

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

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Region I

Report No. 50-293/80-30

Docket No. 50-293

License No. DPR-35 Priority --- Category C

Licensee: Boston Edison Company

800 Boylston Street

Boston, Massachusetts 02199

Facility Name: Pilgrim Nuclear Power Station

Inspection at: Plymouth, Massachusetts

Inspection conducted: October 31, 1980 - November 26, 1980

Inspectors: *J. Johnson*
J. Johnson, Senior Resident Inspector

1/29/81
date signed

date signed

date signed

Approved by: *T. T. Martin*
T. T. Martin, Chief, Reactor Projects
Section No. 3, RO&NS Branch

2/6/81
date signed

Inspection Summary:

Inspection on October 31 - November 26, 1980 (Report No. 50-293/80-30)

Areas Inspected: Routine unannounced inspection of plant operations including an operational safety verification, followup on previous inspection findings, followup on the 'A' Safety Relief Valve (SRV) inadvertent opening on October 31, 1980, maintenance activities, licensee's actions in response to IE Bulletins, containment vent and purge operations, staff working hours and overtime, a review of seismic instrumentation, and a review of the design of containment cooling systems. The inspection involved 84 hours by the resident inspector.

Results: Two deviations were identified in two areas (failure to limit containment vent and purge operations to 90 hours per year, Paragraph 7; and failure to limit a control room operator's working hours, Paragraph 8).

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DETAILS

1. Persons Contacted

W. Armstrong, Deputy Nuclear Operations Manager
R. Belanger, QC Inspector
E. Cobb, Chief Operating Engineer
F. Famulari, QC Supervisor
J. Fiumara, Computer Engineer
E. Graham, Compliance Engineer
R. Machon, Nuclear Operations Manager (Pilgrim Station)
C. Mathis, Deputy Nuclear Operations Manager
P. O'Brien, Construction Management Group Leader
W. Olsen, Senior Nuclear Training Specialist
R. Reposo, QC Inspector
J. Seery, Staff Assistant - Nuclear Safety
P. Smith, Chief Technical Engineer
P. Williard, I&C Engineer
E. Ziemanski, Management Services Group Leader

The inspector also interviewed members of the Operations, Security, Technical and Maintenance Staffs.

2. Followup on Previous Inspection Findings

(Open) Unresolved Item (293/80-29-03): During a telephone conversation between NRC:IE:Region I management and Boston Edison Company management on November 17, 1980, the licensee agreed to take the following action with respect to certain TMI Task Action Plan Category 'A' Requirements:

- Implement station approved procedure(s) for taking and handling a containment atmospheric sample by November 28, 1980.
- Implement station approved procedures for converting high range noble gas effluent monitor readings (R/hr) to effluent release rates (Ci/sec) by November 28, 1980, and
- Correct the operation of control switches for containment vent and nitrogen makeup valves (AO 5033 A&C, AO 5041 A&B, AO 5043 A&B) to allow operation between 'open' and 'close' positions without a key and require a key to get in the 'emergency open' position, by January 1, 1981.

These commitments were confirmed in a letter from the Director, NRC, Region I to Boston Edison Company dated November 18, 1980.

This item remains open pending a review of the completed actions.

3. Operational Safety Verification

a. Scope

The inspector observed control room operations, reviewed applicable logs, conducted discussions with control room operators, and verified proper lineup of selected portions of emergency systems. Tours of the station yard, reactor building, control room, and intake structures were conducted to observe equipment condition including potential fire hazards, housekeeping, physical security and the implementation of radiation protection controls.

These reviews were conducted to verify conformance with the code of Federal Regulations, Technical Specifications, and the licensee's procedures.

b. Events

- (1) On October 31, 1980, the licensee notified the inspector of an error in the original seismic analysis for the Salt Service Water (SSW) System. This analysis took credit for a seismic anchor located outside of the system isolation valves. The anchors were, in fact, the screenwash pumps, which are located outside the missile protected area and would jeopardize the operability of the SSW system if a tornado induced missile should impact the screenwash pumps.

The inspector informed the licensee that relief from Technical Specification 3.5.b was required to permit continued operation.

The reactor was shutdown at 11:52 a.m. on October 31, 1980 (for an unrelated problem with 'A' Safety Relief Valve) and the licensee immediately requested temporary relief from TS 3.5.b to allow operation while modifications were made to the seismic anchors.

