

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

REGION V

Report No. 50-312/80-13
Docket No. 50-312 License No. DPR-54 Safeguards Group _____
Licensee: Sacramento Municipal Utility District
P. O. Box 15830
Sacramento, California 95813
Facility Name: Rancho Seco
Inspection at: Clay Station, California
Inspection conducted: May 5 to 9, 1980
Inspectors: G. B. Zwetzig, Reactor Inspector July 2, 1980
Date Signed
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Approved By: B. H. Faulkenberry, Chief 7/2/80
Date Signed
Summary: Reactor Project Section 2, Reactor Operations and Nuclear Support Branch

Inspection on May 5 to 9, 1980 (Report No. 50-312/80-13)

Areas Inspected: Routine, unannounced inspection of the Document Control Program; Onsite Review Committee Operations; the Reactor Operator Requalification Program; and followup on an IE Bulletin. The inspection involved 36 inspector-hours onsite by one inspector.

Results: No items of noncompliance or deviations were found.

DETAILS

1. Persons Contacted

P. Borchers, Site Document Center Supervisor
R. Colombo, Technical Assistant
*G. Coward, Maintenance Supervisor
*J. Mau, Training Supervisor
*H. Heckert, Nuclear Engineering Technician
*T. Tucker, Shift Supervisor
*M. Carter, Outage Scheduler
*J. Sullivan, Senior Quality Assurance Engineer
*R. Miller, Chemistry and Radiation Control Supervisor
J. King, Shift Supervisor

The inspector also interviewed a number of other licensee employees including a control room operator, an instructor and document clerks.

*Denotes those present at exit interview.

2. Document Control Program

The inspector reviewed licensee procedure ECP-1, "Rancho Seco Configuration Control," and verified that controls had been established for distribution of updated drawings to the plant site. For completed work, these updated drawings would consist either of marked-up drawings printed on yellow paper or (later) aperture cards for the drawing as revised by the drafting department. In addition, when changes were outstanding against a drawing these were noted on the aperture card.

The Site Document Center maintains controlled stick files of drawings at eleven locations onsite. The licensee's representatives at the Site Document Center stated that first priority in distribution of updated drawings was given to the files in the Control Room.

The inspector did not identify formal procedures for removal of obsolete drawings from the controlled files. The licensee's representative stated, however, that personnel who deliver the updated drawings to the controlled stick files are instructed to remove the obsolete drawings when new drawings are inserted. The inspector's examination of the controlled stick files indicated that although there were a few instances where obsolete drawings had not been removed when the latest drawings were inserted, the instructions for removal of obsolete drawings had been followed in most instances. The inspector recommended that an increased effort should be made to assure that all obsolete drawings are removed from the controlled stick files.

The inspector verified that controls were provided for correcting identified discrepancies between plant drawings and the as-built condition of the plant. The principal mechanism for effecting such corrections is Quality Assurance Procedure (QAP) No. 17, "Nonconforming Material Control." This

procedure provides for initiation of a Nonconforming Report (NCR) when a system is found not to be constructed or operating as designed. The system is then either "reworked" to conform, or "repaired" or "accepted" in which case some degree of nonconformance may remain. Any "repair" or "accept" disposition, however, must be approved by the Engineering Review Board which consists of the Managers of Nuclear Operations, Generation Engineering and Quality Assurance. Any plant modifications or drawing changes resulting from the disposition are then handled in the normal manner.

The inspector verified that master indices were maintained for drawings, procedures and technical specifications. It was noted, however, that the indices existed in different locations and in different forms for the various types of documents. A master index was not maintained for manufacturer's technical manuals, but control of newly received manuals had recently been initiated. This apparent past absence of control of manufacturer's technical manuals was also identified during the concurrent inspection by the Performance Appraisal Branch (PAB). Accordingly, this matter will be addressed in the PAB report of the inspection.

