

U.S. NUCLEAR REGULATORY COMMISSION

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Region I

Report No. 82-15
Docket No. 50-333
License No. DPR-59 Priority -- Category C

Licensee: Power Authority of the State of New York
P. O. Box 41
Lycoming, New York 13093

Facility Name: J. A. FitzPatrick Nuclear Power Station

Inspection at: Scriba, New York

Inspection conducted: July 1-31, 1982

Inspectors: James C. Linville
J. C. Linville, Senior Resident Inspector
L. T. Doerflein
L. T. Doerflein, Resident Inspector

8/17/82
date signed

8/17/82
date signed

date signed

Approved by: H. B. Kister
H. B. Kister, Chief, Reactor Projects
Section 1C

8/19/82
date signed

Inspection Summary:

Inspection on July 1-31, 1982 (Report No. 50-333/82-15)

Areas Inspected: Routine and reactive inspection during day and backshift hours by two Resident Inspectors (152 hours) of licensee action on previous inspection findings; licensee event report review; operational safety verification; surveillance observations; maintenance observations; followup on plant trips; review of plant operations; maintenance program review, and review of periodic and special reports.

Results: No violations were observed in six of nine areas inspected. Four violations were observed in three areas. Failure to establish radioactive waste procedures (paragraph 4.e.(2)); Failure to implement photo identification badge procedure (paragraph 4.c.(3)); Failure to review preventive maintenance procedure (paragraph 6), and Failure to complete Quality Control Inspection Report requirements (paragraph 9.a).

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DETAILS

1. Persons Contacted

- *R. Baker, Superintendent of Power
- N. Brosee, Maintenance Superintendent
- *R. Burns, Vice President, BWR Support
- *V. Childs, Senior Resident Engineer
- R. Converse, Operations Superintendent
- *M. Cosgrove, Site Quality Assurance Engineer
- *M. Curling, Training Superintendent
- *W. Fernandez, Technical Services Superintendent
- *H. Keith, Instrument and Control Superintendent
- *R. Liseno, Assistant Operations Superintendent
- *C. McNeill, Resident Manager
- E. Mulcahey, Radiological & Environmental Services Superintendent
- *T. Teifke, Security & Safety Superintendent
- *V. Walz, Senior Plant Engineer
- *R. Wiese, Assistant Maintenance Superintendent

The inspectors also interviewed other licensee personnel during this inspection including shift supervisors, administrative, operators, health physics, security, instrument and control, maintenance and contractor personnel.

*Denotes those present at the exit interview.

2. Licensee Action on Previous Inspection Findings

(Closed) UNRESOLVED ITEM (333/81-06-03): Since failure of the 10 percent closure main steam isolation valve limit switch for 29AOV80A has recurred and is identified as open item 333/82-08-10, this item is closed for administrative purposes.

(Closed) UNRESOLVED ITEM (333/82-06-08): The inspector has observed during plant tours that both drywell oxygen analyzers have been made fully operable.

(Closed) INSPECTOR FOLLOWUP ITEM (333/82-06-03): The inspector reviewed the revision to LER 82-04 which indicated that containment vent and purge isolation logic for a high radiation trip of the reactor building ventilation monitor was missed due to an error in a surveillance test procedure. The inspector had no further questions on this event.

(Closed) INSPECTOR FOLLOWUP ITEM (333/82-01-03): The inspector has observed no further problems with the control of weld rod during routine plant tours while modification work involving welding was in progress.

(Closed) INSPECTOR FOLLOWUP ITEM (333/82-10-05): The licensee revised the Operating Procedure Index on July 1, 1982 placing a** adjacent to OP-37 to indicate that a second verification is required for tagouts of the Containment Atmosphere Dilution system.

(Closed) UNRESOLVED ITEM (333/79-14-03): The inspector reviewed approved modification proposal F1-82-52 which involves changes to the Residual Heat Removal System Pump discharge check valve internals and movement of the downstream orifice to an upstream location to stop recurrent failures reported in several LER's. Item 333/82-08-03 on the same issue remains open pending implementation of modification F1-82-52.

(Closed) INSPECTOR FOLLOWUP ITEM (333/78-25-02): The inspector reviewed ANSI 45.2.3-1973 and determined that there is no requirement for posting housekeeping zones. The inspector has no further questions about the implementation of ANSI 45.2.3-1973.