At 9:30 p.m. on October 31, 1980, NRC:NRR waived the requirements of TS 3.5.b until November 7, 1980, since the only cause of system inoperability would be damage to the screenwash pumps due to a tornado.

A reactor startup was commenced at 10:29 p.m. on October 31, 1980 and routine operations continued while modifications were performed.

The inspector toured the intake structure on November 7, 1980, observed the installation of the new supports and verified completion of the modification through discussions with the cognizant implementing engineer (construction group leader).

The inspector had no further questions in this area. This event is described in LER 80-78.

(2) Drywell Unidentified Leakage

A plant shutdown was initiated at 3:10 p.m. on November 6, 1980, to investigate and repair reactor coolant system (RCS) unidentified leakage calculated to be 5.9 gpm. Investigation revealed packing leakage on 'B' recirculation pump discharge valve, 'C' Inboard MSIV, and RCIC Valve No. 1301-16.

After startup on November 8, 1980, following repairs and pressurization, packing leakage was observed on both 'C' and 'D' inboard MSIV's. While power and RCS pressure was being reduced, a reactor scram occurred due to reactor vessel level low and difficulty controlling level at low steam flows.

During a drywell inspection with the RCS at 900 psig on November 13, 1980 (following repairs to 'C' and 'D' MSIV's), a pinhole leak was observed at a coupling weld on the 2 inch line from the reactor vessel drain to the clean up system. The reactor was again shutdown to repair the defective weld.

The reactor was started up and the unit returned to service on November 14, 1980.

The inspector reviewed the licensee's actions to ensure compliance with the Technical Specifications and station procedures. Items reviewed included control room instrumentation, logs and records and discussions with licensee personnel. The inspector reviewed startup and shutdown check lists, verified placing the plant in cold shutdown within the required time, satisfactory completion of selected valve operability tests following repairs, and verified RCS leakage measurements on November 15-17, 1980 to be within TS limits.

Maintenance activities involving the weld repair are described in Paragraph 5. These events are described in LER's 80-84 and 80-87.

c. Findings

No items of noncompliance were identified during this review of routine operations and the events described above.

4. Inadvertent Opening of 'A' Safety Relief Valve (SRV) at Power

a. Description of the Event

At about 11:45 a.m. on October 31, 1980, the 'A' SRV inadvertently opened at full power. Operators isolated the nitrogen supply to the drywell instrumentation and placed the drywell instrumentation on station compressed instrument air. Reactor power was decreased to approximately 50% and with the air supply pressure about 110 psig, attempts were made to shut the 'A' SRV by cycling the control switch. The relief valve failed to shut and the reactor was manually tripped from 50% power, and a cooldown was initiated to investigate and correct the problems.

b. Review/Investigation/Resolution of Concerns

The inspector reviewed the events, held discussions with the operators and licensee management, observed instrumentation and reviewed records.

It was identified that high nitrogen supply pressure (about 160 psig) was the cause of the opening of the 'A' SRV and that once the accumulators are charged to this pressure, a time delay is experienced before this pressure decreases and allows the SRV to reclose.

A similar event took place on October 7, 1980. Following that event the licensee had been monitoring the nitrogen supply pressure once per shift to keep it below a value which would cause leakage by the solenoid valve. No specific failure of the pressure regulators had been identified.

It was also noted following this event on October 31, 1980 that a delivery of liquid nitrogen had been made immediately prior to the 'A' SRV opening.

It is suspected that a cause of the rapid rise in nitrogen pressure may have been due to liquid nitrogen passing by the ambient vaporizer, freezing an in-line regulator in the open position, and causing high supply pressures (greater than 160 psig) to be transmitted to the solenoid actuator.

During a telephone conversation between NRC:IE:Headquarters, Regional management personnel and Boston Edison Company management personnel on October 31, 1980, the licensee agreed to take the following actions.

- The nitrogen supply system to the SRV's will remain isolated and tagged.

- The frequency of containment air sampling will be increased to once per shift for 7 days.
- The implementation of these two items, above, would be verified by the resident inspector prior to the resumption of operation, and
- That the NRC will be provided documentation of an evaluation of system modifications and testing, for review and concurrence, prior to restoration of the nitrogen system to in service.

