



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

APR - 8 1994

Docket: 50-298
License: DPR-46

Nebraska Public Power District
ATTN: Guy R. Horn, Vice President - Nuclear
P.O. Box 98
Brownville, Nebraska 68321

SUBJECT: APRIL 4, 1994, ENFORCEMENT CONFERENCE MEETING SUMMARY

This refers to the enforcement conference conducted on April 4, 1994, at the Region IV office in Arlington, Texas, concerning activities authorized by NRC License DPR-46 for the Cooper Nuclear Station. Attendees at the meeting are listed in Attachment 1.

The purpose of this meeting was for you to present to the NRC the facts and circumstances pertaining to the apparent violations identified in the Operational Safety Team Inspection report issued January 3, 1994, and our followup letter dated March 1, 1994. Your presentation was to include the corrective actions you have taken to address these issues and prevent future occurrences. There were 20 apparent violations discussed at the Enforcement Conference and you disagreed with three of the apparent violations. The disagreement on two of the apparent violations was related to the circumstances and activities which caused the apparent violations (i.e., you considered them to be violations pertaining to inadequate procedures rather than failure to follow procedures). The third apparent violation pertained to inservice testing of equipment and you disagreed that any regulatory requirement had been violated based on your interpretation of the ASME Code as it relates to increased frequency testing of equipment. However, you did agree that to have equipment in a condition requiring increased testing for extended periods, without proper analysis to determine the cause for the condition, is not desirable or acceptable.

It is our opinion that this meeting was beneficial and has provided a better understanding of the apparent violations identified in NRC Inspection Report 50-298/93-202 and your corrective actions. The briefing materials used in your presentation are attached to this summary.

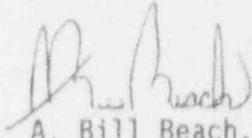
In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and the attachments will be placed in the NRC Public Document Room.

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Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,



A. Bill Beach, Director
Division of Reactor Projects

Attachments:

1. Attendance List
2. Briefing Materials

cc w/attachments:

Nebraska Public Power District
ATTN: G. D. Watson, General Counsel
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Columbus, Nebraska 68602-0499

Nebraska Public Power District
ATTN: Mr. David A. Whitman
P.O. Box 499
Columbus, Nebraska 68602-0499

Nebraska Department of Environmental
Quality
ATTN: Randolph Wood, Director
P.O. Box 98922
Lincoln, Nebraska 68509-8922

Nemaha County Board of Commissioners
ATTN: Larry Bohlken, Chairman
Nemaha County Courthouse
1824 N Street
Auburn, Nebraska 68305

Nebraska Department of Health
ATTN: Harold Borchert, Director
Division of Radiological Health
301 Centennial Mall, South
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Lincoln, Nebraska 68509-5007

Nebraska Public Power District

-3-

Department of Natural Resources
ATTN: Ronald A. Kucera, Department Director
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Jefferson City, Missouri 65102

Kansas Radiation Control Program Director

bcc to DMB (IE45)

bcc distrib. by RIV:

L. J. Callan

Branch Chief (DRP/C)

MIS System

Branch Chief (DRP/TSS)

RIV File

Senior Resident Inspector - Fort Calhoun

Resident Inspector

Lisa Shea, RM/ALF, MS: MNBB 4503

DRSS-FIPB

Project Engineer (DRP/C)

Senior Resident Inspector - River Bend

RIV: C:DRP/C	D:DRP			
JGaglardo;df	ABBeach			
4/7/94	4/8/94			

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APR - 8 1994

bcc to DMB (IE45)

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JGag1;do;df	ABBeach			
4/7/94	4/8/94			

MEETING: ENFORCEMENT CONFERENCE - COOPER

SUBJECT: OSTI ISSUES

DATE: April 4, 1994

ATTENDANCE LIST

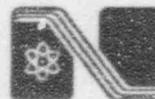
NAME	ORGANIZATION	POSITION TITLE
Edward A. Kappina	US NRC	Senior Resident Inspector ^{Cooper}
Wayne C Walker	US NRC	Resident Inspector - CNS
WILLIAM BECKNER	US NRC	DIRECTOR POIV-1
PETER KOLTAY	NRC/NRR	SC.
Jocelyn Mitchell	US NRC	Acting Deputy Dir., DRS
T. P. Guyard	NRC RIV	Acting, DRS
P. HARRELL	NRC RIV	ACTING DIRECTOR, DRP
J. E. GAGLIARDI	NRC/RIV	Branch Chief, DRP
L. J. CALLAN	NRC/RIV	REGIONAL ADMINISTRATOR
G. R. Wood	NPPD	Vice President, Nuclear
J. M. MEASHAM	NPPD	Sr. Div MGR, SAFETY ASSISTANT
E. M. MACE	NPPD	Sr. MGR SITE SUPPORT
Rick Gardner	NPPD	Plant Manager - CNS
James E. Lynch	NPPD	Plant - Engineering Mgr - CNS
THOMAS W. WILSON	NPPD	DIV MGR - QA
James C. Parker	Midwest Power	Sr. Engineer
RYAN LANTZ	NRC RIV	REACTOR ENGINEER
JOSEPH I. TAPIA	NRC	ACTING PROJECT ENGINEER
C. J. Paulk	NRC RIV	Reactor Inspector
E. E. Collins	NRC RIV	TEAM LEADER
G. Smith	NPPD	Mgr. Licensing
G. D. Cox	NRC	Act. Enforcement Officer
K. A. Connaughton	NRC	Project Manager
W. B. Jones	NRC	Process Engineer

