

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

REGION III

Report No. 50-409/80-06

Docket No. 50-409

License No. DPR-45

Licensee: Dairyland Power Cooperative
2615 East Avenue, South
LaCrosse, WI 54601

Facility Name: LaCrosse Boiling Water Reactor

Inspection At: LaCrosse Site, Genoa, WI

Inspection Conducted: July 1-31, 1980

Inspectors: *KR Ridgway*
K. R. Ridgway (July 21-25, 1980)

8/6/80

KB
K. R. Baker (July 7-11, 1980)

8/11/80

WLB
W. L. Forney (July 1-31, 1980)

8/11/80

for WLB
M. W. Brandon (July 1-31, 1980)

8/11/80

for WLB
Approved By: D. C. Boyd, Chief
Projects Section 4

8/11/80

Inspection Summary

Inspection on July 1-31, 1980 (Report No. 50-409/80-06)

Areas Inspected: Routine announced inspection of the licensee's operational safety; surveillance; maintenance; followup action to IE Bulletins; IE Circulars and open inspection items; organization and administration; onsite review committee and procedures. This inspection involved a total of 403 inspector-hours onsite by four NRC inspectors including 54 inspector-hours onsite during off-shifts.

Results: Of the nine areas inspected, no items of noncompliance or deviations were found in eight areas; one item of noncompliance was found in one area (Infraction - failure to follow procedures in making a facility change).

DETAILS

1. Persons Contacted

- *R. Shimshak, Plant Superintendent
- *J. Parkyn, Assistant Plant Superintendent
- *G. Boyd, Operations Supervisor
- *L. Goodman, Operations Engineer
- *L. Krajewski, Health and Safety Supervisor
- *H. Towsley, Quality Assurance Supervisor
- *S. Rafferty, Reactor Engineer
- W. Angle, Process Engineer
- *M. Polsean, Shift Supervisor
- *W. Nowicki, Supervisor, Instrument and Electrical
- R. Wery, QA Specialist
- *G. Joseph, Security and Fire Protection Supervisor
- L. Kelley, Assistant Operations Supervisor

*Denotes those present at exit interview.

In addition, the inspector observed and held discussions with other engineers, plant equipment operators, reactor operators, assistants, and plant attendants.

2. General

The reactor has been operating at power for the entire month of July. On July 19, 1980, at approximately 2130 hours, the 1B Forced Circulating Pump tripped off because of a low flow condition in the seal injection. This condition was caused by an auxiliary operator mistakenly putting a filter on line with the vent valve left open. Recovery actions by the operators prevented the 1A FCP from tripping off and operation was continued at a lower power level until the 1B pump was restored.

3. Operational Safety Verification

The inspector observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the month of July, 1980. The inspector verified the operability of selected emergency systems, reviewed tagout records and verified proper return to service of affected components. Tours of the reactor building and turbine building were conducted to observe plant equipment conditions, including potential fire hazards, fluid leaks, and excessive vibrations and to verify that maintenance requests had been initiated for equipment in need of maintenance. The inspector by observation and direct interview verified that the physical security plan was being implemented in accordance with the station security plan.

The inspector observed plant housekeeping/cleanliness conditions and verified implementation of radiation protection controls. During the month of July, 1980, the inspector walked down the accessible portions of the Boron Injection, Emergency Core Spray and the Shutdown Condenser systems to verify operability. The inspector also witnessed portions of the radioactive waste system controls associated with radwaste shipments and barreling.

These reviews and observations were conducted to verify that facility operations were in conformance with the requirements established under technical specifications, 10 CFR, and administrative procedures.

The inspectors had a concern with the licensee's control of bypass keys. Technical Specification 3.14.5 states "keys for all plant bypass key switches shall be under the control of the Duty Shift Supervisor and shall be used only under his supervision." The licensee does not keep the key cabinet locked but ensures control of keys by Administrative Control Procedures and Personnel Training. A review of Administrative Control Procedures interview of operators and control room observation indicates that licensee appears to have adequate control of keys.

On June 29, 1980, at approximately 1340 hours, an unmonitored unplanned release of gaseous radioactivity occurred. Release was of a 30 minute duration and was determined to be caused by leakage into the oil storage room from the oil trap on the mechanical vacuum pump. This gaseous activity was subsequently exhausted directly to the outside air by the oil storage room exhaust fan. The licensee calculated that approximately 22.26 mCi of noble gas was released. The licensee also calculated that this release when dispersed to site boundary, amounted to .488 MPC (Maximum Permissible Concentration). This item is considered unresolved Item 80-06-1 and evaluation of licensee ventilation of oil storage to ensure all technical specification and regulatory requirements are being complied with will be considered in a later inspection. The licensee reported this unmonitored unplanned release to the U. S. Nuclear Regulatory Commission operation center by telephone within one hour after obtaining, what they considered, was necessary support information to quantify release. The licensee has been informed that notification within one hour of suspecting or determining an unmonitored or unplanned release is a more conservative approach to the reporting requirements of CFR 10 Part 50.72 and this criteria should be utilized on any future releases.