These commitments were confirmed in a letter from the Director, NRC, Region I, to Boston Edison Company dated October 31, 1980.

c. Findings

At 5:10 p.m. on October 31, 1980, the inspector verified that the two inch nitrogen supply valve to the drywell instrumentation (SRV's) was isolated and tagged, and that the tag was logged in the Watch Engineer's tag log book. The inspector also verified an entry made in the Watch Engineer's Instruction Log requiring a drywell and torus oxygen sample once per shift. These actions were taken prior to the resumption of plant operation at 10:39 p.m. on October 31, 1980.

The inspector reviewed entries in the operations log and additional data sheets from October 31, 1980 to November 6, 1980 to ensure that oxygen samples were being taken once per shift and concentrations were within the Technical Specification limits with instrument air being supplied to the drywell instrumentation.

No items of noncompliance were identified. Pending the completion of the licensee's testing of the nitrogen supply system, system modifications, evaluation of these actions by the NRC, and restoration of the nitrogen system to service (for drywell instrumentation), this item is unresolved (293/80-30-01).

This event is described in LER 80-80.

5. Maintenance Activities

a. Scope and Acceptance Criteria

The inspector reviewed the licensee's activities surrounding the weld repair of a two inch stainless steel line from the reactor vessel drain to the cleanup system performed on November 1, 1980 in order to verify conformance with the ASME Code, the Technical Specifications, and the licensee's procedures. The following records were reviewed:

- Maintenance Request No. 80-8023, and Maintenance Summary Sheets
- Welding and Testing Specification 6498-M-305, Revision 10
- Visual Inspection Record
- QAD Field Weld Check List
- Weld Rod Withdrawal Sheets
- Liquid Penetrant Test Results
- Welder Qualification Records
- NDE Qualification Records

b. Findings

No items of noncompliance were identified however the inspector had the following comments:

- The weld number designation and welder identification number were inconsistent on several of the documents reviewed. The licensee agreed to review and correct the documents.
- During the review of the post repair inspection sheets, the inspector informed the licensee that instructions, should include reference to specific minimum required test pressures, and should be provided to station personnel to ensure that the correct test pressures are used. The licensee acknowledged the inspector's comments and stated that the appropriate actions would be taken to include references to specific test pressures as required.

The inspector had no further questions in this area.

6. Inspection and Enforcement Bulletin Followup

The inspector reviewed the licensee's activities in response to the IE Bulletins described below.

a. 80-07: BWR Jet Pump Failure

The inspector reviewed implementation of station procedure TP 80-67 Revision 1, "Jet Pump Operability surveillance IEB 80-07", dated October 22, 1980. This procedure was revised (to include all the data required to be taken by the Bulletin) in response to the inspector's comments (Inspection Report 50-293/80-27).

No items of noncompliance were identified. The inspector had no further questions at this time and considers this Bulletin closed.

b. 80-17: Failure of Control Rods to Fully Insert During a Scram at a BWR

- Original Bulletin Pph 3.a; Procedure No. 2.1.6, "Reactor Scram" Revision 11 was revised to include a requirement to connect an air hose to the one inch vacuum breakers on the east and west headers and verify that air blows out the vent lines after each scram was reset. The inspector spot checked the implementation of this procedure and no problems were identified.
- Original Bulletin Pph 3.b; Procedure No. 2.1., "Startup from Cold Shutdown", OPER 01 Startup check list was revised to include a check to verify that the S.D.V. was free of water prior to startup.
- Original Bulletin Pph. 6.b; Procedure No. 2.2.86, "Residual Heat Removal", was revised to require all available containment cooling if during normal continuous operation the torus temperature exceeded 80°F.
- Supplement 1, Pph. A.2; Procedure No. 2.2.24; "Standby Liquid Control System", was revised deleting the requirement for station supervision approval prior to initiation of the SBLC system.
- Supplement 1. Pph. A.4; Procedure No. 1.3.10, "Key Control", was revised to require the SBLC initiation key to be located on the main control panel 905 above the switch.
- Supplement 3, Pph. 1.1.; Alarm Response Procedure No. 2.3.2.8, was revised to require a scram if the scram air header pressure reached 60 psig. Emergency Procedure No. 5.3.8 "Loss of Instrument Air", was also revised requiring a scram if the air pressure decreased to the point where it caused a feed regulating valve lock up (as indicated on the main control panel 905 by red indicating lights on push buttons). Based on information received from the licensee, the lock up occurs at a pressure of 64/65 psig and clears at 74 psig. The inspector had no further questions concerning this item.
- Supplement 3, Pph. 1.b.1; Procedure No. 2.4.3, "Rod Drift", was revised requiring immediate reactor scram if two rods in a nine rod array start drifting in.
- Supplement 3, Pph. 1.b.2; Procedure No. TP80-74, Revision 0, "Determination of Leaky Rod Drive Outlet Valves", was developed. The licensee monitors the withdraw header temperature when a control rod high temperature alarm comes in (greater than 20°F) and weekly thereafter. This procedure requires a shutdown if 36 total rods indicate leaking outlet valves (withdraw header temperature greater than 50°F above ambient). The inspector spot checked implementation of this procedure and identified no problems.

