UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Operations Inspection

IE Inspection Report No. 050-346/77-06

Licensee: Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo. OH 43652

Davis-Besse Nuclear Power Station
Unit 1
Oak Harbor, OH

License No. CPPR-80
Category: B

Type of Licensee: PWR (B&W) 906 MWe

Type of Inspection: Routine, Announced

Dates of Inspection: February 8-11, 18-20, 23-24, and March 2-3, 1977

Principal Inspector: T. N. Tambling for R. D. Martin — 3/14/77 (Date)

Accompanying Inspectors: F. A. Maura — 3/15/77 (Date)

T. N. Tambling — 3/14/77 (Date)

R. C. Knop

Other Accompanying Personnel: None

Reviewed By: R. C. Knop, Chief
Reactor Projects Section 1 — 3/15/77 (Date)

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SUMMARY OF FINDINGS

Inspection Summary

Inspection on February 8-11, 18-20, 23, 24, and March 2-3, 1977, (77-06): Review of the applicability of work control procedures to modification and maintenance activities near vital equipment; the degree of auditing planned by quality control personnel of maintenance work orders; fire fighting procedures; fire drills; results of the most recent fire inspection; station alternate shutdown and cooldown procedure; and cable penetration related to facility fire prevention and fighting capability of the licensee. Review of: approved test procedure results; status of test deficiencies; status of the preoperational testing program; status of the licensee's surveillance testing program and procedures; status of previous licensee commitments and outstanding inspection items, and procedural controls over modifications and maintenance. Witnessing of the integrated Safety Features Actuation System Test.

Enforcement Action

No items of noncompliance with NRC requirements were identified during this inspection.

Licensee Action on Previously Identified Enforcement Items

Not within scope of this inspection.

Other Significant Findings

A. Systems and Components

Unresolved Item - Failure to implement an approved field change on the 13.8kV bus prior to the integrated safety feature activation system test is unresolved pending further review by the inspector.

B. Facility Item (Plans and Procedures)

None identified during this inspection.

C. Managerial Items

The licensee was informed that this was a turnover inspection, and the new project inspector was Mr. T. N. Tambling.

D. Deviations

Contrary to the FSAR, Paragraph 9.5.4, Revision 4, dated January 1974, infrared flame detectors have not been provided in the emergency diesel generator and diesel fire pump rooms. (Paragraph 8.b, Part II, Report Details)

E. Status of Previously Reported Unresolved Items

1. IE Inspection Report No. 050-346/76-10 (Page 9)

This report indicated certain deficiencies in test procedure TP 170.01. During this inspection the inspector reviewed the changes to this procedure (Revision 2, January 12, 1977) and discussed the data handling with licensee personnel. This matter is closed.

2. IE Inspection Report No. 050-346/76-23

a. This report indicated the inspector's concern over the apparent discrepancies between Core Flood Tank Level Calibration Curves and their effect on alarm set points. The inspector reviewed a new reference curve obtained from B&W and the alarm setpoint data. This item is closed.

b. This report also indicated addition changes to be made to the Station Review Board Charter. The inspector reviewed (Revision 1, January 25, 1977) to that charter and this item is closed.

c. This report also indicated changes that were to be made to PP1502.04 "Initial Fuel Loading Procedure." The inspector reviewed Revision 1 (not fully approved by recommended by SRB), and this item is closed.

Management Interviews

Due to the prolonged duration of this inspection, management interviews were held on February 9, 24 and March 3, 1977.

A. Management Interview of February 9, 1977.

1. The following persons attended the interview:

J. Evans, Station Superintendent
W. Green, Assistant to Station Superintendent
R. Chesko, Fire Marshall

2. Matters discussed and comments were as follows:

a. The licensee will revise prior to criticality, Item 13 of Enclosure 5 of procedure AD 1844.00 to specify areas, such as the machine shop, where work may proceed without operations personnel knowledge and approval. (Paragraph 1.a, Report Details)

b. The licensee will prepare a procedure or modify AD 1844.00 to include special authorization for activities involving welding, open flame or other ignition sources, taking into consideration nearby flammable material, cable trays, or other vital equipment. It will include requirements for firewatch, communications with control room, and need for portable fire fighting equipment.

