UNITED STATES NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

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REGION III

Report of Operations Inspection

IE Inspection Report No. 050-155/76-21

Licensee:

Consumers Power Company 212 West Michigan Avenue Jackson, Michigan 49210

Big Rock Point Nuclear Power Plant Charlevoix, Michigan

License No. DPR-6 Category: C

Type of Licensee:

BWR (GE), 240 MWt

Routine, Announced

Type of Inspection:

November 15 - 19, 1976

Principal Inspector:

Dates of Inspection:

D. R. Hunter

12-13-76 (Date)

Accompanying Inspector: T. Tambling

12-13-76 (Date)

Other Accompanying Personnel: None

D. C. Boyd, Acting Chief

Reactor Projects Section 2

Reviewed By:

12 -13-76 (Date)

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#### SUMMARY OF FINDINGS

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#### Inspection Summary

Inspection on November 15-19, 1976, (76-21): Review of operations; reportable occurrences: procurement; safety limits, limiting safety system settings, and limiting conditions for operations; fire protection; quality assurance records; calibration; surveillance; and selected outstanding items. One item of noncompliance was identified concerning the failure to report a reportable occurrence.

#### Enforcement Items

The following item was identified during the inspection.

# Infraction

Contrary to Technical Specification Section 6.9.2, the licensee failed to report the inoperable air ejector off-gas monitoring system. (Paragraph 7, Report Details)

# Licensee Action on Previously Identified Enforcement Items

- A. The licensee's corrective actions concerning the plant modification procedures program is still in progress. (Paragraph 11.1, Report Details)
- B. The licensee's corrective actions concerning the maintenance training program is still in progress. (Paragraph 11.c, Report Details)

## Other Significant Items

A. Systems and Components

Unresolved Item: The licensee failed to perform a required visual inspection of containment electrical penetrations potting material. (Paragraph 5.c, Report Details)

B. Facility Items (Plans and Procedures)

The licensee is planning a short maintenance outage in January 1977 which will include testing of the reactor depressurization valves at the cold shutdown condition.

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C. Managerial Items

None.

D. Deviations

None.

E. Status of Previously Reported Unresolved Items

No change.

#### Management Interview

The management interview was conducted on November 19, 1976, by Messrs. Hunter and Tambling with the following persons present:

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- C. J. Hartman, Plant Superintendent
- C. R. Abel, Operations Superintendent
- T. W. Elward, Technical Superintendent
- J. P. Flynn, Maintenance Superintendent
- G. B. Szczotka, Quality Assurance Superintendent
- C. E. Axtell, Health Physicist
- R. E. Schrader, Senior Technologist
- J. J. Fremeau, Quality Assurance, Jackson
- A. The inspector discussed surveillance procedures and stated that some were weak in the lack of detail for returning instrumentation to service after functional testing of the trip channel. In contrast, the calibration procedures were very specific for returning a channel to service. The inspector referenced the licensee's Quality Assurance and Administrative Procedure requirements that require proper steps for returning the system, structure or component to normal service. The licensee stated that they would review the procedures for proper implementation. (Paragraph 2.f, Report Details)
- B. The inspector discussed the calibration of vacuum switches for the turbine vacuum trip and turbine bypass valve closure. It was noted that vacuum switches were calibrated during the last refueling outage but without a written procedure. The licensee stated that they felt that these calibrations were within the skill of the technician performing the calibrations. The inspector stated that as long as the trip settings were specified in the Technical Specifications even though no credit was taken in the safety analysis, a procedure should be used to insure that switches are properly returned to service after calibration. The licensee stated that the safety related trip was the reactor scram on low condenser vacuum, but that they would review that situation during current revision of the Technical Specifications. (Paragraph 3.f, Report Details)

