

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Operations Inspection

IE Inspection Report No. 050-155/77-02

Licensee: Consumers Power Company
212 West Michigan Avenue
Jackson, MI 49210

Big Rock Point
Charlevoix, MI

License No. DPR-6
Category: C

Type of Licensee: BWR GE 240 MWt

Type of Inspection: Routine, Unannounced

Dates of Inspection: March 7-11, 1977

Principal Inspector:

D. R. Hunter
D. R. Hunter

3/25/77
(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: None

Reviewed By:

Gastone Fiorelli
Gastone Fiorelli, Acting Chief
Reactor Projects Section 2

3/25/77
(Date)

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SUMMARY OF FINDINGS

Inspection Summary

Inspection on March 7-11, 1977, (77-02): Review of operations, plant cleanliness, reportable occurrences, procedures, maintenance, design changes, outstanding inspection items, unresolved items, and items of noncompliance. No items of noncompliance were identified during the inspection.

Enforcement Items

None.

Licensee Actions on Previously Identified Enforcement Items

- A. The licensee's review and revision of the design and design control procedures are continuing with a planned completion date of June 1, 1977. (Paragraph 8.a, Report Details)
- B. The licensee's actions concerning the maintenance training program are continuing with a planned completion date of June 1, 1977, consistent with the overall plant training program commitment. (Paragraph 8.b, Report Details)
- C. The licensee's corrective actions concerning the failure to report the inoperable air ejector off-gas system have been completed. (Paragraph 8.c, Report Details)

Other Significant Findings

A. Systems and Components

None.

B. Facility Items (Plans and Procedures)

- 1. The licensee received Amendment 11 to the Technical Specifications on February 23, 1977, which will allow the plant to perform certain surveillance items at the next available shutdown.
- 2. The licensee plans to operate the plant until the scheduled June 1977 refueling outage.

C. Managerial Items

The licensee has submitted a revised organization plan to NRR. The organizational changes include:

1. Corporate changes to reflect the change from Bulk Power to Production and Transmission.
2. Plant changes to reflect the addition of the operations supervisor position, the training coordinator position, the addition of engineers and technologists, the changes to the quality control group, and certain changes in overall department responsibilities.

D. Deviations

None.

E. Status of Previously Reported Unresolved Items

The review of the licensee's operator retraining program records was completed and the status of the program was verified. This matter is considered resolved. (Paragraph 10, Report Details)

Management Interview

The management interview was conducted on March 11, 1977, by Mr. Hunter with the following persons present:

- C. R. Abel, Operations Superintendent
- D. E. DeMoor, Technical Engineer
- T. W. Elward, Technical Superintendent
- J. P. Flynn, Maintenance Superintendent
- G. B. Szczotka, Quality Assurance Superintendent
- A. C. Sevener, Operations Supervisor
- R. W. Doan, Training Coordinator
- C. E. Axtell, Health Physicist
- T. M. Brun, Chemistry and Radiation Protection Supervisor
- R. McCaleb, Quality Assurance Superintendent, Palisades
- J. J. Fremeau, Quality Assurance, Corporate
- K. M. Brun, Secretary

- A. The inspector stated that the control of the high radiation doors, as discussed with the licensee representatives during the inspection, was considered adequate by RIII. It is the inspector's understanding that each normal entrance and control of entrance and exit points

would be performed by two individuals, with one individual remaining at the high radiation door during the period that the door was open. This manner of control allows the individual within the high radiation area to exit and also provides control of the entry point by the second man.

The licensee acknowledged the inspector's statement and stated that the operating order which established the two-man control during high radiation area entries had been placed in effect and will remain in effect until the appropriate radiation protection procedures are reviewed and revised as necessary. (Paragraph 11, Report Details)

- B. The inspector stated that the review of operations, including a facility tour; the review of plant cleanliness; the review of maintenance activities; the review of selected plant procedures; and review of selected outstanding items revealed no discrepancies.

