

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

IE Inspection Report No. 50-313/75-14

Docket No. 50-313

Licensee: Arkansas Power & Light Company
Sixth & Pine Streets
Pine Bluff, Arkansas 71601

License No. DPR-51

Category C

Facility: Arkansas Nuclear One, Unit 1

Location: Russellville, Arkansas

Type of License: B&W, PWR, 2568 Mwt

Type of Inspection: Routine, Unannounced - QA for Operations

Dates of Inspection: November 10-14, 1975

Dates of Previous Inspection: October 28-30, 1975

Principal Inspector: *D. G. Anderson*
D. G. Anderson, Reactor Inspector

11/28/75
Date

Other Accompanying Personnel:

R. Smith
R. Smith, Reactor Inspector

11-28-75
Date

J. E. Gagliardo
J. E. Gagliardo, Reactor Inspector

11/28/75
Date

Reviewed By: *G. L. Madsen*
G. L. Madsen, Chief, Reactor Operations and
Nuclear Support Branch

11/28/75
Date

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SUMMARY OF FINDINGS

A. Enforcement Action

1. Items of Noncompliance

Infractions

- a. Contrary to Criterion II, Appendix B, 10 CFR 50 which requires that, "The applicant shall identify . . . the major organizations participating in the program, together with the designated functions of these organizations," and section 1.6.1.2 of the AP&L Quality Assurance Manual - Operations, the quarterly meeting requirement of the Quality Assurance Committee was not satisfied because a quorum was not present at the June 25, 1975 meeting. (DETAILS, paragraph 6)
- b. Contrary to Technical Specification 6.4.1.g.4, the Plant Safety Committee did not review amendments to design change requests, numbers 187 and 206. (DETAILS, paragraph 11)
- c. Contrary to Criterion V, Appendix B, 10 CFR 50:
 - (1) An individual with a senior reactor operator license did not approve Standing Order No. 12 as required by ANO-1 Administrative Procedure 1005.12.
 - (2) The Plant Superintendent or Assistant Plant Superintendent did not approve the removal of Standing Order No. 10 as required by Procedure 1005.12.
 - (3) The format and content of maintenance procedures do not conform to the guidelines of ANSI Standard N18.7 - 1972 as required by Section 5.2.5 of the licensee's Quality Assurance Manual.

(DETAILS, paragraph 13)

B. Licensee Action on Previously Identified Enforcement Items

Licensee corrective action related to an item of noncompliance (7507/8) directed toward inadequate training of maintenance personnel was reviewed. (DETAILS, paragraph 8)

This item remains unresolved.

(continued)

C. Design Changes

The Plant Safety Committee did not review amendments to design change requests as required by the Technical Specifications. (DETAILS, paragraph 11)

D. Unusual Occurrences

None identified or reported to the inspectors.

E. Other Significant Findings

1. Current Findings

a. Acceptable items

- (1) Selection and qualification of personnel. (DETAILS, paragraph 4)
- (2) Organization and administration. (DETAILS, paragraph 5)
- (3) Audits. (DETAILS, paragraph 7)
- (4) Review of Plant Operations. (DETAILS, paragraph 9)
- (5) Records. (DETAILS, paragraph 10)
- (6) Maintenance. (DETAILS, paragraph 12)
- (7) Drawing Control. (DETAILS, paragraph 13)

b. Unresolved Items

(1) Plant Safety Committee Review of Temporary Procedure Changes

During a future inspection the inspector will verify that the PSC has reviewed temporary procedure changes which have been in effect for more than one year. (DETAILS, paragraph 13)

(2) Preventative Maintenance Activities

During a future inspection the inspector will review all preventative maintenance items to verify that no safety related items are included. (DETAILS, paragraph 13)

c. Items of noncompliance identified by the licensee

None reported to the inspectors.

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2. Status of Previously Reported Unresolved Items

Not inspected.

F. Management Exit Meeting

A management meeting was held at the conclusion of the inspection on November 14, 1975.