This procedure will be completed prior to criticality. (Paragraph 1.a, Report Details)

c. The inspector stated that during his discussion with a member of the licensee's Power Engineering Department, regarding PEI DBI-321, it was agreed to include flammability of materials as one of the considerations during the review of design changes. This will be done prior to criticality. (Paragraph 1.b, Report Details)

d. The licensee agreed to expand EP 1202.33 to include steps to cooldown the plant or to refer to other procedures which may be available to proceed with cooldown, if needed. The procedure is to include alternate methods available to cooldown the unit in case the preferred method is unavailable.

This item is to be completed prior to power escalation. (Paragraph 1.d.(2), Report Details)

e. The licensee will develop a procedure to ensure that the emergency lighting system is periodically verified to be operable. (Paragraph 1.f, Report Details)

f. The inspector noted that during his tour of the cable spreading room combustible material was found laying on the cable trays. The material included rags, magazines, newspapers, cardboard boxes, styrofoam and wood. (Paragraph 1.g.(2)(d), report Details)

g. On February 16, 1977, after additional information had been obtained from the licensee, the inspector notified Mr. Murray

by telephone that the lack of infrared flame detectors in the Diesel Generators and Diesel Fire Pump rooms was not in accordance with the statement given by the licensee on page 9.5.4-1, Revision 4, of the FSAR in response to an NRC question. As such, either the detectors must be installed or a revision to the FSAR submitted to NRR. (Paragraph 1.g.(2)(b), Report Details)

B. Management Interview of February 24, 1977

1. The following persons attended the interview:

L. Roe, Vice President, Facilities Development
J. Evans, Station Superintendent
L. Stalter, Technical Engineer
W. Green, Assistant to Station Superintendent
J. Buck, Operations Quality Assurance Supervisor
A. Mercado, Test Scheduler (B&W)
M. McAlpine, Test Engineer (B&W)
J. Allert, Test Engineer (B&W)

2. Items discussed and comments were as follows:

a. The licensee was informed that this was a turnover inspection and that Mr. T. N. Tambling would be the new Project Inspector for the Davis-Besse facility.

b. The inspector discussed observations made during the witnessing of Phase 2 of the Integrated SFAS test on February 19 and 20, 1977. Within this discussion the following items were specifically addressed.

(1) The licensee stated that they would complete an engineering evaluation of the opening times of valves DH 2733 and DH 2734. This evaluation would include address appropriate commitments in the FSAR and the proposed Technical Specification.

(2) The licensee stated that valves which were inoperable during the tests would be retested individually under the same operating conditions that were present during the test.

(3) The licensee stated they had issued a 10 CFR 50.55(e) report on the manual initiation of SFAS. They did not known at this time what the resolution would be to

eliminate the need for the operator to hold the manual initiating buttons in until the sequencer was off. The inspector stated that this item would be an open item and that the corrective action should be completed prior to entering Mode 6.

(4) The licensee stated that they would review whether it was possible for the sequencers in two companion SFAS channels being out of sequence such that ECCS equipment loads might be dumped on the diesel generator at one time. The results of the review would be provided to the inspector.

(5) The inspector noted that the first attempt to perform the test was aborted because a design change modification on the 13.8kV bus had not been completed. The inspector expressed concern as to how this item was missed since it was supposely a pretest punch item. Subsequently to the exit intervie the licensee was informed by telephone on February 25, 1977, that this item would be considered unresolved pending further review by the inspector.

c. The inspector discussed his review of the preparation of procedures and scheduling of surveillance testing for mode 6 operations (initial fuel loading). The licensee responded that they would make another an indepth review of surveillance requirements and that their scheduling of surveillance tests would reflect the latest input from current preoperational testing. The inspector stated that initiation of surveillance testing should proceed in an orderly fashion to prevent a last minute back log of testing. (Paragraph 9, Report Details)

d. The inspector noted that the review of 248 Facility Change Packages and System Revision Notices against their effect completed preoperational tests had not begun. The licensee acknowledged the suggestion that a priority system may be required to insure that those items associated with preoperational tests whose completion is required for fuel loading are reviewed first. (Paragraph 11, Report Details)

e. The inspector summarized their review of approved test procedures. (Paragraph 5, Report Details)

The inspector requested and obtained a commitment from the licensee that a suitable control method would be established for the removal of plywood "filter simulators" being used in the testing of HVAC systems.

f. The inspector summarized his review of the licensee's Surveillance Testing Program of the Quality Assurance Program for Station Operations. (Paragraph 6, Report Details)

C. Management Interview of March 2, 1977.

1. The following persons attended the interview:

J. Evans, Station Superintendent
J. Lenardson, Quality Assurance Manager
J. Buck, Quality Assurance Supervisor
L. Stalter, Technical Engineer
K. Cantrell, Operations Quality Assurance Engineer
D. Jondle, Surveillance Engineer

2. Items discussed and comments were as follows:

a. The inspector summarized his review of 40 surveillance test procedures. (Paragraph 7, Report Details)

A discussion of the significance of a close tolerance between a given set point and the "Maximum Allowed Value" for that set point took place.

b. As a consequence of his review of these procedures, the inspector requested and obtained the following commitments from the licensee:

(1) The licensee will review all surveillance test procedures for accurate Technical Specification set-points when those specifications are finalized.

