

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

Region I

Report No. 50-354/80-06
50-355/80-06
Docket No. 50-354
50-355
License No. CPPR-120 Priority -- Category A
CPPR-121

Licensee: Public Service Electric. & Gas Company
80 Park Place
Newark, New Jersey 07101

Facility Name: Hope Creek Units 1 & 2

Inspection at: Hancocks Bridge, New Jersey

Inspection conducted: April 23-25 and 29, 1980

Inspectors: *S. K. Chaudhary*
S. K. Chaudhary, Reactor Inspector

5/19/80
date signed

date signed

date signed

Approved by: *S. D. Ebnetter*
S. D. Ebnetter, Chief, Engineering Support
Section No. 2, RC&ES Branch

5/23/80
date signed

Inspection Summary:

Units 1 & 2, Inspection on April 23, 24, 25, 29, 1980 (Combined Inspection Report No. 50-354/80-06 and 50-355/80-06)

Areas Inspected: Routine unannounced inspection by a regional based inspector of the licensee activities in the area of nonconformance control, trend analysis, and control of field change request. The inspection involved 22 hours on site by one regional based inspector.

Results: No item of noncompliance was identified.

REPORT DETAILS

1. Persons Contacted

Public Service Electric & Gas Company

- *A. E. Giardino, Project QA Engineer
- *L. Jankowski, Site QA Engineer
- *P. J. Kudless, Principal Construction Engineer

Bechtel Power Corporation

- *J. B. Gatewood, L. S. QA Engineer
- *R. Hanks, Project Construction QC Engineer
- *W. Hindle, Project Field Engineer
- *G. Moolton, Project QA Engineer
- W. Schuetz, Resident Engineer

U.S. Nuclear Regulatory Commission

- *W. H. Bateman, Resident Reactor Inspector
- (*Denotes people attending exit interview)

2. Plant Tour Units 1 & 2

The inspector conducted a walk-through plant tour of Units 1 & 2 primary containments, reactor buildings and diesel generator buildings to assess the work procedure and general conformance to good construction practices in the areas of rebar installation, concrete pre-placement activity, and installation of structural steel. The resident inspector accompanied the inspector on this tour.

No item of noncompliance was observed.

3. Review of Nonconformance Control Process

The inspector reviewed the procedures and other documents to determine licensee's compliance to the requirement of nonconformance control. The following documents were reviewed:

Bechtel Nuclear QA Manual

Bechtel QC Instruction Manual

PSE&G Trend Analysis of NCR

Bechtel specification C-103, for concrete placement

Bechtel specification C-112, for erection of rebars

PSE&G Audit no. H-178 "Control of nonconformances"

PSE&G letter no. HQL-468, dated April 23, 1980

Nonconformance Reports nos. 501 to 630 covering the period
September 18, 1979 through February 5, 1980.

Based on the review of above documents the inspector determined that the licensee was exercising sufficient control over the process of nonconformance reporting system. The licensee had conducted a comprehensive audit of project nonconformance system in the months of March-April, 1980. The conclusions derived by the licensee through the audit was independently verified by the inspector to be valid and acceptable.

The inspector verified that the licensee was reviewing, and tabulating the reported nonconformances in broad categories for evidence of any significant trend. The inspector observed that there is no requirement in the licensee procedures for trend analysis, however, the licensee was maintaining a tabulated form of nonconformance trend as an unofficial document.

The review of open and closed NCRs disclosed that the nonconformances were reported on proper forms in sufficient details with information on items, locations, inspection report numbers and other pertinent data for the engineering disposition. The closed NCRs were properly dispositioned by the responsible engineering organization, and the disposition was properly verified by quality control.

No item of noncompliance was identified.

4. Review Field Change Requests

The inspector reviewed the system of field design changes as implemented on the project through the Field Change Request (FCR) system. The FCRs were reviewed by the inspector for format, content and completeness, types of changes requested, and the proper approval of the change by responsible organizations involved in the design change process. The following FCRs were reviewed:

FCRs

M-024	C-2208	C-2276
M-025	C-2209	C-2299
M-026	C-2210	C-2302
C-2104	C-2211	C-2304
C-2117	C-2220	C-2305

FCRs (Continued)

C-2122	C-2221	C-2311
C-2123	C-2245	C-2314
C-2137	C-2246	C-2317
C-2138	C-2247	C-2320
C-2166	C-2249	C-2367
C-2173	C-2266	C-2396
C-2188	C-2269	C-2414
C-2206	C-2271	C-2415
C-2207	C-2272	C-2452
		C-2481

Based on the review of above FCRs and discussions with the licensee and constructor personnel the inspector's observations are as follows:

The FCRs initiated at the site conformed to the requirement of format and proper review and approval by responsible organizations, and were properly controlled. However, the inspector observed that a number of FCRs were initiated for in-process works where the completed work was not accomplished per the approved design. These FCRs requested that the work already completed should be accepted as approved design. Furthermore, these FCRs were not incorporated in the project drawings or specification, and were valid for the requested situation only, and some of the FCRs were approved with such statements as - "USE-AS-IS". In discussion with the licensee and constructor personnel the inspector was informed that such FCRs were routinely initiated by the field engineering for in-process work. The inspector questioned the propriety of this practice of design change to approve a work in progress which was not carried out per approved design. The licensee maintained that any in-process work in variance with the approved design was not a nonconformance because it was not formally verified and accepted by quality control. This item is unresolved (80-06-01).

No item of noncompliance was identified.

5. 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. Unresolved items disclosed during this inspection are discussed in paragraph 4 of this report.

6. Exit Interview

The inspector met with licensee representatives (denoted * in paragraph 1) at the conclusion of the inspection on April 29, 1980. The inspector summarized the purpose, scope, and the findings of this inspection.