1. AP&L - ANO-1 Personnel Present

J. W. Anderson, Jr., Plant Superintendent
G. H. Miller, Assistant Plant Superintendent
J. L. Orlicek, Quality Control Engineer
S. A. Terwilliger, Supervisor of Plant Operations
N. A. Moore, Manager - Quality Assurance
L. W. Humphrey, Quality Assurance Engineer
C. A. Halbert, Technical Support Engineer
C. R. Wright, Quality Control Inspector
L. Alexander, Quality Control Inspector
T. Green, Assistant Training Coordinator

2. Items Discussed

The inspectors stated that the purpose of this inspection was to determine if the corporate and plant staff of AP&L has developed and is implementing the Quality Assurance Program as outlined in their QA Manual. The following items were discussed during the course of this meeting:

- a. The item of noncompliance related to quorum requirements of the QA committee. (DETAILS, paragraph 6)
- b. The item of noncompliance related to design change review. (DETAILS, paragraph 11)
- c. The item of noncompliance related to procedural discrepancies. (DETAILS, paragraph 13)

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DETAILS

1. Persons Contacted

Arkansas Power and Light Company (AP&L)

W. Cavanaugh, Manager, Nuclear Services
N. A. Moore, Manager, Quality Assurance
D. A. Rueter, Licensing Engineer
D. R. Sikes, Production Project Supervisor
D. Williams, Assistant Engineer
C. L. Bean, Quality Assurance Inspector
R. D. Lane, Assistant Production Project Supervisor
G. G. Young, Assistant Engineer
J. W. Anderson, Jr., Plant Superintendent
G. H. Miller, Assistant Plant Supervisor
B. A. Ter Ulliger, Supervisor of Plant Operations
T. Cogburn, Nuclear Engineer
T. Baker, Chemistry & Environmental Supervisor
B. G. Parker, Shift Supervisor
V. Kinsey, Secretary, PSC
R. G. Carroll, Health Physics Supervisor
R. Turner, Engineering Technician
T. Martin, Maintenance Supervisor
M. Bishop, Records Supervisor
D. Hollis, Journeyman Mechanic
L. W. Humphrey, Quality Assurance Engineer
A. W. Huebner, Quality Assurance Engineer
D. C. Trimble, Training Coordinator
J. D. Vandergrift, Shift Supervisor
C. A. Halbert, Technical Support Engineer
P. Jones, Instrument and Controls Supervisor
B. Baker, Assistant Maintenance Supervisor
J. Crowe, Store Room Supervisor
L. Alexander, Quality Control Inspector
D. Smith, QA Engineer
J. L. Orlicek, Quality Control Engineer
T. Green, Assistant Training Coordinator

2. Purpose of the Inspection

Revision 2 of the AP&L topical report APL-TOP-1 entitled, "Quality Assurance Manual - Operations" was approved 1/ by NRC/DRL on May 12, 1975.

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1/ Letter and evaluation, Vollmer (NRC/DRL) to Phillips (AP&L) dated 5/12/75.

This inspection was conducted to ascertain that the staff of AP&L has developed and is implementing the Quality Assurance Program as outlined in their manual. It was also the purpose of this inspection to determine if the program is applicable to ANO-1 and that the company corporate and plant QA staff are performing their assigned QA responsibilities.

3. Plant Status

On the first day of the inspection, the plant was at 80% FP and in power ascension after a scheduled shutdown for control rod repatch. At the end of the inspection, the plant was operating at 98.8% FP.

4. Selection and Qualification of Personnel

The inspector verified by a review of selected personnel records that certain key corporate and plant positions, detailed in the QA Manual and the FSAR, were staffed with personnel who meet the minimum educational, experience, and qualification requirements which had been established initially. The inspector also verified that technical training courses committed to in the licensee's application (FSAR) had been completed as required.

The inspector had no questions on this item.

