

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

NOTICE
3 NOV 1978

Report No. 50-334/78-26

AS OF _____
REGION I HAS NOT OBTAINED PROPRIETARY
CLEARANCE IN ACCORDANCE WITH 10 CFR 279

Docket No. 50-334

License No. DPR-66

Priority --

Category C

Licenses: Duquesne Light Company

435 Sixth Street

Pittsburgh, Pennsylvania 15219

Facility Name: Beaver Valley Power Station - Unit 1

Inspection at: Shippingport, Pa. and Corporate Offices, Pittsburgh, Pa.

Inspection conducted: October 2-6 and 10-12, 1978

Inspectors: H. Kister
R. S. Markowski, Reactor Inspector

11/1/78
date signed

H. Kister
B. Beckman, Reactor Inspector

11/1/78
date signed

Approved by: H. Kister
H. Kister, Chief, Nuclear Support
Section No. 2, RO&NS Branch

date signed
11/1/78
date signed

Inspection Summary:

Inspection on October 2-6 and 10-12, 1978 (Report No. 50-334/78-26)

Areas Inspected: Routine, unannounced inspection by regional based inspectors of the Quality Assurance Program (QAP) implementation including: QAP changes; design changes/modifications; procurement; records management; and, audits. The inspection also included followup of previously identified unresolved items and items of noncompliance; and, administrative controls associated with the Equipment Control and SIS reset feature. The inspection involved 91.5 inspector-hours onsite and 10.5 inspector-hours at the corporate offices by two NRC regional based inspectors.

Results: Of the nine areas inspected, no items of noncompliance were identified in eight areas; one recurrent item of noncompliance was identified in one area (Infraction - failure to comply with Equipment Control Procedures - paragraph 10.c).

DETAILS

1. Persons Contacted

*R. Balcerek, Maintenance Supervisor
D. Beron, Storekeeper
*R. Burski, Senior Engineer - BVPS
R. Conrad, Senior Engineer - BVPS
C. Ewing, QA Supervisor
*W. Glidden, QA Engineer
*J. Hrivnak, Station QA
J. Huesmann, Project Team Admin. Coordinator
*E. Kurtz, Sr. QA Engineer
*F. Lipchick, Station QA
*J. Marriott, QA Records Supervisor
*A. Mazukna, QC Supervisor
J. Northrup, Admin. Assistant - Westinghouse
R. Prokopovitch, Reactor Engineer
*M. Prisuta, Management Consultant
F. Salmon, Mech. Eng. Dept. Head
*L. Schad, Operations Supervisor
N. Shaw, QA Engineer
*N. Sikorski, QA Supervisor
*E. Siskin, Project Manager - S&W
T. Slavic, Instrument Engineer
N. Tonet, Engineer
*H. Van Wassen, Project Manager - DLC
J. Waslousky, QA Engineer
*R. Washabaugh, Manager - QA Department
*J. Werling, Station Superintendent
H. Williams, Chief Engineer

Other Accompany NRC Personnel

T. Foley, Reactor Inspector
H. Kister, Chief, Nuclear Support Section No. 2, RO&NS Branch

* denotes those present at the exit meeting.

2. Licensee Action on Previous Inspection Findings

(Closed) Infraction (334/77-24-02): Contrary to Technical Specification 6.5.2.8.c, audits of corrective actions not performed by/under the cognizance of the Offsite Review Committee. This item was previously

reviewed by NRC:RI as documented in Inspection Report No. 50-334/78-09. The inspector again reviewed the ORC audits pursuant to the above Technical Specification and determined that the audits are now being performed in a manner consistent with the requirements.

Subsequent to Inspection No. 50-334/78-09, additional clarification of the subject Technical Specification became available and was provided to the licensee's ORC Vice Chairman, ORC Secretary and others during the course of this inspection. In summary, this information included:

- The acceptability of using a sample of a sufficient size to determine that deficiencies are being corrected on a systematic basis.
- The above sample is to be drawn from a field that encompasses all corrective actions.
- The sample is further defined by the determination that the deficiencies "affect nuclear safety" in that the deficiencies chosen could adversely affect the required performances of safety related structures, systems, components, or methods of operation. Examples of such deficiencies and appropriate thresholds of significance were discussed.
- Clarification of associated administrative aspects of the audits such as delegation of audit performance, audit methodology, and documentation of the basis of the audit and audit subjects.