The licensee acknowledged the inspector's statement. (Paragraphs 2, 4, 5, 6, and 9, Report Details)

- C. The inspector stated that the review of the corrective actions taken for the two reportable occurrences concerning the condensate radiation monitor operability and the reactor depressurization system isolation valve position switches revealed no discrepancies.

The condensate radiation monitor being inoperable for an extended period of time is considered an item of noncompliance. No response to this item is necessary.

The replacement of the reactor depressurization system isolation valve position switches will be reviewed at a subsequent inspection.

The licensee acknowledged the inspector's statements. (Paragraph 3, Report Details)

- D. The inspector stated that the review of the corrective actions taken by the licensee concerning the item of noncompliance associated with the failure to report the inoperable air ejector off-gas system was considered adequate and no further questions were required of this matter.

The inspector stated that a review of the status of the maintenance training program with the licensee representative indicated progress in the area and stated that this item would be reviewed during a later inspection to assure timely completion of Volume 18 of the Administrative Procedures and implementation of the training program.

The licensee acknowledged the inspector's statements. (Paragraph 8, Report Details)

- E. The inspector stated that the review of the unresolved item concerning the licensed operator retraining program records for the review of procedures, procedure changes, and facility changes revealed no apparent discrepancies.

The inspector stated that further review of the operator retraining program revealed that the licensee needed to assure coverage of all the weak areas identified by the 1975 and 1976 annual examinations and provide adequate topical examinations for the formal sessions.

The licensee acknowledged the inspector's statements and stated that the identified weak areas would be included in the scheduled 1977 formal classroom sessions.

The licensee stated that the retraining given the licensed personnel and the grade levels on the training sessions given and the annual examinations indicated adequate licensed operator knowledge level.

The inspector acknowledged the licensee's statement, but indicated that the licensed operator retraining program is a formal commitment; and once established by management, it should be completed in order to meet the commitment. (Paragraph 10, Report Details)

- F. The inspector discussed, by telephone on March 15, 1977, certain deviation reports issued during the addition of the fuel dry sipping system in early 1976. The inspector stated that the licensee identified deviation reports concerning failure to follow procedures and unauthorized procedure changes was considered an item of noncompliance pursuant to Technical Specification 6.8. The licensee's corrective actions were considered adequate and no further questions were required of this item.

The licensee acknowledged the inspector's statements. (Paragraph 7.b.(2), Report Details)

REPORT DETAILS

1. Persons Contacted

C. R. Abel, Operations Superintendent
D. E. DeMoor, Technical Engineer
T. W. Elward, Technical Superintendent
J. P. Flynn, Maintenance Superintendent
G. B. Szczotka, Quality Assurance Superintendent
C. E. Axtell, Health Physicist
A. C. Sevener, Operations Supervisor
R. W. Doan, Training Supervisor
T. M. Brun, Chemical and Radiation Protection Supervisor
L. F. Monshor, Engineer
T. K. Pence, Shift Supervisor
C. F. Sonnenberg, Shift Supervisor
W. F. Blissett, Assistant Shift Supervisor
H. E. Black, Plant Maintenance Supervisor
D. D. Wilks, Assistant Plant Maintenance Supervisor
D. D. Herboldsheimer, Maintenance Coordinator

2. Review of Operations

The inspector reviewed selected operations activities, observed certain operations activities, and interviewed selected personnel to determine plant operation to be within the Technical Specifications and Administrative Controls. The review included:

a. Facility Tour

The inspector conducted a facility tour of selected accessible areas. The tour included:

- (1) Observation of plant housekeeping and plant cleanliness.
- (2) Observation of auxiliary operator plant shift checks.
- (3) Verification of equipment tag outs.

b. Administrative Memos

c. Operating Orders

d. Reactor Scram Report 103 for August 13, 1976, High Flux Trip Following the Turbine IPR Failure

- e. Control Room Manning
- f. Illuminated Annunciators
- g. Plant Chemistry

No discrepancies were noted.