(2) The licensee will review all surveillance test procedures for inclusion of an appropriate indication of prompt management review following the completion of a surveillance test.

c. The licensee was informed that he will be requested, by the letter accompanying this report, to provide a time schedule for the development of suitable calibration controls over installed instrumentation used to satisfy

Technical Specifications where the instruments used are not specifically identified, nor is their calibration frequency. This will include the instruments which are used to satisfy equipment testing whose surveillance is dictated by Section XI of the ASME Code.

d. The licensee was informed, and acknowledged his understanding, that he will have to provide a suitable Management Method for obtaining, and making available to operating personnel, the "baseline" values used as the references for evaluating the suitable performance of pumps whose surveillance is controlled by Section XI of the ASME Code.

e. The inspector summarized his understandings of licensee management decisions regarding Records Management Controls:

(1) The licensee will finalize the program for the management of operations phase records and include these program elements in controlled documents, by April 1, 1977.

(2) The licensee will fully implement these program elements by August 1, 1977.

(3) Those records which are relative to the construction of Unit 1, which are held by the licensee will be retained, during 1977, in the existing record storage facility in the Construction Office.

REPORT DETAILS

Persons Contacted

The following persons in addition to those listed under the Management Interview section of this report, were contacted during this inspection:

T. Murray, Operations Engineer
B. Beyer, Maintenance Engineer
W. Nissen, Assistant Fire Chief
R. Zemenski, Senior Assistant Operating Engineer
J. Hickey, Training Supervisor
L. Haigh, Plant Process Systems Engineer, Power Engineer Department
M. Derivan, Shift Foreman
R. Adney, Shift Foreman
J. Marchese, TECO Quality Control (Bechtel)
G. Humphrey, Instrument and Control Engineer
C. Endicott, Test Scheduler (B&W)
W. Alton, Assistant Engineer
J. Lingenfelter, Senior Assistant Engineer
D. Hitchens, Assistant Engineer
K. Aebie, Assistant Engineer

Results of Inspection

1. Licensee Activities Relative to Fire Prevention and Control (F. Maura)

   a. Work Control Procedure

   Administrative Procedure AD 1844.00 establishes the requirements for controlling and authorizing all maintenance work performed within the site or nuclear safety related structures, systems, and components; and non-nuclear safety related components classified as ASME (QA) items. The procedure does not require operations personnel approval and control of all work, but only for those activities that affect station operations. According to the licensee the Maintenance Foreman will make that determination.

   The licensee agreed to revise the procedure to be more specific of which areas work can be performed without the knowledge and approval of the Shift Foreman. The inspector stated such area shall not include vital equipment, or other equipment. The licensee noted the plans were for work performed in the maintenance shop, grass cutting, etc.

b. Design Change Controls

Administrative Procedure AD 1845.00 and Power Engineering Instructions DBI-320 and 321 established the requirements for controlling and authorizing all design changes at the site. Any change to existing cable penetrations must be processed in accordance with the above procedures. Exhibit "B" of PEI DBI-321 consists of a list of suggested design review considerations which are used during steps 6.b, 6.14 and 8.1 of the procedure. The licensee has agreed to include "flammability of materials" as one of the items to be considered during the design change review process.

c. Quality Assurance Surveillance

QAP 5130 and QCI 3103 require some degree of quality verification by QA and QC personnel of all maintenance work classified as nuclear safety related/ASME. According to the licensee the audit checklist has not been completed, but will include both on-the-job inspection of work in progress and audit of post work authorizations for proper reviews and approvals.

d. Emergency Procedures

(1) Fire Fighting

AD 1827.00, Emergency Plan, specifies who is a member of the fire brigade and summarizes EP 1202.35, Fire Emergency Procedure. EP 1202.35 is a general fire fighting procedure for all plant areas which establishes general guidelines and responsibilities. AP 3009.24 in draft now, covers the fire detection system, inputs to the data logger and in general consists of identification of the area which originated the alarm and verification that the alarm is factual. Once the fire is identified EP 1202.35 applies.

