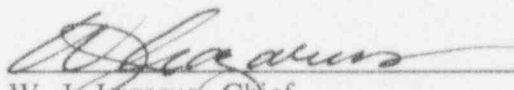


U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report Number: 50-309/94-01
Docket Number: 50-309
Licensee Number: DRP-36
Licensee: Maine Yankee Atomic Power Company
83 Edison Drive
Augusta, Maine 04336
Facility: Maine Yankee Nuclear Generating Station
Inspection Dates: January 1 to February 5, 1994
Inspectors: J. Yerokun, Senior Resident Inspector
W. T. Olsen, Resident Inspector

Approved By:


W. J. Lazarus, Chief
Reactor Projects Section 3B

2/23/94
Date

Scope: Resident inspection of plant activities including operations, maintenance and surveillance, engineering and technical support, and overall plant support.

Overview: See executive summary.

EXECUTIVE SUMMARY

Operations

Performance in this area continues to be strong. Maine Yankee operated the plant safely and continued to closely monitor the leak from RCS loop 1 hot leg isolation valve packing. This leak has presented no significant safety concern. Containment inspection was performed in a well controlled and safe manner.

Maintenance and Surveillance

Maintenance activities were well performed. Troubleshooting activities were controlled by the work order process and were being implemented properly. Surveillance activities were timely and in accordance with station directives and procedures. Maine Yankee has an effective on line leak repair process for high temperature and pressure systems. However, closer supervision of contractor personnel performing the repairs may be appropriate.

Engineering and Technical Support

Good corrective actions were implemented regarding the 4160 volts circuit breaker problems demonstrating a good safety perspective. However, the licensee did not aggressively pursue discrepancies with service water pumps flow data.

Plant Support

Radiological controls, security, and emergency preparedness continue to be effectively implemented.

Safety Assessment/Quality Verification

Maine Yankee's daily (8:00 a.m.) meetings was a significant strength in maintaining a good safety perspective. Management knowledge and involvement with issues were very evident. Plant operations review committee (PORC) maintained a good safety perspective.

Maine Yankee's Quality Control department did not demonstrate a strong safety perspective in initially choosing not to observe an ongoing maintenance activity involving a temporary modification in all safety related 4160 volts circuit breakers.

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DETAILS

1. OPERATIONS

The plant was operated at full power during this inspection period except from January 6, to January 7, 1994 when power was reduced to 75% to backflush the condenser and test the turbine valves.

On a daily basis, inspectors verified adequate control room staffing, appropriate access control, adherence to procedures and technical specifications limiting conditions for operation, and operability of protective systems, including emergency power source. The inspectors also verified operability of selected Engineered Safety Features (ESF) trains and assessed the condition of plant equipment, radiological controls, security and safety. The inspectors reviewed some safety-related tagouts, chemistry sample results, shift turnovers, portions of containment isolation valve lineup, and the posting of notices to workers. The inspectors evaluated plant housekeeping and cleanliness. The inspectors monitored the status of control room annunciators and radiation monitors to ascertain that they were being maintained adequately.

During the inspection period the inspectors conducted backshift inspection on 1/3, 1/11, 1/12, 1/13 and 1/26, and deep backshift inspection on 1/17, 1/19 and 2/1.

1.1 Reactor Coolant System (RCS) Isolation Valve Leakage

On various occasions, the inspectors verified that Maine Yankee was properly monitoring the leakage from RCS Loop 1 Hot Leg Isolation Valve, RC-M-11, packing gland. This leak was noted following the 1993 refueling outage. Leakage from the packing is diverted to the pressurizer quench tank as designed. Maine Yankee has been monitoring the trend of quench tank level and conservatively attributing the tank volume increase to leakage from RC-M-11. The leakage rate has remained minimal at about .023 gpm. Overall RCS leakage since the refueling outage has also remained minimal at about .3 gpm. RCS indicated leakage is limited to 10 gpm identified leakage in Maine Yankee Technical specification section 3.14, Primary System Leakage. The inspectors were satisfied that Maine Yankee was properly monitoring the leak from RC-M-11 packing and that this leak has presented no significant safety concern.

