fuel assemblies was in accordance with procedure requirements.
- d. Controls established for entry/exit and housekeeping on the refueling deck and bridge were in accordance with procedure requirements.
- e. Makeup and license requirement of refueling crew on the refueling deck and in the control room were in accordance with T.S. 6.2.2.a., b., d., and e.
- f. Vessel water level was in accordance with procedure requirements (El-344' 8"), and boron concentration (2050 ppm actual) was in accordance with T.S. 3.8.4.
- g. One decay heat removal loop was operating, and therefore, was in accordance with T.S. 3.8.3.
- h. Direct communications between the control room and the refueling personnel in the reactor building existed when changes in core geometry were taking place, and therefore, was in accordance with T.S. 3.8.5.
- i. Radiation levels in the reactor building refueling area were monitored by RM-G6 and a portable survey instrument (substitute for RM-G7). Radiation levels in the spent fuel storage area were monitored by RM-G9. Therefore, the requirements of T.S. 3.8.1 were satisfied.
- j. The reactor building purge system, including the radiation monitors which initiate purge isolation, was tested and verified operable in accordance with surveillance procedures 1303-10.1 and 1303-4.15 within one week prior to core reloading which commenced on April 24, 1976. Therefore, the requirements of T.S. 3.8.9 were satisfied.

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At the conclusion of this inspection the status of the refueling activities was as follows. Core loading and verification, installation of the upper internals, and lowering of the reactor vessel head onto the vessel were completed

3. Nonroutine Event Reports

a. Selected Reportable Occurrences were reviewed to verify that:

- (1) The details were clearly reported to the NRC and Facility Management as defined in the Technical Specifications;
- (2) Corrective action described in the licensee's report was taken to prevent recurrence;
- (3) Each event was reviewed and evaluated as required by the Technical Specification; and
- (4) Safety limits, limiting safety system settings, and limiting conditions for operation were not exceeded.

This review included discussions with licensee personnel and inspection of PORC minutes, GORB minutes, CTSS Project Accountability Checksheets, Control Room Log, Shift Foreman Log, Reports prepared by PORC, TCN's/PCR's to procedures, revised/new procedures, work requests, facility drawings, and surveillance test results.

b. The following Nonroutine Event Reports were reviewed, and the inspector's findings were acceptable, except where indicated.

- (1) ER 76-03/10 Improper Valve Lineup on Radiation Monitor RM-A2, and

ER 76-06/1T Inoperable Reactor Coolant Leak Detection System Radioactivity Sensitive, RM-A2.

As reported by the licensee, on January 9-10, 1976 and February 4, 1976, a leak detection system based on sensitivity to radioactivity was not in service nor were samples of the Reactor Building atmosphere taken every eight (8) hours as required by T.S. 3.1.6.7. This Item of Noncompliance is an Infraction.

In both instances RM-A2 was returned to service following discovery of the condition. The status of the licensee's long term corrective actions was as follows:

- (a) Surveillance Procedure 1302-3.1 had not been revised to provide additional guidance to personnel after performing surveillance to prevent the misalignment of sampling valves. However, PORC minutes for meeting 76-318 indicated that this action had been completed. A TCN and PCR to SP 1302-3.1 to accomplish this action had been recommended on February 2, 1976; however, a review of these documents indicated that approval by the responsible supervisor, PORC, and Unit Superintendent had not been obtained. The Unit Superintendent stated that the TCN would be approved and implemented by May 14, 1976 and that the PCR would be approved and implemented prior to the 90 day expiration date of the TCN.
- (b) This event had been reviewed with all Radiation Chemical Technicians (RCT's). The sampling procedure HP 1631, Rev 3 has been reviewed with two (2) of the eighteen (18) RCT's, and this training effort is to be completed within 6 months after completion of the refueling outage. This item is unresolved pending completion by the licensee.
- (c) Procedure HP 1716, Rev 0 dated March 24, 1976 was issued, and the procedure provides guidance for removal and replacement of the particulate monitor cover plate and methods to determine the effectiveness of the cover plate seal.

The actions taken to correct this Item of Noncompliance and to prevent its recurrence, as described above and as reviewed by the inspector, are acceptable. No response to this item is required. However, refer to subparagraph (5) below relative to PORC's improper closeout of an outstanding item as discussed (a) above.

