

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Operations Inspection

IE Inspection Report No. 050-346/76-17

Licensee: Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo Ohio 43652

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

License No. CPPR-80
Category: B

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

Type of Inspection: Routine, Announced

Dates of Inspection: August 16-27, 1976

Principal Inspector: *R. D. Martin*
R. D. Martin

(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: None

Reviewed By: *R. C. Knop*
R. C. Knop, Chief
Reactor Projects Section 1

(Date)

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SUMMARY OF FINDINGS

Inspection Summary

Inspection on August 16-17, 1976, (76-17): Review of test schedule of licensee; review of audit, management, program review and reportable occurrence review program of the licensee's Quality Assurance Program for Station Operation, review of test procedures and test results.

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

Of 95 required local leak rate tests of containment penetrations, the licensee has successfully completed 43 tests. Testing continues as penetrations become available.

B. Facility Items (Plans and Procedures)

None identified during this inspection.

C. Managerial Items

The inspectors, after a review of the progress of the test program of the licensee, estimate the earliest fuel load date for the facility to be February 1, 1977.

D. Noncompliance Identified and Corrected by Licensee

None identified during this inspection.

E. Deviations

None identified during this inspection.

F. Status of Previous Reported Unresolved Items

Not within scope of this inspection.

Management Interview

- A. The following persons attended the management interview at the conclusion of the inspection:

L. Roe, Vice President, Facilities Development
J. Evans, Station Superintendent
J. Lenardson, Manager of Quality Assurance
W. Green, Assistant to Station Superintendent

- B. Matters discussed and comments were as follows:

1. Management

The inspector stated that further revisions to the Nuclear Quality Assurance Manual (NQAM) were required pertaining to the review of events by the Station Operator staff. The licensee acknowledge the comments. (Paragraph 1, Report Details)

2. Review

The inspector stated that further revisions to the Station Review Board (SRB) charters were necessary to get agreement with the FSAR and the Technical Specifications.

In addition, the QA requirements for the SRB and Company Nuclear Review Board (CNRB) would have to be included in the NQAM. The licensee stated these revisions would be made. (Paragraph 2, Report Details)

3. Reportable Events

The inspector noted that Administrative Procedures covering site review required additional revision to agree with the FSAR and to include requirements for interface with the SRB. The licensee acknowledged the comment. (Paragraph 3, Report Details)

4. Audits

The inspector stated that except for two items yet to be completed, he had no further questions on the Audit Program of the Quality Assurance Program for Station Operations to be used by the licensee. The licensee indicated that these two items will be ready for review in the near future. (Paragraph 4, Report Details)

5. Test Procedure Review

The inspector noted that he had provided comments on test procedures to staff members of the licensee. (Paragraph 5, Report Details)

6. Nonconformances

The inspector indicated that that he had performed a review of selected NCR's for reportable issues, and that no significant deficiencies were noted. (Paragraph 6, Report Details)

7. Test Schedule

The inspectors summarized their findings with respect to licensee schedule. (Paragraph 7, Report Details)

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:

Toledo Edison Company (TECO)

K. Cantrell, Operations Quality Assurance Engineer
J. Buck, Operations Quality Assurance Engineer
P. Narducci, Quality Control Supervisor
S. Batch, Assistant Engineer
G. Waugh, Assistant Engineer

Babcock and Wilcox (B&W)

A. Mercado, Test Scheduler
B. Bethards, Test Engineer
D. Lee, Test Engineer
J. Albert, Test Engineer

Bechtel Start-up

W. Taylor, Start-up Flushing Engineer

Results of Inspection

1. Management

The inspector reviewed revisions of the Quality Assurance Manual and site Administrative Procedures to determine if comments from a previous inspection^{1/} report had been incorporated.

During discussion with the licensee and review of the Nuclear Quality Assurance Manual (NQAM) it was determined that sections would have to be added to the manual pertaining to the review of significant deficiencies by the Station Review Board (SRB) occurring after the plant was operational. The licensee stated that these requirements would be included in a subsequent revision to the NQAM.

As stated in a previous report,^{2/} the licensee still does not have a formal method of assuring that appropriate management personnel received the following in a timely manner:

1/ IE Inspection Rpt No. 050-346/76-06.

2/ Ibid.

- a. NRC Enforcement Correspondence.
- b. Inspection and Enforcement Bulletins.
- c. Results of Onsite and Offsite Review Board Meetings.

In reviewing the outstanding items from the management aspects of the NQAM, the inspector noted that the monthly QA reports generated by the QA manager are now being transmitted to the plant superintendent as required, and that the monthly report now contains the required analysis of quality trends.

The inspector verified that QA training was given to plant supervisory personnel covering personnel qualifications, NQAM, SAR commitments and test results. In addition, Administrative Procedures are included in the required reading file by the Training Department.

2. Review

The inspector reviewed the status of deficiencies found during a previous inspection^{3/} of the licensee's program for review of facility activities.

