



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

Report No. 50-395/82-01

Licensee: South Carolina Electric and Gas Company
Columbia, SC 29218

Facility Name: Summer

Docket No. 50-395

License No. CPPR-94

Inspection at Summer site near Winnsboro, SC

Inspector: *G. A. Belisle*

1/28/82
Date Signed

Approved by: *C. M. Upright*
C. M. Upright, Section Chief
Engineering Inspection Branch
Engineering and Technical Inspection Division

1/28/82
Date Signed

SUMMARY

Inspection on January 4-8, 1982

Areas Inspected

This routine, unannounced inspection involved 31 inspector-hours on site in the areas of licensee action on previously identified items and preoperational test records.

Results

Of the two areas inspected, no violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

V. Albert, Assistant Manager Support Services
*R. Clary, Manager Nuclear Licensing
*J. Cobb, Technical Support Engineer
*J. Connelly, Deputy Plant Manager
*B. Croley, Assistant Manager Technical Support
*G. Dacier, III, DCC Quality Assurance
*H. Donnelly, ISEG Engineer
*P. Fant, Director, Station Quality Control
*H. Fields, Technical Support Engineer
J. Geddings, Lead Electrical Quality Control Inspector
J. Hembree, Assistant Startup Supervisor
*S. Howze, Nuclear Licensing
*A. Koon, Technical Services Coordinator
F. Lamphere, Office Supervisor
F. Leach, Director of Site Engineering
*C. Ligon, Administration Assistant Nuclear Operations
*R. Mayew, Gilbert Associates Licensing Engineer
C. McKinney, Instrumentation and Control Supervisor
*E. Miller, Senior Clerk
D. Moore, Manager of Quality assurance
R. Morton, Records Supervisor
*D. Nauman, Group Manager Nuclear Services
*J. Parks, Technical Specialist
*S. Smith, Assistant Manager Maintenance Services
*W. Williams, Jr., General Manager Nuclear Operations

NRC Resident Inspector

J. Skolds, Senior Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on January 8, 1982, with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings.

3. Licensee Action on Previous Enforcement Matters

Not inspected.

The following terms are defined and used throughout this report:

Accepted QA Program	FSAR, Chapter 17
CSSC	Critical Structures, Systems and Components
FSAR	Final Safety Analysis Report
I&C	Instrumentation and Control
MWR	Maintenance Work Request
OQAP	Operational Quality Assurance Plan
QA	Quality Assurance
QC	Quality Control
QAP	Quality Assurance Procedures

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Licensee Action on Previously Identified Inspection Findings

- a. (Closed) Open Item (395/80-35-01): Review of Adequacy of Administrative Organization. The inspector reviewed the OQAP, Section 3.2.1 and identified that the licensee has included provisions for review of the adequacy of the administrative organization in conjunction with the annual QA Plan review to assure that the organizational charts, departmental functions, and responsibilities are current.
- b. (Closed) Open Item (395/80-35-02): "Q" List and Consumable/Expendable Items. The inspector reviewed the FSAR Question 421.83 (Amendment 24, March 1981); Question 421.16 (Amendment 5, April 1978); and Question 421.66 (Amendment 8, September 1978) and identified that all items requested by NRR to be added to the "Q" list have been addressed. Question 421.83-a.20 specifically addresses expendable and consumable items necessary for CSSC performance (i.e., weld rod, fuel oil, boric acid, snubber oil, etc.). The licensee's answer to this particular subpart of Question 421.83 stated that these items would be included in revised notes to Table 3.2-1. The notes to Table 3.2-1 state that certain consumable products used in conjunction with safety-related equipment are considered safety-related. Examples of these items are weld rod, diesel fuel oil, boric acid, lithium hydroxide, etc.

The inspector also reviewed OQAP, Section 8.3. This section basically identifies the methodology to be used during procurement of parts for CSSC equipment and the determination to be made by Technical Support Engineering (with concurrence of Nuclear Engineering) for changing the classification of parts from safety to non-safety related.

- c. (Closed) Open Item (395/80-35-03): Determination of "Q" and "Non-Q". The inspector reviewed AP-401, Maintenance Work Request, Revision 3. Paragraph 5.3.2 allows the responsible supervisor to initially determine if the work being performed on the MWR is safety or non-safety related. This initial determination is not final until verified by QC. If QC cannot make this determination, it is referred to the Technical Support Group. The inspector interviewed cognizant personnel in QC and

Technical Support and verified that they understood their responsibilities relative to safety or non-safety related determinations on MWRs.

