

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

REGION V

Report No. 50-312/81-01
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: January 12-15, 1981
Inspectors: GB Jewetzig 2/11/81
G. B. Jewetzig Reactor Inspector Date Signed

Date Signed

Date Signed
Approved By: B. H. Faulkenberry 2/11/81
B. H. Faulkenberry, Chief, Reactor Projects Section 2 Date Signed
Reactor Operations and Nuclear Support Branch

Summary:

Inspection on January 12-15, 1981 (Report No. 50-312/81-01)

Areas Inspected: Routine, unannounced inspection of maintenance activities; seismic instrumentation; followup on previously identified items; followup on IE Bulletins and Circulars; and independent inspection effort. This portion of the inspection involved 25 inspector-hours onsite by one inspector. In addition, as a result of Systematic Appraisal of Licensee Performance (SALP) findings for Rancho Seco, the area of Design Changes was also inspected. This SALP portion of the inspection involved 3 inspector-hours onsite by one inspector.

Results: Of the six areas inspected, no items of noncompliance or deviations were found in five areas; one item of noncompliance (failure to have a properly approved maintenance procedure) and one deviation (absence of procedures for preventive maintenance of mechanical equipment and failure to maintain PM schedule for this equipment) were identified in one area (Paragraph 4).

RV Form 219 (2)

8104200669

DETAILS

1. Persons Contacted

- *N. Brock, I&C Maintenance Supervisor
- D. Cass, Mechanical Maintenance Supervisor
- *Q. Coleman, Quality Assurance Engineer
- *R. Colombo, Technical Assistant
- D. Elliott, Quality Assurance Engineer
- J. Forcier, I&C Technician
- *H. Heckert, Nuclear Engineering Technician
- *J. Jewett, Senior Quality Assurance Engineer
- *V. Lewis, Site Project Engineer
- R. Low, Electrical Engineering Associate
- *R. Miller, Chemical and Radiation Supervisor
- *R. Oubre, Plant Superintendent
- *T. Perry, Senior Quality Assurance Engineer
- J. Price, Surveillance Coordinator
- J. Sullivan, Senior Quality Assurance Engineer
- *T. Tucker, Scheduler
- D. Yount, Electrical Maintenance Supervisor

*Denotes those present at exit meeting on January 15, 1981.

2. Licensee Action on Previous Inspection Findings

a. (Open) Unresolved item (50-312/80-31-04)

The inspector confirmed that the licensee was taking steps to modify the Work Request Procedure (AP.3) to define more clearly the conditions under which the Shift Supervisor may determine engineering requirements and serve as inspector. Since the revision was not complete, this matter will be followed up at a subsequent inspection.

b. (Open) Unresolved item (50-312/79-20-01)

The need for a controlled document to define QA Class I components was discussed with the cognizant licensee representative. He agreed with the need for improvement of the present system and stated he would prepare a controlled document, using the IE Bulletin 79-01B submittal as a starting point. This matter will be followed up at a subsequent inspection.

c. (Open) Deviation (50-312/80-24-02)

The inspector determined that the licensee had significantly improved the timeliness of the MSRC review of audit reports. However, the inspector will continue to audit the area of activity to assure the licensee meets the commitments described in his letter of October 1, 1980.

d. (Open) Noncompliance (50-312/79-22-01)

The inspector determined that the licensee had conducted an audit (number 0-291) of the performance, training and qualification of facility personnel in response to this item of noncompliance. The licensee had also revised his formal audit schedule to provide a periodic audit of this area as required by the technical specifications. The inspector reviewed audit 0-291 and found that although the auditors had determined the qualifications of facility personnel, the report did not state that these qualifications had been compared with those specified in ANSI N18.1 to determine acceptability. The licensee agreed to look into this matter and correct the condition. This will be followed up at a subsequent inspection.

e. (Open) Noncompliance (50-312/80-24-01)

The inspector verified that, in response to this item of noncompliance, the licensee had begun to audit conformance to the requirements of the facility technical specifications. The initial audit of technical requirements was no. 0-342 which dealt with L.C.O. requirements during inoperability of one diesel generator. The inspector reviewed this audit and concluded that it addressed the appropriate factors. The inspector also discussed the nature of future audits with the cognizant licensee representative. Further followup in the area will be conducted during subsequent inspections.