NEBRASKA PUBLIC POWER DISTRICT
NUCLEAR REGULATORY COMMISSION - REGION IV

ENFORCEMENT CONFERENCE

NRC INSPECTION REPORT 50-298/93-202 (JANUARY 3, 1994)

APRIL 4, 1994



AGENDA

INTRODUCTION/OVERVIEW

G.R. HORN

PERFORMANCE IMPROVEMENT RESULTS

G.R. HORN

DISCUSSION OF ISSUES

- *INADEQUATE PROCEDURES/
PROCEDURE ADHERENCE*
- *TECHNICAL SPECIFICATION
COMPLIANCE (LEVEL INSTR.)*
- *TRAINING*
- *FIRE DOORS*
- *CONFIGURATION CONTROL*
- *DESIGN MODIFICATIONS*

R.L. GARDNER

R.L. GARDNER

E.M. MACE

E.M. MACE

J.E. LYNCH

J.E. LYNCH

CLOSING REMARKS

G.R. HORN



INTRODUCTION/OVERVIEW

G.R. HORN



INTRODUCTION/OVERVIEW

PRESENTATION ADDRESSES SEVEN CATEGORIES OF DEFICIENCIES IDENTIFIED IN THE JANUARY 3, 1994, NRC INSPECTION REPORT WHICH ARE BEING CONSIDERED BY THE NRC FOR ESCALATED ENFORCEMENT.

- *ALL DEFICIENCIES ARE BEING ADDRESSED BY ISSUE-SPECIFIC CORRECTIVE ACTIONS.*
- *BROAD CONCERNS EXPRESSED BY THE NRC IN THE OSTI INSPECTION REPORT COVER LETTER WILL BE DISCUSSED IN DETAIL IN TODAY'S MANAGEMENT MEETING.*
 - *PROGRAMMATIC EFFORTS ONGOING.*
 - *POSITIVE RESULTS.*
- *ISSUE-SPECIFIC AND PROGRAMMATIC CORRECTIVE ACTIONS HAVE BEEN PRIORITIZED TO ENSURE THAT MORE SIGNIFICANT SAFETY AND REGULATORY CONCERNS ARE PROMPTLY ADDRESSED.*



INTRODUCTION/OVERVIEW (CONT'D)

- *ALTHOUGH NPPD DISAGREES WITH ONE APPARENT VIOLATION, NRC RAISED A VALID ISSUE -- ACTIONS HAVE BEEN TAKEN TO ADDRESS NRC CONCERNS.*
- *MOST APPARENT VIOLATIONS OCCURRED BEFORE OR DURING ONGOING CULTURE/PERFORMANCE IMPROVEMENT EFFORTS.*
- *LIKELIHOOD OF REPEAT OCCURRENCES HAS BEEN MINIMIZED DUE TO INCREASED MANAGEMENT OVERVIEW AND PERFORMANCE IMPROVEMENT PROGRESS.*



MATRIX OF ISSUES VS. SPECIFIC VS. PROGRAMMATIC CORRECTIVE ACTIONS

<u>ENF. ISSUE</u>	<u>DESCRIPTION</u>	<u>EVENT DATE</u>	<u>DISCOVERY DATE</u>	<u>SPECIFIC CORR. ACTION</u>	<u>PROGRAMMATIC CORR. ACTION</u>
I.1	HOUSEKEEPING	INDEF.	11/93	DR 94-220	*
I.2	BATTERY CHARGER, FUEL OIL TRANSFER PUMP PM	11/93	11/93	DR 94-267	RLG-94-02
I.3	CONTROL BLDG. VENT. FAN MOTOR GREASE MIXING	9/29/93	11/93	DR 94-179	*
<i>I.4</i>	<i>CONTROL BLDG. DAMPERS PM</i>	<i>8/90</i>	<i>11/93</i>	<i>DR 93-542</i>	<i>REW-94-03</i>
I.5	MANIPULATION OF SLC VALVES	11/93	11/93	DR 93-492	MGMT-94-01
I.6	DEFERRED TEMP. MODS	5,6/93	11/93	DR 93-553	*
II.1	ADDIT. WORK ON CLOSED MWR	1/92	11/93	DR 94-265	*
II.2	HPCI OIL PRESS. SET. TOLER.	9/93	11/93	DR 94-252	MGMT-94-01
II.3	ADDL. WORK ON MWR - LEFT OPEN	11/93	11/93	DR 94-245, 93-493	*
II.4	PUMP FREQUENCY TESTING	8/93	8/93	MISC.	*
<i>II.5</i>	<i>OPERATOR AIDS</i>	<i>INDEF.</i>	<i>11/93</i>	<i>MISC.</i>	*
II.6	TRAINING ATTEND. RECORDS	1/93	11/93	NCR 93-237	*
III	SUPPRESS/TORUS LS	1/92	11/93	DR 93-549	MGMT-94-01
				NCR 94-052	
<i>IV.1</i>	<i>STA CERTIFICATION</i>	<i>10/93</i>	<i>10/93</i>	<i>NCR 93-229</i>	<i>EMM-94-02, 07</i>
<i>IV.2</i>	<i>FIRE BRIG. CERTIFICAT'ON</i>	<i>3/91</i>	<i>11/93</i>	<i>NCR 93-243, 228, DR 93-556, 557</i>	<i>EMM-94-02, 07</i>
V.1	REPL. ORIFICE	7/93	11/93	DR 93-294	REW 94-03
V.2	RHR DRAIN LINE	3/93	11/93	DR 94-246	MGMT-94-01
V.3	RHR SPOOL PIECE TORQUE	3/93	11/93	DR 93-551	MGMT-94-01
VI	FIRE DOORS	11/93	11/93	NCRs 93-226, 227, 239, 247, 249	RLG-94-01
<i>VII</i>	<i>DESIGN CONTR. PIPING/INSUL.</i>	<i>11/93</i>	<i>11/93</i>	<i>DR 93-522, NCR 93-230</i>	<i>MGMT-94-01</i>