(Closed) Unresolved item (334/77-24-05): Procedure to control the transmittal of controlled drawings from the Project Manager's Office to the BVPS site to be issued. Activities at the site pursuant to Engineering Management Procedure No. 5.4 were previously reviewed as documented in Inspection Report No. 50-334/78-09. The inspector reviewed the activities associated with this procedure as conducted by the Project Office and found them consistent with the procedural requirements. A new unresolved item associated with drawing control was, however, identified during this inspection as documented in paragraph 5.c of this report.

(Closed) Unresolved item (334/78-09-01): Review ORC Meeting Minutes for documentation of reviews of QA Audit Findings which identify violations pursuant to Technical Specification 6.2.7.e. The inspector reviewed meeting minutes prepared since the date of the last inspection and determined that sufficient identification of this review function was made to provide documentary evidence of completion of the reviews.

(Closed) Unresolved item (334/78-09-02): Review licensee action to provide timely update of engineering drawing files for replacement of out of date prints. The inspector confirmed that the licensee's actions were consistent with the commitments made during Inspection No. 50-334/78-09 and documented in the associated report. The inspector noted that the station had updated its controlled drawing files with the exception of approximately 100 aperture cards which were on order. Hard copy drawing files had been updated.

(Closed) Unresolved item (334/78-09-03): Review ORC action and involvement in followup activities to OA Program Management Audit per Technical Specification 6.5.2.8.d. ORC review and followup of audit activities were reviewed and determined to be consistent with the requirements of the subject Technical Specification.

(Closed) Unresolved item (334/78-09-04): Review of implementation of corrective action associated with design control audits. The inspector reviewed the "Response to the General Summation of the Audit Report" dated July 25, 1978. This documented the action to be taken to correct the unsatisfactory implementation of the design control program identified by internal audits. Although preliminary actions had been taken in accordance with the formal response, full implementation has not been effected. For record purposes only, this item will be closed and the implementation of the corrective action will be verified during subsequent NRC inspections as discussed in the unresolved items contained in paragraph 4 of this report.

(Closed) Unresolved item (334/78-09-05): Review licensee's procurement practices for engineering services to be performed on Category I/Level A systems, equipment, or structures. The inspector reviewed the licensee's quality assurance practices in this regard and specifically reviewed the activities associated with the architect-engineer's continuing services contract. The inspector determined that the licensee's current practices appear to be consistent with the requirements of the Quality Assurance Program and ANSI N45.2.13. The inspector reviewed the completed corrective action for CAR 77-3 and determined that the action taken in regard to evaluating the architect-engineer's quality assurance program and his performance prior to being placed on the Qualified Supplier's List was consistent with applicable program requirements.

(Open) Unresolved item (334/78-09-06): Documentation of design verification associated with DCP 0162. The documentation has not been received by the licensee. The licensee representative stated that efforts were made and will be made to secure the appropriate documents. Refer to paragraph 4 of this report for further discussion.

3. Quality Assurance Program Review

The inspectors reviewed, on a sampling basis, the changes made to the below listed Quality Assurance implementing procedures since the last NRC QA inspection on July 21, 1977. The revisions were reviewed for consistency with the licensee's accepted Quality Assurance plan. These procedures also served as the basis for inspection in the areas discussed within this report. During the conduct of the inspection, discussions with licensee personnel indicated that they were aware of and were implementing the procedural changes.