The inspector verified that appropriate controls were provided for distribution of revised procedures and amendments to the technical specifications. These controls were in the form of a signed return receipt system. Audits to determine whether documentation at controlled locations is up-to-date, is only formally required for Quality Assurance Manuals and Technical Specifications. In addition, on some occasions audits of the configuration control program have ascertained whether the controlled stick files were up-to-date. This was not a regular audit item, however. In view of the importance of up-to-date reference material for use in responding to an emergency, the inspector recommended that the licensee's audit program be expanded to include regular audits of plant drawings and procedures to verify that they are up-to-date. The licensee's representative agreed to consider this. This matter will be followed up at a subsequent inspection (80-13-01).

The inspector selected eight piping and instrumentation (P&I) drawings for safety related systems, four administrative procedures, three surveillance procedures and three operating procedures as reference documents for use in determining (on a sampling basis) the effectiveness of the document control system. The inspector examined the P&I drawings in the controlled files at the Site Document Center, the Control Room, and the Site Administration Building against the index maintained by the Engineering Control Center at the licensee's main headquarters. Based on this examination the inspector determined that, with a few minor discrepancies, the control system was effective and the controlled files were being maintained in an up-to-date condition. While inspecting in the Control Room the inspector noted an additional drawing file which contained many very obsolete P&I drawings. This file was stated to be an uncontrolled file. When this was brought to the attention of the licensee at the exit interview, the licensee's representative agreed to remove the obsolete P&I drawings (that were

not being retained for some special purpose) from the control room. This matter will be followed up at a subsequent inspection (80-13-02).

The inspector examined copies of the selected facility procedures in the master files, the Control Room, the Administration Building Library and the Remote Shutdown Panel (Operating Procedures only) to determine if they were up-to-date relative to the master indices. Except for the copies of the Operating Procedures located in the Administration Building library all of the other copies of the procedures were found to be fully up-to-date. The licensee's representative stated that the reason the procedures in the library were not up-to-date was because the library is not a priority location and therefore only receives copies after they have returned from the printer. Critical operation locations such as the Control Room and Remote Shutdown Panel, however, receive Xerox copies of revised procedures on an expedited basis following approval. In view of the large volume of operating procedure changes recently processed and the non-critical nature of the library repository, the inspector concluded that the logistic delay in updating the procedures at this location was acceptable.

No items of noncompliance or deviations were identified.

3. Onsite Committee Operations

The inspector reviewed the most recent change to the charter of the Plant Review Committee (PRC). This review indicated that the change brought the charter into exact agreement with the facility technical specifications with regard to defining the responsibilities of the committee, and added formal provisions designed to assure that all required procedure revisions were identified in a timely manner.

The inspector verified that the PRC membership was as required by the facility technical specifications and that during 1979 the committee met in excess of the minimum number of times required by the technical specification (114 times in 1979 versus required monthly meetings).

The inspector selected five items reviewed by the committee to determine if a quorum was present and if those in attendance (including nonmember advisors) possessed the expertise necessary for the items being reviewed. Specific items considered, including identification of the meeting at which the item was reviewed, were as follows:

<u>Meeting No.</u>	<u>Date</u>	<u>Topic</u>
765	05/05/80	Quarterly Reactor Building Purge Filtering Surveillance (temporary change to procedure)
751	04/16/80	Reportable Occurrence - Dresser Industries Notification that Safety/Relief Valves were not guaranteed for Two Phase Flow
733	03/15/80	Review of Quarterly Evacuation Drills
721	02/20/80	Reportable Occurrence - Dropping of ARIS Calibration Block
645	08/08/79	Review of Procedure MT .016, Rev. 1, Hydrostatic Test Pump Operations and Hydrostatic Testing

Based on review of the above, the inspector concluded that quorum and expertise requirements were satisfied for the PRC review of these items.

