UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos. 50-424/82-13 and 50-425/82-13

Licensee: Georgia Power Company
P. O. Box 4545
Atlanta, GA 30302

Facility Name: Vogtle

Docket Nos. 50-424 and 50-425

License Nos. CPPR-108 and CPPR-109

Inspection at Vogtle site near Waynesboro, GA

Inspectors: R. W. Wright — 7/7/82 Date Signed

A. G. Debbage — 7/7/82 Date Signed

C. R. McFarland — 7/7/82 Date Signed

Approved by: C. M. Upright, Section Chief — 7/7/82 Date Signed
Engineering Inspection Branch
Division of Engineering and Technical Programs

SUMMARY

Inspection on May 24-28, 1982

Areas Inspected

This routine, unannounced inspection involved 99 inspector-hours on site in the areas of QA inspection of ASME piping/welding work performance; QA inspection of electrical/instrumentation work performance; site procurement, receiving, storage, and maintenance; licensee identified reportable items; and licensee action on previous inspection findings.

Results

Of the five areas inspected, no violations or deviations were identified in four areas; one violation was found in the storage area (Licensee corrective action not effective on storage of charging pumps - paragraph 5.e).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*H. H. Gregory, III, Construction Project Manager
*E. D. Groover, QA Site Supervisor
*A. B. Gallant, Engineering Supervisor - Mechanical
*W. R. Evans, Project Section Supervisor - Mechanical
*D. R. Sikes, Coordination Supervisor
J. R. Petro, Senior QA Field Representative
E. L. Anderson, Senior QA Field Representative
D. C. Garner, Senior QA Field Representative
R. E. Folker, QA Engineer
W. B. Anderson, QC supervisor - Electrical
J. R. Ross, QC Supervisor - Electrical
R. A. Moye, Engineering Supervisor, Electrical
F. L. Deal, Engineering Supervisor, Civil
R. M. Beaver, Engineering Supervisor, Piping
G. A. Burkhalter, QC Supervisor, Mechanical
H. T. Wilkes, Construction Warehouse Supervisor
W. R. Jones, Senior Buyer
D. V. Adams, Invoice Processing Supervisor
C. R. Miles, Jr., QA Field Supervisor

Other licensee employees contacted included numerous construction craftsmen, several technicians, QA/QC personnel, mechanical and electrical training specialists, and office personnel.

Other Organizations

*J. P. Runyan, QA Manager, Pullman Power Products (PPP)
*G. B. Herrington, QA Surveillance, PPP
*W. G. Uhouse, Resident Engineer, Bechtel Power Corporation (BPC)
K. Hastings, General Foreman, Electrical, Cleveland Electric Company

NRC Resident Inspector

W. E. Sanders

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on May 28, 1982, with those persons indicated in paragraph 1 above. The following new items were identified and discussed at the exit interview:

a. Violation 424,425/82-13-01, Failure to take effective corrective action (paragraph 5.e).

b. Inspector Followup Item 424,425/82-13-02, Documentation of nonconformance report review for licensee reportable items (paragraph 7.a).

c. Inspector Followup Item 424,425/82-13-03, Documentation of audit findings (paragraph 7.d).

The licensee acknowledged the three items above and stated procedural changes would be issued to handle the inspector followup items and that corrective action on the violation had already been initiated. Previously identified unresolved item 424,425/82-05-05, Grout Inspection, was closed as discussed in paragraph 3.

3. Licensee Action on Previous Enforcement Matters

(Closed) Unresolved Item 424,425/82-05-05, Grout Inspection. Rags were found in the grouted pads for the Unit 1 boron injection tank. These rags were used for leak stoppage during grouting operations, not as part of the forms. A concrete post-placement inspection (Form dated 12/1/81) was utilized by QC to document an acceptable curing cycle for this grout. Discussions with responsible licensee personnel revealed they had concluded there was no safety significance attached to the slightly embedded rags. Examination of the subject pedestal by the inspector revealed that two of the four pedestals had their leak stoppage rags removed and their grouted surface finished. For the other two the inspector pried away at the rags still existing at the joint between the grout and atop the concrete pedestal surface and found their embedment to be only ¼" to ½". The base plate dimensions are much smaller than the surface area of the grouted pedestal it transmits its load to. There is at least a 4-inch periphery of grouted pedestal not exposed to the primarily perpendicular loading of the pedestal. Consequently, the slightly embedded rags have no structural degradation effect on the pedestals. By interoffice memorandum dated 4/19/82 (File No. X7BG10) caulking is now being used to seal forms. Also, procedure CD-T-02 has been revised by adding a post-placement inspection form to be used strictly for grout placements.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Procurement, Receiving, and Storage (35065)

a. Procedures Reviewed

Program requirements and procedures governing procurement, receiving, and storage control activities were reviewed for completeness and effectiveness. The documents reviewed included the following:

GD-T-09, R3	Inspection of Items in Storage and Storage Areas
GD-T-14, R1	Receipt, Storage and Handling of Welding Materials
GD-T-17, R0	Housekeeping
GD-T-01, R8	Nonconformance Control
GD-A-24, R4	On-site Procurement Process
GD-A-30, R3	Receipt, Receipt Inspection, Storage and Handling
MD-A-03, R2	Mechanical Section Field Procurement Procedures
P.S.A.R.	Sections 17.1.4, 17.1.7, 17.1.8, and 17.1.13

Within this area, no violations or deviations were identified.

b. Storage of Equipment and Materials

All warehouses, storage buildings, and laydown areas were inspected to verify that equipment remaining in storage was retained in the correct level of storage environment. Specific equipment and material examined in each storage area included electrical penetrations, GE induction motor, detector stacks, nuclear service cooling water pump motors, liquid pulsation damper, reactor vessel internals, magnetrol valves, generator gas monitoring system instrumentation, DeLaval Enterprise turbine generators, accumulator tanks, HVAC equipment, electrical cable, stainless steel fittings, and structural steel.

Within this area, no violations or deviations were identified.

c. Procurement and Receiving Inspection Activity

The supervisors of the civil, mechanical, and electrical engineering units are responsible for initiating site procurement of safety related items and construction materials. These are initiated by completion of purchase requisitions, which are then reviewed by the site QA unit prior to the requisition being forwarded for conversion to purchase orders.

The following recent purchase requisitions were examined to ensure that the technical and quality assurance requirements were specified, that the requirements of 10 CFR Part 21 were included when necessary, and that all requisitions had been adequately reviewed and approved in accordance with established procedures.

Purchase Requisition PAVR-9346T dated 3/9/82 was for 2700 clamps complying with specifications ASTM A575 and A164; a material certificate of compliance was required and the storage level was specified.

Purchase requisition PAVR-9042T dated 12/3/81 was for 200,000 linear feet of Unistrut embed type channel to specification ASTM A570 and A386.

Purchase requisition PAV-8555T dated 9/2/81 was for quantities of nuts, studs, springs, cap ends and screws for unistrut channels. Specifications and certification requirements were included.

Purchase requisition PAVR-7801T dated 2/9/81 was for a supply of nuclear service pipe; specifications and codes were included and certified material test reports were required. PAVR-7801T resulted in purchase order PAV-5721 dated 5/28/81 which was placed with Consolidated Pipe and Supply Company, Birmingham, AL. Subsequent change requests and consequent purchase order changes were implemented correctly.

Purchase requisition PAVR-8022T dated 4/3/81 was for structural steel angles and bars to ASTM-A36 specification; this resulted in purchase order PAV-6059 dated 5/5/81 which was placed with O'Neal Steel, Inc., Atlanta.

The following receiving Inspection Reports (RIR) were reviewed.

RIR 28354R dated 5/18/82 was for stainless steel fittings to ASME III, Class 1 and 2; the chemical analysis was received with the shipment.

RIR 17696R dated 4/27/82 was for 2" blind flanges; the report recorded that these had been sent to the pipe warehouse after inspection.

RIR 13819R dated 11/5/81 was for pipe fittings from CAMCO; these were rejected by the receiving inspector and a subsequent memo ordered a return to the vendor of the rejected fittings.

Within this area, no violations or deviations were identified.

d. Quality Assurance Unit Audits

Several audits had been performed by the site QA unit during the previous twelve months in the areas of receiving, storage, maintenance, and procurement activities. These audit reports were examined and the audit schedule for current and future activity reviewed.

Audit GD10-81/24 on procurement was conducted April 22 - May 8, 1981. The scope included organization; QA program review by management; document control; control of purchased materials; equipment and services; identification and control of material, parts, and components; and corrective action. Several minor discrepancies were identified during the audit but the report concluded that the procurement program had been conducted in conformance with the applicable elements of the Quality Assurance program.

