

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

REGION V

Report No. 50-312/80-24
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: August 18-22, 1980
Inspectors: G. B. Zwetzig 9/5/80
G. B. Zwetzig, Reactor Inspector Date Signed

Date Signed

Date Signed
Approved By: B. H. Faulkenberry 9/11/80
B. H. Faulkenberry, Chief, Reactor Projects Section 2 Date Signed
Reactor Operations and Nuclear Support Branch

Summary:

Inspection on August 18-22, 1980 (Report No. 50-312/80-24)

Areas Inspected: Routine, unannounced inspection of audit implementation, surveillance program, followup on previously identified items, followup on IE Bulletins and Circulars, and independent inspection effort. The inspection involved 35 inspector-hours onsite by one inspector.

Results: Of the five areas inspected, no items of noncompliance or deviations were found in four areas; one item of noncompliance (infraction - failure to audit conformance with certain technical specification requirements) and one deviation (failure of MSRC to review audit reports at a scheduled meeting in a timely manner) were identified in one area (Paragraph 3).

RV Form 219 (2)

DETAILS

1. Persons Contacted

- *R. Rodriguez, Manager, Nuclear Operations
- *P. Oubre, Plant Superintendent
- *L. Schwieger, Quality Assurance Director
- *G. Coward, Maintenance Supervisor
- *R. Colombo, Technical Assistant
- *N. Brock, I&C Supervisor
- *R. Hollingsworth, Engineering Aide
- *Q. Coleman, Quality Assurance Engineer
- J. Sullivan, Senior Quality Assurance Engineer
- J. Price, Surveillance Scheduler
- J. Uhl, Plant Mechanical Engineer (ISI/IST)
- D. Blachly, Senior Mechanical Engineer
- D. Wiles, I&C Foreman
- G. Funkhauser, Nuclear Fuel Engineer (B&W)
- J. Dowson, Quality Control Coordinator

The inspector also talked with and interviewed several other licensee and contractor employees including engineers, technicians and clerks.

*Denotes those present at exit interview on August 22, 1980.

2. Licensee Action on Previous Inspection Findings

- a. (Open) Followup Item (50-312/80-04-01). Absence of inspection hold points in mechanical maintenance procedures. The inspector verified that the licensee was actively engaged in upgrading the facility mechanical maintenance procedures to include the addition of inspection hold points at appropriate steps. The inspector also determined that the Quality Control Coordinator was included in the review process for the upgraded procedures. Accordingly, only verification that procedure M.30 has been modified to reference Enclosure 7.5 (of the procedure) is needed to close out this followup item. (80-04-01)

3. Audit Program Implementation

The scope of the audit program at Rancho Seco and the schedule for conduct of the individual audits is given in the licensee's document, "SMUD Nuclear Operations Quality Assurance Audit Program", Quality Control Instruction No. 2 (QCI-2). The inspector examined this document and compared its requirements with the audit requirements defined in Sec. 6.5.2.8 of the facility technical specifications. Based on this comparison it appeared that the audit program was significantly inadequate in one area. This area was Sec. 6.5.2.8.a of the technical specifications, where it is stated that an annual audit will be performed to determine "conformance

of facility operation to all provisions contained within the Technical Specification..." The inadequacies specifically observed related to the apparent absence of annual audits of conformance to the "Limiting Safety System Settings", and "Limiting Conditions for Operations" sections of Appendix A of the technical specifications and the "Environmental Protection Conditions" section of Appendix B.

A representative of the licensee acknowledged that such audits were not performed, and stated that this was because the audits were conducted by Quality Assurance personnel who were not qualified in operations matters. The inspector noted that according to the technical specifications, the audits were the responsibility of the Management Safety Review Committee and that the committee should provide qualified auditors as needed.

This is an item of apparent noncompliance at the level of an infraction.
(80-24-01)

The inspector examined two audits that had been completed during the preceding year to determine if they had been performed in accordance with the requirements contained in ANSI Standard N18.7-1972, "Administrative Controls for Nuclear Power Plants." These audits were No. 0-267, "Configuration Control", Nov./Dec. 1979 and No. 0-268, "Clearance Procedures", Dec. 12, 1979.

Based on review of these audits, the inspector concluded that the audits had been completed in accordance with the required schedule, that written checklists had been prepared and used, that the auditors were qualified to perform the audits, that the results of the audit were documented and distributed as required by the technical specification, that corrective action was being taken as appropriate to the audit findings and that the audited organizations had responded in writing where so requested.