The inspectors inspected accessible High Pressure Safety Injection (HPSI) and Low Pressure Safety Injection (LPSI) isolation valves to ascertain that they were well maintained, in good physical condition and that they did not exhibit any leakage. The inspectors observed valves HSI-M-11, 12, 21, 22, 31, 32, and LSI-M-11, 21, and 31. The valves appeared to be in good physical condition with no indication of any external leakage. The control operators demonstrated that they were well aware of the leakage potential and noted that early indications of the valves' internal leakage were available in the control room through pressure indicators PI-301 and 303 for the HPSI valves and PI-354K for the LPSI valves.

Additionally, there are check valves between these valves and the RCS pressure boundary. The inspectors concluded that Maine Yankee was operating the plant safely relative to RCS leakage and without any high-to-low pressure interface systems isolation valves leakage.

1.2 Bi-Weekly Containment Inspection at Power

On January 11, 1994, the inspector toured the reactor containment building while the station was at power. Prior to entry, Maine Yankee radiation protection personnel conducted a thorough briefing addressing all radiation levels, known hot spots, contaminated areas and airborne radiation levels. All personnel entering the containment had the appropriate dosimetry including neutron dosimetry.

All areas toured inside the containment were clean. Equipment was operating properly with no visible leaks or abnormal noise. The inspector verified that all high radiation areas were locked and radiation protection personnel were cognizant of the high radiation dose rates. During the inspection, Maine Yankee maintenance personnel repaired a section of ventilation duct associated with fan 17-3 per station work order number WO 94-0092. A seam in the duct work had opened and plant engineering personnel recommended the use of a strongback fabricated from 3" channel iron to repair the split. The inspector concluded that the containment inspection was performed in a well controlled and safe manner. No inadequacies were identified.

1.3 Maine Yankee Operations Information (MYOIN) System

The inspector reviewed some Maine Yankee Operations Information (MYOIN) postings to ascertain that they were current, accurate and presented no conflicting instructions to the operators. This review was performed after the inspector observed several "information" postings in the control room. The control room operators were aware of the information posted and did not consider them to be of any distraction from performing their duties. The MYOIN system was well controlled per procedure number 1-300-2, Maine Yankee Operations Information System. A log of all postings is maintained in the control room and reviewed monthly by operations supervision to ensure that postings are updated when required and removed when no longer applicable. The inspector did not identify any problems or express any concerns during this review and was satisfied that the MYOIN system was being implemented properly without any compromise on the safe operation of the plant.

2. MAINTENANCE AND SURVEILLANCE

The inspectors reviewed and observed maintenance and problem investigation activities to verify compliance with regulations as well as administrative and maintenance procedures. The inspector ascertained that maintenance activities on safety related equipment were

performed in accordance with approved work order requirements, codes and standards, with proper QA/QC involvement, proper safety tag and jumper use, and correct equipment alignment.

The inspector witnessed surveillance testing activities and ascertained that they were performed in accordance with technical specification requirements, codes and standards and administrative and surveillance procedures. The inspector observed portions of the following:

- WO 94-00124, P-14B High vibration on charging pump motor step-up gear
- WO 94-00442, P-10B Outboard packing leaking and broken packing follower stud on PCCW pump
- WO 94-00318, MG-1B Troubleshooting
- WO 93-04576, DG-1A PM
- WO 94-00042, Installation of Temp. Mod.Jumpers on 4KV Circuit Breakers
- WO 94-00092, Repair of containment recirculation Fan 17-3 Duct

- Surveillance Procedure 3-1-2.9, ECCS Routine Testing-Service Water Pump Test
- Surveillance Procedure 3-1-4.A, DG-1A Surveillance Testing

Maine Yankee personnel performed the observed maintenance and surveillance activities in accordance with station directives and procedures.

2.1 Troubleshooting Activities (TI-94-01)

The inspectors reviewed Maine Yankee's Troubleshooting process to ascertain that troubleshooting activities at the plant were being adequately controlled and implemented. The inspectors focused on maintenance department troubleshooting activities. In maintenance, the lead responsibility for troubleshooting resides with the section (Electrical, Mechanical or I&C) that has the task involved. Procedure No. 0-16-3, Work Order Processing Procedure, establishes the administrative controls for the control of troubleshooting activities. While there are no specific troubleshooting procedures, each group has procedures that address the group's implementation of 0-16-3. Overall, troubleshooting activities are controlled and documented in maintenance work orders. The boundaries for the troubleshooting activities are limited by the scope and safety tagging of the work order.

