

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-344/89-25

Docket No. 50-344

License No. NPF-1

Licensee: Portland General Electric Company
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Portland, Oregon 97204

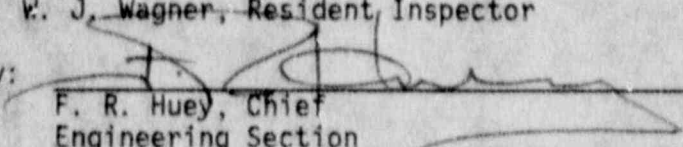
Facility Name: Trojan Nuclear Plant

Inspection at: Rainier, Oregon

Inspection Conducted: September 25-29 and October 10-16, 1989

Inspector: W. J. Wagner, Resident, Inspector

Approved by:


F. R. Huey, Chief
Engineering Section

10/19/89
Date Signed

Summary:

Inspection During the Period of September 25-29 and October 10-16, 1989
(Report No. 50-344/89-25)

Areas Inspected: A routine unannounced inspection by a region based inspector of the licensee's audit program and the offsite support staff. Inspection Procedures 30703, 40702 and 40703 were used as guidance for the inspection.

Results:

General Conclusions and Specific Findings

Procedural inadequacies were identified in the way Nonconforming Activity Reports (NCARs) are processed.

Significant Safety Matters: None

Summary of Violations or Deviations: None

Open Items Summary: None

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DETAILS

1. Persons Contacted

- *D. W. Cockfield, Vice President, Nuclear
- *T. D. Walt, General Manager, Technical Functions
- *D. L. Nordstrom, Quality Operations Branch Manager
- *J. D. Reid, Quality Support Services Branch Manager
- *W. J. Williams, Regulatory Compliance Specialist
- L. W. Erickson, TNOB Staff Supervisor
- J. A. Benjamin, Quality Audit Supervisor
- E. Bradley-Muhammad, QA Engineering Specialist
- B. Naik, QA Engineer
- E. T. Childress, QA Engineer

The inspector also held discussions with other licensee and contractor personnel during the course of the inspection.

*Attended the Exit Meeting on September 29, 1989.

2. Audit Program (40702)

The licensee's Quality Assurance (QA) program delegates responsible to the Quality Audit Group to develop and implement an audit and surveillance schedule to assess the adequacy of onsite and offsite organizations in complying with Technical Specifications (TS) regulatory requirements, commitments in the Final Safety Analysis Report (FSAR), and industry guides and standards. The Quality Audit Supervisor reports to the Quality Operations Branch Manager who has the overall responsibility for implementation of the Audit Program. These activities are described in NQAP No. 117 entitled, "Audit Program Requirements," Revision 2, dated April 7, 1989. NQAP No. 117 defines the full scope of the Audit Program which includes, audit frequency requirements, auditor qualifications, use of Technical Advisors, and audit requirements for the following areas: emergency plan, security plan, fire protection, TS and license conditions, Qualification/Training and Performance of Trojan staff, corrective actions, 10 CFR 50, Appendix B criteria, ANSI N18.7 audits, audits not under TNOB cognizance, and areas considered appropriate by the TNOB or Vice President, Nuclear. The details of the TS audit program is addressed in NQAP No. 118 entitled, "Technical Specification Audit Program," Revision 1, dated April 19, 1989; this includes verification that TS changes are translated into applicable procedures.

The requirements and guidelines for the selection of audit personnel, preparation of audit checklists, performance of audits, reporting of audit results, follow-up of audit findings, and verification of corrective actions taken is addressed in NQAP No. 110 entitled, "Quality Assurance Audits," Revision 15, dated June 9, 1989. The Plant General Manager, Chairman of the TNOB, and the Vice President, Nuclear are on the distribution list for all QA audit reports and evaluations.

In order to enhance their ability to identify safety significant plant problems for immediate management attention, the Quality Operations Branch has created the Quality Operations Rover. As described in QOI No. 203 entitled, "Quality Operations Rover", Revision 0, dated April 3, 1989, personnel assigned as Rover are responsible for conducting weekly plant tours and control room observations, reviewing the control room logs, monthly backshift observations, and for investigating assigned and selected Nuclear Division activities. Results of these activities are documented by the Rover in a Rover Surveillance Report. To access the effectiveness of these Rover activities, the inspector reviewed the following Quality Operations Rover Surveillance Reports:

89-025-ROV: July 24, 1989: Subject: "Material found in Pipe Chase of RHR Pump Recirculation Sump (Interim Report)." This activity was in response to notification by Radwaste personnel regarding material found inside the RHR pump recirculation sump. A Quality Operations (QO) Rover was promptly involved in a detailed inspection of the recirculation sump area. QO identified a number of observations and concerns and will issue a follow-up report to address them and other aspects of the sump issue.

89-029-ROV: July 27, 1989: Subject: "Racking of the Reactor/Bypass Trip Breakers." This observation was made by the Rover upon reading an entry in the control room concerning the discovery of an inadequately latched reactor trip breaker (1455 on July 26). This resulted in the Rover, (a) contacting the Maintenance electrician who identified the problem, (b) performing a walkdown to better understand the positioning of the breakers, and (c) providing a recommendation to prevent recurrence. The QO Audit Supervisor discussed this matter with the Duty Plant General Manager on July 27. The NRC inspector noted that all these activities, (discovery, resolution, reporting to plant management, report issuance) were performed within 24 hours.

89-039-ROV: September 11, 1989 - Subject: "Control Room Area Tags." This surveillance appears to have been well thought-out to describe the issue regarding the rate at which tags were being cleared from the control room.

