

U. S. NUCLEAR REGULATORY COMMISSION

Region I

Report No. 82-17

Docket No. 50-334

License No. DPR-66

Priority --

Category C

Licensee: Duquesne Light Company

435 Sixth Street

Pittsburgh, Pennsylvania 15219

Facility Name: Beaver Valley Power Station, Unit 1

Inspection At: Shippingport, Pennsylvania and Aliquippa, Pennsylvania

Inspection Conducted: July 26-30, 1982

Inspectors: G.W. Meyer
G. W. Meyer, Reactor Inspector

8-17-82
date signed

Approved By: D.L. Capton
D. L. Capton, Chief, Management Programs
Section, DETP

8/19/82
date signed

Inspection Summary:

Inspection on July 26-30, 1982 (Report No. 50-334/82-17)

Areas Inspected: Routine, unannounced inspection by a region-based inspector of licensee actions on previous inspection findings; audit program; organization; and quality assurance program review. The inspection involved 35 hours of inspection including 31 hours onsite, 2 hours offsite, and 2 hours at the Aliquippa training facility.

Results: Noncompliance: None in three areas.

DETAILS

1. Persons Contacted

J. Carey, Vice President, Nuclear Division
C. Ewing, Quality Assurance Manager
S. Fenner, Director, Operations Quality Control
D. Hunkele, Director, Quality Assurance (QA)
*J. Kowalski, Offsite Review Committee (ORC) Coordinator
*F. Lipchick, Senior Compliance Engineer
*A. Mizia, Senior QA Engineer
*D. Roman, Senior QA Engineer
*B. Sepecak, Safety and Licensing Engineer
*J. Sieber, Manager, Nuclear Safety and Licensing
P. Valenti, Technical Advisory Engineer (Acting)
J. Vasselo, Director, Nuclear Division Training

NRC

*W. Troskoski, Resident Inspector

*present at the exit interview conducted on July 30, 1982

2. Licensee Reaction on Previous Inspection Finding

(Closed) Inspector Followup Item (334/81-29-25) Need to utilize an audit plan to scope each quality assurance (QA) audit. The inspector reviewed procedure QAI 18.2.1, "Planning of Audits," Rev. 6, June 30, 1982, which prescribes that an audit plan be prepared and approved prior to preparation of the audit checklist. The audit plan becomes part of the record of each audit. The inspector verified the implementation of QAI 18.2.1 by reviewing the audit plan for audit BV-1-82-30. This item is closed.

(Closed) Inspector Followup Item (334/81-29-26) Procedural requirement to evaluate the need for additional auditor training or the use of technical specialists as part of each audit. The inspector reviewed QAI 18.1.1., "Audit Schedules", Rev. 7, June 30, 1982, to verify that the technical qualifications of the auditors assigned to each audit will be evaluated as part of the audit scheduling function. This item is closed.

(Closed) Inspector Followup Item (334/81-29-27) Evaluation of the effectiveness of each audited program element and documentation of the evaluation in the audit report. The inspector reviewed QAI 18.2.2, "Conduct of Audits," Rev. 5, June 30, 1982 and QAI 18.2.3, "Reporting of Audits," Rev. 9, June 30, 1982 to verify that QA procedures address the evaluation and reporting of the effectiveness of the audited QA program element. The inspector reviewed four audit reports (BV-1-82-01, -07, -10, -16) to verify that an evaluation statement about effectiveness was included in the audit report. This item is closed.

(Closed) Inspector Followup Item (334/81-29-28) Lack of trending of audit findings. The licensee has initiated a program to trend the audit findings and report the trending results as part of the semi-annual QA report to management. The inspector reviewed the Summary of Cause Codes on Beaver Valley (BV) Audits contained in the QA Department Semi-Annual Report for First Half of 1982. This item is closed.