Electrical and I&C departments developed separate sets of guidance to aid in performing troubleshooting activities. These sets of guidance were not formally in any procedure, but planners are aware of them and attach applicable steps to the work order during the planning process. There were no specific steps provided to preclude unauthorized repairs. However, this is controlled by the work order used for conducting the troubleshooting activities. As found and as left conditions are recorded in the work order. The control ensures that if additional work outside the scope of the work order is required, the work order is revised

and reprocessed through the appropriate channels. Procedure 0-16-3 (step 5.1.1) specifically precludes the performance of any corrective maintenance during diagnostic activities. No corrective maintenance may be performed during troubleshooting.

The inspectors reviewed some completed troubleshooting activities and verified that they were performed in accordance with the established work order controls. The inspectors also observed on-going activities (such as with MG 1B) that involved troubleshooting and verified that they were conducted per established controls. Based on the reviews performed and activities witnessed, the inspectors concluded that troubleshooting activities at Maine Yankee were controlled by the work order process and were being implemented properly.

2.2 On-Line Leak Repair for High Temperature and Pressure Systems

During the inspection period the inspector reviewed Maine Yankee's program for controlling on-line leak repair activities. Maine Yankee currently controls on-line leak repair with plant procedure 0-16-3, Work Order Processing, which specifically lists on-line leak repair sealing as a Level 1 maintenance. Level 1 maintenance requires plant engineering and quality programs review prior to work commencement. As part of the review process, plant procedure 17-226, Technical Evaluations, requires that a screening process is performed to address several issues such as the following:

- Does the leakage present a hazard to personnel or possibility of further equipment damage?
- Will the repair be used on a safety class 1, 2, or 3 component to temporarily repair a flaw in an ASME boundary?
- Has the leak repair device been seismically evaluated for safety class components and systems?
- Will injection of leak sealant impair the component from performing its intended function?
- Will the use of leak sealant and clamps increase the probability of stress corrosion (autoclave) on the pressure retaining fasteners?
- Will plant components be overpressurized by the specified leak sealant injection pressure?
- Will the failure of the leak sealant device result in a condition more serious than the initial leak?
- Has the maximum amount of leak sealant been determined to ensure that leak sealant will not be injected into the system?

- Has the leak repair procedure been approved by Plant Operations Review Committee (PORC)?
- Is there another way to reduce or stop the leak?

The procedure also requires a 10CFR50.59 determination and an independent review by engineering. Maine Yankee performs on-line leak repair using outside contractors and in accordance with Maine Yankee approved procedures. In addition, Maine Yankee White Tagging Procedure, 0-14-1, requires that Attachment B, Approval For Work Without White Tags be completed and evaluated for PORC approval. Station procedure 24-105-4, Steam Leak Safety, requires pre-job briefings with the Maine Yankee Industrial Safety Coordinator to determine methods, precautions and special equipment. Radiological concerns are addressed by the Maine Yankee Radiological Work Permit process and the leak seal technicians must be trained radiation workers as required by the station radiation protection program. If a reinjection is required it is controlled by a revision to the original work order or initiation of a new work order. Additional plant engineering and quality programs review is required. Although the contractor is accompanied by a licensee maintenance mechanic, that mechanic has no supervisory responsibility for the work. The details of stopping the leak are determined solely by the contractor. The inspector questioned whether adequate control measures exist for the supervision of leak seal contractor personnel during the injection process. Maine Yankee is evaluating the adequacy of their controls in this area. The inspector had no further concerns at this time.

2.3 4160 Volts Circuit Breakers Temporary Modification

The inspectors observed portions of maintenance activities involving the installation of temporary jumpers in all safety related 4160 volt circuit breakers to bypass charging motor switch, 52-SM/LS. The problem with this switch was discussed in previous NRC inspection report number 50-309/93-28. Maintenance personnel performed the work properly and in accordance with approved work order. The work order (WO 94-0042) contained adequate instructions. Additionally, technical evaluation number 455-93, 4.16 KV circuit breaker charging motor limit switch, was attached to the work order and contained the technical information that addressed the problem, the work to be performed, and the effect of the work on the circuit breakers. When questioned, maintenance personnel demonstrated good knowledge of the work as well as the safety significance associated with it.