- (2) ER 76-8/40 Waste Gas Decay Tank Discharge Valve Inoperable During Waste Gas Release

As reported by the licensee, on February 19, 1976, a gaseous waste release was initiated with the waste gas decay tank discharge valve WDG-V47 incapable of closing on receipt of a high flow signal as required by E.T.S. 2.3.2.A.4. This Item of Noncompliance is an Infraction.

The release was terminated following discovery of this condition. A calibration check of the recorder FR-123 (Range 1, Flow portion) was performed under Work Request 14118 and no deficiencies were found. The recorder test switch was discovered to be in the wrong position during further trouble shooting under WR 14118. The interlock test was performed satisfactorily under WR 14118 prior resumption of the release (No. 38-76-G). The status of the licensee's long term action was as follows:

The procedure for Release of Gas Decay Tanks (OP 1104-27) had not been revised to include verification of the test normal switch position prior to release. However, PORC minutes for meeting 76-324 indicated that this action had been completed. A TCN or PCR to OP 1104-27 or HP 1622 (both procedures cover release of gaseous waste) to accomplish this action could not be located by the licensee. The Unit Superintendent stated that a TCN to accomplish this action would be approved and implemented by May 14, 1976 and that a PCR covering this matter would be approved and implemented prior to the 90 day expiration date of the TCN.

The actions taken to correct this Item of Noncompliance and to prevent its recurrence, as described above and as reviewed by the inspector, are acceptable. No response to this item is required. However, refer to subparagraph (5) below relative to PORC's improper closeout of an outstanding item as discussed above.

(3) ER 76-09/1T Inadequate Makeup Pump "A" Procedural Controls

Surveillance Procedure 1303-11.10 was changed by TCN 76-49 and 76-50 to allow continuance of testing using the "B" and "C" Makeup Pumps. The test results revealed satisfactory performance. The status of the licensee's long term action was as follows:

- (a) The PCR to procedure 1303-11.10 was prepared and was in the review chain. The PCR will be approved prior to the 90 day expiration date of the TCN's. This item is unresolved pending completion by the licensee.
- (b) The special instructions relative to changing the position of valves associated with the Makeup Pumps have been promulgated within the Operations Department.

Caution signs were placed on the suction valves and suction cross connect valves for these pumps. The Shift Supervisor or Shift Foreman is required to verify lineup of the valves in the suction, discharge and recirculation lines for these pumps prior to starting one of these pumps.

During discussions with licensee personnel the inspector determined that procedure 1303-11.10 was the only procedure which contained the inadequacy reported in the subject report.

- (4) ER 76-10/3L "B" Diesel Generator Breaker Failed To Close During Test.

The cause of this occurrence was determined to be an incorrect governor setting, and this was corrected under Work Request 14132. The cause of the incorrect governor setting is unknown; however, due to the difficulties involved in adjusting the governor setting because of limited access to the components, the licensee believes that a set screw could have loosened following governor replacement and adjustments on June 30, 1975 or that a cam arm could have been slightly bent during inspection of the governor on February 19, 1976 (2 days prior to the occurrence).

The test results of procedure 1303-11.10, Emergency Sequence and Power Transfer Test indicated satisfactory performance of both E.S. Channels. The status of the licensee's long term actions was as follows:

- (a) TCN 76-132 to the quarterly surveillance test was approved on April 8, 1976, and this change added the requirement for checking the Ready To Load light.
- (b) Preventive Maintenance procedure PM-E38 was approved and the procedure requires annual calibration of the frequency meter on the control room console. Testing to this procedure was in progress during the inspection. As a result of discussions with licensee personnel, the inspector was informed that based on further review of control room console meters associated with the diesel generators, preventive maintenance procedures would be written to cover the KW meters and Synchronizing Voltmeters. The procedures, which would require biennial calibration, were expected to be approved by June 30, 1976. This item is unresolved pending completion by the licensee.

(5) Improper Closeout of Outstanding Items by the PORC

As delineated in subparagraphs (1)(a) and (2) above, two instances were identified where the PORC closed an outstanding item, which tracked the completion of corrective action documented in the licensee's Nonroutine Event Reports, prior to the item being completed.