The inspector's review determined:

- a. The charter for the Company Nuclear Review Board (CNRB) had been approved and included the requirements of ANSI-N 18.7 and Section 6 of the Technical Specifications.
- b. The charter for the Station Review Board has been approved, however, it was deficient in the following areas:
 - (1) Does not address SRB review of Reactor Trips, excursions as stated in FSAR 13.6.2.
 - (2) Does not address SRB review of 30-day reportable events as stated in FSAR 13.4.1 and Administrative Procedure AD 1804.
 - (3) Wording of SRB review of unreviewed safety questions does not agree with Technical Specification 6.5.1.7.b.
 - (4) FSAR 13.4.1 states that SRB minutes will be kept by a permanent secretary. The charter does not address this or state the time frame for distribution of meeting minutes.

3/ Ibid.

- c. The inspector noted that the QA requirement for the SRB has not been incorporated into the NQAM and that the requirements for the CNRB had been dropped from the NOAM. The licensee stated that these requirements would be included into a subsequent revision to the NQAM.
- d. The inspector noted that based on the way that QAP 2160 is written, a corrective action report would be required for each reportable event in addition to the LER report. The licensee stated that they would review the matter.

3. Reportable Events

The inspector reviewed the status of deficiencies found during a previous inspection^{4/} of the licensee's program for review and reporting of reportable events.

The inspectors review determined:

- a. The Administrative Procedure AD 1807 dealing with review of events did not properly address:
 - (1) Review of Reactor Trips, etc., required by FSAR 13.6.2.
 - (2) The interface with SRB requirements for review of reportable events.
 - (3) The loop closure used in event a Deviation Report is rejected during the report cycle.
 - (4) Description of what will be the tracking mechanism for followup reports, outstanding commitments, etc.
- b. That the NQAM still does not adequately described when a Nonconformance Report will be generated for Reportable Events or Deviations Reports.
- c. Administrative Procedure AD 1804, "Report Management," does not interface with AD 1807 dealing with Reportable Events.

4. Audits

The inspector reviewed the status of deficiencies found during a previous inspection^{5/} of the licensee's program for the conduct of audits.

4/ Ibid.

5/ Ibid.

The inspector's review determined:

- a. The criteria for independence of audit personnel has been established in the program and are in accord with the current FSAR (Revision 20) commitments.
- b. The distribution of Audit Finding Reports are as described in the FSAR and the NQAM procedures.
- c. The method of handling Audit Finding Report replies is as described in the FSAR and the NQAM procedures.
- d. Audit activity scheduling is now part of a controlled document.
- e. The FSAR and the departmental administrative documents address the existence and duties assigned to multiple Operations Quality Assurance Engineers.
- f. The relationship of the Company Nuclear Review Board (CNRB) to Audit Program activities have been addressed in the approved charter of the CNRB.

With the exception of the following two items, the inspector has no further questions regarding the Audit Program of the licensee's Quality Assurance Program for Station Operations as described in Section 17.2.18 of the FSAR:

- a. The licensee is to generate the specific audit schedule described in Quality Assurance Instruction (QAI) 4186.
- b. The licensee is to review and revise, as discussed with the inspector, Exhibit A of QAI 4186.

These two items will be reviewed by the inspector during a subsequent inspection.

5. Test Procedure Review

The inspector provided staff members of the licensee with comments on the following approved test procedures. No significant deficiencies were noted by the inspector during his review of these procedures against present licensee commitments:

- | | | |
|-----------|---|---|
| TP 170.02 | - | Auxiliary Building Non Radioactive Areas
Ventilation System Test |
| TP 200.04 | - | RCS Hydrostatic Test |

- TP 200.08 - Pressurizer Relief Valve Test
- TP 210.03 - RC Chemical Addition System Equipment Preoperational Test
- TP 271.01.1 - Main Steam Supply System Preoperational Test
- TP 600.11 - Auxiliary Feed System and OTSG Level Control

6. Nonconformance Report Review

The inspector reviewed Toledo Edison Nonconformance Reports 73-76 to 101-76 to ascertain if appropriate reporting requirements had been met. No deficiencies were noted.

7. Test Schedule

The inspectors met with licensee staff representatives and management to discuss:

- a. The status of the test schedule.
- b. The progress of testing activities.
- c. The test activities planned.
- d. Revisions to the test schedule.

With regard to this last item, senior management personnel reiterated that, while schedule revisions for the sake of efficiency or expeditious conduct of the test program may be considered, it is the expressed intention of the licensee to do everything possible to demonstrate the adequacy and safety of the facility through the preoperational testing program. Schedule revisions which might conflict with this intent would not be undertaken.

As a result of these discussions, the inspectors indicated to the licensee that the earliest possible fuel load date, in their view, was February 1, 1977. However, they indicated that regardless of the schedule actually attained, inspection activities would match the pace established by the licensee.

8. Test Procedure Results

The inspector reviewed the partially completed Test Procedure TP 203.03 "Decay Heat System Preoperational Test." Sections 7.1 and 7.3 of that procedure were partially completed. The inspector reviewed those test records for conformance to the requirements of the AD 1801 series of Administrative Procedures, and no deficiencies were noted during that review.