However, the inspector noted that there was no Quality Control (QC) department oversight of on-going work activities. There were no hold or witness points designated in the work order during prior QC review. This was considered a weakness in light of the safety significance of the work that involved a temporary modification of all safety related 4160 volts circuit breakers. While the work was relatively simple, the consequence of a common failure was very significant. The inspector discussed this concern with the licensee. QC personnel immediately reevaluated the work package and assigned a QC inspector to observe portions of the remaining work. Additionally, QC personnel reviewed Procedure No. 21-

204, Revision 17, QPD Procedure/Guideline Control and Document Review, and determined that the hold point guidelines (attachment F) did not provide adequate guidance to consider the overall safety significance of work to determine if a hold point was appropriate or not. QC indicated that this procedure would be further reviewed and revised as required to ensure that proper consideration is given to the overall safety significance of work in making a determination of whether to assign a QC hold point or not.

The inspector considered this issue a weakness in Maine Yankee's Quality Control process. Maintenance activities were well performed. No other concerns were identified with this work.

2.4 Failure of Heater Drain Pump Circuit Breaker To Recharge

On February 1, 1994, a Maine Yankee Nuclear Plant Operator (NPO) found the breaker closing spring for Heater Drain Pump P-62A discharged after being cycled from the control room. In light of the recent problems that have been experienced with the 4160 volt circuit breakers, the plant Shift Operating Supervisor (SOS) dispatched the NPO to the protected switchgear room to see if the circuit breaker closing spring had recharged. The NPO reported that it had failed to recharge. This problem has been reported in previous NRC Inspection Reports CC-309/93-23 and 93-28. Maintenance department investigated the failure and identified the following two problems with the circuit breaker:

- The circuit breaker racking mechanism was out of adjustment thereby preventing the circuit breaker interlock mechanism from working properly.
- The circuit breaker interlock switch (52IS) was not operating properly. The purpose of this switch is to allow the circuit breaker closing spring to charge once it is fully racked up onto the electrical bus.

These problems would have prevented the Heater Drain Pump (P-62A) from automatically starting, if required. While the pump is not a safety related component, it could have caused a plant trip if it had failed when called upon to function and a third condensate pump had been unavailable. Maine Yankee immediately verified that closing springs in all 4KV circuit breakers in electrical busses 3,4,5 and 6 were charged. Safety related buses 5 and 6 breakers were checked because the breakers are identical to the non-safety related ones. A station work order was issued to adjust the circuit breaker racking mechanism for P-62A circuit breaker. As a precaution, the circuit breaker for P-62A was replaced with a spare circuit breaker.

Maine Yankee's current long term corrective actions include incorporating this event into Safety Issue Concern (SIC) 93-009 (4KV Circuit Breaker Problems). The inspector reviewed Maine Yankee's immediate and long term corrective actions and determined that they were appropriate for the circumstances and demonstrated a good safety perspective. This is due to the fact that even though the pump is not a safety related component, an unwanted plant trip may have occurred. Also this may indicate an additional failure mechanism for these circuit breakers.

2.5 Repair of Fan 17-3 Duct In The Reactor Containment Building

On January 12, 1994, Maine Yankee maintenance personnel repaired the duct on the discharge plenum for ventilation fan FN-17-3. The repairs were accomplished in accordance with station work order WO 94-0092. A seam opened up on the side next to the wall and required the use of a strongback and an all thread rod to pull the duct back into place. The inspector reviewed the work order, observed the work in containment and determined that the maintenance personnel were knowledgeable of the requirements of the work order. The work was performed adequately.

3. ENGINEERING AND TECHNICAL SUPPORT

3.1 Service Water (SW) Pumps Flow

On January 10, 1994, the inspectors met with Maine Yankee's Corporate Engineering Department personnel to discuss the issues surrounding service water pumps flow. The results of recent flow tests indicated that the service water flowrate might be inadequate during certain periods of the year. Specifically, during the summer periods with high SW inlet temperatures. In December 1993, flows as low as 9,500 gpm were recorded. Considering failure of non-safety piping attached to service water, this measured flow was equivalent to about 8,750 gpm available for the pumps' safety function. The current basis for maximum allowable service water inlet temperature indicates that a measured flow of 10,000 gpm would be expected for adequate pump performance. The inspectors noted that Maine Yankee had not provided any documented evaluations addressing the operability of service water.