The inspectors observed the licensee's transportation activities during the shipment of radioactive material, and verified the shipping paper documentation, loading of the material on the vehicle, package markings, package labeling and control of contamination and radiation levels. In addition, the inspectors performed an independent measurement of the radiation levels.

During the walkdown inspection of the Shutdown Condenser System the inspector noted a pipe and tubing system between the top and

of the condenser shell which included a small pump. This system was not shown on approved piping diagrams. The licensee is presently investigating the documentation of this change. This is considered to be unresolved Item 80-06-02.

No items of noncompliance were identified.

4. Monthly Maintenance Observation

Station maintenance activities of safety related systems and components listed below were observed/reviewed to ascertain that they were conducted in accordance with approved procedures, regulatory guides and industry codes or standards and in conformance with technical specifications.

The following items were considered during this review: the limiting conditions for operation were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures and were inspected as applicable; functional testing and/or calibrations were performed prior to returning components or systems to service; quality control records were maintained; activities were accomplished by qualified personnel; parts and materials used were properly certified; radiological controls were implemented; and, fire prevention controls were implemented.

Work requests were reviewed to determine status of outstanding jobs and to assure that priority is assigned to safety related equipment maintenance which may affect system performance.

The following maintenance activities were observed/reviewed:

Control Rod Drive #24
Forced Recirculation Pump 1A
Control Room Strip Chart Recorders

Following completion of maintenance on the Control Rod Drive #24 and Forced Recirculation Pump 1A, the inspector verified that these systems had been returned to service properly.

No items of noncompliance were noted.

Monthly Surveillance Observation

The inspector observed technical specifications required surveillance testing on the Emergency Diesel Generators, Diesel High Pressure Service Water Pumps and Nuclear Instruments and verified that testing was performed in accordance with adequate procedures, that test instrumentation was calibrated, that limiting conditions for operation were met, that removal and restoration of the affected components were accomplished, that test results conformed with

technical specifications and procedure requirements and were reviewed by personnel other than the individual directing the test, and that any deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel.

The inspector also witnessed portions of the following test activities: Bi-weekly surveillance testing of Channel #2 Spray Systems and Channel #3 water level instrumentation.

During the review of the licensee surveillance performance, the inspectors found that the licensee's corrective actions for deficiencies found in the performance of the shutdown condenser condensate drain valve were not done in accordance with approved procedures. Specifically, on June 26, 1980, LACBWR personnel performed system wiring modifications to the control circuitry of this valve without following the procedures identified in the plant administrative control procedure ACP-04.1.

This is an item of noncompliance.

6. IE Circular Followup

For the IE Circulars listed below, the inspector verified that the Circular was received by the licensee management, that a review for applicability was performed, and that if the circular were applicable to the facility, appropriate corrective actions were taken or scheduled to be taken.

80-05 Emergency Diesel - Generator Lub Oil Addition and Onsite Supply
80-09 Problems With Plant Internal Communication Systems

No items of noncompliance were noted.

7. Organization and Administration

The inspector verified that changes in the organizational structure and assignments had been reported to the NRC through the licensee's QA program and verified that persons assigned to new or different positions in the licensee's organization since the last inspection of this area satisfy qualifications identified in the technical specifications, the licensee's QA program, and applicable national standards.

The inspectors noted that the following changes have been made in the licensee's organization when comparing the most recent LACBWR organization chart with the organization chart in the Technical Specifications (T.S.):

- a. The administrative assistant position has been deleted. A licensee representative stated that the former administrative

assistant who now works at Dairyland's Corporate office, is still providing many of the same duties for LACBWR as were provided when he was stationed at the plant. However, some duties had been absorbed by personnel at the plant. The licensee is planning on hiring an additional stenographer, but at this time, plans to revise the T.S. chart to delete the administrative assistant position.

- b. A new position of Technical Support Engineer has been established and is presently staffed with a contracted engineer but will soon be staffed by a Dairyland employee.
- c. The position of Nuclear Engineer has been left off of the most recent organization charts, however, the licensee is still attempting to fill this position.
- d. The position of Health and Safety Engineer has been filled with a person whose experience and qualifications meets the requirements of Regulatory Guide 1.8 Rev. 1-R, September, 1975 for a Radiation Protection Manager.
- e. The licensee still has a vacant Mechanical Engineer position for which he is still actively recruiting. All operator positions will be filled in early August 1980, as two persons with Navy nuclear experience have accepted offers. The licensee has established rotating shift crews of one shift supervisor (Senior Reactor Operator) and four operators with four operators on day shift, thus exceeding the T.S. staffing requirements.

