APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-498/82-10
50-499/82-10

Dockets: 50-498
50-499

Licensee: Houston Lighting and Power Company
P. O. Box 1700
Houston, Texas 77001

Facility Name: South Texas Project, Units 1 and 2

Inspection At: South Texas Project, Matagorda County, and Houston, Texas

Inspection Conducted: June 1982

Inspectors: for W. M. Hill, Details Section A (paragraphs 4, 5, 6, 7, & 8) — 7/29/82 Date

J. R. Boardman, Details Section A (paragraphs 9, 10, & 11) — 7/26/82 Date

W. G. Hubacek, Details Section A (paragraphs 1, 2, 3, 12, & 13) — 7/26/82 Date

C. R. Oberg, Details Section B — 7/26/82 Date

D. G. Breaux, Details Section C — 7/29/82 Date

Approved: W. A. Crossman, Reactor Project Section B — 7/29/82 Date

C. J. Hale, Reactor System Section, VIB — 7/29/82 Date

Inspection Summary

Inspection Conducted During the Period of June 1982 (Report 50-498/82-10; 50-499/82-10

Areas Inspected: Construction activities related to the transfer of engineering and management functions from Brown & Root (B&R) to Bechtel Power Corporation (Bechtel): Bechtel assessment of the Quadrex Corporation (Quadrex) Report Findings; Bechtel review of the existing design; site caretaking and maintenance activities; site tour; documentation of as-built conditions; safety-related coatings; QA records; preparations for safety-related construction restart; current construction activities; tightening of safety-related fasteners; testing of galvanized bolts; and structural steel materials. This inspection period involved 252 inspector-hours by five NRC inspectors.

Results:

No violations or deviations were identified.

DETAILS SECTION A

1. Persons Contacted

Principal Licensee Employees

*J. Geiger, Project QA Manager
*D. Keating, Project QA General Supervisor
*J. Williams, Site Manager
R. Hernandez, Supervising Project Engineer, Components
J. White, Staff Assistant
J. Anderson, QA Specialist
J. Estella, Supervisor Quality Systems/Administration
D. Bednarczyk, Project QA Supervisor

Other Personnel

B. McCullough, Construction Manager, Bechtel
J. Downs, Deputy Construction Manager, Bechtel
L. Hurst, Project QA Manager, Bechtel
W. Houston, Project QA Engineer, Bechtel
J. Hurly, Project Engineer, Bechtel
J. Gormly, Project Engineer, Bechtel
K. Dotterer, Project QA Engineer, Bechtel
J. Thompson, Site Manager, Ebasco Services, Inc. (Ebasco)
R. Grippardi, QC Site Supervisor, Ebasco
J. Little, Resident Engineer, Bechtel
R. Bedford, Senior Resident Engineer, Ebasco
R. Cantrell, Lead Auditor, Bechtel
J. Crnich, Construction Manager, Ebasco
*C. Hawn, Quality Program Site Manager, Ebasco
R. Cummings, QA Site Supervisor, Ebasco

*Denotes those indviduals attending one or more of the management meetings held during June 1982.

2. Site Tour

The NRC inspector toured the site to observe housekeeping activities, general cleanliness, protection and preservation of equipment and material, and plant status. Areas observed included Units 1 and 2 reactor containment buildings, mechanical-electrical auxiliary buildings, and storage areas.

The NRC inspector observed that these areas were clean and free of accumulations of trash and debris. Tools, equipment, and materials were returned to their storage locations when not in use.

No violations or deviations were identified.

3. Preparations for Resumption of Safety-Related Work

By letter ST-HL-AE-833, dated May 14, 1982, HL&P provided Region IV with their plan and schedule for resuming safety-related work. As described in the schedule, HL&P plans to resume safety-related construction on the essential cooling water (ECW) system as early as July 15, 1982. In order to determine the state of the licensee's readiness to resume construction, the NRC inspector initiated a review of licensee preparations for resumption of safety-related work on the ECW system.