Maine Yankee later developed a design basis screen to document their reviews and analysis of the test results and the technical information supporting the operability determination of the pumps. A system operating criteria was also developed. With the measured flowrates corrected to design conditions (design low tide, non-nuclear piping failure and pressure drop across the heat exchangers) design basis limits were identified as follows:

- For Secondary Component Cooling (SCC), 63 degrees with Heat Exchanger (HX) 5B in service and 47 degrees without 5B
- For Primary Component Cooling (PCC), 67 degrees with HX 4A in service and 51 degrees without 4A.

Yankee Nuclear Services Department (YNSD) provided a safety evaluation for interim justification of maximum service water inlet temperatures for degraded service water flow. Based on current SW inlet temperature of less than 40 degrees, Maine Yankee determined that the system was capable of meeting design criteria. The design basis for SW system corresponded to a maximum water inlet temperature of 80 degrees for PCC HX E-4B and SCC HX E-5A and 90 degrees for HX E-4A and HX E-5B at a minimum flow of 10,000

gpm. The adequacy of the assumptions for this design basis and the reasons for the reduced pump flowrates is still under review. The licensee is preparing for a physical inspection of the pumps to determine the reason for reduced performance. This issue is unresolved (50-309/94-01-01).

4. PLANT SUPPORT

4.1 Radiological Controls

Inspectors routinely reviewed radiological controls including Organization and Management, external radiation exposure control and contamination control. The inspectors also monitored standard industry radiological work practices, and conformance to radiological control procedures and 10 CFR 20 requirements. Radiological controls continue to be effectively implemented.

4.2 Security

The inspectors verified that security conditions met regulatory requirements, the requirements of the physical security plan, and complied with approved procedures. The checks included security staffing, protected and vital area barriers, personnel identification, vehicle searches access control, badging, and compensatory measures when required. No discrepancy was identified.

4.3 Emergency Preparedness

The inspectors toured the emergency operations facility and verified that the facility was well maintained and equipped for use during an emergency situation. Required technical information was available in the technical support center. No discrepancies were observed.

5. SAFETY ASSESSMENT/QUALITY VERIFICATION

The inspectors considered Maine Yankee's daily (8:00 a.m.) meetings a significant strength in maintaining a good safety perspective. Issues are properly discussed and brought up to the right level of attention. Management is kept abreast of issues as they develop, affording the licensee good opportunity to correct problems.

5.1 Plant Operations Review Committee (PORC)

On occasions, the inspectors attended PORC meetings to verify that the requirements of technical specifications 5.5 were met and that the committee maintained a focus on safety. The inspectors observed the committee discuss the technical evaluation (No. 455-93) for the 4160 Volts circuit breakers temporary modification on January 6, 1994 at PORC meeting No. 94-001. The committee maintained a good safety perspective.

5.2 Licensee Event Reports (LERs)

The inspectors reviewed LERs which provided the licensee's assessment of recent events. The inspectors verified that the event description was consistent with the events, that Maine Yankee identified the root cause of the event, took timely and appropriate corrective actions, implemented actions to prevent recurrence, addressed generic implications, and met the reporting requirements of 10 CFR 50.73. The following LERs were reviewed:

- LER 93-022, Control Room Ventilation Trains Inoperable due to Preventive Maintenance
- LER 93-017, Emergency Diesel Generator Voltage Sensing Relay Wiring Discrepancy

Maine Yankee submitted LER 93-017 as "information only" to address a wiring discrepancy in the diesel generator output circuit breaker voltage relay. This discrepancy eliminated train separation between the diesel generators contrary to the electrical separation design criteria specified in the Maine Yankee final safety analysis report (FSAR). This is not a deviation from the General Design Criterion in effect at the time of construction of the plant. Maine Yankee implemented a temporary modification to provide a separate ground return path for the affected relays and initiated a design change to make the change permanent.

5.3 (Closed) Unresolved Item Number 50-309/92-12-01

In section 1.1 of previous NRC inspection report number 50-309/92-12, the inspectors addressed Maine Yankee's actions relative to activities involving improper log keeping by auxiliary operators (AO). The failure by AOs to adhere to procedure 1-200-10-1 was left unresolved pending NRC review.