The licensee stated that the revised organization will be submitted to the Office of Nuclear Reactor Regulation in the near future.

No items of noncompliance were identified.

8. Onsite Review Committee

The inspector examined the onsite review functions conducted during the period September 1979 through May 1980 to verify conformance with technical specifications and other regulatory requirements. This review included: changes since the previous inspection in the charter and/or administrative procedure governing review group activities; review group membership and qualifications; review group meeting frequency and quorum; and, activities reviewed including proposed technical specification changes, noncompliance items and corrective action, proposed facility and procedure changes and proposed tests and experiments conducted per 10 CFR 50.59, and others required by technical specifications.

The Technical Specifications lists one of the responsibilities of the Operations Review Committee is to provide "an independent fire

protection and loss prevention program inspection and audit shall be performed at least once per 12 months, utilizing either qualified offsite licensee personnel or an outside fire protection firm." During the inspection it was noted that the onsite Quality Assurance Group had been conducting annual audits of the fire protection program. A review of these audit reports showed that three nonconformance reports were issued in 1980 and one in 1979 and corrective actions had been or were being taken to resolve these items. In addition the facility is inspected annually by the Mutual Atomic Energy Pool.

No items of noncompliance were identified.

9. Procedures

The inspector reviewed the following procedures to determine if the procedures were issued, reviewed, updated and approved in accordance with technical specification requirements; also that procedure changes were reviewed and approved properly and did not conflict with Technical Specification requirements.

- a. General Operating Procedures (Normal Operating Procedures)
 - (1) 2.1.3 Primary System Heatup and Turbine Generator Startup, 10/5/79
 - (2) 3.3.1 Scram Procedure, 10/76
- b. Startup Procedures for the following systems
 - (1) Control Rod Drive System
 - (2) Containment Ventilation System
 - (3) Waste Treatment Building Ventilation System
 - (4) Source Range Instruments
 - (5) Emergency Diesel Generator
- c. Abnormal Condition Procedures

One procedure for each of the above systems.
- d. Emergency Procedures
 - (1) B11-1 Containment Air Header Pressure Low, 6/79
 - (2) 3.6 Fire Fighting Procedure, 10/79
 - (3) 3.7 Emergency Reactor Shutdown and Cooldown When the Control Room Is Uninhabitable, 10/75
 - (4) 3.3.1 Scram Procedure 10/76
- e. Maintenance Procedures

- (1) M-32-3 Issue 1, 6/24/80, Replacement and Repairs of Upper CRD No. 24
- (2) M-50-02 Issue 0, 4/3/80 FCP Seal Replacement
- (3) IE - 78-02 Issue 0, 6/30/80, Emergency Diesel Generator 1A Meggar Readings
- (4) IE - 48-01, Issue 0, 6/12/80, Repair or Adjustment of Environmentally Qualified Instruments
- (5) TS 5.2.11.2.3.c.1, 2 and 3, Issue 1, 7/31/79, 18 Month Station Battery Inspection
- (6) IE 06-01 Issue 0, 2/19/79, Repair of Fire Barrier on Electrical Penetrations

f. Administrative Procedures

- (1) ACP 15.2 Issue 1, 11/5/79, Equipment Control (Lock & Tag)
- (2) ACP 01.1 Issue 3, 9/19/79, Procedure Revision and Approval

During the inspection, the inspector noted several instances where prerequisites and return to service conditions were not completely documented in the procedures particularly in operations procedures written before 1978. These were supplied to the licensee at the exit interview.

No items of noncompliance were notified.

10. Followup on Open Inspection Items (OII)

- a. (Closed) OII 80-01-01^{1/}: The licensee reviewed the requirements of ACP 03.1 and determined that the procedure for conducting audits requires the same reporting requirements and has issued revision 3 to ACP 03.1 to eliminate the redundant reporting.
- b. (Closed) OII 80-01-04^{2/}: The licensee reviewed the requirements of ACP 07.1 and determined that the procedure utilized by the Operational Review Committee (ORC) provides assurance of proper review and documentation of information without requiring the specific statement and has issued revision 3 to ACP 07.1 to eliminate the redundancy.

No items of noncompliance were identified.

11. Unresolved Items

- 1/ IE Inspection Report No. 50-409/80-01, Paragraph 3
- 2/ IE Inspection Report No. 50-409/80-01, Paragraph 4.h

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items disclosed during the inspection are discussed in Paragraph 3.

12. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) throughout the month and at the conclusion of the inspection. The inspectors summarized the scope and findings of the inspection activities.