3. Reportable Occurrences

The inspector reviewed the following reportable occurrences to assure adequate licensee review, evaluation, corrective actions, and reporting.

- a. LER RC 40-76, Condensate radiation monitor inadequate flow.

The licensee reported^{1/} that the flow through the condensate radiation monitor was observed to be inadequate, apparently from January through December 1976.

The inspector reviewed revisions to Procedure SOP 35, Revision 2, February 10, 1977, Liquid Process Monitor System, to assure adequate steps to monitor the liquid radiation monitor sample flows. The flows are checked each shift by cycling the flow and the check is documented on the shift data sheet.

The failure to maintain the condensate liquid process monitor in service during power operations is an item of noncompliance pursuant to Technical Specification 6.4.3.(d). This item is an infraction.

The corrective action by the licensee appears adequate and no further questions are required of this matter at this time.

- b. LER 04-77, Environmental qualification of the reactor depressurization system isolation valve position switches.

The licensee reported^{2/} that the existing valve position switches were discovered to be water resistant rather than water proof; and a ground could result in the control circuit in a manner which could trip the valve power supply, disabling the isolation valve and the output channel.

1/ CP to R¹II, Ltr dtd 12/30/76.

2/ CP to R¹II, Ltr dtd 2/8/77.

The licensee removed the valve position switches from the valve power circuit and initiated additional surveillance checks to assure the valves remain closed during normal plant operation.

The inspector evaluated the corrective actions taken by the licensee and reviewed the design requirements for the valve position switches.

The licensee had completed a general review of the other RDS inplant instruments/switches and determined no other apparent discrepancies.

The licensee is pursuing the purchase and installation of qualified position switches.

No discrepancies were noted by the inspector and no further questions are required of this matter at this time.

4. Plant Cleanliness

The inspector reviewed selected procedures and instructions, observed plant cleanliness conditions, and interviewed selected plant personnel to determine adequate plant housekeeping practices. The review included:

- a. Administrative Procedure 1.5, Maintenance
- b. Administrative Memos (assignment of cleaning stations)
- c. Selected plant equipment

No discrepancies were noted.

5. Procedures

The inspector reviewed selected plant procedures to verify review and approval, procedure change control, safety evaluation, and procedure requirements were in accordance with the applicable Technical Specifications and regulatory requirements. The selective review included:

- a. General Operating Procedures
- b. Standard Operating Procedures
- c. Offnormal Operating Procedures

- d. Emergency Operating Procedures
- e. Administrative Procedures
- f. Alarm Procedures
- g. Maintenance Procedures

No discrepancies were noted.

6. Maintenance

- a. The inspector reviewed selected maintenance activities to verify safety related activities were performed in accordance with administrative procedures including:
 - (1) Administrative approvals
 - (2) Approved procedures as necessary
 - (3) Inspections as appropriate
 - (4) Appropriate records
 - (5) Personnel qualifications
- b. The review included the following selected maintenance activities:
 - (1) Adjustment of the streamseal butterfly valve (CV-4097) on the containment ventilation supply line, performed on April 21, 1976.
 - (2) Cleaning the sightglass on the emergency condenser shell-side, performed on January 17, 1977.
 - (3) Repair of the control rod drive accumulator A-4, performed on November 11, 1976.
 - (4) Repair of the emergency diesel generator starter, performed on December 28, 1976.^{3/}
 - (5) Repair of the root valve and line to the liquid poison system pressure transmitters, performed on March 10, 1976.

3/ RO 050-155/46-76.

- (6) Removal and replacing the liquid process radiation monitor system linear count rate meter and bunch calibration of the linear count rate meter, performed on November 20-22, 1976.
- (7) Replacement of incore instruments, performed March 27, 1976.
- (8) Repair of reactor vessel temperature recorder, performed on September 14, 1976.
- (9) Repair of steam drum yawway level indicators, performed on June 30, 1976.