Audit GD10-81/87 on procurement was conducted October 19 - November 30, 1981. The scope of this audit was to review the qualified vendor list,

review programs controlling these lists, and review selected purchase orders to verify program implementation; the purpose was to evaluate the adequacy of control of vendor qualification programs for quality related Q items. The report stated that vendors selected for purchases of Q items were either from the Bechtel Evaluated Suppliers List or Georgia Power Qualified Suppliers List. One finding was that purchase requisitions generated by the electrical department with civil specifications were not being reviewed by this department using electrical instruction DT-E-04. This item was closed March 2, 1982.

Audit GD10/MD12-82/62 on fire protection procurement was conducted May 20-25, 1982. The scope included the review of Branch Technical Position 951 for application to procurement activity. Findings were identified which involved Southern Services Company and Bechtel activities; resolution is to be made by GPC HQ staff.

Audit MD03-81/21 on pumps was conducted April 8-16, 1981. The scope included in-place storage, maintenance and inspections of pumps stored in place, and related documentation. One of the pumps referenced in this report was the chemical and volume control system (CVCS) charging pump number 2-1208-P6-02; the storage requirements specified by Bechtel document X6AH02-85-2 requires placement of a small porous bag containing Shell VPI-260 corrosion inhibitor on the baseplate and the unit covered with a plastic cover and suitably sealed. The sealed unit contained the protective atmosphere created by sublimation of the inhibitor. The QA auditor had found that the plastic was not sealed at the time of audit.

The recommended corrective action on 4/27/81 was that procedure GD-T-09 be revised to assure that implementation would control storage maintenance. The corrective action response was that coordination personnel would take a more active role to assure adequate field conditions and that when equipment was placed in a building, a concentrated effort would be made to minimize handling and access to equipment. The audit deficiency was closed on 1/8/82 but only on the basis of procedure revision; implementation problems were found during closure review and were to be addressed in audit WH01-81/103.

Audit WH01-81/103 on equipment in-Storage maintenance was conducted December 14, 1981 through January 18, 1982. The scope included review of current open item corrective actions, examination of equipment maintenance documents, and field examination of equipment storage conditions for sampled equipment. The audit identified a number of inadequate maintenance controls; the general conclusions was that the overall maintenance program needed examination for adequacy of engineer, craft and quality control interfaces. The CVCS charging pump referenced in audit MD03-81/21 was not directly addressed except that the finding #189 had been closed based on the revision to procedure GD-T-09.

The qualification of the audit team leaders were examined; all appeared to be experienced individuals and fully qualified to conduct these audits.

Within this area, one violation was identified (paragraph 5.e)

e. Inplace Storage and Preventive Maintenance

During a walk-through of the auxiliary building, several items of installed equipment were selected for verification of the maintenance inspection activity. These included an absorption tower, auxiliary condensor cooling water pump, CVCS charging pumps, and residual heat removal pumps.

Rotation testing of the residual heat removal pump in room 48 was in progress at this time, and the team was having great difficulty rotating the shaft. A subsequent check verified that a Miscellaneous Daily Report #204096 was issued identifying this condition.

In conducting the inspection of the chemical and volume control system charging pumps, one violation (424,425/82-13-01) was identified involving failure to take effective corrective action. 10 CFR 50, Appendix B, Criterion XVI requires that measures be established to assure that conditions adverse to quality such as nonconformances are promptly identified and corrected. GPC procedure GD-T-09 requires that all equipment at its permanent location shall be made access-controlled to the greatest practical degree. On May 25, 1982, CVCS pump #2-1208-P6-02 was inspected and the other five charging pumps were inspected on May 28. It was apparent that the maintenance requirements had been performed since one unit was well covered, the internal electrical space heaters were energized, the vapor inhibitor bags were present, and the equipment under cover was reasonably free of construction debris. The others had cover conditions ranging from potentially open to nearly full removal, electrical lamps were broken or missing in two units, some had no inhibitor bags, and all had varying degrees of construction materials under the covers.

Mechanical QC immediately issued a memo requesting correction on being informed of the pump conditions; the memo indicated that the cause of the problem was the control of contractor Pullman craft personnel. The problem of maintaining cover integrity had been identified during April 1981 in audit MD03-81/21; however, the finding was closed in January 1982 on the basis of procedure revision and without reaudit of actual conditions in the plant. Also, audit WH01-81/03 in January 1982 clearly indicated a need to improve the interface between engineering, craft, and quality control personnel.