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- C. The inspector discussed his review of completed surveillance procedures. It appeared that all completed procedures were being properly completed and reviewed except for two random cases. In each case, the step had been signed off but the operator performing the surveillance had apparently failed to indicate that the test was satisfactory. The inspector stated that he had reviewed tests prior to and afterward, and found that they were properly completed. The licensee acknowledged the inspector's remarks and agreed the the reviewer should have noted and corrected these two cases. (raragraph 2.d, Report Details)
- D. The inspector discussed the current status of procedures used by the Chemistry and Radiation Protection Department to meet Technical Specifications surveillance requirements. It was noted that there was an active program to rewrite all the procedures in a new format, and the target completion date was early 1977. The inspector stated that based upon his review of completed procedures to date, he had no further questions at this time. (Paragraph 2.c, Re<sub>r</sub>ort Details)
- E. The inspector discussed the calibration of safety related components and equipment not specifically identified in the Technical Specifications, but used to verify operability or compliance with limiting conditions of operation. It was noted that the equipment was apparently being calibrated, but a specific schedule had not been established except for the individual calibration tags placed on a piece of equipment after each calibration which designated the due date for the next calibration. The licensee stated that a special task force is currently working on identification, classification and calibration scheduling of all plant instrumentation and equipment. The target completion date is early 1977. (Paragraph 3.f, Report Details)
- F. The inspector stated that in reviewing the calibration of temperature and level control of the liquid poison tank, the shift operating personnel did not know what the current concentration of sodium pentaborate was. The inspector stated that this information should be readily available to shift personnel in the event they have to respond to a decreasing temperature in the tank. The Technical Specifications require the solution temperature to be greater than 5°F above the solubility temperature for the concentration in the liquid poison tank. The licensee acknowledged the inspectors remarks. (Paragraph 13, Report Details)
- G.

The inspector stated that the review of reportable occurrences revealed two items of noncompliance concerning missed surveillance on the fire protection actuation system and missed surveillance on

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the containment vessel penetration expansion joints. Corrective action taken by the licensee was considered adequate and no further guestions were required.

The inspector also stated that the surveillance on the containment electrical penetration potting compound is considered an unresolved item pending further evaluation by the licensee of the original inspection requirements associated with the specification.

The licensee acknowledged the statements by the inspector, and stated that the electrical penetration inspection requirements would be further evaluated. (Paragraph 5.c, Report Details)

H. The inspector stated that the review of the completed startup test procedures and the safety evaluation associated with the offsite testing of the RDS pilot valves revealed no discrepances; however, the inspector recommended that the licensee review the completed packages to reduce the volume and organize the materials.

The licensee acknowledged the inspector's comment. (Paragraph 6, Report Details)

I. The inspector stated that the review of operations revealed that the air ejector off-gas monitoring system had been operated in a deteriorated condition for part or all of 22 hours on October 31, 1976, as logged in the shift supervisor logbook, and as indicated by review of the channel 2 off-gas strip chart. The inspector stated that the failure to issued a Deviation or Event Report resulted in the failure to report the incident to the appropriate levels of management and to the NRC in accordance with Technical Specifications and indicated an acute weakness in the plant corrective action program. The failure to report this item is an item of noncompliance.

The licensee acknowledged the statements by the inspector and stated that the item would be reviewed. (Paragraph 7, Report Details)

- J. The inspector stated that the review of selected safety limits, limiting safety system setpoints, and limiting conditions for operation revealed no discrepancies. (Paragraph 8, Report Details)
- K. The inspector stated that the review of procurement activities revealed no discrepancies. (Paragraph 9, Report Details)
- L. The inspector stated that the review of selected outstanding inspection items revealed no discrepancies. (Paragraph 11, Report Details)

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#### REPORT DETAILS

# 1. Persons Contacted

C. J. Hartman, Plant Superintendent

C. R. Abel, Operations Superintendent

T. W. Elward, Technical Superintendent

J. P. Flynn, Maintenance Superintendent

G. B. Szczotka, Quality Assurance Superintendent

C. E. Axtell, Health Physicist

R. E. Schrader, Senior Technologist

J. A. Johnson, Instrumient and Control Supervisor

J. J Fremeau, Quality Assurance, Jackson

D. P. Zlanchard, Reactor Engineer

A. C. Sevener, Operations Supervisor

G. W. DaFoe, Plant Security Supervisor

J. M. Brun, Chemical and Radiation Protection Supervisor

G. H. Petitjean, Senior Engineer

J. J. Popa, Maintenance Engineer

E. M. Evans, Plant Engineer

E. McNamara, Shift Supervisor

T. K. Pence, Shift Supervisor

E. J. Thompson, Instrument and Control Technician

G. Dziedzic, Quality Control Inspector

#### 2. Surveillance

The inspector reviewed surveillance records to ascertain whether the surveillance of components or equipment associated with safety related systems and/or components is being conducted as required by Technical Specifications and in accordance with approved plant procedures.