(Closed) Inspector Followup Item (334/81-29-29) Need to provide more guidance and review of audit program by the Offsite Review Committee (ORC). The licensee representatives stated that increased emphasis upon ORC audit responsibilities, as prescribed in the Technical Specifications, would be provided by the assignment of a subcommittee of the ORC to review audits and inspections. The inspector reviewed the Audits and Inspections Subcommittee Charter, Rev. 1, July 29, 1982 to verify the proper assignment of responsibilities and authority to the subcommittee. This item is closed.

(Closed) Violation (334/82-01-02) Failure to provide a program for inspection of operations. The licensee letter to the NRC dated April 30, 1982 identified an inspection program for operations composed of inspections by Shift Technical Advisors (STA's) of routine plant activities and operating surveillance tests and by quality assurance personnel of the specific activities such as chemistry evolutions. The inspector reviewed Technical Advisory Procedure TAG 1.0, Shift Technical Advisor Activities, Rev. 1, June 17, 1982 and Quality Assurance Audit BV-1-82-07. This item is closed.

(Closed) Violation (334/82-01-04) Adequacy of audit program with respect to coverage, technical qualification of auditors, and observations of operations and maintenance activities. The licensee letter to the NRC dated April 30, 1982 describes the corrective actions of a matrix of planned audits versus the eighteen criteria of 10 CFR 50, Appendix B, a evaluation of auditor technical qualifications on an individual audit basis, and an emphasis on actual observation of performed activities during audits. The review of licensee corrective actions for audit coverage is documented under violation (334/82-01-05). The review of auditor technical qualifications is documented under Inspector Followup Item (334/81-29-26). The inspector reviewed audit BV-1-82-07 which included the observation of a chemistry sample performed on the Refueling Water Storage Tank. Also the inspector noted that the audit plan for audit BV-1-82-30, included directions to observe an activity performed under the Environmental Procedures Manual. Further the inspector reviewed QAI's 18.2.1 and 18.2.2 to verify that procedures were revised for performing and documenting the observations. This item is closed.

(Open) Inspector Followup Item (334/81-29-30) Comprehensive management audit of QA program. The licensee representative stated that this task has been assigned to the Cooperative Management Audit (CMAP) audit to be performed by October, 1982. This item is open pending completion of the planned CMAP audit and subsequent review of the audit by NRC:RI.

(Open) Violation (334/82-01-05) Inadequate coverage of audits to meet Technical Specification requirements 6.5.2.8.b. and d. for areas of performance, training, and qualification of facility staff and of activities of the Quality Assurance Program. The licensee letter to the NRC dated April 30, 1982 states that a revised audit checklist was developed to ensure adequate coverage of staff performance, training, and qualification during Audit BV-1-82-10 completed in April, 1982. This revised checklist will form the basis for the checklists of subsequent audits in this area. The inspector reviewed Audit BV-1-82-10 and the associated checklist to verify adequate coverage of staff performance, training, and qualification. This aspect of the violation is closed.

The licensee letter stated that audit coverage of the QA Program activities will be upgraded by means of a matrix of planned audit areas versus the 18 criteria of 10 CFR 50, Appendix B. Development of the audit matrix is targeted for completion by September 30, 1982.

In addition, the licensee states that management overview of Technical Specification audit responsibilities will be improved by means of an Audits and Inspections Subcommittee of the Offsite Review Committee (ORC). The review of this subcommittee is documented under Inspector Followup Item (334/81-29-19).

This item is open pending completion of a matrix of audits and the 18 criteria and subsequent NRC:RI review.

3. Audits

a. Reference

The requirements governing the performance of quality assurance audits of safety-related areas are specified in the following documents:

- 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants
- Technical Specifications, Section 6, Administrative Controls
- Regulatory Guide 1.33/ANSI 18.7 - 1972; Quality Assurance Program Requirements
- Regulatory Guide 1.144/ANSI N45.2.12; Auditing of Quality Assurance Program

b. Program Review

The above documents specify that audits achieve the following:

- The content of audit reports clearly defines the scope of the audit and the results.

- Audits are conducted by trained personnel not having direct responsibility in the area being audited.
- Frequency of audits is in conformance with Technical Specifications and the QA program.
- Appropriate followup actions (including reaudit, if necessary) are being taken, are in progress or are being initiated.
- The audited organization's response to the audit findings is in writing, is timely, and adequately addresses the findings and recommendations.