- "*" indicates that the item is more appropriately addressed by issue-specific corrective actions.
- Italics indicate that the violation was licensee-identified.

DISCUSSION OF APPARENT VIOLATIONS

INADEQUATE PROCEDURES

R.L. GARDNER



INADEQUATE/FAILURE TO FOLLOW PROCEDURES OVERVIEW

93-202-01/92-202-02

CAUSE SUMMARY

- *INATTENTION TO DETAIL.*
- *IMPROPER BALANCE BETWEEN SKILL OF THE CRAFT AND PROCEDURE DETAIL.*
- *ACCEPTANCE OF LESS THAN ADEQUATE PROCEDURES TO DO WORK.*

FOCUS OF CORRECTIVE ACTIONS

- *ENSURE THAT PERSONNEL ARE PROPERLY TRAINED/SKILLED.*
- *MANAGEMENT EFFORTS TO IMPROVE SAFETY CULTURE/IMPROVE QUESTIONING ATTITUDES [MGMT-94-01].*
- *DEVELOPMENT AND UTILIZATION OF FEEDBACK MECHANISMS -- DESCRIBING PROCEDURAL CONCERNS, BOTH ADEQUACY AND ADHERENCE.*
- *PROCEDURE CHANGES.*



INADEQUATE/FAILURE TO FOLLOW PROCEDURES OVERVIEW

93-202-01/92-202-02

RESULTS ACHIEVED

- *WORKER FEEDBACK ON PROCEDURE INADEQUACIES HAS IMPROVED.*
- *INCREASED NUMBER OF DRs AND NCRs.*
- *IMPROVED ATTENTION TO DETAIL.*



APPARENT VIOLATION 93-202-01 (EXAMPLE 1)

NPPD FAILED TO INCORPORATE COMMITMENTS FOR HOUSEKEEPING REQUIREMENTS INTO PROCEDURES.

NPPD AGREES THAT THIS IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V AND THE QAP.

CAUSE:

INATTENTION TO DETAIL REGARDING CONFIRMATION THAT THE COMMITMENT HAD BEEN INCORPORATED INTO APPROPRIATE PROCEDURES.

SIGNIFICANCE:

- *MINIMAL SAFETY SIGNIFICANCE.*
- *SOME REGULATORY SIGNIFICANCE.*



APPARENT VIOLATION 93-202-01 (EXAMPLE 1) (CONT'D)

CORRECTIVE ACTIONS:

- *AFFECTED AREAS CLEANED UP IMMEDIATELY.*
- *ACTIONS HAVE BEEN TAKEN TO ENSURE THAT APPROPRIATE SAMPLING PROCEDURES INCORPORATE CLEANLINESS REQUIREMENTS.*
- *DR 94-220 PREPARED TO ASSESS EXTENT OF CONDITION AND ENSURE DEVELOPMENT OF APPROPRIATE BROAD CORRECTIVE ACTIONS.*
- *BASED ON CUMULATIVE IMPACT OF RECENT EVENTS, NPPD WILL PERFORM A REEVALUATION OF SYSTEM CLEANLINESS COMMITMENTS.*



APPARENT VIOLATION 93-202-01 (EXAMPLE 2)

PREVENTIVE MAINTENANCE TASKS DEALING WITH CLEANING THE 24-V BATTERY CHARGERS AND WITH PERFORMING A VISUAL INSPECTION OF THE DIESEL FUEL OIL TRANSFER PUMP DID NOT HAVE SUFFICIENT DETAIL.

NPPD AGREES THAT THIS IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V.

CAUSE:

BALANCE BETWEEN SKILL OF THE CRAFT AND PROCEDURAL DETAIL WAS INADEQUATE.

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- MINIMAL REGULATORY SIGNIFICANCE.



APPARENT VIOLATION 93-202-01 (EXAMPLE 2) (CONT'D)

CORRECTIVE ACTIONS:

- DR 94-267 INITIATED.
- THE PM WILL BE REVISED PRIOR TO NEXT USE.
- PROGRAM ENHANCEMENTS [RLG-94-02] ARE BEING IMPLEMENTED FOR PM TASKS UNDER THE RESPONSIBILITY OF THE MAINTENANCE DEPARTMENT TO ASSESS AND DOCUMENT THE ADEQUACY OF PM WORK INSTRUCTIONS AND TO REVISE THOSE PMs THAT ARE INADEQUATE.
 - BALANCE BETWEEN SKILL OF THE CRAFT AND PROCEDURAL DETAIL WILL BE ADDRESSED.
 - PRIORITY WILL BE ESTABLISHED TO ENSURE THAT PMs ARE REVISED PRIOR TO USE.