Within this area, one violation was identified for failure to take effective corrective action.

6. QA Inspection of ASME Piping/Welding Activity Performance (35061)

This inspection was performed to determine whether sitework is being accomplished in accordance with NRC requirements and SAR commitments, that the QA/QC program is functioning in a manner to assure that requirements and commitments are met, and that prompt and effective action is taken to achieve permanent corrective action on significant discrepancies. Segments of the safety injection system (SIS) and the residual heat removal system (RHRS) work activities for Unit 1 and 2, respectively, were examined in the following areas to verify the inspection objectives.

a. Field Drawings, Specifications, and Work Procedure

Pullman Power Products Procedures

II-3	Level III Nondestructive Personnel, Control and Administration, Qualification, and Certification, 8/19/81
II-4	Inspection and Testing Personnel, Control and Administration of Training Examination, Qualification and Certification, 10/26/81
III-4	Drawing and Design Control Procedure, 3/31/82
III-7	Field Control of Original Piping Isometrics and Pipe Support Drawings Generated by BPC and Southern Company Services Engineering, 3/31/82
VI-5	Control of Process Sheets and Weld Rod Stores Requisitions, 6/16/81
VII-2	Material Control, 6/16/81
VIII-1	Identification of Materials, Parts and Components, 8/5/81
VIII-3	Control of Welding Materials (Field), 3/5/82
IX-3	Fabrication and Field Installation Specifications for Nuclear Power Plant Components, Piping Systems and Appurtenances, ASME - Section III, 12/18/80
IX-14	Defect Removal and Repair by Welding, 7/31/81
IX-19	Requirements for Alignment and Fit-Up, 2/8/82
IX-43	Procedure for Preheat, Interpass, and Postweld Heat Treatment, 5/6/80
X-5	Field Receiving Inspection Procedure, 4/5/82
X-11	Visual Examination - General, 4/27/81

X-18 Field Welding Inspection, 3/20/82

XV-2 Procedure for Handling Nonconformances (Field), 9/25/81

XV-4 Hold Tags Usage, 5/26/81

XVII-1 Field QA Records Procedure, 4/13/81

Construction Specification X4AZ01, Plant Design and Instrumentation, 4/1/82

Dwg. No. 1K3-1204-006-01, R5, Safety Injection System, Fabrication Isometric

Dwg. No. 1K3-1204-011-01, R7, Safety Injection System, Fabrication Isometric

Dwg. No. 2K3-1205-004-01, R9, Residual Heat Removal System, Fabrication Isometric

The inspector randomly selected the above listed field design drawings and procedures to ascertain whether the most recent revisions of drawings are used to perform work and whether the most recent revisions of construction specifications and work procedures are in agreement with the SAR.

b. Field Inspection

The inspector selected two separate segments of Unit 1's partially completed SIS for examination. The first segment was comprised of prefabricated stainless steel 24" pipe spool piece assemblies SP-006-S-11, SP-006-S-12, and SP-006-S-13 connected by field welds 006-W-12 and 006-W-13, respectively. The second portion of the SIS examined consisted of a 6" pipe subassembly SP-011-S-04 connected by field weld 011-W-07 to a 6"-150 lb. motor operated gate valve (1HV8924).

For Unit 2 a segment of the RHRS consisting of a 12"-300 lb. motor operated gate valve (2HV8812B) and a 12"-300 lb. swing check valve (21205U6002) which were to be connected by a 12" spool piece 040-S-03 and associated field welds 04-W-01 and 04-W-02, respectively, were selected for inspection.

The inspector made a detailed inspection of the work underway or the completed work and a record review to determine that these segments of the SIS and RHRS had been fabricated, installed, and inspected in accordance with approved drawings, specifications, and procedures. The inspector's discussions with various craftsmen and observations of their work performance during the installation and welding of portions of the subject system indicated that the craft's level of knowledge

pertaining to each work task was adequate to provide the required quality of workmanship.

c. Field Engineering and Quality Control

The inspector reviewed the following inspection records associated with the subject SIS/RHRS activities observed to determine their adequacy, whether deficiencies submitted received proper attention and corrective action, and if work and work controls were adequate:

- Equipment/Material Receipt Inspection Reports
- Subassembly Isometrics - Shop Fabrication
- Certification of Shop Inspections
- Certified Mill Test Reports
- NDE Reports
- Form NPV-1 Manufacturers Data Report for Nuclear Valves
- Quality Releases (Westinghouse)
- Certificates of Compliance
- Welding Procedure and Technique Sheets
- Weld Process Sheets
- Pertinent Welder Qualification Records

The inspector reviewed the applicable QA/QC procedures (paragraph 6.a) to determine that the frequency, timing, and acceptance criteria for the inspections were adequate.