5. Organization and Administration

The inspector verified by a review of the QA Manual, the FSAR, and recently submitted semiannual reports, that the licensee's plant and corporate organizational structure is as described in the facility Technical Specifications. The inspector reviewed operating logs and selected shift schedules to verify that shift crew composition and requirements for licensed personnel were in compliance with Technical Specifications. The inspector reviewed meeting minutes of the Quality Assurance Committee, the Plant Safety Committee, and the Safety Review Committee to verify that committee makeup is as required by Technical Specifications.

The inspector had no questions on this item.

6. Review Committees and Functions

The inspector verified that the Plant Superintendent and corporate members of the QA review organization are cognizant of the review commitments and administrative controls which are being implemented with regard to proposed changes and modifications, tests and experiments, changes in procedures, and records, logs, and reporting requirements. The inspector also reviewed minutes of the Plant Safety Committee, the Safety Review Committee, and the QA Committee to verify that:

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- a. All committee meetings convened during the previous year were held at the frequency required by the Technical Specifications and the QA Manual.
- b. Meeting membership of all committees satisfied the quorum requirements of the Technical Specifications and the QA Manual.
- c. Changes, violations, tests and experiments are being reviewed as required by the Technical Specifications and the QA Manual.

The inspector noted that a quorum was not present for the June 25, 1975 meeting of the QA committee. Since this meeting was necessary to meet the meeting requirement of Section 1.6.1.2 of the QA Manual, the person in charge was notified that this discrepancy would be identified as an item of noncompliance of the infraction category.

The inspector had no further comments on this item.

7. Audits

The inspector verified that personnel responsible for approval of audit procedures, training of audit personnel, evaluation of audit personnel independence, and assurance that corrective action is taken for deficiencies identified during audits, understand the defined requirements of the QA program.

The inspector reviewed audit reports to verify that:

- a. Each audit plan identifies scope, requirements, activities, notification, and references, and is conducted according to an approved schedule.
- b. Each audit is conducted according to approved procedures using prepared checklists.
- c. Each audit is performed by trained personnel independent of the area being audited.
- d. Audit results are documented and reviewed by management having responsibility in the audit area, and by corporate management and suggested corrective action is taken for deficiencies noted during the audit.

The inspector had no comments on this item.

8. Training

- a. The inspector verified that each new employee is provided an indoctrination training program which is described in writing and includes:

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- (1) Radiological Health and Safety Training
- (2) Emergency Procedures
- (3) Natural Disaster Procedure
- (4) Fire Procedures
- (5) Personnel Injury Procedures
- (6) Plant Security Procedures
- (7) QA/QC Procedures
- (8) First Aid Procedures

The inspector reviewed personnel files on a sampling basis to verify that documentation is available for employees which includes education, experience, qualifications, training, and retraining (where applicable).

- b. The inspector reviewed training schedules, lecture items, lecture plans, examinations, and interviewed instructors to verify that:
- (1) A training program has been established.
 - (2) Responsibility has been assigned to administer the program.
 - (3) Lecture schedules have been established for required lecture items.
 - (4) The program includes the use of training aids.

The inspector did note however, that in the areas of technical support and maintenance, the training programs do not appear to meet the licensee's commitments to ANSI 18.1, Section 5.1, and Section 5.6. The licensee was notified that this item would be reviewed at the next inspection.

- c. The inspector reviewed records of operator and senior operator training and requalification to verify that:
- (1) Training courses were completed and yearly examinations were administered.
 - (2) Manipulations required by Appendix A to 10 CFR 55 were performed and documented.
 - (3) Individual study and use of training aids was accomplished and documented.

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- (4) Indoctrination of new and existing employees to security practices was conducted.
- (5) Indoctrination of new and existing employees and construction personnel to health physics practices was conducted.
- (6) Indoctrination of new and existing employees to the emergency plan was conducted.
- (7) The lecture series for requalification of all operators and senior operators including subjects and duration is being implemented and documented.
- (8) Individual review of design, procedure, and license changes is being documented.
- (9) The results of supervisory evaluation of each individuals' qualifications, training, and examination is being documented.

The inspector had no further questions on this item.