The procedures reviewed were:

- OP-3 Administrative Controls, Revision 4
- OP-4 Station Design Control, Revision 5
- OP-5 Procurement Control, Revision 2
- OP-6 Material Control, Revision 3
- OP-9 Technical Procedure Control for Operations and Maintenance, Revision 1
- OP-10 Maintenance and Modification Planning, Revision 2
- OP-11 Control of Maintenance and Modification, Revision 3
- OP-13 Control of Nonconforming Items, Revision 4
- OP-15 Quality Assurance Records, Revision 1
- OP-16 Audits, Revision 3
- QAI-1.3.1 Review of DLC Administrative Procedures, Revision 4
- QAI-2.1.2 Training of Quality Assurance Staff, Revision 3
- QAI-2.1.3 Training and Qualification of Auditors, Revision 3
- QAI-3.1.1 QA Review of Design Documents, Revision 4
- QAI-4.1.1 QA Review of Procurement Documents, Revision 4
- QAI-5.1 Preparation and Revision of the Quality Assurance Program, Revision 3
- QAI-5.2 Preparation and Revision of the Quality Assurance Department Instructions, Revision 2
- QAI-6.2 Control of Quality Assurance Program Procedures, Revision 1
- QAI-6.3 Control of Quality Assurance Department Instructions, Revision 1
- QAI-7.1.1 Evaluation and Selection of Vendors and Contractors, Revision 3
- QAI-7.1.2 Qualified Suppliers List, Revision 3
- QAI-15.2.1 Quality Assurance Department Review of Suppliers' Nonconformance Dispositions, Revision 0
- QAI-16.1.1 Corrective Action Request, Revision 5
- QAI-16.1.2 Audit Follow-up Report System, Revision 6
- QAI-18.1.1 Audit Schedules, Revision 4

- QAI-18.2.1 Planning of Audits, Revision 3
- QAI-18.2.2 Conduct of Audits, Revision 3
- QAI-18.2.3 Reporting of Audits, Revision 5
- QAI-18.2.5 Planning, Conduct, Reporting and Follow-up of Joint Audits, Revision 1
- SEP1.0 Administrative Guide, Revision 0
- SEP2.0 Procedure Preparation and Control, Revision 0
- SEP2.1 QA Category, QC Level and Documentation Review, Revision 0
- SEP2.2 Routine or Problem Reviews, Revision 0
- SEP2.3 Design Change Control, Revision 0
- SEP2.4 Engineering Coordination, Revision 0
- SEP2.5 Response to NRC Technical Questions, Revision 0
- SEP2.6 Design Change Package Technical Document Control, Revision 0

No items of noncompliances were identified.

4. Design Change/Modification Control

a. References

- The 1977 Management Audit of the Quality Assurance Program, Section III - Procedure OP-4, Design Control and Section IV - Procedure OP-8, Document Control, December 5, 1977. (referred to below as the "Management Audit")
- Response to the General Summation of the Audit Report, Finding 10 and Finding 11, July 25, 1978. (referred to below as the "formal response")
- QA Audit BV-1-78-17, Station Engineering Services, September 13, 1978
- Site Engineering Procedures (SEP) listed in Paragraph 3
- IE Report No. 50-334/78-09, April 24, 1978

b. Introduction

As documented in IE Report No. 50-334/78-09, the Management Audit and internal QA audit BV-1-77-21 had identified unsatisfactory implementation of the design control program.

During the conduct of this inspection, the inspector reviewed the documents identified above and Design Control Packages (DCP) initiated subsequent to the issuance of the Site Engineering Procedures (SEP's) to verify that:

- The corrective action taken for significant conditions adverse to quality was documented and reported to appropriate levels of management.
- That measures were established to assure that the identified deficiencies would be promptly corrected.
- That measures were established to control design changes during the interim period prior to the functioning of the "on site design group."

No items of noncompliance were identified. However, unresolved items as discussed in the subparagraphs below were identified.

- (1) The implementation of the formal response to the Management Audit promulgated by the Vice Presidents of Operations and Engineering and Construction (E&C) was verified to have commenced.

However, the procedure (SEP2.3) being utilized by the Power Station Engineering Group as presently constituted was not consistent with the formal response, (i.e. Finding 10) which stated that station personnel will not be responsible for design.

SEP2.3 at this time procedurally permits assignment of design responsibility and performance of design activities within the Power Station Engineering Group (PSEG).

The inspector requested clarification of the intended organizational alignment of the "On Site Design Group" (OSDG). The OSDG will administratively be part of the E&C division. The Power Station Engineering Group is part of the Operations division and is not and was not intended to become the OSDG. Furthermore, "station personnel" in the context of the formal response meant personnel who administratively report to the Station Superintendent.