APPARENT VIOLATION 93-202-01 (EXAMPLE 3)

PM TASK 07272 (DEVELOPED FOR THE CONTROL BUILDING VENTILATION FAN MOTORS) DID NOT HAVE PROVISIONS THAT WOULD PREVENT MIXING INCOMPATIBLE GREASES.

NPPD AGREES THAT IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V.

CAUSE:

- PROCESS SHOULD HAVE ENSURED THAT AN ADEQUATE REVIEW OF LUBRICATION CRITERIA OCCURS FOR DESIGN/MAINTENANCE DOCUMENTS.

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.



APPARENT VIOLATION 93-202-01 (EXAMPLE 3) (CONT'D)

CORRECTIVE ACTIONS:

- *REVISED MAINTENANCE PROCEDURE 7.0.2, "WORK ITEM TRACKING-PREVENTIVE MAINTENANCE" TO ENSURE APPROPRIATE REVIEW OF PM ADDITIONS AND/OR CHANGES THAT INVOLVE LUBRICANTS.*
 - ° *ENSURE APPROPRIATE COMMUNICATIONS BETWEEN DESIGN CHANGE PROCESS AND LUBRICANT CONTROL PROCESS.*
- *DR 94-179 INITIATED.*
- *DETAILED ASSESSMENT OF ALL PMs PERFORMED TO PROVIDE FURTHER ASSURANCE THAT SAFETY RELATED EQUIPMENT DID NOT HAVE INCOMPATIBLE GREASES.*
- *PM 07272 WILL BE REVISED BEFORE NEXT USE.*



APPARENT VIOLATION 93-202-01 (EXAMPLE 4)

THE WEEKLY PM CYCLE OF SIX CONTROL BUILDING ACTUATORS HAD NOT BEEN PERFORMED SINCE THEY WERE INSTALLED IN 1990. THE PM ITEM HAD BEEN IDENTIFIED IN THE DESIGN CHANGE PACKAGE UNDER WHICH THE ACTUATORS WERE INSTALLED, BUT THE PM TASK WAS NOT PREPARED AND INCORPORATED INTO THE MAINTENANCE PROGRAM.

NPPD AGREES THAT THIS SELF-IDENTIFIED FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V.

CAUSE:

FAILURE TO ENSURE THAT THE PM WAS INCORPORATED IN APPROPRIATE PROCEDURES IN A TIMELY MANNER.

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.



APPARENT VIOLATION 93-202-01 (EXAMPLE 4) (CONT'D)

CORRECTIVE ACTIONS:

- *DR 93-542 INITIATED.*
- *DISCUSSION WITH VENDOR TO DETERMINE APPROPRIATE FREQUENCY.*
- *INCORPORATED QUARTERLY PM REQUIREMENTS INTO PROCEDURE 6.3.17.11.*
- *DAMPERS SUCCESSFULLY CYCLED UNDER INTERIM MEASURES (QUARTERLY).*
- *A REVIEW OF OPEN DCs WHICH COULD HAVE SIMILAR DEFICIENCIES HAS BEEN COMPLETED.*
- *A REVIEW OPEN ESCs WHICH COULD HAVE SIMILAR DEFICIENCIES IS ONGOING.*
- *PROCEDURE 3.4.11 "STATUS REPORTS" HAS BEEN REVISED TO REQUIRE TIMELY SUBMITTAL REVIEW AND "IMPLEMENTATION" OF PMs.*
- *CAUSES ALREADY BEING ADDRESSED IN ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [REW-94-03].*



APPARENT VIOLATION 93-202-01 (EXAMPLE 5)

DURING THE PERFORMANCE OF A SURVEILLANCE TEST FOR STANDBY LIQUID CONTROL PUMP OPERABILITY, AN OPERATOR MANIPULATED TWO VALVES THAT WERE REQUIRED TO PERFORM THE TEST, BUT WERE NOT INCLUDED IN PROCEDURAL GUIDANCE.

NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V.

CAUSE:

- POTENTIALLY CONFLICTING GUIDANCE WITHIN PROCEDURE 2.0.1.

SIGNIFICANCE:

- NO SAFETY SIGNIFICANCE.
- MINIMAL REGULATORY SIGNIFICANCE.



APPARENT VIOLATION 93-202-01 (EXAMPLE 5) (CONT'D)

CORRECTIVE ACTIONS:

- DR 93-492 INITIATED.
- TPCN 93-321 WAS INITIATED TO PROVIDE INTERIM GUIDANCE.
 - PROCEDURE 2.0.1 BEING REVISED TO CLARIFY GUIDANCE TO OPERATORS.
- MANAGEMENT EXPECTATIONS CONCERNING PROCEDURE ADHERENCE STRESSED IN OPERATIONS MANAGER LETTER TO ALL OPERATIONS DEPARTMENT PERSONNEL.
- PROCEDURE 6.3.8.2, "SLC PUMP OPERABILITY" REVISED TO LIST ADDITIONAL POSSIBLE VALVE MANIPULATIONS.
- CAUSE ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [MGMT-94-01].