9. Review of Plant Operations

During this inspection, the conduct of plant operations was reviewed to insure that all phases of facility operations conform to the requirements of the facility license and the licensee's administrative procedures.

The inspection effort included:

- a. Review of control room log sheets from November 5 through November 13, 1975 to verify that required entries are made and that the sheets are reviewed by the staff.
- b. Review of the shift supervisor log entries from November 5 to November 13, 1975 to verify that plant conditions are logged in sufficient detail.
- c. Observation of control room operations and verification that the number of on-duty operators complied with TS requirements.
- d. Observation of control room indications, alarms, and valve position switches.
- e. Discussions with the control room operator to verify his knowledge of any abnormal condition noted by alarms and other indication.
- f. Tour of selected plant areas to verify that:

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- (1) Monitoring instrumentation is being recorded as required.
- (2) Radiation controls have been properly established.
- (3) Plant housekeeping conditions are adequate.
- (4) There are no significant fluid leaks.
- (5) There is no excessive piping vibrations.
- (6) Pipe hanger/seismic restraint setting and oil levels are satisfactory.

The inspectors conducted drop-in visits of the control room throughout the inspection period and also observed the shift turnover between 0800-1600 and 1600-2400 shifts on November 12. Control room manning requirements were satisfied and control room operations were being conducted in a professional manner during all of the visits. In general, the condition and cleanliness of the plant was acceptable.

10. Records

The licensee's program for the control, storage, retention and retrieval of records and documents was reviewed to assure conformance with Technical Specifications (TS) and approved procedures.

The inspection effort included:

- a. A review of procedures that provide the definition for control of records.
- b. A review of selected documents to verify that the program for the control, storage, retention and retrieval of records is in conformance with QCP 1004.04, "Turnover of Quality Assurance Documentation from Construction to AP&L"; Procedure 1004.21, "Handling of Procedures"; Procedure 1005.08, "Drawing Control"; Procedure 1005.09, "Plant Records Management", and Technical Specification 6.11.
- c. Selected drawings, operating records, surveillance tests, acceptance tests, calibration records, and vendor certification data was requested and verified to be of the latest revisions and all records requested were available.

The licensee stated that all drawings have not been turned over from the Architect Engineer but expects this turnover to be completed by March 1976.

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11. Design, Design Change and Modification

- a. Facility records, relative to selected design changes completed since licensing, were reviewed and discussions relative to these changes were held with the licensee. The following areas were examined during this inspection:
- (1) Written safety evaluations as per 10 CFR 50.59.
 - (2) Quality assurance procedures.
 - (3) Review and approval of the change as required by the Technical Specifications and established QA procedures.
 - (4) Implementation of the change as required by procedures.
 - (5) Acceptance test procedures, data sheets and approval sheets verifying satisfactory control.
 - (6) Review and approval of the performance of the modified equipment as indicated in acceptance criteria of the acceptance testing.
 - (7) Operating procedure, where applicable, to the changes made.
 - (8) As-built drawings, changed to reflect the modifications.
 - (9) Interviews with selected licensee personnel were conducted to determine level of understanding of the design control process.
 - (10) Design reviews held by an independent organization.
 - (11) Minutes of the Plant Safety Committee and Safety Review Committee.
- b. Major design changes, number 187 and number 266, were selected for an in depth review of the design control and understanding by the licensee of his procedures for implementing design control.
- c. The following summarizes the inspector's findings:
- (1) Each of the changes were implemented in accordance with the established procedures.
 - (2) The acceptance test records indicate that the acceptance criteria contained in the installation and test procedures were met for each change where required.

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- (3) The performance of the modified equipment was reviewed and approved for each change.
- (4) Procedures were revised, where appropriate, to reflect the changes to equipment.
- (5) Selected as-built drawings were reviewed for DCR 187 and 266. Drawing sketches were provided in each case to perform the modification; however, the master drawings were not corrected in all cases to identify the modification. The drawings were recently turned over to AP&L from the construction Architect-Engineer (AE) and a major plan and updating of drawings is in progress.
- (6) The two initial Design Change Requests were approved as required by the licensee procedures and technical specifications.