- Supplement 3, Pph. 2; Procedure No. 2.1.6, "Reactor Scram", was revised requiring a verification of actuation of the six scram discharge instrument volume limit switches prior to bypassing the S.D.V. high level scram, and a subsequent clearing of all six limit switches following reset.

During a telephone conversation between NRC:IE, NRR and BECo management personnel on November 24, 1980, the acceptability of this method to detect damaged floats was discussed.

This licensee agreed to modify computer inputs to include recordings for all six limit switches and to revise station procedures to add specific acceptance criteria (time to reset) for limit switch operability. The licensee stated that these modifications and procedure changes were expected to be in place by December 19, 1980 and that in the interim, surveillance procedure no. 8.M.1-20 (limit switch set point check) would be performed prior to startup if a scram should occur.

The licensee's proposal was found to be acceptable and the inspector had no further questions in this area at this time.

- Confirmatory Order dated October 2, 1980: The inspector questioned the licensee concerning whether the once-per-shift UT checks of the scram discharge volume (S.D.V.) had been performed for several shifts between October 28, 1980 and November 6, 1980 for which no entry had been made in the operations log. The licensee provided verification to the inspector that they had been performed. The licensee also determined that all checks had not been performed at greater than six hour intervals and immediately issued clarifying instructions in the Watch Engineer's Log.

The inspector subsequently reviewed the operations log entries from November 6-14, 1980 to verify the implementation of these once-per-shift UT checks of the S.D.V. No discrepancies were identified.

c. 80-14: Degradation of BWR Scram Discharge Volume (SDV) Capability

The licensee issued a revised response (dated September 10, 1980) because of previous NRC concerns that the original response (dated July 30, 1980) did not adequately address periodic testing and notification.

The inspector reviewed the following station procedures:

- Revised procedure no. 2.2.17 "Communications Systems", Revision 6, which requires an ENS report to the NRC for any inoperable

S.D.V. vent/drain valve or if any S.D.V. vent/drain valve is closed for more than one hour in any 24 hour period.

- Normal operating procedure no. 2.2.87, "Control Rod Drive System", Revision 8, which requires that the S.D.V. vent and drain valves be normally open.
- Revised surveillance procedure 8.M.1.20, Revision 7, "High Water Level Scram Discharge Tank", which requires any inoperability to be reported to the NRC within 24 hours.

The licensee's September 10, 1980 response stated that a procedure for periodic (once per cycle) operability testing would be prepared by January 1, 1981.

This Bulletin remains open pending a review of the implementation of a surveillance procedure to perform periodic operability testing of the S.D.V. vent and drain valves.

No items of noncompliance were identified during the review of these IE Bulletins.

7. Containment Vent and Purge Operations

a. Scope and Acceptance Criteria

The inspector reviewed the licensee's activities concerning containment vent and purge operations with respect to the criteria established by NRC:NRR and the commitments made by the licensee in the following documents.

NRC

- Letter from NRR to BECo. dated November 29, 1978, "Containment Purging During Normal Operation".
- Letter from NRR to BECo. dated October 22, 1979, "Containment Purging and Venting During Normal Operation".
- Letter from NRR to BECo. dated September 9, 1980, "Confirmation of Commitment to Staff's October 23, 1979 INTERIM POSITION ON CONTAINMENT Purging and Venting".

BECO

- Letter from BECo to NRR dated January 9, 1979, No. 79-22.
- Letter from BECo to NRR dated August 21, 1979, No. 79-158.