AD 1827.01, requires that Emergency Plan drills be performed annually. No other Administrative Procedure exists concerning fire drills or fire training. However, it has been the licensee's practice to have weekly fire drills so that every member of the fire brigade participates in a fire drill approximately every two months. The inspector noted that no drills have been performed during 1977, but this was explained by the licensee as caused by the extra work load generated by recent operator licensing exams and preparations for fuel loading. As soon as possible the licensee plans to return to the weekly fire drill schedule.

A practical exercise in extinguishing fires using water and Co_2 was performed in 1975. The licensee has no plans to perform this type of exercise periodically.

The present fire brigade has been licensed by the state of Ohio. According to the licensee to maintain the certification requires monthly fire drills. Training is performed under the direction of the Fire Chief who is a state licensed fire instructor, and also Fire Chief of a nearby volunteer fire department. In addition, several members of the fire brigade are members of some of the county volunteer fire departments.

(2) Alternate Shutdown and Cooldown

EP 1202.33 covers only the unit shutdown and control in hot standby condition if evacuation of the control room is required. The licensee has agreed to expand the procedure, as required, to include cooldown of the unit, and the use of alternate methods available to cooldown the unit in case the preferred system is unavailable.

e. Fire Inspection

Fire inspections are performed by NELPIA for the licensee. The inspector reviewed the last NELPIA inspection performed on September 23-24, 1976, and found no references to problems in the area of fire protection.

f. Emergency Lighting

Emergency lighting throughout the plant consists of 120 V incandescent lamps normally AC supplied. Upon failure of the AC supply an automatic transfer switch transfers the load to the 124 V DC source. The inspector verified that the lamps in the control room were operable. The licensee had no plans to periodically verify the operability of the system (lamps or transfer switch), but has agreed to develop such a surveillance procedure.

g. Facility Inspection

(1) An inspection of cable penetrations, fire fighting equipment, and fire detection equipment was performed in the following areas:

(a) Control Room

(b) Cable Spreading Room

(c) D/G Rooms

(d) Low Voltage and High Voltage Switchgear Rooms

(e) Battery Rooms

(f) Oil Storage Room

(2) The following was noted during the inspection:

(a) The large majority of the fire stop seals (silicon rubber foam) in the control room and cable spreading room are yet to be completed. Open penetrations were still noted in the battery rooms, D/G rooms and switchgear rooms. The licensee is aware that these penetrations must be sealed before fuel loading.

(b) Fire protection equipment throughtout the station consists of water sprinklers, hose stations and portable Co_2 and dry chemical extinguishers. Fire detection equipment consists of smoke detectors and thermal detectors. In response to questions from NRC the licensee stated in the FSAR, Section 9.5.4, Page 9.5.4-1, Revision 4, that infrared flame detectors were installed in areas such as the emergency diesel generators and diesel fire pump room. Instead smoke detectors have been installed. The licensee stated that infrared detectors are not in use or planned for the station. This is considered to be a deviation from an FSAR commitment.

(c) Fire hose and portable extinguisher equipment is being inspected and tested in accordance with PT 5113.09 as plant areas are being turned over to operations by construction. The Fire Chief is responsible for the performance of PT 5113.09.

The fire hose stations have been provided with 2 1/2" hose connections which according to the licensee are compatible with local fire department equipment.

(d) During the inspection of the cable spreading room the following was found laying on top of the asbestos blankets covering the cable trays: several pieces of 2" x 4" wood studs which appeared to have been coated with flame retardant paint, two large rags, one

magazine, newspapers, three cardboard boxes and several pieces of styrofoam. The licensee was to conduct a thorough inspection of all cable trays in the room to ensure all combustible material has been removed.

(e) The licensee is being equipped with 19 Scott air packs and 19 extra air cylinders. In addition, it plans to install a cascade system of high pressure air bottles for recharging Scott air packs.

5. Completed and Approved Test Procedure Results (Martin, Knop, Tambling)

The inspector reviewed the following test procedure packages for completeness with regard to:

a. Meeting acceptance criteria.

b. Appropriate management review and approval.

c. Conformance to the requirements of administrative procedures.

The review of these test procedure packages included reviews of temporary procedure changes, QC Verification sheets, chronological logs, deficiency reports, and other related material. No significant deficiencies were noted during this review.