- d. (Closed) Open Item (395/80-35-04): Distribution and Review of Audit Responses and Corrective Actions. The inspector reviewed OQAP, Section 15.11.1 and identified that correspondence generated regarding audit followup and resolution receive the same distribution as the original audit report.
- e. (Closed) Open Item (395/80-35-05): Outdated References and Titles. The inspector reviewed a representative sample of QAPs (10 of 25) and identified that erroneous references and outdated titles had been either deleted or corrected.
- f. (Closed) Open Item (395/80-35-06): Specification of Audit Response Time. The inspector reviewed QAP 21, SCE&G Quality Assurance Audit Report Preparation, Revision 2, Section VII.C and identified that the audit team leader or applicable director will prepare a cover letter transmitting the audit report and requesting a response to the audit conclusions within four weeks after the audit report date.
- g. (Closed) Open Item (395/80-35-07): Clarification of OQAP Section 15.3.2 on Technical Audits. The inspector reviewed OQAP, Section 15.5 and identified that when it is necessary to evaluate the overall effectiveness of technically based activities, audit teams will have as one or more members technical specialists in the areas being audited.
- h. (Closed) Open Item (395/80-35-08): Escalation Procedure. The inspector reviewed QAP 19, Internal SCE&G/QA Audits, Revision 2; QAP 20, External SCE&G/QA Audits, Revision 2; and QAP 23, Surveillance of Site Activities, Revision 3. These procedures state that escalation of audit findings and concerns will be executed as discussed in Management Directive 18. The inspector reviewed Management Directive 16 which outlines the course of action to be taken for escalation of audit findings. This directive had been approved January 4, 1982. Cognizant QA personnel are aware that QAPs 19, 20 and 23, will have to be revised to reference Management Directive 16 vice 18. Drafts of these procedures have been submitted for review to upgrade the erroneous reference from Management Directive 18 to Management Directive 16. These procedures were reviewed and approved on January 6, 1982.
- i. (Closed) Open Item (395/80-35-09): Control of Drawings Under Revision. The inspector reviewed AP 301.1, Document Control Procedure, Revision 5, Change 5 and identified that controls have been established to assure that drawings are suitably marked, when they have component identification changes pending. Marking of these drawings assures that personnel using these drawings will be alerted to the fact that changes are in progress.

- j. (Closed) Open Item (395/80-35-10): Document Receipt Acknowledgement. The inspector reviewed AP 301.1, Document Control Procedure, Revision 5, Change 4 and identified that a fixed timeframe (10 working days) has been incorporated into the procedure for acknowledging receipt of documents.
- k. (Closed) Open Item (395/80-35-11): QC Guidance On Hold Points. The inspector reviewed AP-1200, Quality Control Inspection Program, Revision 3, and QCP-G1, Specification and Documentation of Quality Control Inspection Requirements, Revision 1, and verified that sufficient guidelines now exist for including QC hold points on safety related maintenance activities.
- l. (Closed) Open Item (395/80-35-12): Plant Engineering Procedures. The plant engineering procedures that existed when this item was opened (November 1980) have been deleted and replaced with a series of Nuclear Engineering Procedures. The inspector reviewed NE-113, -128, -129, -130, -131, -132, -133, -134, -135, -136, QQAP 6.0, QAP-3 and AP-1500 and identified that the method for handling modifications appears to be adequate. AP-1500, Design Modification Control, Revision 1, contains requirements to assure that modifications are reviewed by various plant groups for incorporation of those modifications into existing plant procedures and training program. AP-1500 also requires that the basis for safety evaluations are included as part of the modification package.
- m. (Closed) Open Item (395/80-35-13): Calibration Procedures. The inspector reviewed ICP-240.012, 240.001, and 235.009 and verified that changes identified during the startup testing program had been included in updates of these procedures as applicable. The licensee is in process of upgrading all ICPs to reflect changes identified during startup testing.
- n. (Closed) Open Item (395/80-35-14): Safety Related Classification of Procedures. The inspector reviewed drawing D-302-861, Revision 18, and confirmed that Stack Flow Monitor FT 8252 previously identified by this item is non-safety related. The licensee has an ongoing system to identify safety-related procedures as they are being written.
- o. (Closed) Open Item (395/80-35-15): Discrepancies in Classification of Inspection Items. The inspector reviewed the QQAP, Sections 9.4.4 and 11.4 and verified that the classifications of materials are consistent with regulatory requirements; i.e., acceptable, hold or reject.
- p. (Closed) Open Item (395/80-35-16): Operations, Maintenance and Testing Index. The inspector reviewed the QA Records and Retention Chart, Revision 4, and identified that Section G has ten indexed subparagraphs to fully define record types and retention times for these records.

- q. (Closed) Open Item (395/80-35-17): Mechanical Calibration Inconsistencies. The inspector reviewed MMP-285.005, Calibration of Torque Transducers, Amplifiers and Analyzers, Revision 0, and confirmed that the transducer readout unit used for calibration of torque wrenches will have a sticker applied upon completion of calibration of the unit.

6. Preoperational Test Records (39301)

- References:
- (a) OQAP, Section 14, Records, Revision 7
 - (b) QAP 16, Quality Assurance Records Accumulation and Retention, Revision 3
 - (c) AP-301.2, Nuclear Operations Record Control Procedure, Revision 0
 - (d) FQCP-2.2.1, Records Filing Procedure, Revision 14
 - (e) FQCP-2.2.2, Document Issue Procedure
 - (f) SUM-B-10, Document Control, Revision 1

The inspector reviewed the listed references to assure they met requirements of the accepted QA Program, Regulatory Guide 1.88, and ANSI N-45.2.9 as endorsed by that program. The inspector verified the following aspects of the preoperational test record program:

- Administrative controls have been established for maintaining records of various activities during the preoperational testing period.
- Record storage controls have been established which include retention periods for each type of record.
- Responsibilities have been assigned for establishing retention periods of new records.

The inspector toured the records storage facilities (operations vault, construction vault, and startup testing facilities). Various records were selected to verify that they were retrievable and indexed adequately.

Based on this review, one inspector followup item was identified. The licensee is currently storing startup records in one hour rated fire cabinets in a trailer. The licensee is also storing selected records in satellite locations under the same conditions. Discussions with cognizant personnel identified that a study was not performed to determine if one-hour cabinets are sufficient as required by ANSI N45.2.9 and NFPA 232-1975. Until the licensee performs a study to determine the adequacy of storage of records in satellite locations, this is identified as an inspector followup item (395/82-01-01).