The following items were considered during this review: A program had been developed and implemented related to the control, scheduling and evaluation of surveillance testing; a master schedule of surveillance requirements was being maintained; procedural content and format; the technical adequacy to achieve desired results; acceptance criteria; calibration of instrumentation specified for use in conduct of surveillance; method of returning system or component to service; secondary review of results of the surveillance; personnel understanding of their responsibilities; proper review and approval of surveillance procedures; surveillance conducted according to procedure; and discussions with cognizant plant personnel.

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Administrative Procedure 1.17, Surveillance Testing and Inspection Program, defines the responsibilities, control, procedure requirements, review and control of testing results, implementation of the program, scheduling and record retention to meet the requirements of the Technical Specifications, the Quality Assurance Program, 10 CFR 50, Appendix B, and ANSI Standard 18.7-1972, Revision 1.

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Review of Administrative Procedure 1.17 indicates that:

- Responsibilities have been assigned for management of the surveillance program.
- b. Formal requirements have been established for conducting tests and inspection in accordance with approved procedures.
- c. Formal methods have been established for review and approval of test results.
- d. Formal methods are available for returning systems or components to service.
- e. Formal requirements have been established for use of test and measurement equipment used during surveillance testing.

The following procedures and surveillance records were reviewed:

- a. Master Surveillance Schedule under the control of the Operations Department and the Instrument and Control group.
- b. Shutdown Cooling System Pressure Interlocks, TR-38, Revision 0, dated May 22, 1975.
- c. Primary Coolant Analysis, TI-04, 05, 06, and 07 and T7-10.

These surveillances consist of a record sheet only of the specific analysis performed on the primary coolant. Detailed laboratory procedures are used to perform the individual analysis. RCP-1, Sampling; RCP-2, Iodine; PCP-9, Preparation and Counting; Crud, Filtrate and Radioiodine Samples; and CIP-10, Operation of Conductivity Bridge were reviewed. Two of these procedureswere being rewritten in the format required by Administrative Procedure 1.17. The representative of the licensee stated that the Chemistry Department was in the process of rewriting all lab procedures into the new format required by their new QA Program and Administrative Procedures. It was estimated that approximately 75% of the lab procedures had been rewritten with a target completion date of early

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1977. Review of the four new procedures indicated that procedural content met internal requirements.

 Emergency Cooling System Valve Test, T30-22, Revision 1, August 11, 1976:

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Surveillances for August 6, September 6, October 9, and November 5, 1976, were reviewed. It was noted that on August 6, and September 6, 1976, Step 5.2.6 to verify that the check valve was functional, the operator performing the test failed to circle appropriate conditions as to whether the step was satisfactory or unsatisfactory. The step was appropriately initiated as complete.

Review of other tests indicated that these two incidents appeared to be isolated cases and not a general problem. These two cases were discussed with a representative of the Operations Department with emphasis on the need to verify that each step of a test is complete.

e. Emergency Diesel Auto Start Test, T7-01, Revision 9, May 27, 1976, and T30-18 requirements.

Tests performed June 1976 through the week of November 15, 1976, were reviewed. The licensee has had numerous starting problems during this period. These problems have been documented and appropriately reported.

f. Containment Spille, Ost-Incident System (Core and Enclosure Spray), TR-10.

A representative of the licensee stated that this test is to be rewritten as a T-180 series to meet the six-month testing requirements of the Technical Specifications. It was last performed July 13, 1976, and based upon the master schedule, is due to be performed again January 13, 1977.

The inspector noted that the present procedure is weak in the area of assuring that instrument root valves, which are closed during the functionaly testing of an instrument channel, are properly returned to service according to the requirements of Administrative Procedure 1.17 and Policy No. 10 of the Quality Assurance Program. The current procedure covers the return to service of instrument root valves closed in the functional test of an instrument channel in one statement without listing the individual valves. A representative of the licensee stated that they felt the details of returning the channel to service were within the training and craft capabilities of the instrument technician performing the test. Paradoxically, the procedures used to calibrate the sensor (different from the channel functional surveillance test) lists each instrument root valve for specific checkoff for return to service. According to the representative of the licensee, the calibration procedures could or could not be performed at the same time as the functional test. This was dependent upon scheduling.

g. Control Rod Drive Performance Test, Procedures T-180-08 and TR-01, Revision 1, April 12, 1974.