APPARENT VIOLATION 93-202-01 (EXAMPLE 6)

PROCEDURE 2.0.7 FAILED TO PROVIDE MEASURES TO ENSURE THAT THE NECESSARY REVIEWS ASSOCIATED WITH TEMPORARY MODIFICATIONS (WHICH WERE DEFERRED BECAUSE THE AFFECTED SYSTEM WAS OUT OF SERVICE) WERE PERFORMED IN THE EVENT THE SYSTEM WAS PLACED BACK IN SERVICE WITH THE TEMPORARY MODIFICATION STILL INSTALLED. AS A RESULT OF THIS DEFICIENCY, AT LEAST TWO IN-SERVICE TEMPORARY MODIFICATIONS (PTMs FOR PLANT SECURITY) HAD NOT BEEN PROPERLY REVIEWED.

NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V.

CAUSE:

- FAILURE TO RECOGNIZE NECESSARY CHECKS AND BALANCES WHEN DEVIATING FROM NORMAL PTM PROCESS.



APPARENT VIOLATION 93-202-01 (EXAMPLE 6) (CONT'D)

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.

CORRECTIVE ACTIONS:

- APPROPRIATE REVIEWS OF PTMs 93-31 AND 93-53 WERE PERFORMED.
- DR 93-553 ISSUED.
- TEMPORARY PROCEDURE CHANGE 93-355 IMPLEMENTED AS AN INTERIM MEASURE -- DELETED SCREENING QUESTION.
- PROCEDURE 2.0.7 REVISED AND APPROVED ON 3/2/94. THE PROCEDURE REQUIRES REVIEWS, INCLUDING SORC APPROVAL, PRIOR TO INSTALLATION OF ANY PTM.



DISCUSSION OF APPARENT VIOLATIONS

PROCEDURE ADHERENCE

R.L. GARDNER



APPARENT VIOLATION 93-202-02 (EXAMPLE 1)

DESCRIPTION:

A MAINTENANCE WORK REQUEST WAS IMPROPERLY USED TO PERFORM ADDITIONAL WORK ON LEVEL INDICATOR PC-LI-13. THE ADDITIONAL WORK INCLUDED POST-MAINTENANCE TESTING AND CORRECTING AN INCORRECT LEVEL READING AFTER THE WORK IDENTIFIED ON THE MWR HAD BEEN COMPLETED. THE ADDITIONAL WORK WAS NOT SPECIFIED IN THE APPROVED MWR.

NPPD BELIEVES THAT A VIOLATION OCCURRED ON A DIFFERENT BASIS -- SINCE THE PROCEDURE ON MWRs WAS INADEQUATE A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V OCCURRED.

CAUSES:

- UNCLEAR GUIDANCE FOR WHAT SHOULD BE CONSIDERED WITHIN THE "SCOPE OF WORK" FOR AN MWR.
- PROCEDURAL REQUIREMENTS FOR TROUBLESHOOTING INADEQUATE.



APPARENT VIOLATION 93-202-02 (EXAMPLE 1) (CONT'D)

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.

CORRECTIVE ACTIONS:

- DR 94-265 INITIATED.
- TPCN ISSUED TO CLARIFY INSTRUCTIONS TO MORE CLEARLY QUANTIFY "SCOPE OF WORK" AND "TROUBLESHOOTING."



APPARENT VIOLATION 93-202-02 (EXAMPLE 2)

MWR 93-3590 WAS WRITTEN TO ADJUST THE OIL PRESSURE ON THE HIGH PRESSURE COOLANT INJECTION TURBINE LUBE OIL SYSTEM TO A SPECIFIC PRESSURE (12 psig), BUT IT DID NOT SPECIFY THE ACCEPTABLE TOLERANCE FOR THE PRESSURE SETTING (10-12 psig) PER SURVEILLANCE PROCEDURE 6.3.3.1.1, "HPCI IST AND QUARTERLY TEST MODE SURVEILLANCE OPERATION," REV. 2. THE CRAFTS PERSON ADJUSTED THE PRESSURE TO 11 psig AND DID NOT PROVIDE AN EXPLANATION FOR THE DISCREPANCY.

NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V, "INSTRUCTIONS, PROCEDURES, AND DRAWINGS".

CAUSE:

- NOT RECOGNIZING THE NEED TO DOCUMENT AND EXPLAIN DEVIATIONS TO WORK INSTRUCTIONS.



APPARENT VIOLATION 93-202-02 (EXAMPLE 2) (CONT'D)

SIGNIFICANCE:

- NO SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.

CORRECTIVE ACTIONS:

- DR 94-252 INITIATED.
- ASSESSED ADEQUACY OF AS-LEFT CONDITION.
- RE-EMPHASIS TO PERSONNEL ON THE NECESSITY OF STRICT COMPLIANCE TO PROCEDURES.
- NPPD MANAGEMENT HAS INITIATED LONG TERM CORRECTIVE ACTIONS TO IMPROVE ATTENTION TO DETAIL AND BETTER ENSURE APPROPRIATE QUESTIONING ATTITUDES [MGMT-94-01].



