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

REGION III

Report No. 50-409/81-02

Docket No. 50-409

License No. DPR-45

4-8-81

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

Facility Name: La Crosse Boiling Water Reactor

Inspection At: La Crosse Site, Genoa, WI

Inspection Conducted: February 1-28, 1981

Inspectors: W. L. Forney

RFW For M. W. Branch

RFWarnick Approved By: R. F. Warnick, Chief

Projects Section 2B

Inspection Summary

Inspection on February 1-28, 1981 (Report No. 50-409/81-02)

Areas Inspected: Routine, resident inspection of the licensee's Operational Safety, Surveillance, Maintenance, Followup Action on IE Bulletins, IE Circulars, Licensee Event Reports, Open Inspection Items and Reactor Plant Trips, Temporary Instructions 2515/42, Rev. 1, dealing with TMI Task Action Plan, and day-to-day surveillance of licensee's Physical Security Plan and Procedures. The inspection involved a total of 280 inspector-hours onsite by two NRC inspectors including 24 inspector-hours during offshifts. Results: Of the ten items inspected, no items of noncompliance or deviations were identified in nine of the areas; one item of noncompliance was noted in the area of operational safety, Paragraph 3.c (operator error causing loss of offsite power)

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DETAILS

1. Persons Contacted

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

*Denotes those present at the exit interview.

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

2. General

The plant has been operating at power since February 2, 1981. The plant staff is presently developing their Radiological Emergency Plan utilizing outside consultants as necessary. This plan was due to be issued to the United States Nuclear Regulatory Commission for review on January 2, 1981, but because of limited staff that date was not met. Plant management's present schedule is for March 31, 1981.

3. Operational Safety Verification

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

The inspector observed plant housekeeping/cleanliness conditions and verified implementation of radiation protection controls. During the

month of February, the inspector walked down the accessible portions of the Control Rod Drive Hydraulic systems to verify operability. The inspector also witnessed portions of the radioactive waste system controls associated with radwaste shipments and barreling.

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

The inspectors noted the following matters requiring licensee action:

- a. Maintenance personnel were noted exiting a radiological controlled area without frisking. This item was brought to the attention of plant management and a meeting was held with maintenance department personnel. Plant management committed to clarify requirements in a Health and Safety memo. This is considered to be an unresolved item (50-409/81-02-01).
- b. The inspectors noted that several Security Control Procedures (SCP's 3.0, 4.1B, 4.1C and 6.3) were changed prior to receiving prior NRC approval of the change to the Physical Security Plan. This item was brought to the attention of plant management and interoffice memo "Burns" dated February 26, 1981, was issued to clarify the proper procedures to follow until "PSP" is approved by the NRC.
- c. The inspectors noted that there has been an increasing number of operator errors and that three such errors occuring on January 16, 1981, and again on February 1, 1981, resulted in reactor trips. The reactor trip on February 1, 1981, due to an operator switching error left the plant without offsite power (all backup systems operated as required). This item is considered to be an item of noncompliance and is discussed in Appendix A to the letter transmitting this report.

4. Monthly Maintenance Observation

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

The following items were considered during this review: the limiting conditions for operation were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures and were inspected as applicable; functional testing and/or calibrations were performed prior to returning components or systems to service; quality control records were maintained; activities were accomplished by qualified personnel; parts and materials used were properly certified; radiological controls were implemented; and, fire prevention controls were implemented. Work requests were reviewed to determine status of outstanding jobs and to assure that priority is assigned to safety related equipment maintenance which may affect system performance.

The following maintenance activities were observed/reviewed:

- 1. Repair/replacement of fluid coupling on number 1B force circulating pump.
- 2. Trouble shooting of NI Channel Number 8.

Following completion of maintenance on the number 1B Force Circulating Pump, the inspector verified that these systems had been returned to service properly.

No items of noncompliance were identified.

5. Monthly Surveillance Observation

The inspector observed technical specifications required surveillance testing on the 1A and 1B Emergency Diesel Generators, 1A and 1B HPSW diesels and verified that testing was performed in accordance with adequate procedures, that test instrumentation was calibrated, that limiting conditions for operation were met, that removal and restoration of the affected components were accomplished, that test results conformed with technical specifications and procedure requirements and were reviewed by personnel other than the individual directing the test, and that any deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel.

The inspector also witnessed portions of the following test activities: Verification of deployment capabilities for emergency service water system needed for liquification issue resolution at LACBWR.

The inspector expressed to plant management the need to ensure adequate personnel are trained and technically adequate procedures are in place for the use of the emergency service water system.

No items of noncompliance were identified.

6. Licensee Event Reports Followup

Through direct observations, discussions with licensee personnel, and review of records, the following event reports were reviewed to determine that reportability requirements were fulfilled, immediate corrective action was accomplished, and corrective action to prevent recurrence had been accomplished in accordance with technical specifications. LER 80-05 - Unauthorized Modification to Shutdown Condenser LER 80-09 - Mechanical Interlock on Air Lock Was Inoperable LER 80-10 - Late Accomplishment of Technical Specification Test LER 80-11 - Violation of Cooldown Rate on Reactor Vessel

No items of noncompliance were identified.

7. IE Bulletin Followup

For the IE Bulletins listed below the inspector verified that the written response was within the time period stated in the bulletin, that the written response included the information required to be reported, that the written response included adequate corrective action commitments based on information presentation in the bulletin and the licensee's response, that licensee management forwarded copies of the written response to the appropriate onsite management representatives, that information discussed in the licensee's written response was accurate, and that corrective action taken by the licensee was as described in the written response.