TP 200.04 - RCS Hydro

TP 300.03 - CRDM Functional

TP 2400.[illegible] - BWST Level to SFAS Pre-op Calibration

6. Surveillance Test Program (R. Martin)

As part of the review of the licensee's operation preparedness in implementing his Quality Assurance Program for Station Operations, the inspector reviewed the licensee's Surveillance Testing Program.

The program activities were compared against commitments made in Chapter 17.2 of the FSAR, and the requirements of Section XI of the ASME Code and the proposed Technical Specifications. The review included the program elements as described in the AD 1838 series of Administrative Procedures and the Nuclear Quality Assurance Manual.

a. The following program deficiencies were identified.

(1) The controlling procedures do not identify the mechanism by which the prompt review of test results for the initial evaluation of system OPERABILITY will be achieved.

(2) The degree and manner of involvement of the QC staff in surveillance matters is not clearly identified.

(3) Section 3.1.1 of AD 1838.01 is not clear as to the applicability of test dates to items covered by Section XI. The procedure does not describe the method of identifying code components, and the test does not agree with the surveillance engineer's understanding of how dates are to be handled.

(4) The procedure does not describe the method by which surveillance will be assured during mode changes:

(a) The involvement of Shift Foreman in obtaining the necessary information.

(b) Training of Shift Foreman to operate the terminal.

(c) Actions to be taken if the terminal is out of service.

(5) The Surveillance Test Program does not describe how Section XI pumps which are in the "Alert" range will be identified and the surveillance frequency doubles. (The inspector understands the licensee plans to utilize this "alert range" option.)

(6) The enclosure (cross reference) to AD 1838.00.1 has several omissions and errors. The licensee indicated that a review of this enclosure is planned.

(7) Enclosure 2 to AD 1838.00 should be reviewed as the duties assigned under the Title "Foreman" do not always agree with the understandings of the staff as to their responsibilities, especially in the matter of the Shift Foreman being the initial management member to review test results, and declare systems operable.

(8) The inspector understands that a change to QCI-331 is planned to indicate the surveillance plans of the QCE staff directly onto the surveillance testing schedule. The inspector indicated that an appropriate method should also be developed for those activities not covered by the computer schedule (Daily and Shift Checks).

Since the above items are of a programmatic nature, the licensee was informed that they are to be completed prior to fuel loading.

The licensee also was urged to retain a "hard copy" of his computer program so that he could re-enter it into the computer easily in the event of computer difficulties.

b. The following program implementation aspects were reviewed:

(1) Twenty-five approved surveillance test procedures were selected and the computer scheduled frequency of those tests were compared to the requirements of the proposed Technical Specifications. No discrepancies were found in this review.

(2) Twenty-nine surveillance tests were reviewed to assure that the procedures had been reviewed and approved in accordance with the administrative requirements of the licensee. No discrepancies were found during this review.

The details review of approved procedures for content is summarized in the next section of this report.

7. Review of Surveillance Test Procedures

The inspector performed a review of the following test procedures:

ST 5010.01	ST 5030.11	ST 5033.01	ST 5051.03
ST 5010.02	ST 5031.01	ST 5033.03	ST 5052.02
ST 5010.03	ST 5031.02	ST 5034.01	ST 5060.01
ST 5013.02	ST 5031.03	ST 5034.02	ST 5063.02
ST 5021.01	ST 5031.04	ST 5034.03	ST 5065.01
ST 5030.01	ST 5031.05	ST 5040.01	ST 5065.06
ST 5030.04	ST 5031.06	ST 5041.01	ST 5065.07
ST 5030.05	ST 5031.09	ST 5042.01	ST 5074.01
ST 5030.06	ST 5031.10	ST 5042.02	ST 5075.01
ST 5030.07	ST 5031.11	ST 5043.01	ST 5076.01

The results of this review are summarized below:

a. Six procedures did not indicate prompt review by the Shift Foreman to indicate system operability.

b. Six procedures had Technical Specification values not in agreement with the most recent proposed values. The licensee indicated that it was their decision not to try to change an STP each time the Technical Specification values changed, but to leave those revisions until the specifications were finalized.

c. Five procedures had errors in technical content.

d. Two procedures called for the use of measuring equipment which was not sufficiently accurate to establish the settings called for in the procedures.

The licensee was given the details of these findings, and made the following commitments:

a. All the errors identified (Items "c" and "d") will be corrected.

b. Commitments relative to items "a" and "b" above are described in the Management Interview (March 2, 1977).