## 3. Calibration

The inspector reviewed calibration records to ascertain whether the calibration of components and equipment associated with safety related systems and functions is in conformance with the requirements of the Technical Specifications, requirements established by the licensee, .d with approved guides and standards.

The following items were considered during the review: Frequency of calibration; accuracy of components consistent with specified range and accuracy criteria; service status of the system with regard to the applicable Limiting Conditions of Operation; the procedure content with regard to review and approval; trip setting acceptance values; detailed stepwise instructions and technical content; observation of calibration; calibration of secondary instrument standards; and establishment of a system of controls.

Quality Assurance Program Procedure No. 12-1, Calibration Control of Measuring and Test Equipment, and Administrative Procedure 1.19, Control of Measuring and Test Equipment, define the responsibilities, control, scheduling, procedure control, listing of test equipment, dating of calibration, handling of nonconforming equipment, and recordkeeping.

The following records and procedures were reviewed for compliance with the Technical Specifications, the Quality Assurance Program, and Administrative Procedures.

- Reactor Protection System Scram Sensors Test, TR-32 (old T-365-13). Specific trip sensors reviewed:
  - (1) High Reactor Pressure Switches IRPS-1.
  - (2) High Neutron Flux.
- B. Reactor Protection System Undervoltage Breaker Check, IRP-7, Revision 1, May 17, 1975.

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c. Core Spray and Enclosure Spray Valve Indication, TR-10, for time delay on spray valve, IPI-2 for calibration of PS/7064A and B (Containment Pressures Sensor Used for Containment Spray Actuation), IPI-1 for calibration of PS/IG 11B and D (Reactor Pressure Sensors Used for Core Spray Actuation).

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- d. Electronic Calibration of Off-gas Instrument, TR-40, Revision 0 May 13, 1975, including the observation of the actual calibration performed November 17, 1976.
- e. Calibration of standards used in the calibration of safety related sensors.
  - (1) AC Ammeter, S/N 8520-10001
  - (2) DC Voltmeter, S/N 8520-10115
  - (3) AC Voltmeter, S/N 8520-10115
  - (4) Sine-Square Wave Gen, S/N 8520-10080
  - (5) Resistance Bridge, S/N 8520-10078
  - (6) Electronic Counter, S/N 8520-10029
  - (7) DC Power Supply, S/N 8520-007
  - (8) Ashcroft Vacuum Tester
  - (9) L&N Potentionmeter Box, 8520-10082

Primary electrical and electronic standards traceable to national standards are not maintained at the facility. Secondary standards are used at the facility. These secondary standards are returned to the System Protection and Laboratory Service Department (SPLSD) in Jackson, Michigan, for periodic recertification. SPLSD references the primary standard traceable to the National Standard in their report on the calibration of the secondary report.

f. Selected components and equipment associated with safety related systems and/or functions not identified in the Technical Specifications as requiring specific calibration frequencies were reviewed to determine if calibrations were being performed on a routine schedule and within the requirements established by the licensee's Quality Assurance and Administrative Procedures.

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Within this review, it was noted that the licensee is currently implementating a program to identify and classify all plant instrumentation as to its function, safety related status, range, accuracy, alarm setpoints, calibration frequency and need for calibration procedures. A representative of the licensee stated that all equipment or components have been identified, schedules are being determined and procedures being written when required. Problems are being encountered in attaining original specifications because they were never provided or were lost.

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The inspector verified that calibration requirements for the following have been specified and are being met:

- (1) Turbine Vacuum Trip
- (2) Turbine Bypass Valve Closure
- (3) Liquid Poison Tank Temperature Controllers TI-1341, TS-1508 and TS-1512
- (4) Liquid Poison Tank Level Alarms
- (5) Liquid Poison High Temperature Alarm
- (6) Liquid Poison Low Temperature Alarm
- (7) Control Rod High Temperature Alarm
- g. The inspector reviewed the qualifications of two individuals having responsibilities for performing calibrations of equipment and confirmed that their qualifications are in conformance with ANSI 18.1-1971 standards.
- h. During a tour of the facility, the inspector verified that equipment and laboratory instruments are being tagged with the current calibration dates and due dates for recalibration. A representative of the licensee stated some of the current due dates for recalibration may be changed after completion of their current program of identification and calibration.

#### 4. Records

The licensee is currently in a transition state of upgrading their document control to meet storage commitment of their Quality Assurance Program and ANSI 45.2.9. The upgrading also includes plans to convert to a microfilm system for document retention and retrieval.