The number of QC inspectors provided for the coverage of the subject piping/welding activities observed was satisfactory. Discussions conducted with the PPP QC inspectors and QA engineering personnel determined that their knowledge of piping/welding activities was adequate and that they conveyed the feeling that management was committed to a quality program. The training, qualification, and certifications of two PPP QC inspectors and one QA engineer were examined and found in accordance with procedures.

d. Nonconforming Items Reports (NCRs)

The inspector reviewed selected PPP NCRs for piping/welding construction discrepancies to verify as applicable that:

(1) the action taken corrected the items;
(2) the items were considered for reportability to the NRC;
(3) the instituted effective action prevented recurrence; and
(4) the contractor has an adequate program to detect trends in discrepancies.

The following PPP NCRs were reviewed: 421, 485, 489, 490, 492, 528, 537, 549, 558, 573, 578, 590, and 600.

e. Materials and Equipment

The reports of inspections (listed in paragraph 6.c) made by the licensee/vendor of materials used for the work in progress were examined to verify that the material met design and purchase order requirements.

The inspector examined the auxiliary building weld material distribution center (WMDC) ongoing activities which included handling, storage, requisition, issue and controls for return of issued welding materials.

f. Audits

The inspector reviewed the following PPP surveillances and licensee audits which have been performed on various phases of piping/welding construction activities.

PPP Surveillances

7037-1-82	7037-12-82
7037-4-82	7037-16-82
7037-11-82	7037-17-82

GPC Audits

MD01-81/15, 81/66, 82/27 and 82/33 - "QA Audit of Large Bore Piping"

MD02-81/35, 81/71 and 82/04 - "QA Audit of Small Bore Piping"

The above surveillances and audits were examined to determine if they were meaningful, effective, reflect quality performance, and whether corrective actions taken as a result of surveillance/audit findings were proper, timely, and complete.

Within the areas of piping/welding inspection activities, no violations or deviations were identified.

7. QA Inspection of Electrical Work Performance (35061)

This inspection was conducted to determine whether the site work is being performed in accordance with NRC requirements and SAR commitments, the QA/QC program is functioning consistently with these requirements and commitments, and to assure that timely and effective action is taken to achieve permanent corrective action on significant deficiencies.

The inspector reviewed schedules, drawings, and work procedures relative to the installation of safety related electrical and instrumentation work and the related QC and QA activities. A limited number of electrical components and cabinets are being stored in place in Unit 1 and supports and raceways

are being installed, but safety class 1E electrical cable pulling is not scheduled before the last quarter of 1982.

a. Field Work Procedures and Documentation

The following documentation was reviewed to verify the inspection objectives versus the commitments made in the SAR sections 8.3.1.2.6 through 8.3.1.2.9 and section E8, Raceway Systems, of the Construction Specification.

Procedure	Title or Subject
ED-T-01	Inspection of Embedded Items
FD-T-02	Raceway Installation
ED-T-04	Installation of Major Electrical Equipment
ED-T-05	Cable Reel Control
ED-T-07	Cable Installation
GD-A-30	Receipt, Receipt Inspection, Storage and Handling
GD-T-01	Nonconformance Control
MD-T-08	Control and Installation of Instrumentation Components
DPT-A-01	Training, Qualification and Certification of Technical Inspectors
QA-05	Open Item Control

The review of GD-T-01, Revision 8, indicates a need to document the review of all nonconformance reports (NCR) for work onsite (Exhibit 1) by the QA Site Supervisor (QASS) for the applicability of reporting the NCR items as required by 10 CFR 50.55(e) and 10 CFR 21. The review is required and is being documented for NCRs on contractor work (Exhibit 8). Discussions with the QASS indicates that the review is being done and the procedure will be revised to discuss the review of all NCRs for 10 CFR 50.55(e) and 10 CFR 21 and to document the review by revising Exhibit 1 and an evaluation section (such as section E). The implementation of this revised program and training related to GD-T-01 will be NRC inspector followup item 424,425/82-13-02, Documentation of NCR Review for 10 CFR 50.55(e) and 10 CFR 21 Requirements.