The inspector reviewed the following procedures to verify that the licensee maintains an administration system to meet the above requirements.

- OP-1, Operations Quality Assurance Program
- JP-16, Audits
- QAI-16.1.2, Audit Followup Report System
- QAI-18.1.1, Audit Schedules
- QAI-18.2.1, Planning of Audits
- QAI-18.2.2, Conduct of Audits
- QAI-18.2.3, Reporting of Audits

c. Implementation

The inspector reviewed the following areas to verify compliance with the audit program requirements.

- 1982 Schedule of Audits
- Organization Chart for Operations QA Department
- Audit files, including checklist, report, and response for four audits (BV-1-82-01, -07, -10, and -16)
- Lead auditor certifications for six QA personnel
- QA Department Semi-Annual Report for First Half of 1982

d. Findings

No violations were identified.

4. Organization

a. Reference

The following documents describe the licensee organization and the qualifications of the various positions:

- Technical Specifications, Section 6; Administrative Controls
- ANSI N18.1-1971; Selection and Training of Nuclear Power Plant Personnel

b. Program Review

The inspector reviewed the Operations Quality Assurance Manual (OP's-1 to -16) to verify that the responsibilities of the licensee management were specified and that the structure of the organization was consistent with the Technical Specifications.

c. Implementation

The inspector reviewed the qualifications of two managers, two superintendents, and seven directors/supervisors to verify that they met the education and experience requirements of ANSI N18.1-1971. During review of other areas, the inspector verified that the actual responsibilities, authorities, and lines of reporting of the management were consistent with the Technical Specifications and Operations Quality Assurance Manual. Further, the inspector reviewed a selective sample of procedures which implemented the Operations Quality Assurance Manual to verify that they were consistent and were properly understood by licensee personnel.

d. Findings

No violations were identified.

5. Quality Assurance Program Review

a. Reference

The requirements governing the quality assurance program for performance of quality control inspections and surveillances of safety-related areas are specified in the following documents:

- 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants
- Regulatory Guide 1.30/ANSI N45.2.4 - 1972, Quality Assurance Requirements for Inspection and Testing of Instrumentation and Electrical Equipment

- Regulatory Guide 1.33/ANSI N18.7 - 1972, Quality Assurance Program Requirements
- Regulatory Guide 1.58/ANSI N45.2.6 - 1973, Qualification of Inspection Personnel
- Regulatory Guide 1.116/ANSI N45.2.8 - 1975, Quality Assurance Requirements for Inspection and Testing of Mechanical Equipment

b. Program Review

The above documents specify that quality control (QC) work achieve the following:

- inspections are performed by trained personnel, independent of the work being inspected and qualified for the applicable inspection
- administrative procedures provide sufficient guidance to direct the overall inspector effort
- detailed instructions are used to ensure thorough inspections
- documentation exists for the results of the inspection.

The inspector reviewed the following procedures to verify that the licensee maintains an administrative system to meet the above requirements:

- OQC-10.1; OQC Surveillance of Plant Maintenance
- QAI-18.3.2; Quality Assurance Surveillances

c. Implementation

The inspector reviewed the following areas to verify compliance with the quality control (QC) program requirements:

- Operations QC organization chart
- Certifications of seven QC personnel
- 29 QC General Inspection Reports completed in July, 1982
- QA Department Surveillance Log
- 17 QA Surveillance Reports, completed between February and April, 1982.

A licensee representative stated that the QC Department goal is that 100% of corrective maintenance jobs receive some QC inspection and that this goal is achieved with infrequent exceptions.

d. Findings

No violations were identified.

6. Management Meetings

Licensee management was informed of the scope and purpose of the inspection at an entrance interview conducted on July 27, 1982. The findings of the inspection were periodically discussed with licensee representatives during the course of the inspection. An exit interview conducted on July 30, 1982 (see Paragraph 1 for attendees) at which time the findings of the inspection were presented.