10 CFR 50, Appendix B, Criterion XVI states in part, "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected." The FSAR Appendix 1A, Operational Quality Assurance Plan Section 6.7 states in part, "the Station Superintendent is directly responsible for....ensuring that conditions adverse to quality, when identified, are corrected for all activities involving operations, maintenance, repair, refueling, testing, and site engineering."

Improper control and closeout of the PORC outstanding items, as described above, is contrary to the above requirements. This Item of Noncompliance is an Infraction.

(6) GORB Review of Nonroutine Event Reports

The GORB review of the events discussed in subparagraphs (1) through (4) above had been completed with the exception of ER 76-10/3L. The inspector observed that the last GORB meeting was conducted on March 9, 1976, and that this report was submitted after that date on March 18, 1976. This item is unresolved pending completion by the licensee.

4. Licensee Plans for Coping with Strikes

Prior to this inspection Region I had been notified by the licensee that the contract between the Metropolitan Edison Company and IBEW union personnel would expire on May 1, 1976 and that negotiations for a new contract were in progress. During this inspection, the inspector was informed that negotiations were continuing and that the old contract was extended until May 7, 1976.

The inspector discussed with the Unit 1 Superintendent the plans established by the licensee for coping with a strike. The licensee had an approved organization chart for coping with a strike. The inspector determined that plant staffing, as delineated by the chart, would be capable of meeting regulatory requirements in the following areas:

- a. Plant Management
- b. Operations
- c. Maintenance
- d. Chemistry and Radiation Protection
- e. Security

The Unit 1 Superintendent stated that other than the organization chart discussed above there was no written procedure for coping with a strike. Additionally, he stated that to his knowledge there was no regulatory requirement or licensee commitment to have such a procedure. The inspector acknowledged the Unit 1 Superintendent's statement. Through further discussions with the Unit 1 Superintendent the inspector learned that actions for various contingencies would be taken by the licensee to cope with a strike and that the licensee's agreements with support agencies included coverage during a strike. These areas included:

- a. Refresher training of licensed and nonlicensed personnel.
- b. Arrangements with local support agencies to ensure unhampered delivery of goods at the site.
- c. Arrangements will remain in effect for medical treatment of injured or contaminated persons.
- d. Arrangements will remain in effect for local fire fighting support.
- e. Arrangements will remain in effect for local law enforcement support as required.

Based on further discussions with the Unit 1 Superintendent the inspector determined that emergency communication equipment was available and had been recently checked and determined to be operable. Additionally, the licensee's organization for coping with a strike was sufficient to implement the emergency plan.

5. Administrative Control of System Lineups

During review of Operating Procedure 1102-1, Plant Heatup to 525^oF and 1102-2, Plant Startup, the inspector questioned the meaning of the terminology contained in these procedures. The procedures in some areas state in part, "Verify a current...lineup for...per O.P. _____." (e.g. Verify a current lineup for the emergency electrical system per OP 1107-2.) and in other areas "Complete a ...lineup...per O.P. _____." (e.g. Complete a valve lineup on the emergency feed system per O.P. 1106-6.)

The licensee indicated that "verifying a current lineup" did not mean to perform the referenced lineup, but instead that the lineup had been performed at some undefined time in the past (as evidenced by a completed lineup contained in the control room files) and that changes in the lineups were controlled by other procedures for operation, testing, maintenance, etc. Action by the Supervisor of Operations or a Shift Supervisor could cause the lineup to be verified anytime its status was in doubt.

The inspector stated that this item would be unresolved pending review at a subsequent inspection to ensure that systems disturbed during the refueling outage were realigned prior to plant startup.

The licensee acknowledged this statement and indicated that this policy would be reviewed.

6. Seismic Qualification of Steam Generator Level and Pressure Indications

The licensee reported this matter prior to this inspection as Event Report 76-11/3L (letters dated February 27, March 27, and April 9, 1976). The licensee's investigation was continuing, and a final report was expected to be submitted on or about May 6, 1976. The status of the licensee's investigation and the scope of this investigation was reviewed with licensee personnel while at the Corporate Office on May 3, 1976. The inspector's findings were as follows:

- a. The scope of the licensee's review included the Steam Generator (SG) level and pressure transmitters and support structures, cables and cable trays, instrument cabinets, and power supplies and sources.
- b. The licensee's tentative findings relative to the seismic question indicated three deficiencies. These were as follows:
 - (1) Some SG pressure and level indication trays needed to be tied down to their supports.
 - (2) The instrument cabinets needed to be better anchored to their foundation.
 - (3) The instrument cabinets contain some instrumentation which has not been seismically tested. Should failure of this instrumentation occur alternate monitoring techniques using a digital voltmeter could be employed.