3. Licensee Event Report (LER) Review

The inspector reviewed LER's to verify that the details of the events were clearly reported. The inspector determined that reporting requirements had been met, the report was adequate to assess the event, the cause appeared accurate and was supported by details, corrective actions appeared appropriate to correct the cause, the form was complete and generic applicability to other plants was not in question.

LER's 82-27, 82-28*, 82-29* and 82-30* were reviewed.
*LER's selected for onsite followup.

LER 82-28 reported the failure of the drywell equipment sump flow integrator. The inspector will review the results of the licensee's investigation into the cause of this failure when the followup LER is submitted. (333/82-15-01)

LER 82-29 reported that A Main Steam Line Radiation Monitor tripped due to a loose fuse. The licensee stated that a caution would be added to the surveillance procedure during which the fuse is removed to ensure careful installation of the fuse. The inspector will review the procedure revision when it is implemented. (333/82-15-02)

LER 82-30 reported that B Rod Block Monitor was out of calibration and that recalibration was the only required corrective action. After discussion with the inspector, the licensee agreed to increase the surveillance frequency to verify continued proper operation and to revise the LER accordingly. The inspector will review the revised LER later. (333/82-15-03)

4. Operational Safety Verification

a. Control Room Observations

- (1) Daily, the inspectors verified selected plant parameters and equipment availability to ensure compliance with limiting conditions for operation of the plant Technical Specifications. Items checked included:

-- Power distribution limits;

- Availability and proper valve lineup of safety systems;
 - Availability and proper alignment of onsite and offsite emergency power sources;
 - Reactor Control panel indications;
 - Primary containment temperature and pressure;
 - Drywell to suppression chamber differential pressure;
 - Standby Liquid Control Tank level and concentration, and
 - Stack monitor recorder traces.
- (2) The inspectors directly observed the following plant operations to ensure adherence to approved procedures:
- Routine Power Operation
 - Reactor Startups
 - Issuance of RWP's and Work Request/Event/Deficiency forms
- (3) Selected lit annunciators were discussed with control room operators to verify that the reasons for them were understood and corrective action, if required, was being taken.
- (4) Shift turnovers were observed to ensure proper control room and shift manning. Shift turnover checklists and log review by the oncoming and offgoing shifts were also observed by the inspectors.
- (5) Findings:
- (a) On July 8, 1982, the inspector noted that the value of the B Average Power Range Monitor (APRM) Gain Adjustment Factor (AGAF) was 1.01. When the inspector discussed this with the Nuclear Control Operator (NCO), the NCO adjusted it to less than 1.0 as required by procedure RA-7.3.1, APRM Calibration but he did not document it on form RA-1A as required.

Again on July 9, 1982, the inspector noted that the value of the F APRM AGAF was 1.01. Similarly, another NCO adjusted the AGAF to less than 1.0 without documenting it on form RA-1A as required. During subsequent discussions with the licensee, the inspector determined that form RA-1A is only necessary to document the performance of the daily calibration of APRM's required by Technical Specifications. Completion of the form is not necessary every time an APRM is calibrated because the

AGAF is greater than 1.0 according to the licensee. After this discussion, the licensee agreed to revise RAP 7.3.1 to clarify the requirements for documenting APRM calibrations. The inspector will review this revision later. (333/82-15-04)

- (b) During the month the inspector noted a marked increase in the tailpipe temperature for F Safety Relief Valve (SRV) from about 250°F to about 300°F. The inspector expressed concern about this condition to the licensee because of recent problems experienced with two stage Target Rock SRV's at Pilgrim and Hatch. When the inspector determined that Pilgrim has Technical Specifications related to high tailpipe temperatures on two stage Target Rock SRV's, the inspector initiated discussions with NRR and the licensee to impose similar requirements on the licensee. When the licensee discussed this matter with Target Rock representatives, he stated that he was told by the Target Rock representatives that based on testing an SRV would not lift in the safety valve mode with more than 200 pounds per hour steam leakage through the pilot valve which roughly correlates to a tailpipe temperature of 40 to 50°F above normal. Based on this information, the licensee declared F SRV inoperable in the safety valve mode. In this condition, a shutdown will be required within 30 days by Technical Specification 3.6.E.2.a. The licensee considers that the 30 days started when the tailpipe temperature jumped rapidly from 275°F to about 300°F following a startup on July 16, 1982. In addition, the licensee committed to performing an as-found test on F SRV topworks at the exit meeting. The inspector will review the results of this test and the LER associated with this event later. (333/82-15-05)

b. Shift Logs and Operating Records

- (1) Selected shift logs and operating records were reviewed to:
- Obtain information on plant problems and operations;
 - Detect changes and trends in performance;
 - Detect possible conflicts with Technical Specifications or regulatory requirements;
 - Determine that records are being maintained and reviewed as required, and
 - Assess the effectiveness of the communications provided by the logs.