No discrepancies were noted.

- c. The inspector reviewed the newly revised administrative procedures and the quality assurance procedures concerning maintenance activities to verify that the licensee had developed and implemented a program which meets regulatory requirements. The review included:

- (1) Quality Assurance Policy 5.0, Instructions, Procedures and Drawings.
- (2) Quality Assurance Program Procedure for Operations 5-52, Documentation of Maintenance.
- (3) Administrative Procedure 1.5, Maintenance Administration.
- (4) Administrative Procedure 1.18, Safety Related Preventative Maintenance.

No discrepancies were noted.

7. Design Changes

- a. The inspector reviewed selected facility changes to determine that the changes were made in accordance with approved procedures and regulatory requirements. The review included verification of the following:
 - (1) Review and approval of the activity
 - (2) Procedures, including specifications and codes, inspections, and test requirements

- (3) Acceptance testing
- (4) Operating Procedure changes
- (5) As-built Drawing changes
- (6) Records

b. Selected facility changes were reviewed:

- (1) FC-321, Addition of a 2-inch tie line and valves from the radwaste demineralizer to the dirty waste tank, performed about April 27, 1976.
- (2) FC-324, Fuel Dry Sipping System added to the plant, completed during early 1976.^{4/}

The inspector reviewed the following procedures and activities for performance of the modification:

- (a) RE YY, Fuel Dry Sipping System Functional Test
- (b) RE ZZ, Fuel Dry Sipping System Maintenance Activity, Phase A.
- (c) RE ZZZ, Fuel Dry Sipping System Maintenance Activity, Phase B.
- (d) IFFI-1, Instrument and Control Calibration of the FDSS.
- (e) TR-55, Fuel Dry Sipping System Operation Functional Test.
- (f) TR-54, Fuel Dry Sipping System Instrument and Control Checkout.
- (g) Initiation and closeout of selected deviation reports which included an item of noncompliance pursuant to Technical Specification 6.8, identified by the licensee and appropriate corrective action taken.

DVR-B-76-09, Temporary Procedure Change (Fuel Dry Sipping System Functional Test, RE YY).

DVR-B-76-11, Violation of Precautions and Limitations (Maintenance Phase A, RE ZZ).

4/ IE Inspection Rpt No. 050-155/76-02.

The licensee's corrective actions were considered adequate and no further questions are required of this matter at this time.

- (3) FC-327, Addition of a tachometer to the emergency diesel generator engine, performed on December 15, 1975.
- (4) FC-337, Decrease of the LPRM cable length, performed in June 1976.
- (5) FC-340, Addition of the service building, completed in August 1976.
- (6) FC-341, Modification to the G-21 fuel, completed on March 4, 1976.
- (7) FC-343, Exchange of 11 rods in F-84 fuel assembly, utilizing Procedures RE GE-1 and RE GE-2.
- (8) FC-346, Removal of retainer ring and safety wire from the gamma source irradiation bracket, performed in March 1976.
- (9) FC-347, Modification to the G-1U Fuel.
- (10) FC-356, Relocation of fire header isolation valve, performed utilizing construction work package CWP-001, 1305-001.
- (11) FC-363, Modification of the service water line to the liquid process monitor, performed on May 18, 1976.
- (12) FC-374, Locking open of the fire protection system valves as required by the new ECCS analysis.
- (13) FC-375, Placing containment pressure transmitters on a common penetration to allow isolation utilizing one valve, performed on June 6, 1976.
- (14) FC-390, Modification of the stack gas monitor to provide redundant sample paths and prevent freezing during cold weather.
- (15) FC-394, Modification of the emergency diesel generator starting sequence, performed on October 5, 1976.

No other discrepancies were noted.

8. Items of Noncompliance

The inspector reviewed the status of the corrective actions concerning previous items of noncompliance.

a. Design and Design Control^{5/6/7/}

The licensee's design and design control program is continuing under the interim commitment that every facility change is considered safety related by the Plant Review Committee until immediately prior to implementation.