During discussions with licensee and contractor personnel, the NRC inspector was informed that most of the specifications and drawings needed for ECW restart were issued by Bechtel Houston Engineering but had not yet been received by Ebasco at the site. Ebasco representatives stated that following their receipt of the specifications and drawings, another six weeks would be required to develop and issue construction and quality control procedures for the ECW work activities. This six-week procedure development period appeared to indicate that ECW restart would not commence prior to early August 1982.

The NRC inspector was also informed that engineering work package EM-406A related to the ECW system will be issued prior to ECW restart. Eighteen outstanding B&R nonconformance reports (NCR's) on the ECW system will receive dispositions and approval prior to restart, and any outstanding show cause order items will be addressed in the specifications. A contractor representative stated that there were no Quadrex Report issues which affect the planned ECW restart.

Inspection of backfill activities will be performed by Pittsburgh Testing Laboratory (PTL) under contract to Bechtel. Ebasco will perform inspection of welding activities and nondestructive examination of welds.

At the time of this inspection on June 10, 1982, staffing of the licensee and contractor QA/QC organizations was as follows:

HL&P - 23 personnel on site

Bechtel - 43 personnel on site

Ebasco - 16 personnel on site (4-6 more expected in June)

Total site staffing, including all HL&P and contractor personnel, was slightly in excess of 1200 personnel.

Licensee representatives stated that required personnel training and certifications would be completed prior to ECW restart. The training will include instruction of construction craft and quality control personnel in the use of the construction and quality control procedures which are presently under development.

Further review of ECW restart activities will be conducted during future NRC inspections.

No violations or deviations were identified.

4. ASME Section III Components, Supports, and Appurtenances

The NRC inspector reviewed two completed packages which documented the status of ASME Section III, Components, Component Supports, and Appurtenances. Drawing No. 1-N-5025-4 (package) provided the status of the volume control tank for unit 1. Drawing No. I-N-5021-4 provided the status of component cooling heat exchangers 1A, 1B, and 1C. Each package contained the applicable drawing, index, mechanical equipment data sheet, mechanical equipment operations traveler, installation sketch, and open items list.

Page 2 of the Code Status Report listed any open items. This list contained a description of the incomplete items or open NCR's as applicable. Several incomplete items were listed in both packages reviewed by the NRC inspector, as would be expected for systems which have not been completed.

The NRC inspector had no further questions concerning the documentation of the as-built condition of these systems.

5. Safety-Related Coatings

Bechtel transition Procedure No. 4, "As-Built Verification of Site Safety-Related Civil Structural Activities Including Nuclear Coatings and Fire Proofing During the Transition Phase," describes the methods for documenting the status of safety-related coatings. The Protective Coatings Inspection Book (Q Book) and the latest architectural drawings were used by Bechtel QC Engineers to perform visual walk downs. The status of safety-related coatings (incomplete or deficient) was indicated on the "as-built" drawings. In addition, a review of the following items was made: applicator qualification, inspector qualification, coating materials, and calibration data. A work package, CM-101-1-C-08-001, was developed for Unit 1 containment. The work package was divided into the following subsections:

- Reactor containment building liner
- Reactor containment building polar crane
- Reactor containment building polar crane girder & supports
- Documentation review
- Rooms in containment

The NRC inspector reviewed the sketches of the containment liner. The respective areas of each Q book were identified on the sketches. The NRC inspector also reviewed the following room drawings for the containment: 1-A-1019-0 (1, 2, and 3 of 16); 1-A-1020-0 (3, 4, 5, 6, and 7 of 16); 1-A-1021-0 (8 and 9 of 16); 1-A-1022-0 (10 and 11 of 16); 1-A-1023-0 (12 and 13 of 16); and 1-A-1024-0 (14, 15 and 16 of 16). The NRC inspector observed that a general summary of the findings indicated the following:

a. No "Coating Applicator's Record" was included with the inspection report.

b. Applicator was not qualified to perform the coating system used.

c. Coating material was not traceable to a manufacturer's certification.

d. The wrong test equipment was listed on the inspection report.

e. No evidence of field calibration of test equipment was found.

f. Two-inch areas around embeds were uncoated.

g. Chips, gouges, and survey marks were found in coating.

h. Rust was found on coated steel.

i. Inspection report stated area was prepared, or coated; but the area was not.

j. Dirt, tape, and spatter adhering to the coating.

k. Runs and sags were discovered.

l. Area was inaccessible for inspection.