During the review and fabrication of these design changes, additional changes were identified and made. The Steam Line Break Instrument and Control System was changed to allow manual electric operation of the feed line isolation valve while the system was at operational pressure. The Building Spray System Crossover line removal design change was changed to permit installation of a drain line.

Design Changes 266A and 187A do not have evidence of having been reviewed by the Plant Safety Committee. This is considered an item of noncompliance to TS 6.4.1.g.4 which states, "the committee shall review proposed changes or modification to plant systems or equipment."

12. Maintenance

The maintenance of safety related equipment was examined and compared against the requirements of 1004.10, "Calibration Control," 1004.13, "Nonconforming Material, Parts or Components," and 1004.17, "On-site Fabrication and Modification Control," ANSI 18.1, "Selection and Training of Nuclear Power Plant Personnel" and the Technical Specifications.

The inspector selected 20 Job Orders and examined each for the following:

- a. Were limiting conditions for operation met while the equipment was removed from service for maintenance?
- b. Were administrative approvals obtained prior to initiating the work?
- c. Were the maintenance activities accomplished using approved procedures when specified?

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- d. Were the maintenance activities inspected as required?
- e. Were Surveillance Testing calibrations and functional tests completed as required prior to returning the equipment to an operating status?
- f. Were required quality control records generated?
- g. Were maintenance activities accomplished by qualified personnel?

Interviews were held with selected personnel from the corporate offices, operations group, engineering group, and maintenance group to determine the levels of understanding of how maintenance of safety items is controlled. Comments on maintenance are included in paragraph 15.

13. Document Control

The objective of this inspection effort was to determine if the licensee has implemented the document control section of his QA program.

a. Procedure Control

The inspector reviewed the licensee's overall procedure controls which included:

- (1) Verification that a master list is maintained which identifies the current revision number of all procedures and instructions.
- (2) Verification that the control room copy of the operations procedure manual is complete and current.
- (3) Verification that the requirements for recalling/destroying superseded procedures is understood and followed by operations personnel.
- (4) Verification that operations personnel understand and comply with the requirements for issuing and controlling temporary procedure changes.
- (5) Verification that standing orders and special orders are issued and controlled in accordance with the established procedures.
- (6) Verification that the content of all procedures is in conformance with requirements of ANSI Standard N18.7 - 1972.
- (7) Verification that responsibilities have been assigned and requirements delineated to assure that the results of preventative and corrective maintenance are reviewed for adequacy and identification of problems which may require further corrective action.

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Technical Specification (TS) 6.7.3 and the licensee's Quality Control Procedure (QCP) 1004.21 establish the requirements for issuing and controlling temporary procedure changes. The licensee has issued numerous temporary procedure changes. The inspector selectively reviewed approximately 10% of the current temporary changes and found that all of them had been issued in accordance with the above requirements. QCP 1004.21 and Section 5.3.3 of the Quality Assurance Manual require, however, that temporary procedure changes which remain in effect for more than one year shall be reviewed by the Plant Safety Committee (PSC).

The inspector selected for review fourteen (14) temporary procedure changes which had been issued between May and September 1974. A licensee representative stated that all of these changes had been reviewed by the PSC. The inspector stated that he would review the documentation of the PSC reviews during a future inspection. This item has been identified as an unresolved item pending the inspector's review of the PSC minutes.

ANO-1 Administrative Procedure 1005.12 entitled "Standing Orders" requires in part that, "Standing Orders will require approval of the Plant Superintendent or Assistant Plant Superintendent and the group supervisor whose group will carry out the orders, plus additional signatures as necessary, such that at least one of the signatures is by an individual with a Senior Reactor Operator's License."