- Letter from BECo to NRR dated December 19, 1979, No. 79-270.
- Letter from BECo to NRR dated May 27, 1980, No. 80-94.
- Letter from BECo to NRR dated May 27, 1980, No. 80-95.

The inspector's review included the following items:

- Station procedures.
- Plant Design Change Request (PDCR) 3033, "Modify Containment Vent and Purge Valves".
- Completed maintenance requests.
- Completed valve operability surveillance tests.
- Discussions with station personnel.

b. Findings

- (1) The licensee stated in the December 19, 1979 response to NRR that permanent modification would be made to the isolation logic to ensure at least one uninhibited isolation signal was provided to the containment vent and purge isolation valves in the event another signal was bypassed or blocked.

The inspector had verified on October 28, 1980 (during a review of actions in response to the TMI Action Category 'A' Requirement) through a review of preop. test procedures that changes to the isolation logic had been performed.

The acceptance criteria in these tests included the following for valves:

A0 5033A	A0 5033C
5035A	5035B
5036A	5036B
5041A	5041B
5042A	5042B
5043A	5043B
5044A	5044B

- All valves isolate on hi drywell pressure and/or low reactor vessel water level, if the control switch is in the 'open' position.

For valves A0 5033A, 33C (1" nitrogen makeup valve)
 A0 5041 A&B, A0 5043 A&B (2" drywell and torus
 vent valves)

-- Isolate on LoLo reactor vessel water level if the control switch is in the 'emergency open' position.

- (2) The licensee stated (in the May 27, 1980 letter BECo No. 80-95) that the containment vent and purge valves are 20" butterfly valves, that analysis has shown operability in the event of a LOCA if their opening is limited to 45°, and that modifications have been implemented limiting their opening to 45°.

During the review of PDCR 80-33, and the associated maintenance requests, the inspector verified that six of the eight 20" containment vent and purge valves had been modified to limit their opening by installing physical stops on the operator. No records of modifying the two outboard 20" purge inlet valves (A0 5035B and A0 5036B) were available.

Also, in the May 27, 1980 response from the licensee, a 4" nitrogen purge isolation valve, A0 5033B was not addressed.

This information pertaining to the two outboard 20" purge inlet valves and the 4" nitrogen makeup valve is under further review by NRC and remains unresolved (50-293/80-30-04).

- (3) The licensee stated that in order to maintain the drywell-torus d/p required by Technical Specification that the two inch series drywell and torus vent valves (A0 5041 A,B and A0 5043 A,B) would not be limited in their use during normal operation.

The licensee further stated that purge and vent isolation valves were used to inert the containment within the 24 hour period allowed by Technical Specification after startup. and to deinert the containment in the 24 hour period prior to shutdown also allowed by Technical Specifications.

The licensee did state, however, (in the August 21, 1979 and December 19, 1979 responses to NRR) that operation of containment purge isolation valves (other than those used for drywell-torus d/p control) would be limited in their use to 90 hours per year during power operation.

On November 20, 1980, the inspector requested the licensee to show how the 90 hour limitation was being implemented since the station procedure controlling containment purge and vent operations, No. 2.2.70, Revision 14, dated August 13, 1980, "Primary Containment Atmospheric System", did not include methods to implement this limitation.

It was determined on November 21, 1980 that administrative controls had not been implemented to limit the opening of purge and vent valves (other than those used for drywell-tori d/p control) to 90 hours per year during power operation and also that there was no mechanism for keeping track of the running total of length of time opened.

The licensee determined from a review of the station operations log that since plant startup after the January-May, 1980 refueling outage that the 20" purge valves had been opened for approximately 145 hours during power operation (greater than about 1% power).

The licensee stated that actions would be taken in the following areas:

- administrative controls would be implemented to not start deinerting until subcritical and to minimize the time spent inerting on startup during power operation.
- implement a method for keeping track of total opening times of the 20" purge valves.
- initiate a request for modification to assist in these controls (possibly using meters to keep track of opening times, and separate controls/interlocks on the 20" valve control switches).
- re-evaluate the 90 hour/year limitation and determine what actions should be taken, if any, if the limit is exceeded.

The inspector acknowledged the licensee's statement and stated that the failure to limit the opening of the 20" containment purge valves was considered a deviation from the licensee's August 21, 1979 and December 19, 1979 commitments (50-293/80-30-02).