Except for the final disposition of these comments, the NRC inspector had no further questions relative to the review and documentation of the status of safety-related coatings by Bechtel.

6. Quality Assurance Records

Pittsburg Testing Laboratories (PTL), a subcontractor, performs soils and concrete testing services on site. The original PTL test results are retained in the QA records vault. PTL retains copies in their files. The NRC inspector reviewed the filing system in the vault to ascertain whether the records were in satisfactory condition, a system was established to properly file the records, and the records were easily retrievable for subsequent use. The test results were filed under a subcontract number with a suffix of two additional digits added for indexing. The following are examples:

- S0107-12 Daily Concrete Inspection Reports
- S0107-28 Concrete Cyclinder Test Results

The majority of the test reports were filed by date; however, some files were arranged by concrete mix number or other appropriate classification. During the review, one typographical error was observed. A responsible employee in the vault stated that a knowledgeable representative from PTL would make the correction and initial the change. The NRC inspector considers this an acceptable method for correcting typographical errors in construction records. The NRC inspector had no further questions relative to filing of subcontractor test results.

7. Storage and Maintenance

The NRC inspector observed activities in several warehouses and other designated storage areas with particular attention paid to the following activities:

- Storage areas were segregated and classified as levels A through D to provide appropriate storage and environmental control for various types of equipment.
- Temperature and humidity were being measured and recorded to confirm that ambient conditions were being controlled as appropriate.

- Storage areas were not being used to store food, drink, or salt.
- An active program was in effect to control rodents and small animals.
- Racks, crates, and cribbing were carrying the full weight without component distortion.
- All items were labeled and stored in a manner that allows access for inspection.
- Fire protection systems and equipment were available for use.
- Sufficient dunnage was available to protect materials and components in storage.
- Canvas or plastic covering was available for weather protection, as required.
- Protective covers and seals were properly attached.
- Personnel access to the storage locations was adequately controlled.

During a tour of Warehouse E, the NRC inspector observed some damage to the cabinet of a nonsafety-related motor center (MCC). Subsequent review of the maintenance records indicated that routine inspection of the equipment had identified the damage and that the damage had been properly recorded on the inspection record for further disposition.

The NRC inspector conducted a review of the maintenance records for the following equipment:

H-1026	Cooling Coil 21A
H-1027	Cooling Coil 11A
H-1028	Cooling Coil 21B
H-1029	Cooling Coil 11B
H-1031	Cooling Coil for CCW Pump 11A
H-1032	Cooling Coil for CCW Pump 11C
H-1033 - H-1035	Cooling Coils
H-1037 - H-1063	Cooling Coils
V-0176	4-inch Motor Operated Gate Valve 150# (CS)
V-0182	4-inch Motor Operated Stop Check Valve 900# (CS)
V-0188	3-inch Motor Operated Flex Wedge Gate Valve (SS)
V-1543	Motor Operated Valves (Ser. # 001)

V-1545	Motor Operated Valves (Ser. # 001)
V-1550	Motor Operated Valves (Ser # 7620-95400-11-1)
V-0541	18-inch Gate Valve 900# (CS)
V-0185	4-inch Motor Operated Stop Check Valve 150# (SS)
V-0771	4-inch Motor Operated Gate Valve 150# (CS)
V-0783	3-inch Motor Operated Flex Wedge Gate Valve 150# (SS)
V-0936	70-inch Gate Valve 900# (CS) w/Motor Operator
V-1391	3-inch Motor Operated Gate Valve 150# (SS)

The NRC inspector identified no unacceptable conditions during review of these records.