This procedure also establishes the following requirements relative to the removal of a standing order: "Standing Order may be removed by request of the Group Supervisor and will require approval of the Plant Superintendent or Assistant Plant Superintendent and the Group Supervisor whose group is responsible for carrying out the Standing Order"

Contrary to the above requirements, Standing Order No. 12 (Reactor Power History, Quadrant Tilt and Imbalance Records) was not approved by an individual with a Senior Reactor Operator's License and Standing Order No. 10 (Relay Tests) was removed without the approval of the Plant Superintendent or Assistant Plant Superintendent. The failure to adhere to the requirements of procedure 1005.12 is an item of noncompliance with the requirements of Criterion V of Appendix B to 10 CFR 50 which requires that activities affecting quality be accomplished in accordance with written procedures. The licensee is committed to this Appendix B requirement by his approved Quality Assurance Manual.

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ANSI Standard N18.7, Section 5.3.2, establishes the recommended format and content of operating and maintenance procedures, and Administrative Procedure 1004.21 (Handling of Procedures) requires that procedures be drafted using guidance similar to that of Section 5.3.2 of ANSI N18.7. For maintenance procedures, however, Section 5.3.5 of ANSI N18.7 has additional requirements. This section states that, "Maintenance procedures shall contain applicable items listed under 5.3.2 and, in addition, measures to cover the features of maintenance described below." The additional features referenced by the above statement in Section 5.3.5 include:

- (a) Adherence to applicable radiation protection measures.
- (b) Permission to release equipment or systems for maintenance.
- (c) Measures to provide for protection of equipment and workers.
- (d) Measures to prevent entry of extraneous material and to assure that foreign material is removed from these systems.
- (e) Post-maintenance checkout and return to service.

It was further noted that Administrative Procedure 1004.21 does not require the above additional features within the format/content of maintenance procedures.

The operating, emergency and maintenance procedures which were reviewed during this inspection did comply with the format/content guidance of Section 5.3.2 and Procedure 1004.21. It was found, however, that the format and content of maintenance procedures were not in conformance with the above additional requirements of ANSI N18.7. Some of the above features had been incorporated in several of the procedures which were reviewed, but in general these features are not included in maintenance procedures.

Since the licensee stated in Section 5.2.5 of his Quality Assurance Manual (QAM) that, "The format, content and philosophy of instructions and procedures shall comply with the guidelines provided in ANSI N18.7 - 1972" The licensee's failure to conform to ANSI N18.7 for maintenance procedure content, constitutes an item of non-compliance with Criterion V of 10 CFR 50, Appendix B.

The inspector reviewed the licensee's preventative maintenance (PM) activities and program. The preventative maintenance program consists of a computer scheduled program from which a schedule of PM

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activities is produced and issued weekly to maintenance personnel. A punched computer card is also issued for each maintenance item on the schedule. The computer cards are returned as the maintenance items are completed and are used to remove the completed maintenance items from the schedule.

Licensee representatives said that there exists no written administrative procedures which provide instructions relating to the (1) planning; (2) performance; (3) documentation; (4) testing; and (5) review of PM activities. The licensee's representative also stated that there exists no written procedures for conducting PM activities. The inspector noted that the failure to have procedures for controlling and conducting safety-related maintenance activities is contrary to Section 5.1.6.1 of ANSI Standard N18.7 - 1972 and to TS 6.7.1.e. The licensee representatives said that there are no maintenance items within the PM program that can affect the performance of safety-related equipment. The inspector stated that he would review the list of PM items during a future inspection to verify that no safety-related maintenance is included in the PM program. This item has been identified as an unresolved item pending completion of the above review by the inspector.

b. Drawing Control

The inspector also reviewed the licensee's overall control of engineering drawings. The review included:

- (1) An examination of the administrative procedures used to define the control of drawing.
- (2) Questioning of plant supervisory personnel to ascertain whether they understand the above procedures.
- (3) An examination of 12 drawings to verify that the master copy (SEPIA) in the plant files, the sub-master in the corporate office and the working copies in the control room and/or work shops were of the same revision and issue date.

No discrepancies were found in this review.