APPARENT VIOLATION 93-202-02 (EXAMPLE 3)

CONTRARY TO APPROVED MAINTENANCE PROCEDURES, MWRs WERE FOUND TO HAVE BEEN LEFT OPEN FOR EXTENDED PERIODS TO PERMIT MULTIPLE WORK ACTIVITIES TO BE PERFORMED ON THE COMPONENT USING THE OPEN MWR. USE OF A RWCU PUMP MWR FOR INTENDED REPAIRS AND A SUBSEQUENTLY DISCOVERED OIL LEAK AND USE OF AN MWR FOR SGT INDICATOR TROUBLE SHOOTING AND SUBSEQUENT WORK (AFTER THE MWR HAD BEEN CLOSED) WERE CITED AS EXAMPLES OF THIS APPARENT VIOLATION.

NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V.

CAUSE:

- *UNCLEAR GUIDANCE FOR WHAT SHOULD BE CONSIDERED WITHIN THE "SCOPE OF WORK" FOR AN MWR.*
- *PROCEDURAL REQUIREMENTS FOR TROUBLESHOOTING INADEQUATE.*



APPARENT VIOLATION 93-202-02 (EXAMPLE 3) (CONT'D)

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.

CORRECTIVE ACTIONS:

- A REVIEW OF THE MWRs WAS PERFORMED TO ENSURE THAT WORK WAS PERFORMED APPROPRIATELY.
- MWR 93-3927 WAS ISSUED TO ALLOW ADDITIONAL WORK (SGT).
- DRs 93-493 AND 94-245 WERE ISSUED.
- TPCN ISSUED TO CLARIFY INSTRUCTIONS TO MORE CLEARLY QUANTIFY "SCOPE OF WORK" AND "TROUBLESHOOTING."



APPARENT VIOLATION 93-202-02 (EXAMPLE 4)

DESCRIPTION:

ENGINEERING PROCEDURE 3.9 REQUIRES THAT PUMPS FAILING INSERVICE TESTING BE REPAIRED, REPLACED, OR HAVE AN ENGINEERING ANALYSIS PERFORMED DEMONSTRATING THAT THE CONDITION DID NOT IMPAIR PUMP OPERABILITY AND THAT THE PUMP WOULD PERFORM ITS INTENDED FUNCTION. THE SLC PUMPS AND 11 ADDITIONAL COMPONENTS WERE FOUND TO HAVE BEEN ON INCREASED FREQUENCY TESTING WITHOUT THE REQUIRED REPAIR, REPLACEMENT, OR ENGINEERING ANALYSIS HAVING BEEN PERFORMED. THE SLC PUMPS HAD BEEN ON INCREASED TESTING FREQUENCY SINCE DECEMBER 1990 WITHOUT HAVING BEEN REPAIRED, REPLACED, OR ANALYZED.

NPPD DISAGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V AND ENGINEERING PROCEDURE 3.9.

- HOWEVER, NPPD AGREES THAT A PROBLEM EXISTED WITH COMMUNICATING THESE INSTANCES TO MANAGEMENT AND AS A RESULT, AT THE TIME OF THE OSTI INSPECTION, AGGRESSIVE ACTIONS TO RESOLVE COMPONENT PROBLEMS HAD NOT BEEN TAKEN.



APPARENT VIOLATION 93-202-02 (EXAMPLE 4)

BASIS:

- *PROCEDURE 3.9 AND ASME SECTION XI, IWP-3230(a) CODE REQUIREMENTS ADDRESS "ALERT" AND "ACTION" CATEGORIES.*
- *THE PUMPS WERE APPROPRIATELY CATEGORIZED IN THE "ALERT" CATEGORY.*
- *ALL "ALERT" REQUIREMENTS -- MAINTAINING INCREASED TESTING FREQUENCY UNTIL THE CAUSE OF THE DEVIATION IS DETERMINED AND THE CONDITION CORRECTED -- WERE SATISFIED.*
- *CORRECTIVE ACTION MAY INCLUDE REPAIR, REPLACEMENT, OR ENGINEERING ANALYSIS.*
- *UPON COMPLETION OF CORRECTIVE ACTION, NORMAL TESTING FREQUENCY MAY BE RESUMED.*



APPARENT VIOLATION 93-202-02 (EXAMPLE 4) (CONT'D)

BASIS (CONT'D):

- "ACTION" CATEGORY REQUIRES THE FOLLOWING:
 - DECLARE THE PUMP INOPERABLE AND DO NOT RETURN THE PUMP TO SERVICE UNTIL THE CAUSE OF THE DEVIATION HAS BEEN DETERMINED AND THE CONDITION CORRECTED.
 - CORRECTIVE ACTION MAY INCLUDE REPAIR, REPLACEMENT OR ENGINEERING ANALYSIS.
- THE CITED COMPONENTS WERE NEVER IN THE "ACTION" CATEGORY -- THEREFORE, ITS REQUIREMENTS WERE NEVER APPLICABLE.