The inspector also reviewed the minutes of approximately fifteen other meetings of the PRC held during 1979 and 1980 to determine whether the PRC had, as required by the technical specifications, reviewed proposed changes in the facility technical specifications, proposed changes in the facility or its procedures made pursuant to the provisions of 10 CFR 50.59, and violations of facility technical specifications. Based on this review of a representative sample of meeting minutes the inspector concluded that with the exception of the review and processing of violations of technical specifications, PRC reviews had been conducted as required. Regarding review of violations of technical specifications, the inspector determined that the PRC did not formally review NRC inspection reports and Notices of Violations which might be inferred as a requirement of the technical specifications. Rather, the PRC reviewed licensee-identified reportable occurrences which involved violations of technical specifications, and reviewed and approved facility and procedure changes bearing on plant operation which constituted corrective action relative to NRC identified items of noncompliance. Since this does not include review of all violations of technical specifications (e.g. violation of administrative requirements such as audits, training, etc.) and since a quorum of the committee did not always review the licensee's letter of response to the NRC, it is not clear that the licensee is in conformance with facility technical specification 6.5.1.6.e.

This matter is considered unresolved (80-13-03).

4. Licensed Operator Requalification Training

The inspector reviewed the licensee's NRC approved requalification program (Administrative Procedure 25, "Licensed NRC Operator Retraining") and determined that the only changes in the program since the previous inspection were those mandated by the NRC in its letter of approval and the addition of training concerning the TMI-2 accident and the lessons learned therefrom.

The inspector also determined that the licensee had prepared a schedule for presentation of the required lectures, but was advised by the licensee representative that revisions in the schedule were frequently necessary to accommodate shift schedules and competing demands on the operators time. In addition, the inspector was told that with the present staffing, practically all of the formal classroom training of operators is done on overtime - either before or after the regular workshift.

The inspector inquired as to the availability of lesson plans for the various lectures and determined that plans were available, in varying degrees of detail, for a number of the lecture topics. The inspector was also advised, however, that lesson plans were frequently not available for topics presented by guest lecturers from outside the Training Staff.

Inasmuch as these lecturers are typically experts in a specific field, the inspector concluded that such exceptions from good practice were undesirable, but acceptable.

The inspector also determined that the licensee had evaluated the results of the most recent annual examinations and identified the areas where each operator had scored less than 80% in each of the examination topics. The inspector could not, however, determine how this evaluation was translated into required operator attendance at scheduled lecture topics in the deficient areas.

By examination of training records the inspector determined that although a number of operators had scored less than 80% in some topic areas of the annual examination, none had a total score of less than 70%, nor had any received unsatisfactory performance evaluations or failed to perform licensed duties for a period of four months or longer.

By review of training records the inspector was able to determine for two Control Room Operators, two Shift Supervisors and two licensed operators not actively engaged in operating or directing operation of the facility, that the files contained the following documentation:

- (a) copies of the most recent annual written examinations and the individuals responses
- (b) documentation of attendance at lectures (but not necessarily documentation of attendance at required lectures)
- (c) documentation of required control manipulations (primarily at the B&W simulator)
- (d) the results of performance evaluations, and
- (e) performance of self-study of changes in procedures and technical specification

The inspector also interviewed three licensed operators and verified that they had received the training identified in their training records.

As indicated above, it was difficult to ascertain whether operators had attended scheduled lectures in identified deficient areas. The inspector did determine, however, that the licensee had recently certified that certain operators had satisfactorily completed the operator requalification program. In view of the poor state of records relating to attendance at required lectures in identified deficient areas, the inspector questioned the existence of an auditable basis for this certification. The licensee's representative acknowledged the need for improvement of documentation in this area and stated that such improvements were being undertaken. This matter will be followed up at a subsequent inspection (80-13-04).

No items of noncompliance or deviations were identified.

5. Followup on IE Bulletin

The inspector examined the licensee's actions with respect to the following bulletin:

a. IE Bulletin 79-27 (closed)

The licensee initially responded to this bulletin by letter dated February 22, 1980. This response was supplemented by the licensee's letter of March 12, 1980. By letter dated April 14, 1980 the NRC issued an order confirming the licensee's commitments to implement the actions described in the letter of March 12, 1980 prior to resumption of operation following refueling. Implementation of these commitments was verified by the Resident Inspectors and is documented in Inspection Reports 50-312/80-16 and 50-312/80-17.

6. 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. An unresolved item disclosed during the inspection is discussed in Paragraph 3.

7. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on May 9, 1980. The inspector summarized the purpose and the scope of the inspection and the findings. The findings were acknowledged by the licensee.