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New storage facilities have been designated, but have not been completed as yet.

To provide an evaluation of the effectiveness of the licensee's current control system, selected documents and records were reviewed for compliance with Administrative Procedure 1.11, Plant Records Management.

Records reviewed during this inspection included.

- Control and review of surveillance and calibration procedures maintained by the Instrument and Control group, Operations group and Chemistry and Radiation Protection group.
- b. Review and retention of completed surveillance procedures.
- c. Review and retention of completed calibration records maintained by the Instrument and Control group.
- d. Personnel qualification records.

Records are maintained on maintenance of equipment. All major maintenance activities and operating activities are summarized in weekly Operations Reports. These weekly reports are reviewed annually for trends. The licensee is currently developing a program (ASIST) that will enable them to recall the maintenance history of any piece of plant equipment and provide a means of time between failures. Target date to getting the system working is early 1977.

# 5. Reportable Occurrences

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

a. LER RO-25-76, Failure of the emergency diesel generator to meet the 15-second starting requirement.

The licensee reported<sup>1</sup>/ that the emergency diesel generator failed to start within the required 15 seconds during routine testing on September 2, 1976. The inspector reviewed the event with the licensee representative. The increased surveillance of twice per week is continuing. The licensee has had the diesel vendor representative on site to observe diesel starting and has noted apparent sluggish governor operation. A new governor has been ordered and the replacement of the governor is scheduled for the January plant maintenance outage.

1/ Ltr, CP to IE:III, dtd 10/1/76.

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The inspector noted that of at least 24 test operations (August through November 19, 1976) the diesel had failed to meet the starting time three times but had apparently started during each test operation.

No further questions are required of this matter at this time.

b. LER RO-26-76, Failure to perform the required fire pump actuation testing associated with reactor depressurization system.

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The licensee reported<sup>2/</sup> that the fire pump actuation testing required by the reactor depressurization system was not performed during July and August following initial system testing on May 20, 1976.

The inspector verified that the licensee had subsequently performed the testing on September 14, 1976, and the test procedure was scheduled to be performed monthly.

The failure to perform the required testing in accordance with Technical Specifications, Sections 4.1.4.A and 4.1.5.C is an item of noncompliance. Corrective actions taken by the licensee are considered adequate and no further questions are required of this matter at this time.

c. LER RO-27-76, Failure to perform the required inspections of the containment vessel penetrations expansion joints.

The licensee reported  $\frac{3}{}$  that during a review of inspection reports, it was discovered that the inspection being performed on the containment expansion joints were not adequate. The welds on the expansion joints had been inspected during the previous outage, but the expansion joints had not been visually inspected in accordance with Technical Specification 3.7(c).

The expansion joints are scheduled to be inspected during the January maintenance outage. The licensee is reviewing and evaluating the required procedure changes to perform the visual inspections.

The corrective actions appear adequate; since no previous problems have been encountered with the expansion joints. No further questions are required of this matter at this time.

2/ Ltr, CP to IE:III, dtd 10/6/76. 3/ Ltr, CP to IE:III, dtd 10/27/76.

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Associated with the same visual inspection required by Technical Specification 3.7(c), the visual inspection of the potting compounding of the electrical penetrations could not be inspected due to the physical construction of the penetrations. The licensee is evaluating the inspection requirements to determine the action to be taken.

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This item will be considered unresolved pending the completion of the evaluation by the licensee.

d. LER RO-28-76, Reactor depressurization system "D" battery pilot cell and three other cells were found below specification during routine surveillance.

The licensee reported 4/ that the specific gravity of four cells in the reactor depressurization system "D" battery were discovered below a specific gravity of 1.200 during routine surveillance on October 4, 1976. This was the fourth event concerning low specific gravity readings following battery watering activities.

The review of the event with the licensee representative revealed that during the week of November 15-19, 1976, the battery vendor representative was scheduled to be onsite to review the problem with the appropriate personnel. The low specific gravities (slightly below 1.200, 1.189, 1.198 and 1.193) do not appear to deteriorate the battery capacity significantly. The specific gravities taken after an equalizing charge on the RDS "D" battery revealed all cells above 1.200.