(2) The following logs and records were reviewed:

- Shift Supervisor Log
- Nuclear Control Operator Log
- Night Orders
- Shift Turnover Check Sheet
- Protective Tag Record Log
- Jumper Log
- Liquid Radwaste Discharge Log
- Gaseous and Particulate Sample Logs
- Weekly Chemistry Status Log
- Air Sample Log

(3) No violations were observed.

c. Plant Tours

(1) During the inspection period, the inspectors made observations and conducted tours of plant areas including the following:

- Control Room
- Relay Room
- Reactor Building
- Turbine Building
- Diesel Generator Rooms
- Electric Bays
- Pumphouse-Screenwell
- Standby Gas Treatment Building
- Radwaste Building
- Drywell
- Battery Rooms
- Cable Tunnels

- (2) During the plant tours, the inspector conducted a visual inspection of selected piping between containment and the isolation valves for leakage or leakage paths. This included verification that manual valves were shut, capped and locked when required and that motor operated or air operated valves were not mechanically blocked. Other items verified during the plant tours included:
- (a) Fire Protection Conditions
 - No significant fire hazards existed.
 - Extinguishing equipment, fire alarms, actuating controls, fire fighting equipment and emergency equipment was operable.
 - Ignition sources and flammable material were properly controlled.
 - (b) Housekeeping/Cleanliness Conditions
 - Critical clean areas like the refueling floor were properly controlled.
 - Combustible material was properly controlled.
 - (c) Radiation Protection Controls
 - Surveys were properly performed.
 - Radiation Protection instruments were calibrated and operable.
 - Radiation Work Permits were complete, appropriate and followed.
 - Methods used to control exposures of those working in high radiation areas were appropriate.
 - Activities in radioactive waste system areas were conducted in accordance with approved procedures.
 - (d) Physical Security Plan Implementation
 - The security organization appeared to be properly manned and capable of performing its assigned function.
 - Isolation zones were clear.
 - Persons and packages were checked prior to entry into the protected area.

- Vehicles were properly searched and escorted or controlled within the protected area.
 - Persons within the protected area displayed photo identification badges and persons requiring escorts were properly escorted.
 - Compensatory measures were employed when required by security equipment failure or impairment.
 - Protected area and vital area barriers were not degraded and access to these areas was properly controlled.
- (e) Verification of adherence to selected Technical Specification Limiting Conditions for Operation.

(3) Findings:

At 8:45 a.m. on July 12, 1982, the inspector noted a Radiation Work Permit (RWP) (No. 3468) at the Drywell entrance which had a photo identification badge attached to it. The badge belonged to an individual who was working in the Drywell. Later the same day the inspector noted that three individuals had left their photo identification badges attached to an RWP in the Turbine Building Track Bay. These badges belonged to three individuals working in the area. The inspector informed the licensee that leaving badges attached to RWP's is a violation of Plant Standing Order No. 3 which requires that personnel wear badges in a manner in which they can be observed by other personnel. (333/82-15-06)

d. Tagout Verification

The inspectors verified that the following safety related protective tagout records (PTR's) were proper by observing the positions of breakers, switches and/or valves.

- PTR 820548 on the Reactor Protection System Fuses for 29AOV80A.
- PTR 820719 on the Electric Fire Pump.
- PTR 820788 on A Low Pressure Coolant Injection Motor Operated Valve Battery.

e. Radioactive Waste Systems Controls

- (1) The inspector witnessed selected portions of one liquid radioactive release to verify the following:
- The required release approvals were obtained.
 - The required samples were taken and analyzed.

- The radioactive waste system was operated in accordance with approved procedures.
- The release control instrumentation was operable and in use.