The inspector reviewed the overall design control program status with the licensee representative and determined that the quality assurance procedure concerning minor modifications is in review prior to issue for implementation^{8/} by June 1, 1977.

The design control procedures will be further reviewed following completion of the quality assurance program procedures.

b. Training^{9/}

The licensee's overall plant training program commitment^{10/} made as a result of the approval of the quality assurance program by the NRC is being pursued by the licensee. A training matrix for the overall plant staff has been generated and the training program for all personnel will be implemented by June 1, 1977,^{11/} and personnel performing safety related activities will be trained and qualified by January 1, 1978.

The implementation and completion of the overall plant training program will be reviewed further as the licensee completes the program during 1977.

c. Inoperable Air Ejector Off-Gas System^{12/13/}

The review of the corrective actions taken by the licensee concerning the failure to report the inoperable air ejector off-gas system appeared adequate.

- 5/ IE Inspection Rpt No. 050-155/75-15.
- 6/ IE Inspection Rpt No. 050-155/76-01.
- 7/ IE Inspection Rpt No. 050-155/76-18.
- 8/ CP to NRR, Ltr dtd 12/14/76.
- 9/ IE Inspection Rpt No. 050-155/76-16.
- 10/ CP to NRR, Ltr dtd 12/14/76.
- 11/ ibid.
- 12/ IE Inspection Rpt No. 050-155/76-21.
- 13/ RO 050-155/35-76.

The licensee has reviewed the event with concerned parties and revised the offnormal procedure (ONP 2.17, Abnormal Off-Gas on Stack Gas, Revision 2, February 2, 1977). The procedure revision was reviewed by the operations group and the change has been covered during the scheduled licensed operator retraining activities.

No discrepancies were noted and no further questions are required of this matter at this time.

9. Outstanding Items

The inspector reviewed selected items to determine adequate resolution and completion.

a. Containment Vessel Personnel Hatch Alarm System^{14/15/}

The licensee has completed a modification to the containment vessel personnel hatch to insure that the mechanical interlock handle is left in the "MID" position to provide two boundaries when the personnel hatch is not in use for ingress or egress.

The inspector observed the operation of the personnel hatch alarm during a tour of the facility, noting audible alarms inside and outside the containment. The alarm bell sounded continuously as appropriate until the mechanical interlock handle was moved to the "MID" position.

The mechanical interlock on the equipment hatch is maintained in the "atmosphere side locking ring" position and is used in conjunction with the security system.

The inspector reviewed the revisions to the system operating procedure (SOP-10, Revision 2, February 10, 1977, Containment Vessel).

No discrepancies were noted and no further questions required of this matter at this time. This item is considered closed.

b. Fire Drill Procedure^{16/17/}

The inspector reviewed the monthly shift fire drill procedure (T30-27, Revision 1, January 19, 1977) performed by each shift supervisor for the shift personnel. The shift supervisor

14/ IE Inspection Rpt No. 050-155/75-11.

15/ IE Inspection Rpt No. 050-155/75-12.

16/ IE Inspection Rpt No. 050-155/75-16.

17/ IE Inspection Rpt No. 050-155/76-21.

indicated that no set time designated to perform the procedure and the drill is performed during the day shift occasionally to include the nonshift personnel.

No discrepancies were noted and this item is considered closed.

c. Fuel Transfer Casks Safety Brake Mechanism^{18/}

The inspector reviewed the fuel handling system procedure (MFHS-4, Revision 0, November 29, 1976, Fuel Handling and Resetting of the Fuel Handling Transfer Cask).

The preventive maintenance requirements now include tripping of the safety brake mechanism prior to a refueling outage to insure operability.