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

## 6. Reactor Depressurization System

The inspector reviewed selected portions of the completed startup procedures and reports for the reactor depressurization system hot functional testing (O-RDS-1, STP-10, Revision 5), pipe movement verification test (STP-15, Revision 1), final report on the pipe movement verification test (dated September 23, 1976, to Consumers), and the safety evaluation and report on the offsite testing of the depressurization valves, pilot valves performed on July 23-24, 1976.

No discrepancies were noted.

4/ Ltr, CP to IE:III, dtd 10/16/76.

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#### 7. Review of Operations

The review of selected records and activities to be in accordance with the Technical Specifications and Administrative Procedures revealed one item of noncompliance.

The review revealed that on October 31, 1976, the air ejector offgas system was not fully operational between 0100 and 2200 hours. The review of the channel No. 2 recording indicated a deteriorated off-gas level due to air purging and moisture during the specified period. The corrective actions, apparently taken by the licensee, including the air purging of the system, the repair of the AE system steam trap (which initiated the event by causing flooding of the sample system), and monitoring of the stack gas levels during the event appeared adequate.

The licensee failed to initiate the required Deviation Report (QA-16) or Event Report (QA-19) it the shift supervisor level, nor subsequently at the department head levels during the logbook reviews.

The failure to recognize the event as reportable and initiate the appropriate reports is an item of noncompliance pursuant to Technical Specification 6.9.2.

 Safety Limits, Limiting Safety System Setpoints, and Limiting Conditions for Operations

The review of selected operations activities, maintenance activities, facility changes, offnormal conditions, and reportable occurrences revealed no discrepancies.

9. Procurement Activities

The review of selected procurement activities to assure compliance with the applicable procedures for the purchase of materials, supplies and services revealed no discrepancies.

# 10. Fire Prevention and Protection

The review of selected procedures for control of activities associated with fire hazards, procedures for responding to fires, and surveillance activities revealed no discrepancies. The review by the inspector included:

a. Site Emergency Plan, Appendix D, Fire Plan.

 Alarm Procedure ALP 1.6, Edwards Pyrotronics Fire System Annunicator

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- c. Emergency Procedure EMP 3.5, Control Room Fire
- d. Emergency Procedure EMP 3.6, Plant Fires
- e. Administrative Procedure 1.9, Major and Minor Modifications
- f. Administrative Procedures 1.5 and 1.16, Maintenance Activities
- g. Offnormal Procedure ONP 2.25, Emergency Shutdown
- h. Preventative maintenance, surveillance, and schedules for specific fire protection items.
  - (1) Fire Pumps
  - (2) Fire Hoses and Hose Stations
  - (3) Fire Protection System Flow Test
  - (4) Fire Extinguisher Inspection Program
  - (5) Fire Hydrant Flushing
- i. A recent fire inspection was performed by Nuclear Material Limited on July 13-14, 1976. The inspector reviewed the fire inspection results with the licensee representative. Five fire inspection items remained open at the time of the inspection. The licensee is in the process of resolving the open items locally and in the offsite engineering group.

## 11. Outstanding Items

The inspector reviewed outstanding items to ascertain completion and status.

a. Health Physics Training and Retraining 5/

The licensee had completed a training session for the chemistry and radiation technicians on November 15, 1976. The training sessions included examinations on the material with the average grades above 80 percent. Two of the individual grades were below 70 percent. The specific examinations were discussed with the health physicist who indicated an acceptable evaluation

5/ IE Inspection Rpt No. 050-155/76-16.

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of the individual and the low grades were due to poor questions on that particular section of the examination. The two individuals were considered adequate by the licensee.

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No discrepancies were noted. No further questions are required by the matter at the time and this item is considered closed.

The licensee is in the process of setting up a chemistry and radiation protection technician retraining course. This item will be reviewed at a later date following completion.

No discrepancies were noted.

b. Quality Assurance Training for Maintenance and I&C Personnel-

The licensee had completed an indoctrination program for the maintenance personnel consisting of two sessions.

No d'screpancies were noted.

c. Maintenance Training 7/

The licensee is continuing to prepare the maintenance training program. The completed program will be reviewed at a later dated following completion.

- d. Fire Protection Items Status of Items Associated with IE Bulletin No. 75-040/
  - The flushing and lubrication of all fire hydrants is performed on the cold weather check sheet annually. This item is considered closed.
  - (2) The engineering study to provide smoke and heat venting is continuing.
  - (3) The annual tests for all heat actuating devices associated with the transfer automatic deluge systems are not completed.
  - (4) The provision of a one-hour barrier between the control room and the hallway with fire doors has been withdrawn by Nuclear Material Limited. The licensee is evaluating this item to determine the status.
- 6/ IE Inspection Rpt No. 050-155/76-16. 7/ Ibid.
- 8/ Ltr, CP to IE:III, dtd 12/4/76.