3. Seismic Instrumentation

The inspector examined the calibration records for the seismic event recording instrumentation (consisting of seismic triggers and triaxial accelerometers) and concluded that it had been calibrated in conformance with technical specification requirements. The inspector also determined that the batteries which provide emergency power to this equipment had also been tested in accordance with technical specification requirements. The seismic switches which annunciate acceleration levels in the Control Room (0.065g, 0.13g (OBE), 0.19g and 0.25g (SSE)) had also been calibrated.

Although the above equipment was properly calibrated, the licensee expressed concern regarding its long-term reliability. Accordingly, he has ordered a new system which will be installed following delivery in the next few months.

No items of noncompliance or deviations were identified.

4. Maintenance

The inspection of this subject included examination of both equipment repair and preventive maintenance. In the area of equipment repair, the inspector selected twelve LERs involving equipment problems during 1980 and examined the documentation associated with the corrective action. Matters considered in this examination included evidence of proper approval of work, recognition of applicable limiting conditions for operation, use of properly approved procedures, specification of inspection and testing as appropriate, availability of quality control records and use of qualified personnel. Except as indicated below, no matters in conflict with regulatory requirements were identified.

The exceptions were as follows:

- a. Work Request Number 45667 involved repair of the Limitorque operator on a safety features valve and subsequent valve testing; but no written procedures were identified in the work request for either the repair or the testing. Depending on the complexity of the procedures involved, regulatory guidance might or might not require written procedures for these operations. If this were an infrequent operation, the inspector would conclude that the nature of the task clearly required a written procedure. However, based on the inspector's experience, repair of limitorque operators is sufficiently common that qualified maintenance personnel would normally possess the skills necessary for the specified repairs and testing. In addition, it appears that appropriate testing was performed and that satisfactory test results were obtained. Accordingly, the absence of written procedures in this case was judged to be marginally acceptable. At the exit meeting the inspector noted that this work request was an exception to the licensee's normal practice and recommended against repetition. The licensee agreed to look into the matter.
- b. Work Request Number 44953 involved repair of a decay heat removal pump with the repair procedure being contained within a Maintenance Inspection Data Report (MIDR). Technical Specifications 6.8.1 and 6.8.2, together with Regulatory Guide 1.33, require that maintenance procedures be reviewed by the PRC and approved by the Plant Superintendent prior to implementation. In this instance the complexity of the maintenance was such that the inspector concluded the average maintenance technician would not normally possess the skills to do the work without detailed instructions and that a written and approved procedure would be required to assure the required maintenance and subsequent testing is properly performed. For the maintenance in question the detailed instructions were contained within an MIDR which had only been approved by the cognizant engineer and a QA engineer. Based on discussions with licensee representatives this was a common practice for maintenance. Because this maintenance procedure had not been reviewed by the PRC and approved by the Plant Superintendent prior to implementation, this is an item of apparent noncompliance (81-01-01).

The inspector also examined the licensee's preventive maintenance (PM) program in the areas of electrical and mechanical maintenance (instrument maintenance was previously covered in Inspection Reports No. 50-312/80-24 (paragraph 4) and 50-312/80-31 (paragraph 4)). Based on examination of current PM computer program printouts, review of PM procedures and discussions with maintenance supervisors, the inspector made the following observations:

- a. Regarding electrical maintenance, approximately 20% of the safety related items scheduled for maintenance during January 1981, were overdue by one month or more. The procedures provided for electrical maintenance, however, appeared comprehensive and appropriate.
- b. Regarding mechanical maintenance, approximately 100% of the safety related items scheduled for maintenance during January 1981 were overdue by one month or more. In addition, although a PM procedure number was specified in the computer printout the procedure designation was in error. Further, procedure M.116 "Visual Inspection", which the inspector believes was the intended reference, had not been issued at the time of the inspection. When asked what the mechanics looked for during PM the inspector was told they look for leaks, vibration and loose anchor bolts. There was no mention, however, of oil or grease changes, replacement or cleaning of filters and strainers, or examination of parts with limited lifetimes, such as wear rings, etc.

Based on the foregoing, the inspector concluded that a PM schedule as described in ANSI N18.7-1972, was not being effectively maintained in the areas of mechanical and electrical equipment. This is an apparent deviation (81-01-02).