By letter dated September 23, 1976 the licensee committed to meet the requirements contained in ANSI N18.7-1972. The only area identified by the inspector where the licensee was not meeting the requirements set forth in Section 4.4 of this standard was with regard to review of audit reports. Specifically, this section of the standard states, in part, that "Written reports of such audits shall be reviewed at a scheduled meeting of the independent review and audit group..." In contrast to this requirement, however, although the licensee stated that he distributed a copy of each audit report to each member of the independent audit and review group (MSRC), he acknowledged that these reports were not reviewed as an item of business at MSRC meetings. Instead, it appeared to be the licensee's practice to wait until several audits have been completed and then review a list of brief synopses of audit results at a single meeting. At the time of this inspection, the last time such a review had been performed by the MSRC was in September 1979 - approximately eleven months earlier. The inspector concluded that this practice does not meet the intent of the requirements of the standard in two respects:

- (1) A synopsis of the audit is the subject of the MSRC review rather than the complete audit report, and
- (2) The current practice does not provide timely review of audits.

This is an apparent deviation from your commitment to the requirements of ANSI N18.7-1972. (80-24-02)

4. Surveillance Program

The inspector examined two aspects of the licensee's surveillance program: (1) the surveillance and inservice inspection and testing that must be done to conform with explicit requirements set forth in the technical specifications and in 10 CFR 50.55a, and (2) the calibration program for instruments which are used to demonstrate conformance with technical specification limits where the calibration requirements for the instruments are not explicitly stated.

Regarding required surveillances and inservice inspection and testing (ISI/IST), the inspector verified that the licensee maintained a master schedule for the conduct of such activities. The inspector also determined on a sampling basis that technical specification and ISI/IST requirements were properly reflected in his program. The reference used in this determination (for the ISI/IST portion) was the licensee's proposed ISI/IST program as defined in his letters of December 24, 1979 and April 17 and May 30, 1980. The inspector emphasized to the licensee that until the licensee's proposed program is approved by the NRC and the facility technical specifications are revised accordingly; he is required to follow the more conservative aspects of the combined program as discussed in the NRC letter from R. W. Reid to J. J. Mattimoe dated October 17, 1979. The licensee indicated his awareness of this requirement.

In reviewing the master schedule for surveillance and ISI/IST the inspector also verified that responsibility for the conduct of each test had been assigned and that the program status was updated approximately monthly, or more frequently when needed.

The inspector determined that responsibility for administration of the surveillance program had been assigned to the Engineering and Quality Control Supervisor by Administrative Procedure AP.1, "Organization"; that surveillances were done in accordance with written procedures which included acceptance criteria and that the results were reviewed by a cognizant engineer.

The only aspect of the licensee's program identified which appeared to be of questionable acceptability was the area of review and evaluation of the results of surveillances and tests. The licensee's surveillance program is described in Administrative Procedure No. 303 (AP.303). The program as presently defined does not explicitly require review of surveillance results. Accordingly, internal audits of this program would

not be likely to determine whether such reviews were conducted. Nevertheless, because the importance of independent professional review of test results is understood within the licensee's organization, such a review is provided. This is effected informally by the Surveillance Coordinator who expedites completion of reviews and requires that such reviews be completed prior to accepting the results for filing.

Based on the above, the inspector recommended that AP.303 be revised to add a formal requirement for the review of surveillance and testing results. The licensee's representative agreed to study this recommendation. This matter will be followed up at a subsequent inspection. (80-24-03)

The other aspect of the licensee's surveillance program examined by the inspector dealt with the calibration of instruments used to demonstrate conformance with technical specification limits where the calibration requirements for the instruments are not explicitly stated. This area was examined by identifying certain of the technical specifications where this consideration applied; this included the following sections of the technical specifications:

- Sec. 3.1.2.2 - Pressure/temperature limits for heatup/cooldown
- Sec. 3.1.3.1 - Temperature for Criticality
- Sec. 3.4.14 - Condensate Storage Tank Level
- Sec. 3.7.1.D - Diesel Generator Fuel Level
- Sec. 3.14.4.1- Carbon Dioxide Volume and Pressure

Based on discussions with operations personnel, the inspector determined the identification numbers of the instruments used to meet the limits stated in the above sections of the technical specifications. The inspector then determined that there was a master schedule for calibration of plant instruments, which also stated the required calibration frequency and the calibration status.

