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

REGION V

Report No. 50-312/80-18

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: June 9-13, 1980

Inspectors: B H Faulkenberry for G. B. Zwetzig, Reactor Inspector — 7/7/80 Date Signed

Date Signed

Date Signed

Approved By: B H Faulkenberry — 7/7/80 Date Signed
B. H. Faulkenberry, Chief, Reactor Projects Section 2
Reactor Operations and Nuclear Support Branch

Summary:

Inspection on June 9-13, 1980 (Report No. 50-312/80-18)

Areas Inspected: Routine, unannounced inspection of operator requalification program, procedures for control of test and measuring equipment, overall facility procedures status, followup of proposed plant modifications and witnessing of an emergency drill. The inspection involved 34 inspector-hours onsite by one inspector.

Results: Of the five areas inspected, no items of noncompliance or deviations were found in three areas; two items of apparent noncompliance were identified in two areas (infraction - absence of documentation showing that an operator had completed the approved requalification program as certified - Paragraph 2; and infraction - failure to provide list of items requiring calibration and identify calibration frequency - Paragraph 3).

RV Form 219 (2)

DETAILS

1. Persons Contacted

*J. Mau, Training Supervisor
S. Redeker, Instructor
F. Burke, Electrical Engineer (Sierra Technology)
*D. Wiles, I&C Foreman
*O. Coleman, Assistant Mechanical Engineer (QA)
*R. Low, I&C Engineer
*D. Cass, Mechanical Maintenance Supervisor
*T. Tucker, Shift Supervisor
*J. Sullivan, Senior Quality Assurance Engineer
*R. Miller, Chemical and Radiation Supervisor
*R. Medina, Quality Assurance Engineer
*R. Colombo, Technical Assistant
*B. Spencer, Shift Supervisor
*J. McColligan, Engineering and Quality Control Supervisor
*N. Brock, Electrical/I&C Maintenance Supervisor
*G. Coward, Maintenance Supervisor

The inspector also talked with and interviewed several other licensee employees, including machinists, clerks and tool crib personnel.

*Denotes those attending the exit interview on June 13, 1980.

2. Licensed Operator Requalification Training

The examination of this activity was a continuation of the review described in Inspection Report 50-312/80-13. That report noted that it was difficult to ascertain whether operators had attended scheduled lectures in identified deficient areas. To further investigate this matter the inspector closely examined the training records for three licensed operators. These operators were three of the ten operators the licensee had certified, in a letter to the NRC dated April 28, 1980, as having satisfactorily completed the Rancho Seco Requalification Program during the effective term of their current licenses.

Based on a review of the records the inspector determined that in all cases except one, the operators had attended all required lectures. Regarding the exception, one operator had obtained a grade of less than 80% in a major subject area included in the annual requalification examination given on July 5, 1979, but there was no record of his attendance at a scheduled lecture on this subject given on September 4, 1979. Such attendance is required by paragraph 3.6.1.2 of the licensee's approved requalification program unless he is excused by the plant superintendent for good cause. In the event attendance at a required lecture is excused, the program requires that the individual be assigned reading material on a self-study basis to fulfill missed lecture time.

In the present instance there was no documentation of excused attendance, assignment or completion of self-study material on this subject or attendance at any other lecture on this subject prior to the licensee's certification that this operator had successfully completed the requalification program.

This is an item of apparent noncompliance at the level of an infraction (80-18-01).

It is noted that in the course of this inspection the licensee's representatives showed the inspector a new system of record-keeping which was being developed and, if effectively implemented and maintained, should prevent recurrence of the type of incident noted above. It is also noted that following the inspector's identification of the above item of apparent noncompliance, the licensee provided the required training to the operator and by letter dated June 11, 1980 notified the NRC's Operator Licensing Branch of the inspector's finding and the licensee's corrective action.

3. Test and Measurement Equipment

In performing the inspection of the licensee's program in this area, the inspector reviewed the applicable portions of the following licensee documents:

Quality Assurance Procedure No. 14, "Calibration of Measurement and Test Equipment", Rev. 3 (QAP-14),
Administrative Procedure No. 33, "Calibration and Control of Inspection and Test Equipment", (AP-33),
Maintenance Procedure No. I-011, "General Calibration Procedure", Rev. 2 (I-011),
Maintenance Procedure No. MT.013, "Control of Mechanical Measuring Devices", Rev. 2 (MT.013), and
Audit Report No. O-295, "Control of Measuring and Test Equipment", April 29, 1980.

With regard to the requirements of the licensee's program, as outlined in QAP-14, these requirements appear to be consistent with the licensee's commitments and good practice. QAP-14, for example, requires that a list of items requiring calibration be prepared and that the calibration frequency for each item be noted. QAP-14 also requires that items be calibrated in accordance with manufacturer's instructions or an approved procedure, that such instruments shall be assigned control numbers, that records of use shall be maintained and that the program shall be audited. In addition, AP-33 requires that all procedures in which inspection or test equipment are used must record the control numbers of the test equipment together with the recalibration due date.