5. Independent Inspection Effort

The inspector toured various areas of the plant to observe operations and activity in progress and to inspect the general state of cleanliness, housekeeping and adherence to fire protection rules. In the course of the tour the inspector noted that the enclosure for the fire hydrant and fire hose, located in the tank farm area, was in poor condition with respect to providing shelter and orderly storage. This fact was reported to the licensee at the exit meeting. Otherwise, most areas appeared to be clean and orderly. No items were identified which were in conflict with regulatory requirements.

6. Systematic Appraisal of Licensee Performance (SALP) Inspection.

By letter dated August 28, 1980, J. L. Crews of Region V advised J. J. Mattimoe of SMUD, of aspects of Rancho Seco operations which would be receiving an increased frequency and/or scope of inspection as a result of the Region V SALP review. These areas were Design Changes and Modifications, Quality Assurance Audits, Training, and Quality Control and Maintenance. The inspection performed during the present visit pursuant to the SALP evaluation is reported below.

a. Design Changes Quality Control (SALP)

Recent SALP inspections in this area addressed concerns related to possible failure to consider the structural effects of facility changes on plant safety, the effects of changes to QA Class 2 and 3 systems on QA Class I systems, and the possible implementation of facility changes through the use of Work Requests (which are primarily intended to be used for maintenance or repairs). The present inspection, therefore, consisted of a general document review of recent facility changes of all classes. These changes included changes to the non-Class I Reactor Coolant System flow indication; providing a fuse for the Unit T-avg Control Station; relocation of an evacuation strobe light; installation of radiation instrumentation required by NUREG 0578, paragraph 2.1.8.b; correction of a wiring error related to trip of the auxiliary boiler and construction of a masonry enclosure for a transformer. All documentation appeared to be in order and no conflicts with the licensee's procedures or regulatory requirements were identified.

7. Followup on IE Bulletins and Circulars

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

a. IE Bulletin 80-11 (Closed)

By letter dated July 16, 1980 the licensee identified the masonry walls in the facility which were in proximity to or had attachments to safety related piping and/or equipment, such that wall failure could affect a safety related system. The licensee also provided a schedule for evaluation of the potential for, or consequences of wall failure. This evaluation was due on or about November 10, 1980, but was not sent by the licensee until January 19, 1981, following inquiry by the inspector and regional management. Discussions with the cognizant licensee representative indicated that this was an oversight. Based on the inspector's records, licensee responses to bulletins typically are made on a timely basis or the NRC is duly notified when additional time is needed for preparing submittals. The inspector therefore concludes that this is an infrequent occurrence and does not provide sufficient basis for requiring revision of the licensee's system for management of bulletin responses.

Regarding the information contained in the licensee's letter of July 16, 1980, the inspector performed a walk-down of the identified masonry walls and visually confirmed the information contained within the submittal. This item is closed.

b. IE Bulletin 80-08 (Closed)

By letter dated July 7, 1980 the licensee provided his initial response to the Bulletin requests concerning containment liner penetration welds. The inspector's review of this letter indicated it was not fully responsive to the Bulletin requests. Supplemental information was provided by letter dated December 5, 1980. On the basis of reviewing both submittals, the inspector concludes that the licensee has provided an acceptable response to this Bulletin.

c. IE Bulletin 80-21 (Closed)

By letter dated December 1, 1980 the licensee reported that no valve parts which were the subject of this Bulletin were in use or planned for use at Rancho Seco.

d. IE Bulletin 80-23 (Closed)

By letter dated November 24, 1980 the licensee reported that no solenoid valves which were the subject of this Bulletin were in use at Rancho Seco.

e. IE Bulletin 79-03A (Closed)

By letter dated July 30, 1980 the licensee provided his initial response to this revision of IE Bulletin 79-03. Upon reviewing this response the inspector determined that additional clarification was needed. This was provided by the licensee's letter of December 3, 1980. The inspector now concludes that the licensee has provided an acceptable response.

f. IE Circular 80-05 (Closed)

Based on discussions with the Plant Superintendent, the inspector determined that the licensee had performed the remaining work necessary to close this circular (measure lube oil consumption rate of diesel generators and assure that an adequate inventory of lube oil is normally maintained onsite).

8. Exit Meeting

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on January 15, 1981. The inspector summarized the purpose and the scope of the inspection and the findings. The findings were acknowledged by the licensee.