No discrepancies were noted and this item is considered closed.

d. Maintenance and Instrument and Control Preventive Maintenance Programs^{19/20/}

The review of the status of the programs with the licensee representative revealed that the equipment and instrument data lists are being finalized. The preventive maintenance requirements are being established.

This item will remain open pending completion of the programs by the licensee.

e. Reactor Depressurization Batteries Low Specific Gravity^{21/22/23/}

The licensee has submitted^{24/} a request to change the Technical Specifications which will allow the specific gravity limits on the RDS battery cells to be lowered to 1.150 from 1.200 and the three series cell voltage readings to be 6 volts or greater.

No further questions are required of this matter at this time and this item is considered closed.

- 18/ IE Inspection Rpt No. 050-155/76-04.
- 19/ IE Inspection Rpt No. 050-155/76-10.
- 20/ IE Inspection Rpt No. 050-155/76-21.
- 21/ Ibid.
- 22/ IE Inspection Rpt No. 050-155/77-01.
- 23/ RO 050-155/43-76.
- 24/ CP to NRR, Ltr dtd 3/4/77.

f. Type G and GIU Reload Exxon Fuel^{25/}

The licensee's corrective action for the discovery of inconsistencies in the fuel design report and computer code included the submittal of a Technical Specifications change request describing the changes made and proposing new limits. The licensee submitted^{26/} the change request to NRR.

No further questions are required of this matter at this time and this item is considered closed.

g. Licensed Operator Retraining Program^{27/28/}

The inspector reviewed the areas of change to the program approved by the NRC.

- (1) Accelerated training is to be conducted within 5 days following examination grade determination.
- (2) Schedule of a minimum of 6 sessions per calendar year for each licensed operator. The inspector verified that the licensee had scheduled 8 formal sessions for the 1977 year, including the required subject material to be covered during the formal sessions.
- (3) Documentation of review and/or approval of materials (facility changes, license changes, procedure changes, etc.) to allow certain management/engineering personnel to bypass the affected lectures and quizzes on the materials.

The inspector reviewed the area with the licensee representative to assure that the appropriate documentation program was being planned and implemented.

- (4) Control manipulations on an approved BWR simulator will be taken credit for to reduce the inplant maneuvers required for the operator.

No discrepancies were noted and this item is considered closed.

h. Emergency Diesel Generator Starting Time^{29/30/}

The inspector reviewed the licensee's evaluation concerning the emergency diesel generator starting time criteria.

- 25/ RO 050-155/29-76.
26/ CP to NRR, Ltr dtd 12/17/76.
27/ CP to OLB, Ltr dtd 7/26/76.
28/ OLB to CP, Ltr dtd 9/27/76.
29/ RO 050-155/22-76.
30/ RO 050-155/31-76.

The time requirement for core flow at the present time is 20.4 seconds.^{31/} The licensee has established that core flow of 400 gpm can be achieved with the limiting core spray valves open to the 60% position.

The most limiting condition appears to include the start time of the diesel, energizing of the emergency bus (2B), and the subsequent opening of the nozzle spray valves (AC) to the 60% position.

The valve opening time (60%) is 8.4 seconds; therefore the diesel start/bus energizing time must be a maximum of 12 seconds.

The licensee has identified and corrected an apparent diesel starting problem^{32/33/} and has reduced the diesel generator start/bus energizing time to less than 12 seconds consistently (routinely 9-11 seconds January and February during accelerated surveillance testing).

No further questions are required of this matter at this time and this item is considered closed.

i. Core Spray Recirculation System Alternate Cooling Supply^{34/35/}

The inspector reviewed the alternate cooling supply to the core recirculation spray heat exchanger system. In a previous report^{36/} the hose, valves, and basic calculations of flow^{37/} were reviewed to assure compliance with the requirements prior to plant startup.

No further questions are required of this matter at this time and this item is considered closed.

10. Unresolved Item

The inspector reviewed the licensee's corrective actions concerning the apparent operator retraining program records inadequacies.