The above items are to be corrected by design changes, and the licensee expected to complete items (1) and (2) above prior to returning the unit to service.

The licensee was informed of the importance of the NRC's receipt of the final report such that a review and evaluation could be made prior to returning the unit to service. This item is unresolved pending receipt of the final report* and subsequent review and inspection by a Region I inspector, as appropriate.

7. Station Manning Requirements

The inspector reviewed the following records to verify that licensed operators were at the station during the time period of January 1 through February 29, 1976 as required by Technical Specification 6.2.2.b.

- a. Daily Attendance Sheets
- b. Monthly Time Reports for SRO's and RO's
- c. Shift Foreman Log Book
- d. Control Room Operators Log Book

Findings were acceptable.

Additionally, discussions were conducted with licensed operators on April 29, 1976 and the licensee's yearly shift schedule was reviewed. Based on these discussions and review, the inspector determined that the station was manned as required by T.S. 6.2.2.b on April 29, 1976 and that procedures existed to ensure continued compliance with this requirement.

8. General Office Review Board (GORB)

- a. The inspector reviewed GORB activities for the period of January 1 through March 31, 1976. This review consisted of the following:
 - (1) Draft minutes of GORB Meeting #22 conducted on March 9, 10, 1976. (Approved minutes not available for review)
 - (2) Agenda for GORB Meeting #22.
 - (3) Telephone discussion with GORB Chairman on April 30, 1976.
- b. The inspector's findings with respect to adherence to Technical Specification requirements were as follows:

* Final Report dated May 7, 1976 was received subsequent to the inspection.

- (1) The Unit Superintendent and PORC Chairman did not deem it appropriate to refer any proposed changes to procedures, equipment or systems to the GORB for their review during the period of January 1 through March 31, 1976. The Manager-Generation Operations-Nuclear submitted proposals on procedures concerning the removal of surveillance specimen holder tubes to the GORB. These proposals were reviewed during GORB Meeting #22. This review fulfilled the requirement of Technical Specification 6.5.2.B.7.a.
- (2) The Chairman of the GORB did not deem it necessary to transmit to the Company President recommendations to prevent recurrence of reportable occurrences and/or improve the effectiveness of the plant and corporate organization during the period of January 1 through March 31, 1976. Therefore, the requirement of Technical Specification 6.5.2.B.10.b.3 was not required to be performed.
- (3) GORB review of the Generation Division Audit Program was accomplished as required by Technical Specification 6.5.2.B.7.g. during the period of January 1 through March 31, 1976.
- (4) GORB review of proposed changes to the facility technical specifications (Appendix A) submitted to the NRC during the period of January 1 through March 31, 1976 (Proposed Changes 29, 30, 31, 32) was accomplished for proposed changes 30, 31 during Meeting #22 as required by Technical Specification 6.5.2.B.7.c. GORB review of violations of technical specifications and/or the facility operating license is scheduled for accomplishment during the June GORB Meeting.

This item is unresolved pending completion of GORB review of proposed changes 29 and 32 and violations of technical specifications/facility operating license.

9. Unit Superintendent Test and Experiment Responsibilities

The inspector verified by procedure review and discussion with the Unit Superintendent that administrative controls existed to ensure all proposed tests and experiments not described in the FSAR were evaluated to determine that they did not involve an unreviewed safety question as required by Technical Specification 6.1.1.a.3. Review of PORC minutes and Special Operating Procedures and discussion with facility staff indicated that no tests or experiments were conducted during the period of January 1 through February 29, 1976.