Discussions with the Station Superintendent further clarified that the intended function of the Power Station Engineering Group was to provide coordination of the modification effort. Procedurally, this included receipt control of technical documents, field change coordination and transmittal of the design change records back to the Project Team for record update.

The Station Superintendent acknowledged that SEP2.3 appeared to be inconsistent with the formal response and stated that the appropriate SEPs' will be revised to delete the provisions for design performance for Category I design changes by the Power Station Engineering Group.

Pending review of the revised procedures by RI, this item is unresolved (334/78-26-01). The committed completion date is January 31, 1979.

- (2) During the review of Design Change Packages (DCPs) initiated subsequent to the issue of the SEPs (May 1978) the inspector noted that for those DCPs that had been assigned to the PSEG, design activities were performed by major contractors (Architect Engineer, component vendor, etc.).

All the DCP's reviewed were still ongoing in various stages of development and had not been installed.

The inspector identified that the SEP's did not specifically address Section 5.1 of ANSI N45.2.11, External Interface Control. Presently, the PSEG can interface directly with the A-E or other major contractors. The two general areas of concern are interface control of Technical Documents and field change administration. The need for SEP clarification in these areas was identified in QA Audit BV-1-78-17.

The Station Superintendent acknowledged the inspector's finding and stated that the SEP's would be revised to clarify how the provisions of Section 5 of ANSI N45.2.11 would be complied with in the areas of Technical Document control and field change administration.

Pending review of the revised procedures by RI, this item is unresolved (334/78-26-02). The committed completion date for this item is January 31, 1979.

- (3) Subsequent to the acceptance of a completed modification, the Station Engineering Supervisor (PSEG) is required to accumulate the appropriate documents and transmit them to the Project Manager (E&C) for record update.

During the review of receipt logs at the corporate office and files maintained at the site, the inspector noted that the record update process had not been initiated for the majority of Category I modifications completed from late 1977 to present.

The Management Audit, Section IV had identified that DCPs of completed modifications were unsatisfactory. The formal response stated that the records update subsequent to completion of installation would commence consistent with the establishment of the OSEG.

The Station Superintendent acknowledged the inspector's finding and stated that record inventorying and transmittal to the Project Team will commence by November 30, 1978.

Pending verification of this process by RI this item is unresolved. (334/78-26-03)

5. Drawing Control

a. References

- Applicable Procedures as referenced in Paragraph 3
- EMP 5.4, Control of Duquesne Light Issued Technical Documents, Revision 1
- EMP 2.13, Design Drawings, Revision 1
- OAP-1.8, S&W Drawing Controls, Revision 0

b. Implementation Review

The inspector selected and reviewed a sample of safety related engineering drawings to determine that established controls were implemented and that as-built drawings are being maintained. The inspector compared the site drawing indices and files to those maintained at the Project (corporate) Office to ensure that the station's General Office file and Control Room file of controlled drawings were of a revision status consistent with those maintained by the Project Office.

The results of this inspection indicated that, except for drawing revisions yet to be issued as a result of Design Change Packages, the station and Project Office file revision status were consistent.

Although no items of noncompliance were identified, an unresolved item was identified as discussed in paragraph c below.

c. As-built Drawing Status and Index Control

The inspector reviewed the licensee's activities associated with their on-going program to issue and maintain as-built engineering drawings, including:

- Incorporation of construction-related Engineering and Design Change Requests into as-built drawings by the licensee's Architect-Engineer;
- The corrective action in progress for a major drawing audit conducted during late 1977 - early 1978;
- Plans for issuing a revised, composite drawing index;
- Status of incorporating drawing changes associated with Design Change Packages; and,
- Planning in progress to further upgrade as-built drawing quality and accuracy.

During this review, the inspector noted an apparent inconsistency between the station and Project Office drawing control procedures. Quality Assurance Manual implementing procedure OP-8, Document Control, places the responsibility for establishing and implementing document control measures with each department for its respective documents, including drawings. Engineering Management Procedure (EMP) 5.4 and the station's OAP 1.3 individually meet the requirements of OP-8 but appear to be in conflict with each other with regard to the controlled distribution and status control of as-built drawings as discussed below.