On July 2, 1982, the inspector observed the release of Batch 4505, B Laundry Drain Tank.

- (2) On July 13, 1982, the inspector observed the loading and dewatering of a radioactive waste transportation cask to verify that the operation was conducted in accordance with approved procedures and that the procedures were adequate. The radioactive waste was powdex resin which was being transferred from the waste sludge tank to the transportation cask. Following the operation, the inspector expressed a concern over the adequacy of the hose used to transfer the resin from the radwaste building to the cask in the truck bay. The hose was approximately forty feet long and had to be tied to the cask and held in place by lead weights. A licensee representative agreed with the inspector's concern and stated that modification F1-79-30 has been initiated to install piping from the waste tanks to the truck bay to eliminate the long length of hose.

In addition, the inspector determined that the two valve manifold on the discharge of the waste sludge pump, to which the hose discussed above is attached and to which another hose routed to the concentrated waste tank is attached, is not shown on drawings OP-48-1, Revision 3 or FM-17E-18. The licensee showed the inspector unreviewed safety evaluation JAF-SE-81-097 for modification F1-79-30, not yet approved for implementation, which would replace the manifold and hoses with hard piping. The inspector also determined from a handwritten master list of work requests that the installation of the manifold and hoses was apparently authorized by work request 20/2125 dated July 31, 1979 which remains open because the licensee has not been able to locate a copy of it.

While reviewing the system lineup the inspector also determined, based on review of radwaste system drawings and discussions with licensee personnel, that procedure F-OP-48, Solid Radwaste System, Revision 6, did not contain any steps for transferring waste from the waste sludge tank to the transportation cask. The licensee stated that a procedure for this operation had been prepared but had not yet been reviewed by the Plant Operations Review Committee or approved by the Resident Manager. The inspector informed the licensee that failure to provide a written procedure for transferring radioactive waste from the waste sludge tank to the transportation cask was a violation of Technical Specification 6.8 and ANSI 18.7-1972, Section 5.3.7. (333/82-15-07) The licensee issued Revision 7 to OP-48 on July 15, 1982 adding procedures for processing the waste sludge tank to the waste contractor.

- (3) On July 14, 1982, the inspector observed the survey of radioactive waste shipment number 07-82-043A. The inspector also reviewed the shipment records and observed that the shipment was properly labelled.

f. Emergency System Operability

The inspectors verified operability of the Control Rod Drive Hydraulic System and Process Radiation Monitoring System. The following items were included in the system verification:

- Confirmation that each accessible valve in the primary flow path was in the correct position.
- Confirmation that power supplies and breakers are properly aligned for components that must activate upon an initiation signal.
- Visual inspection of the major components for leakage and other conditions which might prevent fulfillment of their functional requirements.

The inspectors also verified the operability of the Standby Liquid Control System by performing a complete walkdown of the accessible portions of the system. The following were included in the Standby Liquid Control System verification:

- Confirmation that the licensee's system lineup procedures match plant drawings and the as-built configuration.
- Verification that valves are in the proper position, have power available, and are locked (sealed) as required.
- Verification that system instrumentation is properly valved in.
- Verification that there are no obvious deficiencies which might degrade system performance such as inoperable hangers or supports.

During the verification of the Standby Liquid Control System the inspector noted the following discrepancies between the OP-17 valve lineup (VLU) table, drawing OP-17-1 and drawing FM-21A-12.

- Valves SLC 20, 21 and 25 are not shown on FM-21A-12 while they are on the OP-17 VLU and OP-17-1.
- Valves 750 A and B, 751 A and B, and 752 B are locked closed according to the OP-17 VLU but are not shown as such on either FM-21A-12 or OP-17-1.
- Valve 723 is locked according to the OP-17 VLU and OP-17-1 but is not shown as such on FM-21A-12.

- FM-21A-12 shows temporary strainers on the pump suction which are no longer in place or shown on OP-17-1.
- FM-21A-12 incorrectly depicts the piping arrangement for the discharge of SV 39A and B while OP-17-1 shows it correctly as-built.