The inspector considers the QO Rover surveillances to be a significant enhancement of the QA audit program which is meeting management's goal of having important safety problems brought to their immediate attention. This was evident during the Exit Meeting by management's awareness of the above Rover reports. The inspector also observed that the Rover activities appears to be having a positive affect on the Quality Audits group, as evident by the increased quality of the inspection reports. The auditors appeared to be more self-critical and intrusive in accomplishing their responsibilities.

The inspector reviewed 12 Nonconforming Activity Reports (NCARs) generated as a result of various auditing and inspection activities. Control of nonconforming activities is addressed in NDP No. 600-2, Revision 5, dated July 14, 1989. According to this procedure, upon receipt of the initiated NCAR, the Quality Support Services Branch evaluates the NCAR for validity, and, if valid, the NCAR is logged-in and receives an NCAR number. This validation process is not always completed

within the recommended 5 working days which raises concerns with the initiators because there is no convenient way to track the status of the nonconforming activity reported. Discussions with the Quality Support Services Branch Manager revealed that a separate document is used to track the status of NCARs. This separate document allows the Quality Support Branch (QS) to maintain the status record for the NCARs, which is given the next sequential number from a log. The NCAR initiators, however, are not aware of this log which breeds negative feelings toward the NCAR process. The inspector interviewed a number of quality personnel regarding the procedure with the consensus being that all NCARs received by QS should be immediately logged-in and then evaluated for validity. The licensee acknowledged these concerns and committed to make appropriate changes to their procedures. One consideration presented to the inspector was to revise QSI No. 203, Section 3.1 to include provisions to notify the initiator of an NCAR (or NCR) of the computer assigned Document Tracking number for their tracking and follow-up purposes.

The inspector also identified a procedural inadequacy when reviewing the NCAR process. NCAR No. P89-143 had been cancelled by the Quality Systems Group without providing justification to the initiator. This NCAR, evaluated to be valid on April 15, 1989, documented a nonconforming activity where a maintenance procedure (MP-12-5) did not include one of the detailed work steps required for removal of a motor input drive shaft. The craftsmen performed this work activity, to "remove worm shaft and gear..." knowing that this work step was missing from the procedure. The inspector noted that this activity appeared to be an obvious sequential work step necessary to remove the drive shaft with no cautions or special notes needed to perform the task. Procedure MP-12-5 has since been revised, per Deviation No. 89-127, to include this work step. The inspector's concern was that the craftsmen knowingly continued to work through the missing work step which is contrary to Administrative Order (AO) 4-2, entitled "Use of Procedures," Revision 19, dated March 2, 1989. Specifically, Section 4.2.3 of AO-4-2 states, in part, "Do not blindly follow procedures. If the procedure cannot be performed as written, then immediately stop the activity." NCAR P89-143 was cancelled on April 26, 1989 with a statement that "This does not meet the requirements for being an NCAR, problem has been corrected with deviation 89-127." It is the inspector's opinion that the NCAR was valid because it did identify a nonconforming activity (maintenance activity performed without procedural direction, i.e. with a missing work step) requiring the evaluation provided through the NCAR process for probable cause and appropriate corrective actions. Unlike the NCR procedure NDP No. 600-1, Section 5.13 "cancelling NCRs," there is no similar section in NDP No. 600-2 which allows Quality Support Services to cancel an NCAR once a number has been assigned to it. The licensee acknowledged the problem and, during the exit meeting, committed to review and revise as appropriate NDP No. 600-2 to address cancelling NCARs similar to the requirements in NDP No. 600-1.

No violations or deviations were identified.

3. Offsite Support Staff (40703)

The purpose of the Trojan Nuclear Operations Board (TNOB), established pursuant to requirements set forth in the Operating Licensee (Technical Specification 6.5.2), is to provide independent review of designated activities involving the operation and safety of the Trojan Nuclear Plant. TNOB activities are addressed in two procedures: NDP No. 500-1 entitled "Trojan Nuclear Operations Board," Revision 2, dated April 22, 1988, and TNOB No. 110-1 entitled "Functions and Procedures of Trojan Nuclear Operations Board Staff," Revision 7, dated August 9, 1988. These procedures define the functions, responsibilities, and requirements of the TNOB and staff.

The inspector discussed TNOB activities with the TNOB supervisor, the Quality Operations Branch Manager, and one member of the TNOB staff. All agreed that the TNOB meetings have improved over the last year; specifically, the agenda, more open ended discussions, with emphasis on main issues concerning plant operations and safety. These individuals were qualified for their respective positions and duties according to the above TNOB procedures.

The inspector reviewed the TNOB meeting minutes of Meeting No. 201 conducted on June 7-8, 1989. The section on Plant Report discussed current status, and the major events since the last TNOB meeting including major NRC inspection findings during this period. Twenty-eight action items were generated during this meeting, two of which addressed a major concern regarding delays in NCR processing. The meeting minutes appeared to support the views expressed by the TNOB staff regarding the quality and free exchange of discussion on each issue.

The inspector reviewed the QA audit report of TNOB activities documented in memorandum LW-131-89, dated April 8, 1989. The audit conducted from March 6-10, 1989, covered three areas of TNOB activities: implementation of actions; compliance with Technical Specifications; and compliance with TNOB procedures. The audit resulted in the issuance of one NCAR and three recommendations offered. NCAR No. P89-102 was issued to document the inclusion of a superseded procedure in 12 TNOB Procedure Manuals.

No violations or deviations were identified.

4. Exit Meeting

The inspector met with licensee representatives denoted in paragraph 1 on September 29, 1989. During this meeting the licensee committed to correct the NCAR procedural inadequacies discussed in paragraph 2 regarding the logging-in and cancellation of NCARs. The inspector also informed the licensee that the inspection period would be extended for further review in Region V of documentation on the audit program and TNOB activities. The scope and findings of the inspection were discussed as described in this report.