EMP 5 places the responsibility for distribution of controlled drawings with the Duquesne Light Project Manager and, in combination with EMP 2.13, provides for the review, approval, issuance/distribution, and indexing of drawings and drawing revisions. The measures provided by these procedures appear consistent with the Project Team's function of technical coordination.

OAP 1.8, however, provides for the station to obtain drawings from either the Duquesne Light Project Team (per EMP 5.4) or directly from their architect-engineer, thus permitting the station to receive and use drawings which may not reflect the most recent information issued and controlled by the Project Office.

The inspector identified two areas of concern regarding the apparent procedure inconsistencies above:

- (1) Since their receipt of the last architect-engineer issued composite drawing index in early 1977, the station and the Project Office have been independently maintaining their respective drawing indices and revision status. The station's index is based upon drawings/revisions received. The independence of the two separately maintained indices does not provide assurance that the proper drawings are being used at the respective locations. The licensee stated that, as a result of the drawing audit findings previously discussed, their architect-engineer is planning to issue an updated, composite index which will be issued to all locations in the immediate future.
- (2) The Project Office administers the updating of drawings to reflect Design Change Packages which have been implemented at the station. This office, in conjunction with the architect-engineer, maintains a drawing change status based upon each Design Change Package. Due, however, to the independent means of drawing control applied by the station, it appears that no mechanism has been formally established to make users of engineering drawings at the station aware that changes may have been made to the station's systems which are not yet reflected on the currently issued drawings.

The inspector noted that the drawing controls presently implemented at the station and Project Office appear to provide sufficient assurance that drawings appropriate to the circumstances are now being used for safety related activities. The continued acceptability of these drawing control measures is, however, questionable based on the anticipated increase in the number of Design Change Packages being submitted for document update and the number of drawing revisions to be issued as a result of the above drawing audit corrective actions. The licensee acknowledged these inspector concerns and stated that the matters would be reviewed and appropriately addressed as part of their on-going efforts in this area.

Pending licensee resolution of the apparent conflicts between EMP 5.4 and OAP-1.8 and the establishment of a uniform method of drawing status identification, including those drawings affected but not yet revised by Design Change Packages, this item is unresolved. (334/78-26-04)

6. Records

a. References

-- Applicable procedures referenced in Paragraph 3.

b. Review

The licensee has identified through his internal audit program that the present records management system does not fully comply with ANSI N45.2.9.

During the conduct of this inspection, several types of records, including maintenance records, modification records, calibration records, audits, onsite review committee meeting minutes, procurement documents, surveillance records and licensee event reports were requested to verify that records are retrievable.

The licensee's QA records management program provides for the station to retain QA records in the station files for up to two years prior to transmittal to the Quality Assurance Department for archival storage. Quality Assurance Audit BV-1-78-2, Finding No. 8, identified that the station is not currently storing the QA records in its possession in accordance with the facility requirements of ANSI N45.2.9 as required by the OQA Program. This finding was confirmed by the inspector.

The proposed corrective action for this finding included evaluation of the present station facilities for adequacy of fire protection and measures to be taken to assure protection of the records for an interim period until a permanent station records facility can be completed. The corrective action is in progress, as is construction of the permanent facility.

The acceptability of station QA records storage in accordance with the requirements of ANSI N45.2.9 is unresolved pending NRC:RI review of the completed corrective action to the above audit findings. (334/78-26-05)

7. Procurementa. References

- Applicable Procedures as listed in Paragraph 3
- General Purchasing Department Procedure No. 1, Procurement of QA Category I, Level A Safety Related Materials, Revision 4
- GS 202.0, Identification Control Function, Revision 4
- GS 203.2, Category I, II, and III Parts Level A Inspection Function, Revision 2
- GS 204.0, Storage Function, Revision 1
- GS 213.0, Issuing Function, Revision 1
- GS 214.0, Procurement of Nonstock Material, Revision 0

b. Implementation Review

The inspector selected a sample of items which had been installed in plant systems or had been released from storage for installation. Review of Maintenance Work Requests and their associated Material Requisitions provided traceability to the appropriate Purchase Order records package.