The inspector will verify the correction of these discrepancies during a later inspection. (333/82-15-08)

5. Surveillance Observations

The inspector observed portions of the surveillance procedures listed below to verify that the test instrumentation was properly calibrated, approved procedures were used, the work was performed by qualified personnel, limiting conditions for operation were met, and the system was correctly restored following the testing:

- F-ST-76B, Electric Fire Pump Operational Check, Revision 5, dated May 19, 1982, performed on July 7, 1982.
- F-ISP-12-1, RCIC Steam Line Low Pressure Instrument Functional Test/Calibration, Revision 7, dated April 15, 1982, performed July 28, 1982.
- F-ISP-9-1, RCIC Steam Line High Flow Instrument Function Test/Calibration, Revision 8, dated April 22, 1982, performed July 28, 1982.

The inspector also witnessed all aspects of F-ST-11, Main Steam Isolation Valves Limit Switch Instrument Functional Test, Revision 4, dated April 8, 1981, performed July 2, 1982. Observations were made to verify that:

- The surveillance procedure conforms to technical specification requirements and had been properly approved.
- Limiting Conditions for Operations for removing equipment from service were met.
- Testing was performed by qualified personnel.
- Test results met technical specification requirements.
- The surveillance test documentation was reviewed.
- Equipment was properly restored to service following the test.

No violations were observed.

6. Maintenance Observations

The inspectors observed portions of various safety related maintenance activities. Through direct observation and review of records, they determined that:

- Redundant components were operable.
- These activities did not violate the limiting conditions for operation.
- Required administrative approvals and tagouts were obtained prior to initiating the work.
- Approved procedures were used or the activity was within the "skills of the trade."
- Appropriate radiological controls were properly implemented.
- Ignition/fire prevention controls were properly implemented.
- Equipment was properly tested prior to returning it to service.

During this inspection period, the following activities were observed:

- WR 20/20380, Replace Drywell Equipment Drain Sump Integrator 20-FQT-530 performed on July 1, 1982.
- WR 76/14843, Perform preventive maintenance on Electric Fire Pump motor performed on July 7, 1982.
- WR 29/18632, Adjust "A" Main Steam Isolation Valve 90% limit switch performed on July 12, 1982.
- WR 05/18742, Adjust "D" inboard and outboard Main Steam Isolation Valve 90% limit switches performed on July 12, 1982.
- WR 71/14839, B Low Pressure Coolant Injection Motor Operated Valve Battery preventive maintenance performed on July 8, 1982.
- WR 30/19650, Replace Control Rod Drive 02-23 insert solenoid valve performed on July 15, 1982.

During the maintenance on the electric fire pump, the inspector noted that the procedure in use, Preventive Maintenance Procedure No. EP-005, did not reference the type of controller used on the electric fire pump and that the megger voltage in the procedure had been changed on the Work Tracking Form from 500 to 1000 volts. In addition, the inspector noted and later verified with licensee personnel that procedure EP-005 had not been reviewed since it was initially approved in September 1978. Administrative Procedure 1.4 requires that procedures concerned with nuclear or environmental safety be reviewed at least every two and a half years by the department superintendent. The inspector informed the licensee that failure to maintain procedure EP-005 through periodic review was a violation of Technical Specification 6.8 and Administrative Procedure 1.4. (333/82-15-09)

7. Followup on Plant Trips

- a. At 7:25 a.m. on July 11, 1981, a high vibration on number 9 generator exciter bearing caused a turbine trip and the reactor scrammed from about 85 percent power due to turbine stop valve fast closure. The inspector determined through a review of logs and key parameter recorder charts, and through discussions with licensee personnel that at the time of the scram the facility was returning to full power following a rod sequence exchange. All systems functioned as required and no ECCS systems were initiated. There was no release associated with this trip. There had been vibration spiking problems on number 9 and 10 bearings since early in the cycle which began in March 1982. For a period of time the licensee had disabled the turbine vibration trip function to increase the setpoint on number 10 bearing. In April, General Electric investigated the problem and in a letter dated May 6, 1982, recommended further investigation and repairs at a convenient time. A trip investigation by the licensee and General Electric determined the number 9 bearing vibration detector had failed due to a broken lead. The licensee replaced the number 9 bearing vibration detector, shimmed number 9 bearing and aligned the generator to stator exciter coupling to reduce the higher than normal vibrations on number 9 and number 10 bearings.
- b. At 4:03 a.m. on July 15, 1982, the reactor scrammed on low reactor vessel level while licensee personnel were attempting to shift from the low feedwater flow control bypass valve to the normal A reactor feedwater pump (RFP) discharge valve during a facility startup. The licensee stated that it appeared that the RFP stalled and its hydraulic coupler properly uncoupled on a low speed signal. The licensee attributed this to a lack of operator experience with this evolution of shifting from the low feedwater flow control valve to the RFP discharge valve since the trim of the low feedwater flow control valve was modified to provide control at lower flows during the last refueling outage which ended in March 1982. The licensee plans to provide the operators with better procedural guidance and to modify the low feedwater flow control valve stroke further to provide a wider range of operation such that the transition can be made more easily at a higher feedwater flow rate. The inspector will review these licensee actions when they are completed. (333/82-15-10)