It was noted that the plant's master copy (SEPIA) of all drawings was not truly the master or original. The SEPIA copies are reproduced from the true master (MYLAR) which is controlled by the Architect-Engineer (AE). Drawing changes are transmitted to the AE by the corporate engineering staff. The AE makes the change to the MYLAR master and sends a new SEPIA master to the licensee. Licensee representatives stated that this method of drawing revision has not resulted in excessive time delays between the initiation of a drawing change and the receipt of the revised drawing. The licensee

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representatives said that all of the MYLAR master drawings will be turned over to the licensee by March 1976 and after the turnover the licensee will make all drawing changes.

14. Reporting Requirements

The objective of this inspection effort was to determine if (1) the information reported in the Startup Report is substantiated by facility records; (2) the Startup Report was submitted in accordance with the TS; (3) the test results are consistent with previously identified performance specifications, and (4) identified deficiencies had been corrected.

For the twelve (12) startup tests listed in Table I the inspector reviewed the approved test procedures, the original test data, the calculations and evaluations made by the startup engineers and the documentation of the final reviews conducted by the Test Work Group (TWG) and plant supervision. The above data and test results were compared with the information reported in the ANO-1 Startup Report dated March 19, 1975. No discrepancies were noted which had not been reported in the Startup Report.

As noted in the Startup Report, the baseline data for vibration and loose parts monitoring was not completed at the 100% power level because of instrumentation problems. It was also noted that several areas in the reactor auxiliary building and many areas in the reactor building had dose rates which exceeded the acceptance criteria given for the biological shield tests. These items had not been resolved as of the date of this inspection and remain open.

15. Plant Malfunctions, Failures and Nonconformities

The objective of this inspection effort was to determine if the licensee has implemented an effective QA program which will assure that malfunctions and failures of systems and components will be adequately reviewed, evaluated and reported in accordance with NRC requirements.

The inspector reviewed ANO-1 Quality Control Procedures (QCP) No. 1004.02 (Initiation and Processing of Trouble Tickets), and No. 1004.13 (Nonconformance and Corrective Action). These procedures provide acceptable methods of identifying and dispositioning conditions which are adverse to quality. The procedures also provide adequate methods for supervisory review of the adverse conditions to determine the cause and reportability of the condition.

The inspector also interviewed five supervisory personnel to determine if they understood the methods used to identify, dispose, evaluate and report conditions which are adverse to quality. All of the individuals interviewed were aware of the methods for processing trouble tickets (Procedure 1004.02),

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but two of the individuals had only marginal knowledge of the use of Nonconformance Reports (NCR's) as outlined by Procedure 1004.13.

QCP Procedure 1004.13 requires that all personnel promptly report nonconformances in all areas and that discrepancies noted during maintenance are reported on trouble tickets or "on an NCR by the cognizant supervisor, if appropriate." The procedure also describes the conditions for which an NCR would normally be issued. These requirements are stated as follows:

"The cognizant supervisor is responsible for determining the need for an NCR. NCR's are normally written to cover:

- (1) Recurring failures
- (2) Failures resulting from poor workmanship
- (3) Failures resulting from improper material applications
- (4) Failures indicating design deficiencies
- (5) Incidents requiring failure analysis beyond the scope of sound engineering judgement
- (6) Significant conditions adverse to quality"

The inspector reviewed the NCR's which had been issued in the past year. It was noted that most of the NCR's were related to nonconformances in procurement items. The inspector noted that most of the Abnormal Occurrences (AO's) reported by the licensee in 1975 satisfied one of the six criterion listed above, but an NCR was not issued for any of these AO's. Since procedure 1004.13 states that NCR's are normally written to cover the above listed criteria, the licensee's failure to issue NCR's for abnormal occurrences is not an item of noncompliance with the procedure, but it is apparent that the intent of the procedure is not being followed. The inspector expressed concern about this matter to the licensee representatives.

It was also noted by the inspectors, and brought to the attention of licensee representatives, that the two supervisors who demonstrated only a marginal knowledge of NCR processing were in the Plant Maintenance Group. In paragraph 8 of this report apparent weaknesses in the training of maintenance personnel were discussed. The results of this inspection effort substantiates this apparent weakness.