The Purchase Orders listed below were reviewed to verify that proper approvals had been obtained, quality control inspection requirements had been specified and quality record requirements had been provided. The Purchase Order packages so reviewed were:

<u>PO</u>	<u>Item Description</u>
91520	Battery Charger Electrical Parts
C-2105	Valve Packing - CVCS Valves
C-3047	SI Accumulator Pressure Channel Power Supply
91572	CVCS Valve Parts
91010	RHR System Valve Parts
*C-007365	Primary Grade Hydrazine
*C-007240	Stock Swagelok Fittings

The inspector reviewed the Quality Control and Stores Department inspection records documenting the receipt inspection of the items selected and confirmed that the inspections had been conducted and reported as required by the applicable procedures. The inspector further verified that the items were procured from vendors included on the licensee's Qualified Suppliers List or were appropriately listed in the CASE Register as qualified suppliers in accordance with the licensee's QA program.

No items of noncompliance were identified.

c. Storage Area Tour

The inspector toured the station warehouse area, observing general storage conditions, conforming and nonconforming material identification and segregation, and general housekeeping practices. During this inspection, several areas within the warehouse were noted by the inspector to be affected by ongoing outage activities and warehouse storage space expansion. The inspector reviewed the areas and the activities with the station Storekeeper and determined that the activities appeared to be sufficiently controlled as to not detrimentally affect the storage, handling, and issuance of safety related material or parts. The affected areas will be reinspected during a subsequent inspection.

The items noted by asterisks in paragraph b above were selected from the warehouse area to verify traceability to procurement documentation and inspection records.

No items of noncompliance were identified.

d. Procurement of Vendor Repair and Calibration Services

The BVPS FSAR, Sections A.2.2.1 and A.2.2.3 and the BVPS Quality Assurance Manual, OP-4, Section 12.3.1 require that certain vendor services, including the calibration of test and measuring equipment to be used in safety related activities, be provided by vendors which have been evaluated and approved in accordance with the OQA Program. The principal assurance that such procurements are assigned to qualified suppliers/vendors is achieved by assignment of a Quality Assurance Category and a Quality Control Level designator to each Purchase Order. These designators identify the procurement document controls and vendor QA program requirements to be implemented for a particular procurement.

The inspector's review of test and measurement equipment calibration purchases for instruments subsequently used for safety related calibrations or surveillances indicated that, although all sampled items had been calibrated by qualified suppliers, the QA Categories/QC Levels assigned to the procurements could have permitted the services to be provided by an unevaluated, unqualified vendor. Procedure review by the inspector and discussion with licensee personnel indicated that the various implementing procedures applicable to such service purchases do not address the assignment of specific QA Category/QC Level designations to such services.

The licensee acknowledged the inspector's concern and stated that the applicable procedures would be reviewed and revised as required to ensure that the assignment of QA Category and QC Level to calibration service procurements would be commensurate with the intended use of the calibrated equipment. This review and the initiation of procedure revisions will be completed by January 31, 1979. This item is unresolved pending review of the licensee's action by NRC:RI. (334/78-26-06)

8. Audits

a. References

- Applicable Procedures referenced in Paragraph 3
- Offsite Review Committee Charter, Revision 5

b. Quality Assurance Department Audits

The inspectors reviewed the QA audits performed on BVPS Unit 1 during the period of August 1, 1977 through September 25, 1978 (Audit Nos. BV-1-77-13 through BV-1-77-23, and BV-1-78-1 through BV-1-78-15).

These audits were reviewed to verify that they were conducted as follows: in accordance with written checklists/procedures; by trained personnel not having direct responsibilities in the area(s) audited; with findings documented and reviewed by management having responsibility in the area of audit and by corporate management; with followup actions initiated/completed/closed out; and, with audit frequencies and general audit conduct in accordance with established procedures and standards.

No items of noncompliance were identified.

c. Offsite Review Committee Audits

The inspectors reviewed the Offsite Review Committee Audits conducted during the period of April 19, 1977 through October 1, 1978 which were performed pursuant to Technical Specifications 6.5.2.8.a through 6.5.2.8.j and 6.5.2.10. The inspector determined that the audits required had been conducted in conformance with the Technical Specifications for the period indicated. Those audits not subject to performance during the indicated period are scheduled for performance consistent with the applicable Technical Specification.