APPARENT VIOLATION 93-202-02 (EXAMPLE 4) (CONT'D)

ACTIONS TAKEN:

- *NPPD MANAGEMENT IS NOT SATISFIED WITH THE PROMPTNESS THAT COMPONENTS WERE RETURNED TO THE NORMAL TESTING FREQUENCY.*
 - *QA AUDIT 93-18-A WAS ISSUED PRIOR TO THE OSTI. IN RESPONSE, A PLAN WAS BEING DEVELOPED FOR EACH COMPONENT ON THE INCREASED TESTING FREQUENCY LIST.*
 - *ACTIONS HAVE BEEN TAKEN TO ENSURE THAT THE SYSTEM ENGINEER IS BETTER INFORMED OF MANAGEMENT EXPECTATIONS FOR EXPEDITIOUSLY RESTORING COMPONENTS TO THE NORMAL TESTING FREQUENCY.*
- *NOW, A CR IS WRITTEN WHENEVER A COMPONENT ENTERS THE "ALERT" RANGE TO ENSURE THAT MANAGEMENT MAINTAINS AWARENESS OF THE SITUATION.*
- *PROCEDURE 3.9 HAS BEEN REVISED TO MORE CLEARLY REFLECT THE INTENT OF THE APPLICABLE CODE REQUIREMENTS FOR INCREASED TESTING FREQUENCY.*



APPARENT VIOLATION 93-202-02 (EXAMPLE 5)

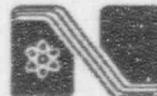
NPPD FAILED TO CONTROL OPERATOR AIDS, INCLUDING "GREEN BAND" MARKINGS CONSISTENT WITH PROCEDURE 2.0.9.

NPPD DISAGREES THAT THIS IS AN EXAMPLE OF A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V FOR FAILURE TO FOLLOW OPERATIONS PROCEDURE 2.0.9.

- *HOWEVER, NPPD CONCLUDES THAT A VIOLATION OF CRITERION V OCCURRED FOR A DIFFERENT REASON -- APPROPRIATE PROCEDURES WERE NOT IN PLACE TO CONTROL HUMAN FACTORS ENHANCEMENTS SUCH AS THE ORANGE DOTS AND "GREEN BANDS."*

CAUSES:

- *ORANGE DOTS DO NOT MEET THE THRESHOLD OR INTENT OF AN "OPERATOR AID" AS IDENTIFIED IN PROCEDURE 2.0.9 AND INPO GOOD PRACTICE OP-207.*
- *NPPD DID NOT CONSIDER THE ORANGE DOTS OR GREEN BANDING TO BE AN OPERATOR AID.*
- *ONLY SOME OF THE GREEN BANDING WAS CONTROLLED BY PROCEDURE 3.26.1, "METER BANDING CHANGE CONTROL."*



APPARENT VIOLATION 93-202-02 (EXAMPLE 5) (CONT'D)

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.

CORRECTIVE ACTIONS:

- ORANGE DOTS REMOVED.
- PLANT WALKDOWN CONDUCTED TO IDENTIFY/REMOVE ANY OTHER DOTS AND TO REMOVE OR PREPARE WORK ITEMS TO REMOVE INAPPROPRIATE FIELD METER BANDING.
- PROCEDURE 3.26.1 WILL BE MODIFIED TO INCLUDE BANDING CONTROL ON INSTRUMENTS IN THE FIELD.
- CNS PROCEDURE BEING DEVELOPED TO ADDRESS LABELING IN THE FIELD.



APPARENT VIOLATION 93-202-02 (EXAMPLE 5) (CONT'D)

CORRECTIVE ACTIONS (CONT'D):

- *METER BANDING IN THE FIELD WILL BE LIMITED TO METERING THAT IS NOT AVAILABLE IN THE CONTROL ROOM AND IS USED FOR SCRAM FREQUENCY REDUCTION OR TO MEET OTHER REGULATORY AGENCY (E.G., EPA, ETC) REQUIREMENTS.*

- *CHANGE REQUESTS HAVE BEEN WRITTEN FOR ALL METER BANDING IN THE FIELD THAT WILL NOT BE REMOVED.*
 - *HUMAN FACTORS STANDARDS WILL BE APPLIED.*

- *FIELD METER BANDING NOT REQUIRED AS A RESULT OF THE PROCEDURE REVISION WILL BE REMOVED.*



APPARENT VIOLATION 93-202-02 (EXAMPLE 6)

CONTRARY TO PROCEDURE NTI-02, THE START AND COMPLETION DATES IN VARIOUS ATTENDANCE RECORDS CONCERNING THE FOURTH QUARTER 1992 AND FIRST QUARTER 1993 FIRE BRIGADE TRAINING WERE CHANGED BY OVERWRITING THE ORIGINAL DATES ON THE FORM.

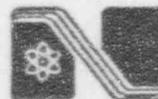
NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V AND TRAINING PROCEDURE NTI-02.

CAUSE:

- FAILURE BY AN INDIVIDUAL TO IMPLEMENT QA REQUIREMENTS FOR MODIFYING OFFICIAL RECORDS.

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.



APPARENT VIOLATION 93-202-02 (EXAMPLE 6) (CONT'D)

CORRECTIVE ACTIONS:

- TRAINING DATA CORRECTED IN COMPUTER DATABANK.
- INVESTIGATION CONDUCTED TO DETERMINE EXTENT AND INTENT OF EVENT.
- INVOLVED INSTRUCTOR WAS DISCIPLINED.
- TRAINING MANAGER HELD DEPARTMENT MEETING OUTLINING THE CIRCUMSTANCES OF THE EVENT, EMPHASIZING THE IMPORTANCE OF ACCURATE RECORDS.
- NCR 93-237.