8. Review of Plant Operations

Environmental Protection

- a. On July 6, 1982, the inspector observed environmental monitoring stations E, H, J and K and verified that they were installed and operating properly.
- b. On July 2, 1982, the inspector witnessed the collection of water samples from the FitzPatrick Plant inlet and discharge canals. The inspector also observed portions of the preparation and analysis of these samples. Based on these observations the inspector verified

that the collection, preparation and analysis of the inlet and discharge canal samples were performed in accordance with procedures ESP-3, Circulating Water Sampling Equipment Operation, Revision 1, dated February 1981 and ESP-5, Analyses of Environmental Samples, Revision 4, dated January 1981.

- c. The inspector reviewed the 1981 Annual Environmental Operating Report and discussed the data with licensee personnel. Based on this review and the subsequent discussions, the inspector determined that the licensee is reporting all data required by the Technical Specifications.

Emergency Preparedness Drills

On July 20 and 29, 1982, the inspector witnessed parts of emergency drills involving state and county, as well as licensee participation in preparation for the annual drill scheduled for August 11, 1982. The inspector observed licensee response in the control room and the technical support center and attended the drill critiques.

No violations were observed.

9. Maintenance Program Review

The inspector reviewed the maintenance program procedures listed in enclosure 1 against the requirements of the Technical Specifications, Chapter 13 of the FSAR, and ANSI 18.7-1972. Areas covered included corrective maintenance, equipment control, preventive maintenance, special processes, cleanliness and housekeeping. The inspector's findings are as follows:

- a. The inspector noted that the licensee imposes quality control (QC) inspection points using QC inspection report (QCIR) checklists on safety related maintenance activities by requiring a QC signature on work requests and work tracking forms acknowledging commencement of the work. Thus, it is the responsibility of the QC inspector to ensure inspection points are witnessed and not of the supervisor in charge of the maintenance activity. To determine the effectiveness of this approach, the inspector reviewed selected QCIR's. The inspector found that sections 2.14 and 2.15 of QCIR F-81-0548 and that section 2(a)5 of QCIR F-82-0015 were not completed. In addition, previously developed job specific checklists were not used for QCIR's F-82-0194 and F-82-0027 on bolted bonnet valves and QCIR's F-82-0079, F-82-0157, F-81-0509, and F-81-0510 on emergency diesel generator preventive maintenance. Only the QCIR cover sheet and prerequisite sheet were completed for these activities. These are violations of 10 CFR 50, Appendix B, Criterion X, Section 10 of the Quality Assurance Program and Quality Assurance Procedure 10.1 which require that inspection checklists which delineate inspection requirements including inspection points be developed and completed. (333/82-15-11)

The inspector expressed further concern to the licensee that some detailed maintenance activities such as those associated with QCIR's