8. Nonsafety-Related Construction Restart

Construction has resumed at the South Texas Project in nonsafety-related areas. The following is a summary of construction activities during June:

a. Repair the drainage system at the river water makeup pump facility;

b. Groom concrete coatings around embeds on elevation 60, Unit 1 electrical auxiliary building;

c. Repair/install permanent lighting in the Unit 1 turbine generator building;

d. Rework grating and handrails in the Unit 1 turbine generator building;

e. Maintain, clean, and inspect the turbine generator bearings;

f. Clean the expansion joint for the Unit 1 main condenser;

g. Reverify survey points; and

h. Placement of moisture separator reheaters on the Unit 2 turbine deck.

The NRC inspector identified no problems relative to any of these nonsafety-related activities. No safety-related construction was conducted during this month.

9. Tightening of Safety-Related Fasteners

A review by the NRC inspector of tightening requirements for safety-related threaded fasteners revealed only B&R Procedure CCP-15, Revision 11, dated March 9, 1981, "Fabrication and Erection of Miscellaneous and

Structural Steel." This procedure covers only tightening (by either "turn-of-the-nut" or automatic cutoff impact wrenches) of threaded fasteners to ASTM A-325 and A-490. Tightening of threaded fasteners to specifications ASTM/ASME A-36, A-193, A-307, and A-540 is not covered by the subject procedure, nor could licensee personnel identifiy procedures or specifications detailing these requirements, including the requirements for such significant threaded joints as the reactor vessel anchor bolts.

In addition, procedure CCP-15, Revision 11, paragraph 9.5.3.1.2, specifies that the torque wrench used for quality inspections of threaded fastener tightening be calibrated every two months, while ANSI N45.2.5-1974 "Supplemental QA Requirements, for Installation, Inspection, and Testing of Structural Concrete and Steel During the Construction Phase of Nuclear Power Plant," committed to by the licensee, in Section 5.4 requires cablibration at least weekly.

N45.2.5-1974, Section 5.4, also states that "at the beginning of tightening operations, all bolts tightened by each bolting crew shall be checked until the results are consistently acceptable." This requirement is not included in CCP-15, Revision 11.

This will remain an unresolved item (8210-01) pending further review by the NRC inspector.

10. Testing of Galvanized High Strength Bolts for Structural Steel Joints

ASTM Specification A-325-76, "Specification for High Strength Bolts for Structural Steel Joints, Including Nuts and Plain Hardened Washers," committed to by the licensee in FSAR Section 3.8.3.6.4.1, requires in Sections 6.9 and 8.5 a special proof test for galvanized bolts. The NRC inspector reviewed certified material test reports for approximately 52,000 A-325 galvanized bolts used in safety-related applications and found no documentation of performance of the subject test. There were 6800 fasteners on B&R site field purchase order 35-1197-9988; 44,569 were on nonsafety-related Mosher Steel Purchase Orders HM-608, HM-628, HM-540, HM-794, HM-1026, HM-1073, HM 1004, HM 1123, HM 1377, and one order for which the Mosher Steel number was unreadable, but which was Texas Bolt order 112928. These nonsafety-related fasteners were used in safety-related applications as reported by the licensee in accordance with 10 CFR 50.55(e) by letter dated June 17, 1980.

This will remain an unresolved item (8210-02) pending further review by the NRC inspector.

11. Structural Steel Materials and Certified Mill Test Reports

Licensee FSAR Section 3.8.3.6.4.1, "Materials," states that all structural and miscellaneous steel conforms to the following specifications and lists seven specifications ASTM A-1, A-36, A-123, A-307, A-441, A-588, and A-325.

The NRC inspector found structural and miscellaneous steel ordered to the following additional specifications not listed in Section 3.8.3.6.4.1.

. A-193 on purchase orders 35-1197-9141, 9293, 9850, 11851

. A-490 on purchase orders 35-1197-9988, 15272, and 24369

In addition, the NRC inspector noted that FSAR Section 3.8.3.6.4.3 states that certified mill test reports documenting chemical and physical properties are supplied for all materials used.