b. Field Inspection

Field observations and discussions with electrical craft, QC, and QA personnel were conducted relative to installation of electrical raceways, raceway supports, and electrical equipment stored in place in the auxiliary building. Particular attention was given to raceways and tray supports in room 63, level A of the Unit 1 auxiliary building, the conduit installation to the Chemical Feed Mix Tank in room 43, level D of the Unit 1 auxiliary building, transformer switchboards in room 104, level D of the Unit 2 auxiliary building and the raceways in room 02, and the conduit in place prior to a concrete placement for the Unit 2 auxiliary building level 1 floor.

The inspector also toured the control building, the fuel handling building, and the Unit 1 containment with the QC Inspection Supervisor, Electrical. QC inspectors are routinely observing work in progress, but work is currently limited to facility lighting and work that is not safety related.

c. Training

The inspector reviewed the training program for the electrical and instrumentation field engineers and QC inspectors, reviewed the training course material listed below as representative samples of the training program, and toured the associated teaching laboratories used in these training courses.

Training Courses	Subject
E-4.0	Raceways and Embedded Items Inspection
E-5.0	Cable Installation
E-9.0	Cable Reel Control
E-11.0	Anchor Bolt Inspection
E-12.0	Cable Termination
M-11.0	Installation Inspection of Controls and Instrumentation
M-30.04	Instrumentation and Controls Inspection
M-30.4	Certification and Recertification of I&C Inspectors

The courses are considered adequate for the purposes intended.

The examination for the electrical courses are routinely changed, whereas, the examinations for the instrumentation courses (taught by the mechanical instructors) have not been changed for several years. The examinations consist of questions for general knowledge of the subject plus questions for specific requirements for the procedure. Some parts of the examinations are open book. The courses and the examinations are approved by the licensee's Construction Department Training in the Atlanta office and the originals of the examinations for individuals are in the Atlanta office. The QC inspection supervisors keep track of the certification of their inspectors and the need for recertification.

d. Audits

The inspector reviewed audit plans and reports listed below and discussed the subjects with the auditors and the QA Site Supervisor.

Audit Plan	Subject	Report Nos.
ED01	Conduit and Cable Trays	81/42, 81/85, 82/42

ED02	Cable Receipt and Storage	81/14, 82/41	81/56,	81/102,
ED03	Cable Routing	82/17		
ED05	Electrical Equipment	81/23, 82/25	81/59,	81/98,
QC01/TR01	Quality Control and Training	82/34		
TR01	Training Program	80/28		

Audit checklists are routinely developed (handwritten) and used for each audit. The checklist items are items of current interest and do not statistically represent the requirements as stated in the referenced procedures. The auditor's observations and comments routinely concern more items than are on the checklist and appy to numerous requirements in the procedures. The checklist for audit ED01 81/42 relative to Florida Steel, Inc., an offsite vendor of tray supports, was significantly more detailed and contained many more items than contained in checklists for onsite work. The auditors comments documented a thorough audit.

The audit findings for the reports reviewed highlighted only the deficiencies found relative to procedural requirements. The reports contained numerous negative findings that were not identified as deficiencies, nor were they tracked for corrective action. The licensee has recognized the need to track these negative findings as well as the deficiencies and has revised procedure QA05, Open Items Control, (revision 7, dated May 27, 1982) to track corrective actions for audit finding report items and for observations by licensee auditors. The implementation of this revised program will be NRC inspector followup item 424,425/82-13-03, Documentation of Audit Findings.

Within this area, no violations or deviations were identified.

8. Licensee Identified Reportable Items (92700)

Open (P21/82-001) Cable Tray Splice Bolts. The inspector reviewed the licensee's final report to Region II dated May 3, 1982, discussed the item with responsible engineering, craft, QC and QC personnel, observed samples of broken bolts, and observed related work in the Unit 1 auxiliary building, level A, room 63. Samples of the failed bolts indicated configuration deficiencies that may be generic. The allen head punch in the bolt head extended into most of the bolt shafts. The licensee has initiated a program to replace all of the defective bolts. This item will remain open pending implementation of the licensee's corrective action program.