- F-82-0477, F-82-0477A and F-82-0216 had no job specific QCIR requirements. The licensee acknowledged the inspector's concern at the exit interview and stated that it would be addressed in the response to the violation.
- b. During the inspection, the licensee showed the inspector a long list of work requests dating back to 1980 for which the work is complete but the documentation has not yet been given to QC for review. The inspector expressed concern about this condition and the lack of any program to assure that work request documentation is completed in a timely manner. The inspector will review licensee action on this matter later. (333/82-15-12)
 - c. During review of the welding support procedures (WSP's), the inspector noted that these procedures receive no plant operations review committee (PORC) review prior to approval and no periodic review. Although special process procedures are not specifically addressed in ANSI 18.7-1972, the inspector considers WSP's to be similar to other administrative procedures subject to these requirements. At the exit interview, the licensee stated that the WSP's will be converted to Work Activity Control Procedures (WACP) which are reviewed by PORC prior to approval and periodically thereafter. The inspector will review the conversion of WSP's to WACP's later. (333/82-15-13)
 - d. The inspector has observed that the licensee uses informal tags with work request numbers on indicators and switches to indicate the status of equipment which is less than fully operable. Since there is no control over the placement or removal of these tags, the inspector expressed concern to the licensee that the operators might not trust indications or use operable equipment if the tags are inadvertently left in place after the work is completed. At the exit interview, the licensee stated that the use of these tags will be formalized by November 30, 1982. The inspector will review this action later. (333/82-15-14)
 - e. Although the licensee periodically performs many preventive maintenance (PM) type activities on items like limitorque valve operators, breakers, motor controllers, control rod drive hydraulic system pilot valves, etc., the licensee has no formal, defined PM program. This item was identified by INPO during their 1981 inspection. Although the licensee committed to a July 1982 program implementation in response to INPO, the licensee now feels that a complete program may not be in place for a couple of years. However, the licensee has developed a computer program to track PM items and is in the process of developing frequencies for PM items. The inspector will review licensee progress in this area later. (333/82-15-15)
 - f. Although the licensee maintains an equipment history file for safety-related equipment, there is also no formal program for review of completed maintenance actions to assess the adequacy of PM items, to identify repetitive failures of parts and components, and to identify design deficiencies. The licensee intends to make this type of effort an element of the PM program.

10. Review of Periodic and Special Reports

Upon receipt, the inspector reviewed periodic and special reports. The review included the following: Inclusion of information required by the NRC; test results and/or supporting information consistent with design predictions and performance specifications; planned corrective action for resolution of problems; reportability and validity of reported information. The following periodic report was reviewed:

-- Operating Status Report for the month of June 1982, dated July 6, 1982.

No violations were observed.

11. Exit Interview

At periodic intervals during the course of this inspection, meetings were held with senior facility management to discuss inspection scope and findings. On July 30, 1982, the inspectors met with the licensee representatives (denoted in paragraph 1) and summarized the scope and findings of the inspection as they are described in this report.

ENCLOSURE 1

Maintenance Program Procedures Reviewed

Work Activity Control Procedures

- 10.1.1 Procedure for Control of Maintenance, Revision 5
- 10.1.2 Equipment & personnel Protective Tagging, Revision 4
- 10.1.7 Housekeeping and Cleanliness Control, Revision 2
- 10.1.10 Control of Combustibles & Flammable Material, Revision 1

Maintenance Department Standing Order

- No. 3 Initiation of Preventive Maintenance, dated July 1979, Revision 0

Quality Assurance Procedures

- 2.1 Quality Assurance Program Scope, dated February 11, 1982, Revision 1
- 10.1 Inspection of Quality Related Activities, July 15, 1981, Revision 0

Administrative Procedure

- 3.2 Control of Special Process Procedures, Revision 1

Nondestructive Examination Procedures

- 1.1 Nondestructive Examination Personnel Qualification & Certification Procedure, dated March 25, 1981, Revision 6
- 5.1 Preparation & Processing of Quality Assurance Nondestructive Examination Procedures, dated January 17, 1978, Revision 0
- 9.1 General Requirements for Liquid Penetrant Examination, dated March 25, 1982, Revision 2
- 9.2 General Requirements for Magnetic Particle Examination, dated March 25, 1982, Revision 2
- 9.3 General Requirements for Radiographic Examination, dated March 25, 1982, Revision 1
- 9.4 General Requirements for Ultrasonic Examination, dated March 25, 1982, Revision 2
- 9.5 General Requirements for Visual Inspection, dated January 17, 1978, Revision 0

Welding Support Procedures

- WSP 01 Control of Welding Material, dated November 8, 1979, Revision 1
- WSP 02 Performance Qualification of Welders, dated September 1, 1978, Revision 0
- WSP 03 Qualification of Welding Procedure Specification, dated September 1, 1978, Revision 0

ENCLOSURE 1 (continued)

Welding Support Procedures (continued)

WSP 04 Control of Welding and Cutting, dated April 13, 1981, Revision 1
WSP 05 Welding Administration and Examination, dated November 5, 1979,
Revision 0

Operations Department Standing Order

ODSO 04 Shift Relief and Log Keeping, dated June 9, 1982, Revision 16