By letter dated October 15, 1993, to Maine Yankee, NRC identified this issue as a non-cited violation. The NRC decided not to assign a severity level to the violation of requirement by falsification of plant records because, adequate corrective actions were already taken by the licensee. This item is closed.

5.4 (Closed) Unresolved Item Number 50-309/93-04-01

In section 5.0 of previous NRC inspection report 50-309/93-04, Maine Yankee's failure to document and review observed differences between actual total dynamic head (TDH) and TDH derived from manufacturer's curves for the Containment Spray (CS) and low Pressure Safety Injection (LPSI) pumps was identified as an unresolved item.

Prior to this, Maine Yankee had incorporated into the Supplemental Equipment Reliability Program (SERP), new data sheets to serve in evaluating and trending refueling full flow test results for the CS, LPSI, HPSI, and AFW/EFW pumps. The 1992 refueling test data for these pumps were compared to their respective manufacturer's pump curves. Discrepancies

identified with the LPSI and CS pumps flow were attributed to the main control board (MCB) flow meters indicating lower flow than actual. Maine Yankee determined that after adjustment for flow instrument accuracy, the pump data were within the pump curve parameters. These flow meters were calibrated during the 1993 refueling outage. Procedure 3.1.15.3, Revision 20, ECCS Operational Pump Flow and Check Valve Testing, was modified such that pump flows are recorded from computer points for more accurate flow indication. The inspector verified that the equipment reliability program and procedure 3.1.15.3 had been revised as stated. The inspector also reviewed Maine Yankee's evaluation of the 1992 and 1993 test results and was satisfied that this issue had been properly addressed. This item is closed.

5.5 (Closed) Violation Number 50-309/93-03-01

In previous NRC inspection report 50-309/93-03, the inspectors identified a violation of NRC requirements when several valves in the emergency feedwater system were not locked as required by the station locked valve procedure and plant technical specification section 3.6, Emergency Core Cooling and Containment Spray Systems.

As an immediate corrective action, Maine Yankee' operations personnel conducted a walkdown of the emergency and auxiliary feedwater systems and identified three other valves requiring locking devices. These valves were immediately locked as required by station procedure 1-200-1, Administrative Control of Valves, Attachment D. In addition, Maine Yankee management directed the operations department to commence a review of all station safety related system operating and surveillance procedures to ensure all valves requiring locking devices were in conformance with the station technical specifications. On February 1, 1994, Maine Yankee operations management personnel provided the inspectors the results of the station review and the status of corrective actions that have been accomplished to resolve this issue. Maine Yankee generated a data base to include all emergency core cooling systems (ECCS) valves. Station operations personnel walked down all systems included in the data base and verified that all valves were locked as required. In addition, all non-safety system operating procedures and surveillances were reviewed to identify any other support system valves that would require locking devices. After Maine Yankee completed this review several temporary procedure changes were issued to incorporate identified discrepancies. The inspector determined that Maine Yankee's actions to resolve this issue were appropriate and comprehensive with the proper safety perspective. The inspector had no further questions regarding this matter. This item is closed.

6. ADMINISTRATIVE

6.1 Persons Contacted

During this report period, inspectors conducted interviews and discussions with various licensee personnel, including plant operators, maintenance technicians and the licensee management.

6.2 Summary of Facility Activities

NRC Inspection 50-309/94-02 in radiological controls was conducted during this inspection period.

On January 13 and February 3, 1994, NRC regional and headquarters management visited the plant. They observed plant activities, toured the plant and held discussions with various Maine Yankee management personnel.

6.3 Interface with the State of Maine

Periodically, the resident inspectors and the onsite representative of the State of Maine discussed findings and activities of their corresponding organizations. No unacceptable plant conditions were identified.

6.4 Exit Meeting

Inspectors periodically held meetings with senior facility management to discuss the inspection scope and findings. At the conclusion of the inspection, the inspectors also presented a summary of findings for the report period. The exit meeting was held on February 8, 1994, and attended by the following:

Maine Yankee

R. Blackmore, Plant Manager
R. Bickford, Manager, Maintenance
J. Connell, Supervisor, Licensing
J. Frothingham, Manager, Quality Programs
H. GilPatrick, Section Head, Corporate Engineering
G. Leitch, Vice President, Operations
L. McCabe, Engineer, Corporate Engineering
J. Weast, Engineer, Licensing

State of Maine

P. Dostie, State Nuclear Safety Inspector