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- (5) The use of a firewatch form<sup>9</sup>/ is standard practice at the facility. The form includes the type activity to be performed, where the activity is located, when the activity is to be performed, any hazards associated with the activity, and a specific firewatch assigned by the responsible supervisor. The licensee is determining the necessity to include this practice in a formal procedure. This item will be reviewed at a subsequent inspection.
- (6) Fire drills are scheduled to be 10/ completed at monthly interval. The licensee is in the process of preparing procedures/controls for performing these fire drills. This item will be reviewed with the licensee at a subsequent inspection.
- (7) The newly installed cable penetration seals<sup>11/</sup> are included in the plant Q-list and are considered quality/safety related during all maintenance activities associated with them. No further questions are required concerning this matter at this time, and this item is considered closed.
- e. Preventive Maintenance Program 12/

The inspector reviewed the status of the plant preventive maintenance program with the licensee representative. The completion of the program, including the computer programming for implementation, is projected to be in mid 1977. This item will be reviewed further at a subsequent inspection.

f. Inservice Inspection - 1977

The inspector's review of the scheduled  $\frac{13/14}{}$  inservice inspection items for the 1977 outage revealed no discrepancies. The licensee is continuing the ISI program in accordance with the Technical Specifications, Section 9. Approximately 90 welds are scheduled for inspection during the June 1977 outage.

g. Stack Gas Monitoring System

The inspector verified that the facility change had been implemented which rerouted the stack gas monitoring system sample line to prevent freezing. The modification included providing two internal sample lines with valving and heat tracing.

9/ IE Inspection Rpt No. 050-155/75-16. 10/ Ibid. 11/ Ibid. 12/ IE Inspection Rpt No. 050-155/76-10. 13/ IE Bulletin No. 76-04. 14/ Ltr, CF to IE:III, dtd 6/7/76. 15/ IE Inspection Rpt No. 050-155/76-04.

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The stack gas monitoring system has apparently operated normally with no noted problems.

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

h. Emergency Condenser Shellside Samples

The review of the gross, degassed beta-gamma samples of the emergency condenser revealed the following data for 1976:

August -  $4.26 \times 10^{-6}$  uCi/ml September -  $3.59 \times 10^{-6}$  uCi/ml October -  $3.87 \times 10^{-6}$  uCi/ml

No further questions are required concerning this matter at this time, and the item is considered closed.

i. Modification Program Procedures 19/

The licensee is continuing to prepare the Quality Assurance procedure for minor modifications. The completed program will be reviewed at a later date following completion of the procedures.

#### 12. Quality Assurance Activities

The inspector's review of the implementation of the Quality Assurance Program revealed that the licensee is in the process of indicating a program status to the NRC, 20 following the completion of the evaluation of an independent audit of the formal Quality Assurance Program. The implementation of the Quality Assurance Program is being followed by IE:III.

No further questions are required of this matter at this time.

13. Facility Tour

The inspectors toured the facility to view the general plant conditions, plant cleanliness including fire hazards, and selected plant equipment status.

16/ IE Inspection Rpt No. 050-155/75-07.

- 17/ IE Bulletin No. 76-01.
- 18/ Ltr, CP to IE:III, dtd 4/5/75.

19/ IE Inspection Report No. 050-155/76-18.

20/ Ltr, CP to IE:III, dtd 9/17/76.

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# Specific items reviewed included:

- a. Emergency condenser ystem valve positions, local instrumentation, and the actual graded sightglass water level if for the shell side of the condenser.
- b. Local reactor pressure, reactor water level, steam drum water level, and accessible containment water level switches.
- c. Marysville emergency diesel generator and power cable reel. $\frac{22}{}$
- d. Selected fire hose stations and fire extinguishers.

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- e. Selected recordings of parameters inside and outside the control room.
- f. Liquid poison system valve positions and system status.

No discrepancies were noted.

## 14. Licensee Identified Items

The inspector reviewed the corrective actions taken by the licensee concerning two items found by the licensee through his management controls and audit program.

No discrepancies were noted. (Paragraphs 5.b, 5.c, Report Details)

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