8. Interim Criteria for Shift Staffing

The inspector reviewed the licensee's actions in response to a letter from NRR to all operating plants dated July 31, 1980 which specified criteria for shift staffing and limitations on working hours.

The inspector reviewed the licensee's October 15, 1980 response to this issue which stated that the interim criteria for shift staffing would be implemented no later than July 1, 1981 but that meeting all the limitations on working hours and overtime would place an excessive burden on the operating organization. The licensee did state, however, that a member of the

required shift staff would be limited to 12 hours straight while performing safety related control room duties.

On November 24, 1980, the licensee management identified that a control room operator had been continuously on watch for an excessive length of time (32 hours). On watch supervisors were unable to acquire a relief by calling off watch operators at home.

On November 26, 1980, the inspector attended an Onsite Review Committee (ORC) meeting which included a review of this event. The licensee stated that subsequent to October 15, 1980, several operators were transferred from the operations department to other positions, and that further negotiations with the local bargaining unit were needed because of the sensitivity of replacing union watch standers with supervisory personnel.

The inspector questioned the licensee management concerning the actions that would be taken to implement the commitment to limit working hours. The licensee stated that instructions would be placed in the Watch Engineer's (W.E.) Instruction Log to inform the W.E. that licensed operators would be limited to 12 hours consecutive control room duty and that upper management approval would be required to exceed this limit. The licensee further stated that station policy limiting working hours would be included in a station administrative document by January, 1981.

The inspector acknowledged the licensee's statements and stated that the failure to limit length of time that the control room operator was on watch was considered a deviation from the licensee's October 15, 1980 commitment (50-293/80-30-03).

9. Seismic Monitoring Instrumentation

Although the Technical Specifications do not place any requirements on seismic instrumentation, the inspector questioned the licensee on November 14, 1980, about concerns expressed by a vendor representative (Kinematics, Inc.) involving the operation of recently installed seismic monitoring and support equipment. The concerns focused on the status of the antenna which picks up a time signal from a remote national station and transmits this time signal to a WWV receiver mounted in the seismic instrumentation panel in the rear of the control room.

The inspector reviewed Plant Design Change Request No. 78-24-1, Seismic Monitoring Equipment, and observed selected portions of the installed instrumentation. This modification included the installation of three up-graded SMA3 seismic accelerometers in the reactor building, tape recorder units, a WWV radio receiver, and playback units in the rear control panel, and an outside antenna for the WWV receiver. The WWV receiver provides a time signal on an additional tape recorder unit to be able to automatically record event time.

The licensee stated that because several problems had been identified with the operation of the WWV receiver and the antenna, that the receiver had been previously shipped to the vendor for repairs and that a new antenna had been authorized by BECo Engineering Department. The licensee further stated, that at the time of the vendor representative's site visit, that a misunderstanding resulted concerning which antenna was to be used and that the entire modification had not yet been verified and signed off as complete.

The inspector observed satisfactory operation of the WWV receiver on November 19, 1980 and had no further questions.

No items of noncompliance were identified.

10. Susceptibility of Containment Flooding

The inspector was requested to review the design of Pilgrim's containment with respect to susceptibility of flooding because of a problem at another reactor site.

The inspector reviewed system drawings, observed indications available at the main control room panel, and radwaste control room panel, and interviewed licensee personnel. The following information includes details about the system design:

- There is a high level alarm for each of the drywell equipment and floor drain sumps at the radwaste control panel.
- Drywell equipment and floor drain containment isolation valves are controlled from, and position indication are displayed in the main control room.
- Sump pump running indication is provided at the radwaste control panel.
- A sump pump integrator for both of the sumps is located at the radwaste control panel.
- Drywell components are cooled by Reactor Building Closed Cooling Water (RBCCW), a closed system, with instrumentation available to determine inventory changes.
- The main control room has a single annunciator which alarms if a local alarm at the radwaste control panel is not reset/is not acknowledged.

This information was forwarded separately to NRC:IE for review.

No items of noncompliance were identified during this review.

11. Unresolved Items

Areas for which more information is required to determine acceptability are considered unresolved. Unresolved items are discussed in Paragraphs 4.c and 7.b.

12. Exit Interview

At periodic intervals during the course of the inspection, meetings were held with senior facility management to discuss the inspection scope and findings.