- 31/ CP to NRR, Ltr dtd 7/25/76.
- 32/ RO 050-155/01-77.
- 33/ IE Inspection Rpt No. 050-155/77-01.
- 34/ CP to NRR, Ltr dtd 2/4/77.
- 35/ IE Inspection Rpt No. 050-155/76-13.
- 36/ Ibid.
- 37/ Memorandum and Order dtd 5/26/76.

a. Procedure Change Reviews

In the area of review of procedure changes by certain licensed individuals, the record review by the inspector and the licensee representative revealed that procedure changes had been adequately reviewed by the individuals during the performance of job responsibilities and the review was documented.^{38/}

No discrepancies were noted.

b. Facility Change Reviews

The record review by the inspector and the licensee representative revealed that the facility changes performed during 1976 had been reviewed adequately by licensed personnel either during training sessions or during the performance of job responsibilities and the review was documented.^{39/}

No discrepancies were noted.

c. Formal Classroom Sessions

The inspector's review of the classroom sessions held in 1976 revealed inadequacies in two areas; materials covered and testing.

The plant refueling and modification outage extended from January 1976 through July 1976, creating a scheduling problem concerning attendance of formal classroom sessions.

During the first part of 1976, the licensee held formal training in numerous areas, including:

- (1) All facility changes concerning the ECCS and RDS modifications.
- (2) All procedures and procedure changes concerning the ECCS and RDS modifications.
- (3) A complete review of the newly written emergency procedures.
- (4) A complete review of the newly written offnormal procedures.
- (5) An accelerated walk-through and evaluation of all licensed personnel concerning the newly written emergency procedures.
- (6) A complete review of the 1975 annual examination of the licensed personnel during scheduled monthly sessions.

^{38/} OLB to CP, Ltr dtd 9/27/76.

^{39/} Ibid.

The licensee scheduled sessions which included the weak areas identified by the 1975 examination; but during the 1976 sessions held, these areas were not adequately covered nor evaluated due to the change in scope of the sessions caused by the extended plant outage and plant modifications.

The inspector's review of the areas revealed that the licensee has scheduled retraining sessions for 1977 to complete the formal retraining program. The 1977 sessions include repeat items to insure coverage of the inadequacies identified for the 1976 sessions. These areas include:

- (1) Radiation Protection Manual Review (also a weak area from 1975 annual examination)
- (2) Principles of Reactor Operation (also a weak area from 1975 annual examination)
- (3) Technical Specifications Review
- (4) Standard and General Operating Procedures (also a weak area from 1975 annual examination)

The areas which were not adequately covered and are to be included with the 1977 formal sessions include:

- (1) Liquid Poison System
- (2) Fuel Handling and Core Parameters

The inclusion of these items in the 1977 retraining formal classroom sessions conducted on a once-per-five week basis with the appropriate examination and evaluation performed in accordance with the licensee's commitment ^{40/41} appears adequate. This will be carried as an open item pending the completion of the 1977 portion of the licensee operator requalification program.

No further questions are required of the retraining records at this time and this matter is considered resolved.

40/ CP to OLB, Ltr dtd 7/19/74.

41/ CP to OLB, Ltr dtd 7/26/76.

11. High Radiation Doors

The inspector reviewed the licensee's control of high radiation doors/areas. ^{42/43/44/}

The licensee maintains the high radiation area doors locked and except in emergencies the entrance into such areas is performed utilizing two persons. This control method provides the locked control of high radiation areas, the specific control of the area when open for entry by stationing a person at the high radiation door, and the specific control which would not prevent a person from leaving the high radiation area.

The management control method appeared adequate to the inspector and the issuance of an operating order to fully implement the management control method, followed by a procedure revision as required should prevent any noncompliance with 10 CFR 20.203.

- 42/ IE Inspection Rpt No. 050-155/76-22.
- 43/ CP to RIII, Ltr dtd 2/1/77.
- 44/ CP to RIII, Ltr dtd 3/3/77.