No items of noncompliance were identified.

9. SIS Reset Feature

The inspector requested that the licensee evaluate his procedures which control the use of SIS RESET to determine if the procedures identify:

- the specific operator actions required prior to use; and,
- the specific operator actions necessary to manually restart required engineered safety features if a loss of offsite power or an accident occurs before the equipment is returned to an automatic starting sequence mode.

Prior to the completion of this inspection, the licensee's preliminary evaluation indicated that revisions may be needed to insure that specific actions are taken to verify that required pumps are restarted after SI has been reset and a loss of power occurs.

Pending completion of the procedure evaluation and identification of any necessary procedure revisions and review by RI, this item is unresolved. The committed completion date is November 1, 1978.
(334/78-26-07)

10. Equipment Control

a. References

- Technical Specifications, Section 6
- BVPS Operating Manual, Chapter 1.48, Revision 4

b. Implementation Review

The inspector reviewed the administration of equipment control activities associated with the licensee's Equipment Clearance Permit (safety tagging) system and Safety Related Valve and Equipment Status Control (valve status boards).

Selected valve status board Valve Operating Number Diagrams located in the control room were reviewed for compliance with Operating Manual procedure requirements including correct drawing revision status, accuracy of valve status markups, and implementation of document control measures. Equipment Clearance Permits were reviewed on a sampling basis for completeness of data, accuracy of associated logs, and the presence of proper authorization/verification signatures. The sampled Equipment Clearance Permits were compared to their respective valve status board Valve Operating Number Diagrams to determine that individual valve position and tagout status was accurately reflected on the status boards.

Nine valve status board Valve Operating Number Diagrams and eighteen Equipment Clearance Permits were reviewed as discussed above. Additionally, eleven controlled copy electrical diagrams held in the Control Room were reviewed for proper revision status.

c. Findings

- (1) Eight of the nine Control Room valve status board Valve Operating Number Diagrams reviewed were not identified as Controlled Copies as required by the Operating Manual, Chapter 1.48. The inspector determined that the subject drawings were otherwise properly maintained in terms of correct revision status, appropriate Onsite Committee reviews and Superintendent's approvals, and color coding. The diagrams being used during this inspection were in the process of being replaced with newer drawings which the inspector confirmed would have the required Controlled Copy stamp when issued.
- (2) Three of the eighteen Equipment Clearance Permits sampled were identified in the Equipment Clearance Permit Logs as being active but could not be located in the Control Room. The subject permits were subsequently located in the station's General Office files, having been cleared prior to this

inspection. Thirteen of the eighteen Equipment Clearance Permits sampled did not have the status of their abnormally positioned valves indicated on the respective valve status boards.

- (3) The valve status boards indicated that valves RC-68, RC-69 and DG-249 were danger tagged shut. The Equipment Clearance Permit and tags associated with the valves had been cleared on September 27, 1978. The inspector visually confirmed that the tags were no longer posted on the valves.

Findings (2) and (3) above are contrary to the requirements of Technical Specification 6.8.1 and the BVPS Operating Manual, Chapter 1.48, Sections 1.48.5.E and 1.48.6 and constitutes an Infraction level Item of Noncompliance. (334/78-26-08) This is a recurrent item of noncompliance; the previous item was documented in IE Inspection Report No. 50-334/78-17.

During the course of this inspection the licensee took immediate action to correct the conditions identified above including an audit of active Equipment Clearance Permits against the logs and valve status boards and re-emphasized to the control room operators the need to comply with the applicable procedures. All discrepancies identified by the inspector and the licensee were corrected prior to the end of the inspection and were reinspected on a sampling basis by the inspector.

Based on the immediate corrective action taken, the response to this item need only address the action taken to prevent recurrence.

11. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items identified during this inspection are discussed in paragraphs 4, 5, 6, 7, and 9.

12. Exit Interview

The inspectors met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on October 12, 1978. The scope and findings of the inspection as stated in this report were presented and the licensee verified the target dates for the unresolved items as discussed herein.