IEB 80-23 Failure of Solenoid Valves Manufactured by Valcor Engineering Corp.

No items of noncompliance were identified.

8. IE Circular Followup

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

IEC 80-23 Potential Defects in Beloit Power System Emergency Generators

No items of noncompliance were identified.

9. Review of Plant Operations

During the month of February, 1981, the inspectors reviewed the following activities:

a. Procurement

The inspectors reviewed procurement and storage activities to ascertain whether the purchase of components, materials and supplies used for safety related functions are in conformance with the licensee's approved QA program and implementing procedures. Non-conforming items are segregated and marked accordingly. Applicable preventative maintenance is performed, housekeeping and environmental requirements are met and limited shelf-life items are controlled.

The inspector's review revealed several work areas in the licensee's system dealing with the labeling and storage of limited shelf-life items. The licensee has started a program to properly identify shelf-life of items and to develop a system to purge out old and order new items if necessary.

The inspectors also reviewed FC-71-80-01 and determined that stainless steel seamless tubing, Items 1 and 2 of Purchase Order A76958, was not stamped as a QC item as required by ACP-05.1. FC 71-80-01 states that this material will be used in a safety related system. This item has been identified to plant management for resolution.

The above items are considered unresolved item 50-409/81-02-02.

10. Plant Trips

Following the plant trips on January 31, 1981 and February 1, 1981, the inspector ascertained the status of the reactor and safety systems by observation of control room indicators and discussions with licensee personnel concerning plant parameters, emergency system status and reactor coolant chemistry. The inspector verified the establishment of proper communications and reviewed the corrective actions taken by the licensee.

All systems responded as expected, and the plant was returned to operation on February 2, 1981.

The trip on February 1, 1981 was caused by an operator opening the wrong disconnect that divorced the plant from offsite power. This item is an item of noncompliance and is also discussed in Paragraph 3, Operational Safety Verification.

11. TMI Action Plan Inspection of Procedures and Staffing (TI 2515/42, Rev. 1)

The inspectors verified that the following tasks were completed by the licensee:

- (a) I.A.1.1 Shift Technical Advisor Staffing and Training Program Implementation
- (b) 1.A.1.2 Shift Supervisor Responsibilities

- (c) I.A.2.1 Immediate Upgrading of RO and SRG Training and Qualifications
- (d) I.C.2 Shift Relief/Turnover

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- (e) I.C.3 Shift Supervisor Responsibilities
- (f) I.C.4 Control Room Access
- (g) I.C.5 Procedure for Operating Experience Feedback

The inspectors did not complete the review of items I.C.6 (Verification of Operating Activities) or II.F.2 (Identification of and Recovery from Conditions Leading to Inadequate Core Cooling), the licensee is to provide additional information to the inspectors. This is considered to be unresolved item 50-409/81-02-03.

- 12. Followup on Previous Items of Noncompliance and Open Inspection Items (011)
 - a. (Closed) OII 80-09-NC-1¹/ Failure of licensee to conduct proper 10 CFR 50.59 review of modification to shutdown condenser. The licensee's response to this item included dissemination of information to all plant employees.
 - b. (Closed) OII $80-09-NC-2^{1/}$ Failure to provide the required two valves in series for containment isolation on the unauthorized modification to the shutdown condenser. The licensee's response to this item included dissemination of this item of noncompliance to all plant employees.
 - c. (Closed) OII 80-09-NC-3¹/ Violation of containment integrity while the reactor was operating at power. The licensee's response to this item concluded that if 50.59 review was accomplished, this item would not have occurred.
 - d. (Closed) OII 80-09-NC-4^{1/} Failure to make notification to NRC Operations Center of an event that resulted in automatic actuation of the reactor protection system. The licensee's response indicated that Operations Department Supervisors have been re-instructed.
 - e. (Closed) OII 80-14-NC-1^{2/} Failure to maintain main steam bypass valve control setting at 15 psig above its nominal value. The licensee's response established a requirement to monitor and log hourly.
- 1/ IE Inspection Report 50-409/80-09.
- 2/ IE Inspection Report 50-409/81-14.

- f. (Closed) OII 80-14-NC-2^{2/} Failure to follow procedures. The licensee's response indicates that the reason the procedures were not followed was because of a misunderstanding of procedure, but has now been clarified to all operating personnel.
- g. (Closed) OII 80-14-NC-3^{2/} Failure to conduct the required two year review of the refueling section of the operating manual. The licensee provided additional documentation that proved the two year review was accomplished.
- h. (Closed) OII 80-14-NC- $4^{2/}$ Failure to follow procedures.
 - (1) The licensee indicated that the licensee considered the one hour logging of source range NI's meet the necessary requirements. This was discussed with licensee management and commitments were received that indicate continuous monitoring would be required during fuel loading and that procedures used during the next refueling would contain those words.
 - (2) Necessary initials were obtained on the Fuel Element Transfer Record.
 - (3) The licensee pointed out additional paragraphs in the briefing book and it appears that this section of Item No. 4 was not an item of noncompliance.

13. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items disclosed during the inspection are discussed in Paragraph 3, 9 and 11.

14. Exit Interview

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

2/ IE Inspection Report 50-409/80-14.