Using the instrument identification numbers which had been obtained, the inspector examined the master calibration schedule to determine if all of the identified instruments were on the list. This examination revealed that all but two classes of the above instruments were included on the master calibration schedule. These two classes were LI 88701/88702 (diesel generator fuel level, tanks A and B) and PI 99802 (CO₂ pressure). These omissions were brought to the attention of the licensee representative who agreed to add these instruments to the master schedule. This will be followed up at a subsequent inspection. (80-24-04)

Regarding LI 88701/88702, it was noted that although these instruments were not on the master schedule, regular calibration was provided for the associated low level switches. It was also noted, however, that the low level setpoint was specified as three feet (corresponding to about 10,000 gallons) versus the technical specification limit of 35,000 gallons. This was brought to the attention of the licensee at the exit interview for his information and corrective action if deemed appropriate.

The inspector determined the master calibration schedule and calibration status was maintained up-to-date by the I&C clerk and that such maintenance represented a significant portion of the job assignment. It was also determined that formal calibration requirements had been established for instruments on the list. Those requirements consisted either of specific procedures for a given instrument or "General Calibration Procedure", I-011, which references use of the manufacturer's technical manual and defines the general calibration procedure and tolerances. The inspector also examined the calibration status and determined on a sampling basis that although some calibrations (not required by the technical specifications) were somewhat overdue, the overall calibration schedule generally was being met.

No items of noncompliance or deviations were identified.

5. Independent Inspection Effort

The inspector toured various areas of the plant to observe operations and activities in progress and to inspect the general state of cleanliness, housekeeping and adherence to fire protection rules. As part of this tour the inspector examined certain of the instruments used to verify conformance with technical specification limits. No items were identified which were in conflict with regulatory requirements.

6. Followup on IE Bulletins and Circulars

The inspector examined the licensee's actions with respect to the following bulletins and circulars:

a. IE Bulletin 79-1 (Open)

A previous walkdown by the inspector of the piping represented by stress problem no. 73 (see Inspection Report 50-312/80-09) revealed that the stress analysis model still contained errors, despite revisions made as a result of the review conducted pursuant to this bulletin. This raised two questions:

- (1) Did the error affect the validity of the revised seismic analysis, and
- (2) What were the implications of the error on the quality of the bulletin review effort?

A written response to the first question has not yet been received from the licensee. In order to resolve the second question, the inspector requested that the licensee provide review packages for two additional stress problems. These packages were requested on short notice to minimize the opportunity for last minute corrections. The packages were supplied as requested and showed no evidence of any recent alterations. The inspector performed a walkdown of the lines represented by these problems and, on the basis of a sampling inspection at selected locations, confirmed that the stress analyses for these lines correctly reflected the as-built condition. Accordingly, the inspector concludes that the licensee's review performed pursuant to this bulletin has maintained an adequate level of quality.

A further matter relating to Bulletin 79-14 arose as a result of the licensee's submittal of August 1, 1980. This submittal noted that the piping represented by stress problem 60A, B and C had not been completely inspected because of high radiation conditions. After reviewing this submittal the inspector advised the cognizant licensee representative that such a response was inadequate and should be supplemented to describe the extent of the inspection that was performed and justification for not requiring examination of uninspected areas. The licensee's representative agreed to provide such a supplement.

Accordingly, in order to close this bulletin it is necessary that the licensee provide the supplemental information described above, and an explanation of the resolution of the error identified by the inspector in connection with stress problem 73.

b. IE Bulletin 79-17 (Closed)

This bulletin deals with pipe cracks in stagnant borated water systems at PWR facilities. The licensee responded to this bulletin by letters dated August 21 and September 5, 1979 and March 28, 1980. The licensee also contracted for nondestructive examination of the prescribed number of accessible welds (116) and the results are presented in a B&W report dated March 25, 1980. The inspector reviewed the licensee's submittals and the report of the weld inspection and found these documents responsive to the bulletin guidance. This item is closed.

c. IE Circular 79-25 (Closed)

The inspector reviewed a licensee internal memorandum stating that none of the subject shock arrestor strut assemblies were used in the facility. This item is closed.

d. IE Circular 80-04 (Closed)

The inspector noted that the licensee was actively responding to this bulletin. This was being done by adding cautionary notes regarding securing of threaded locking devices during the licensee's current review and upgrading of maintenance procedures. This item is closed.

e. IE Circular 80-15 (Open)

This circular deals with loss of reactor coolant pump cooling and natural circulation cooldown. The inspector verified that the licensee had satisfactorily responded to items 1 and 2 of this circular. The circular will remain open until the licensee has also addressed items 3, 4 and 5.

7. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on August 22, 1980. The inspector summarized the purpose and scope of the inspection and the findings. The findings were acknowledged by the licensee. (Note - The finding of a deviation as described in paragraph 3 was not communicated to the licensee at the exit interview but the licensee was advised of this finding by telephone on August 25, 1980).