B&R Specifications 3A010SS012-G, "Category I Structural Steel," approved November 7, 1978, and 3A010SS026-G, "Category I Miscellaneous Steel," approved March 20, 1980, in Sections 3.7.1 and 3.1, respectively, allow certificates of conformance for A-307 bolts, and for all nuts and washers.

The B&R Specifications also reference or include ASTM specifications not included in FSAR Section 3.8.3.6.4.1 such as A-490, A-153, A-570, A-53, A-618, A-240, A-106, A-234, A-501, A-519 and A-668.

The fact that B&R has utilized specifications not included in FSAR Section 3.8.3.6.4.1 has been identified by the licensee's Vendor Control Program (VCP) review.

This will reamin an unresolved item (8210-03) pending further review by the NRC inspector.

12. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. Three unresolved items disclosed during the inspection are discussed in paragraphs 9, 10, and 11.

13. Management Meetings

Meetings were held with management personnel periodically during the course of this inspection to discuss inspection scope and findings.

DETAILS SECTION B

1. Persons Contacted

Principal Licensee Employees

C. L. Robertson, Manager, Nuclear Licensing Department
J. G. White, Staff Assistant, Nuclear Engineering
L. J. Klement, Supervising Engineer - Licensing
M. E. Powell, Team Leader, Licensing
Dr. J. R. Sumpter, Manager, Nuclear Services Department

2. Status of Quadrex Report Findings

During the period June 21-24, 1982, the Quadrex Review Coordinator (QRC), visited the HL&P and Bechtel offices in Houston to determine the progress of the review and resolution of Quadrex Report findings. The initial draft of EN-619, Compliance Work Package for the Quadrex Report, was issued for HL&P approval on June 18, 1982. This draft was examined by the QRC; however, since the report was preliminary, no comments were made. HL&P planned to have the report finalized by July 15, 1982. The QRC indicated that, for planning purposes, NRC inspection of the resolution of Quadrex findings would start approximately July 19, 1982 (this is subject to change).

The QRC interviewed HL&P personnel regarding the reportability and the safety significance of Quadrex Report issues. The QRC also interviewed HL&P personnel regarding the intended use and purpose of the Quadrex Report. Since these topics will be subject to further discussions, any statements of NRC findings will be documented in NRC Inspection Report 50-498/82-12; 50-499/82-12.

Note: As of the issuance of this report, the NRC inspection of the Quadrex Report resolution will not start until August 30, 1982. This delay was determined to be necessary in order to provide the necessary time for EN619 preparation, review, and approval by Bechtel and HL&P.

DETAILS SECTION C

This section of the report details NRC activities with respect to surveillance/inspection of the Bechtel/Brown & Root transition process. To assess the overall transition program and to keep track of exact status of the Bechtel review and assessment of the existing Brown & Root engineering design and associated data, an NRC Region IV inspector was placed on a full-time basis at the A/E facility (Bechtel-Houston). For background information on transition activities prior to this report, refer to the details section of previous monthly reports.

Phase A of the Bechtel/Brown & Root transition process is the review and assessment of the South Texas Project design. This task has been broken down to discretely defined systems and are defined as work packages. As the initial Bechtel review and assessment of a certain work package is completed, a draft final report is sent to HL&P for their review and comment. These HL&P comments are then incorporated into the generation of the work package final reports. When all of the final reports have been completed for the designated work packages, phase A of the transition will be completed. Some phase B activities are scheduled to commence prior to the completion of phase A of the transition. The following draft final reports have been sent to HL&P for review and comment:

*EE-200	*EN-612	*EJ-306	*EJ-303	*EM-511
*EE-215	*EE-208	*EM-558	*EN-606	*EC-150
*EE-202	*EJ-300	*EJ-314	*EA-006	*EC-151
*EE-210	*EN-610	*EJ-361	*EJ-318	EM-410
*EJ-316	*EJ-364	*EA-002	EA-003	EJ-315
*EJ-310	*EN-609	*EE-205	*EM-515	EJ-352
*EE-209	*EE-220	*EN-605	*EC-110	*EJ-366
*EA-007	*EJ-313	*EE-206	EJ-351	*EC-155
*EM-557	*EE-214	*EC-174	EJ-369	*EC-142
*EN-608	*EJ-362	*EM-506	*EJ-360	EE-219
EC-165	EJ-317	EM-520	EA-011	EN-601
*EM-455	EN-604	EA-008	EN-613	EJ-353
EN-607	EA-005	EP-705	EM-550	EJ-354
*EJ-370	EJ-301	EM-459	EM-501	EJ-355
*EM-504	EM-405	EM-527	EM-505	EE-213
*EC-186	EM-452	EM-517	EC-138	EE-224
EN-603	EM-509	EE-223	EJ-371	EE-203
EJ-367	EP-700	EM-513	EJ-373	
EE-212	EE-216	EM-508	EM-457	
*EJ-358	EE-217	EM-507	EM-502	
*EJ-365	EE-207	EM-407	EC-171	
*EC-104	EM-519	EM-409	EJ-356	

* Final report sent to HL&P

The present status of design documentation transmitted by Brown & Root and received by Bechtel is as follows;

	Total Scheduled	Scheduled to Date	Received
Engineering	870	870	868
Procurement	801	801	713

Bechtel has transmitted the Draft Final Report EN-619 entitled "Review of Quadrex Report" to HL&P. The purpose of this work package is to establish a program for the evaluation and disposition of the Quadrex Report findings. HL&P has reviewed the draft and meetings with Bechtel Engineering are being held to clarify their comments on the report. These comments will be incorporated into the EN-619 Final Report.

A meeting between Region IV personnel and HL&P management was held during which transition activities and ultimate resumption of construction were discussed. HL&P committed to transmitting the following documents for NRC review: *

a. HL&P/Bechtel Interface Agreement

b. HL&P/Bechtel Westinghouse Interface Agreement

c. Index of HL&P STP Procedures

d. Index of Bechtel STP Procedures

e. Bechtel/Ebasco Interface Agreement

f. RMS Procedures Listing

g. STP Quality Assurance Interface Agreement

h. HL&P Organization Chart

i. Bechtel Key Management Organization Charts

j. Ebasco Key Management Organization Charts

k. HL&P Resumes of Key People

* These items have been transmitted and received by NRC Region IV office.

Findings

The NRC inspector observed that recently the number of projected completed review package reports is much higher than that which Bechtel has actually completed. Bechtel engineering has committed to an emphasis on trying to keep up with scheduled transition activities.

Upon reviewing the engineering review package EN-613, "Radioactive Vent and Drain System," the NRC inspector observed such Bechtel statements as, "The present STP Design does not include the use of safety class instrumentation . . . SRP 9.3.3 states that if a system is capable of detecting leaks in safety systems that utilizes the drainage system sumps and is the only means for such leakage detection, it is considered safety related in this regard." Bechtel went on to state, "Should further investigations called for in this system work package not resolve the more serious concerns, the radioactive vent and drain system may have to be reviewed for reportability under 50.55(e)." Bechtel stated to the NRC inspector that a review of other related packages will reveal if this is the only leakage detection method and is in fact not safety class, then reportability to the NRC is in order.

Upon reviewing the engineering package EC-138, "Diesel Generator Building," Bechtel stated that potential reportable items may exist due to several discrepancies between calculations and the design drawings, among these items are rebar not shown on drawings, a lesser area of steel shown on drawings than the calculation requires, smaller anchor bolts, and inconsistencies for structural steel connections. The NRC inspector spoke to Bechtel about the clarity of the statement and HL&P reporting responsibility under 50.55(e). HL&P voiced concern that during the transition phase they will become aware of items of potential reportability before Bechtel has had the time to evaluate the items and then communicate these items to HL&P for possible reportability. The NRC's stance on this item is that the definition of notification between the AE and HL&P of reportable items, whether in this transitional period or not, must be constant, and that timely reportability is of the utmost importance.