As for implementation of the program, the inspector examined implementation in two functional areas: the instrumentation and control area, and the mechanical area. In the I&C area, implementation of the program appeared to be in substantial conformance with the licensee's program as described above. The only item identified in the I&C area which was

not in substantial conformance with the program was the absence of an official list defining the items requiring calibration and the calibration schedule. The inspector did examine a monthly computer listing which indicated the test instruments requiring calibration during the month. Presumably the collected computer listings for the year would constitute a list for the instruments under the jurisdiction of I&C. A single comprehensive list showing all test and measuring equipment requiring calibration and the calibration frequencies could not be furnished by the licensee representatives, however.

The inspector's examination of the program in the area of mechanical maintenance indicated that usage records were maintained for torque wrenches and that such wrenches were check-calibrated at the intended use-value at the time of issuance from the tool crib and upon return. Beyond this, however, there was no evidence of an implemented formal calibration program. For example, a few items, such as gage blocks, were noted which bore (current) calibration stickers but there was no indication or knowledge on the part of licensee representatives of any directives, system or assignment of responsibility to maintain the current calibration of mechanical test equipment.* In addition, the licensee's representatives could not furnish an official list defining the items requiring calibration and the calibration frequency. Because the establishment of such a list is fundamental to control of test and measuring equipment and because such a list is required by QAP-14, which in turn is required by facility technical specification 6.8.1.a, this is an item of apparent noncompliance at the level of an infraction (80-18-02).

* Micrometers, gage blocks, dial indicators, vernier calipers and torque wrench calibration testers, etc.

4. Facility Procedures

The inspector examined the approval cover sheets for the following procedures and verified that they had been reviewed and approved in accordance with the provisions of the facility technical specifications:

General Plant Operating Procedures: B.2 and B.6
Systems Operating Procedures: A.3, A.14, A.15, A.40 and A.74
Annunciator Procedures: H2PSA/8, H2PSA/25, H2PSA/48, H2SFA/25 and H2X/1
Emergency Procedures: C.6, D.8, D.11 and AP.500.C
Maintenance Procedures: M.10, M.11, M.20, M.117 and M.127, and
Administrative Procedures: AP.2 and AP.17

The inspector also examined the following surveillance procedures where temporary changes had been utilized during the past fifteen months and determined that the processing of the temporary changes conformed with technical specification requirements:

SP 200.7, SP 201.01, SP 203.01A, SP 204.01B, SP 205.02, SP 206.03B, SP 207.04B and SP 209.03.

The inspector verified on a sampling basis that operating procedures had been modified to reflect changes in the technical specifications which

were required and approved for use during Cycle 4.

Other aspects of the licensee's procedures program will be covered at a subsequent inspection.

No items of noncompliance or deviations were identified.

5. Emergency Drill

An emergency drill was conducted by the licensee during the inspection visit. This was the first such drill to be conducted since the onsite Technical Support Center (TSC) was outfitted. The inspector witnessed operations at the TSC during the drill and supplied the following comments during the critique session.

a. The secretary (NRC employee) at the Resident Inspector's trailer was not aware that a drill was being conducted. She thought it was merely a periodic test of the siren. The apparent reason she did not realize it was a drill was because the site public address system, which announced the drill and provided instructions, could not be clearly heard at the location of the trailer.

b. The licensee's Emergency Plan should recognize that one or more NRC inspectors will be at the site at the time of or shortly after the initiation of the Emergency Plan. In order to perform their duties under these conditions, the inspector will need access to a continuous communication link with NRC headquarters and accurate and timely information on plant status, current and past values of plant parameters, radiological and meteorlogical conditions, status of injuries, exposures, etc. The licensee's Emergency Plan should recognize and be compatible with these needs. In meeting these needs, however, the licensee's plan must also be compatible with the requirement to maintain an open continuous communication channel with the NRC Operations Center as specified in 10 CFR 50.72(b).

c. The plan should be modified as necessary to provide automatic relocation of the guard station outside the Control Room to facilitate data acquisition and dissemination. If the guard station is to be replaced by a card reader, equivalent modifications should be implemented, if deemed necessary for effective emergency response.

d. The test lacked an element of realism in that numerous inquiries from SMUD headquarters and the media were not simulated. The licensee stated that media inquiries should not be a problem during an emergency because, the SMUD telephone operators had been instructed to route such inquiries to SMUD headquarters.

These matters will be followed up at a subsequent inspection (80-18-03).

6. Followup on IE Bulletins

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

a. IE Bulletin 79-27 (Closed)

The licensee's March 12, 1980 letter which provided an expanded response to Bulletin 79-27, stated that implementation of positive indication of the position of the pressurizer power-operated relief valve and safety valves would be provided no later than June 1, 1980. The inspector visited the control room to verify the installation of the indicators, reviewed test procedure STP 618 which was used to test the installed system and interviewed the cognizant engineer. Based on this review the inspector concluded that the licensee had satisfactorily satisfied the commitment noted above.

b. IE Bulletin 80-04 (Closed)

The licensee's response to this bulletin dated May 6, 1980, concluded that the FSAR analysis remained valid. Accordingly, no corrective actions were identified. This concludes the IE review of the licensee's response. Technical aspects of the licensee's submittal (response to items 1 and 2 of IEB 80-04) will be evaluated by NRR.

7. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on June 13, 1980. The inspector summarized the purpose and the scope of the inspection and the findings. The findings were acknowledged by the licensee.