8. Test Witnessing - Integrated Safety Feature Actuation System (SFAS) Test

Conduct of Phase 2 of pre-operational test TP 310.02 "Integrated SFAS Test" was witnessed to determine whether the test was conducted according to procedure, personnel participiating in the test were adequated indoctrinated as to their responsibilities and the general conduct was satisfactory.

Within this review the following problems or observations were identified:

a. The licensee identified four valves that could not be response tested during the test because specific equipment problems with the valves. These were logged as test deficiencies by the licensee for individual testing on completion of repair work.

b. The licensee initiated test procedure changes to run the test with valves DH 7A and DH 7B (BWST Isolation Valves) and DH 2733 and DH 2734 (Decay Heat pumps suction valves) open. These changes were made because these valves have a slow open time compared to the starting time of the decay heat pump and could cause damage to the pumps. Although these valves receive a signal to open on SFAS initiation, they justified the procedure changes on the fact that these valves are normally aligned in the open position. This alignment is under administrative control.

It was noted that this type testing is not in agreement with the testing requirements covered in Section 6.3.4 and Table 6-17 of the FSAR and the proposed Technical Specifications. The licensee stated that there was an outstanding nonconformance report on valves DH 2733 and DH 2734 covering the opening times (approximately 80 seconds). The licensee also confirmed that they planned an engineering evaluation on these valves and would initiated appropriate changes. (There was no indication of what type action would be taken at this time).

c. The first attempt to run Phase 2 of the test was aborted when the diesel generator started, but failed energize it's bus. The licensee determinaed that failure of the diesel generator to load on its associated bus was due to an uncompleted field

change on 13.8kV bus. Original control design required undervoltage on both the 13.8kV and 4160 volt buses before diesel generator would load on the 4160V bus. A design change had been initiated and approved. The test engineer stated that he had received confirmation that the field change had been completed. The licensee was informed that this item would remain unresolved pending further review as to why this design change had not been completed prior to starting the test.

d. The second attempt to initiate Phase 2 of the test was aborted when the diesel generator failed to start. The licensee determined that the diesel failed to start due to an inherent design feature on the actuation of the sequencers in the SFAS circuitry. If the sequencer receives only a monentary signal it will not complete its sequence and will reset. As in the case of manual actuation by an operator, the momentary pushing of the manual button may not be long enough to lock in the sequencer. The licensee initiated a 50.55(e) report on this deficiency for appropriate review and corrective action.

e. It was noted that one of the two sequencers apparently did not reset on the monentary manual actuation and completed its sequencer in the second aborted attempt to run the test. The circuit logic of SFAS requires the combined input of two companion channels to initiate one train of SFAS associated equipment.

In reviewing sequencer operation it was noted that each actuation step has a narrow three second window. If the designated equipment does not start within this three second window it is blocked from starting until the total sequence of starting SFAS associated equipment is complete. At this time the start signal to all equipment is unblocked.

If the sequencers in the two companion SFAS channels should be out of phase (by three seconds), it appears that it is possible to load all SFAS equipment on the diesel at one time. The licensee stated that they would review this potential problem and provide the results to the inspector.

9. Surveillance Test Requirement for Fuel Load

The inspector reviewed the current status of procedure and schedule preparation of surveillance testing required to enter Mode 6 (fuel loading)

a. Where possible the licensee plans to use complete pre-operational tests to meet surveillance testing requirements. Section Leaders are to review preoperational tests to determine whether they meet surveillance criteria. To date this information has not been forwarded to the scheduler therefore, a realistic schedule was not available for the inspectors review.

b. The licensee still has surveillance test procedure in preparation.

c. A cursory review of identified surveillance requirements indicated a need for the licensee to recheck his current list. A representative of the licensee stated that they were planning to do this.

10. Status of Audit Finding (AFR) Close-outs

Reference: Inspection Report 77-03, Paragraph 9, Report Details. The inspector verified that the status of over due AFR responses had been reviewed and that a schedule had been developed for close-out.

11. Licensee Review of System Revision Notices (SRN)

Reference: Inspection Report 77-03, Paragraph 8, Report Details. In response to a previous commitment, the licensee has identified 248 SRN's issued to date. These SRN's have been catalogued to systems and review assignments have been made with a logging system established to document reviews by responsible section heads. The responsible section heads are to review each assigned SRN against its affect on preoperational testing of a system to determine whether the SRN change requires complete, partial or no retesting of the system.

It was noted that because large number of SRN's (248) to be reviewed, the licensee may have to set up a priority system of review to insure that SRN's effecting preoperational testing required prior to fuel loading are completed.