NRC FORM 798
(11-81)
NRC 0636

U.S. NUCLEAR REGULATORY COMMISSION

INSPECTOR'S REPORT

Office of Inspection and Enforcement

PRINCIPAL INSPECTOR (Name, last, first, and middle initial): HULL, WILLIAM M. JR

REVIEWER: W. A. CROSSMAN

INSPECTORS: W. G. HUBACEK; ~~D.R. BREAU~~ D. G. BREAUX; C. R. OBERG; J. R. BOARDMAN

LICENSEE/VENDOR: HOUSTON LIGHTING & POWER, PO BOX 1700, HOUSTON TX 77001

TRANSACTION TYPE: X I - INSERT; M - MODIFY; D - DELETE; R - REPLACE

DOCKET NO (8 digits) OR LICENSE NO (8) PRODUCT (11 digits)	REPORT NO	SEQ	NEXT INSPEC DATE MO	YR
05000498	82-10	A		
05000499	82-10	B		
		C		
		D		

PERIOD OF INVESTIGATION/INSPECTION: FROM 06/01/82 TO 06/30/82

INSPECTION PERFORMED BY: X 1 - REGIONAL OFFICE STAFF; X 2 - RESIDENT INSPECTOR; 3 - PERFORMANCE APPRAISAL TEAM; OTHER

ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See NRC 0530 "Manpower Reporting—Weekly Manpower Reporting" for code.): REGION 4, DIVISION C, BRANCH A

REGIONAL ACTION (Check one box only): 1 - NRC FORM 591; 2 - REGIONAL OFFICE LETTER

TYPE OF ACTIVITY CONDUCTED (Check one box only): X 02 - SAFETY; 03 - INCIDENT; 04 - ENFORCEMENT; 05 - MGMT AUDIT; 06 - MGMT VISIT; 07 - SPECIAL; 08 - VENDOR; 09 - MAT. ACCT.; 10 - PLANT SEC; 11 - INVEST VER; 12 - SHIPMENT/EXPORT; 13 - IMPORT; 14 - INQUIRY; 15 - INVESTIGATION

INSPECTION/INVESTIGATION FINDING (Check one box only): X 1 - CLEAR; 2 - VIOLATION; 3 - DEVIATION; 4 - VIOLATION & DEVIATION

TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS: A B C D

ENFORCEMENT CONFERENCE HELD: A B C D; 1 - YES

REPORT CONTAINS 2.790 INFORMATION: A B C D; 1 - YES

LETTER OR REPORT TRANSMITTAL DATE: NRC FORM 591 OR REG LETTER ISSUED MO DAY YR; REPORT SENT TO HQ FOR ACTION MO DAY YR

MODULE INFORMATION

Module Number (Insp) Phase	Manual Chapter	Procedure Number	Level	Priority	Direct Inspection Effort in Staff Hours Expended This Inspection	Percentage Completed to Date	Status	Module Rpo Followup Phase	Manual Chapter	Procedure Number	Level
2	92	05	1B	A	2						
EXT - DELAY DA IMP PROC				B	2						
2	92	05	3B	A	2						
EXT - DELAY WORK ACT				B	2						
2	92	05	5B	A	2						
DA Records				B	2						
2	92	70	1B	A	3			2	92	70	6B
IIP + UNR				B	3			2	92	70	6B
					3						

Module Number (Insp) Phase	Manual Chapter	Procedure Number	Level	Priority	Direct Inspection Effort in Staff Hours Expended This Inspection	Percentage Completed to Date	Status	Module Rpo Followup Phase	Manual Chapter	Procedure Number	Level
2	92	70	6B	A	20						
IIE				B	20						
2	30	70	3B	A	2						
MM				B	2						
0	99	92	3B	A	11						
G.P.O.				B	11						
2	37	99	5B	A	84						
D.G.B				B	84						

TOTAL 252