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10. Plant Operations Review Committee

a. The inspector reviewed the following records:

- (1) Minutes PORC Meeting 315 held on January 2, 1976
- (2) Minutes PORC Meeting 316 held on January 5-9, 1976
- (3) Minutes PORC Meeting 317 held on January 12-17, 1976
- (4) Minutes PORC Meeting 318 held on January 19-24, 1976
- (5) Minutes PORC Meeting 319 held on January 26-31, 1976
- (6) Minutes PORC Meeting 320 held on February 2-6, 1976
- (7) Minutes PORC Meeting 321 held on February 9-14, 1976
- (8) Minutes PORC Meeting 322 held on February 16-22, 1976
- (9) Minutes PORC Meeting 323 held on February 23-29, 1976

b. During this review and subsequent discussion with members of the facility staff, the inspector verified the following:

- (1) The quorum and frequency requirements of Technical Specification 6.5.1.4 and 6.5.1.5 were met during the period of January 1 through February 29, 1976.
- (2) No tests and experiments were conducted pursuant to 10 CFR 50.59(a). The requirement for PORC review per Technical Specification 6.5.1.6.b.2 was not required to be performed.
- (3) Appendix A Technical Specifications and license violations identified in Region I Inspection Reports and Reportable Occurrences were reviewed as required by Technical Specification 6.5.1.6.e.2 during the period of January 1 through February 29, 1976. However, violations of internal station instructions and procedures identified in Nonconformance Reports 76-10, 76-57, 76-86, 76-91, 76-92, 76-95, 76-102, 76-103, 76-110, 76-115, 76-118, 76-122, 76-164, and 76-243 were not reviewed.

The above finding is contrary to the requirement of Technical Specification 6.5.1.6.e.2). This item is an Infraction.

11. Procedural Adherence

The inspector reviewed 128 Nonconformance Reports generated during the period of January 1 through February 29, 1976 to determine if failure to follow nuclear safety related procedures was involved. From the information contained in the NCR's, the inspector determined that fourteen (14) cases of failure to follow procedures related to nuclear safety were identified. These cases are in noncompliance with Technical Specification 6.8.1, and this is an Infraction.

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The actions taken to correct these Items of Noncompliance and to prevent their recurrence have been reviewed by the inspector and are acceptable. No response to this item is required.

12. Corporate Technical Support Staff (CTSS)

The inspector verified the Corporate Technical Support Staff had reviewed indications of unanticipated deficiencies in design and operation of nuclear safety related structures, components and systems as required by T.S. 6.5.2.A.2.h. that occurred during the period of January 1 through February 29, 1976. The deficiencies reviewed included the Surveillance Specimen Holder Tubes and the Seismic Qualification of the Steam Generator Level Instrumentation.

Findings were acceptable.

13. Previously Reported Unresolved Items

a. Corporate Technical Support Staff Review of Facility Procedure Changes

Reference: Region I Inspection Report 50-289/76-01, Detail 14.b.(4)

Based on review of applicable records of procedure changes made during the period November 1 through December 31, 1975, the inspector determined that CTSS review had been completed on 58 of the 71 changes. The 13 remaining PCR's requiring CTSS review are 75-403, 75-350, 75-435, 75-433, 75-410, 75-407, 75-408, 75-409, 75-413, 75-412, 75-472, 75-471 and 75-449. This item remains unresolved pending completion by the licensee.

Detail 14.c of the referenced report delineates CTSS review of PCR's covering 1974 and 1975. The inspector reviewed applicable records concerning these activities and had the following findings:

- (1) QA is still holding their audit finding open, pending review of a response from the Manager, Generation Engineering.
- (2) The review of the existing backlog to determine those PCR's which may have a significant affect on plant operations was completed on January 23, 1976. A total of 88 PCR's were so categorized. As of April 29, 1976, 29 of these PCR's had been reviewed and the remaining PCR's were being assigned and reviewed on a priority basis.

- (3) The status of the backlog is being reviewed weekly by the Manager, Generation Engineering utilizing a Procedure Review Progress Sheet.
- (4) The PCR Status as of April 30, 1976 was as follows:
 - (a) For 1974, of the 514 PCR's generated, 180 had been reviewed, 9 had been assigned for review, and the remaining 326 had not been assigned. The status of the previously reported 53 PCR's in the unknown category had been identified.
 - (b) For 1975, of the 542 PCR's generated, 221 had been completed, 19 had been assigned for review, and the remaining 302 had not been assigned. The status of the previously reported 75 PCR's in the unknown category had been identified.
 - (c) For 1976, of the 163 PCR's generated, 119 had been reviewed, 16 had been assigned for review, and the remaining 28 had not been received from the site.

The licensee was informed that based on the inspector's review the commitments to Region I, as documented in the referenced report, were being met. The licensee's progress concerning this matter will continue to be reviewed during subsequent inspections.