DISCUSSION OF APPARENT VIOLATIONS

TECHNICAL SPECIFICATIONS - WATER LEVEL INSTRUMENTATION

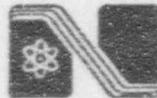
R.L. GARDNER



APPARENT VIOLATION 93-202-03

ON JANUARY 30, 1992, BOTH SUPPRESSION CHAMBER/TORUS WATER LEVEL INSTRUMENTS (PC-LI-12 AND PC-LI-13) WERE RENDERED INOPERABLE DURING THE PERFORMANCE OF A MAINTENANCE WORK REQUEST, AND AN ORDERLY SHUT DOWN WAS NOT COMMENCED AFTER 6 HOURS AND THE REACTOR WAS NOT PLACED IN HOT SHUTDOWN WITHIN THE FOLLOWING 6 HOURS. THE INSTRUMENTS WERE NOT DECLARED OPERABLE UNTIL THE FOLLOWING DAY.

NPPD AGREES THAT THIS FINDING REPRESENTS A VIOLATION OF TECHNICAL SPECIFICATION TABLE 3.2.F.



APPARENT VIOLATION 93-202-03 (CONT'D)

CAUSES:

INATTENTION TO DETAIL IN FOLLOWING PROCEDURE REQUIREMENTS.

- *AS STATED IN PROCEDURE 2.0.2, "OPERATIONS LOGS AND REPORTS," TECHNICAL SPECIFICATION INOPERABILITY MUST BE LOGGED IN THE SHIFT SUPERVISORS' LOG AND SHOULD BE LOGGED IN THE CONTROL ROOM LOG.*
- *FAILURE TO RECOGNIZE THAT PMT HAD NOT BEEN PERFORMED AND THAT THE METER WAS STILL "INOPERABLE" WHEN THE SECOND METER WAS REMOVED.*

SIGNIFICANCE:

- *SOME SAFETY SIGNIFICANCE.*
- *REGULATORY SIGNIFICANCE.*



APPARENT VIOLATION 93-202-03 (CONT'D)

CORRECTIVE ACTIONS:

- *LIR 93-549 INITIATED -- SUBSEQUENTLY UPGRADED TO NCR-94-052.*
- *REVIEW OF PAST TABLE 3.2.F-RELATED MWRs PERFORMED.*
 - *HELD I&C DEPARTMENT TAILGATE SESSIONS TO DISCUSS WORKING ON INSTRUMENTATION LISTED IN TECH. SPECS.*
 - *COMPLETED TRAINING FOR OPERATOR RE TECH. SPEC. SECTIONS 3.1 AND 3.2 INSTRUMENTS.*
- *PROCEDURAL GUIDELINES HAVE BEEN DEVELOPED TO PREVENT THE INCLUSION OF MULTIPLE TECHNICAL SPECIFICATION COMPONENTS INTO A SINGLE MWR.*
- *CAUSES ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [MGMT-94-01].*



DISCUSSION OF APPARENT VIOLATIONS

TRAINING - STAs AND SECURITY OFFICERS

E.M. MACE



TRAINING OVERVIEW

93-202-04

CAUSE SUMMARY

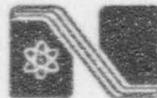
- LACK OF MANAGEMENT, SUPERVISORY, AND INDIVIDUAL ACCOUNTABILITY.
- LACK OF A QUESTIONING ATTITUDE.

FOCUS OF CORRECTIVE ACTIONS

- MANAGEMENT INVOLVEMENT AND COMMUNICATIONS OF EXPECTATIONS.
- REDESIGNED TRACKING SYSTEM.
- COMPLIANCE MATRIX DEVELOPMENT.

RESULTS ACHIEVED

- INCREASED AWARENESS.
- NUMBER OF CERTIFICATION DELINQUENCIES SUBSTANTIALLY REDUCED.
- TRACKING SYSTEM AND COMPLIANCE MATRIX PROCEEDING ON SCHEDULE.



APPARENT VIOLATION 93-202-04 (EXAMPLES 1 & 2)

STAs

NPPD IDENTIFIED THAT BETWEEN OCTOBER 14 AND 21, 1993, WITH THE PLANT IN THE RUN MODE, FIVE SHIFT TECHNICAL ADVISORS STOOD WATCH EVEN THOUGH THEIR TRAINING HAD EXPIRED.

FIRE BRIGADE

NPPD IDENTIFIED THAT DURING 1993, SECURITY OFFICERS WHO WERE MEMBERS OF THE FIRE BRIGADE WERE NOT UNDERGOING QUARTERLY FIRE BRIGADE TRAINING. IN ADDITION, TRAINING SESSIONS HAD NOT BEEN HELD QUARTERLY FOR ALL MEMBERS OF THE FIRE BRIGADE.

NPPD AGREES THAT THE FINDINGS ARE EXAMPLES OF VIOLATIONS OF 10 C.F.R. PART 50, APPENDIX B, CRITERION XVI (RE STAs AND FIRE BRIGADE) AND TECHNICAL SPECIFICATION 6.1.4.B (RE FIRE BRIGADE).



APPARENT VIOLATION 93-202-04 (EXAMPLES 1 & 2) (CONT'D)

CAUSES:

STA

- *INADEQUATE COMMITMENT TO TRAINING PROGRAM IMPLEMENTATION BY MANAGEMENT AND INDIVIDUALS.*

FIRE BRIGADE

- *NPPD IMPROPERLY CONCLUDED THAT THE REQUIREMENT FOR QUARTERLY TRAINING DID NOT APPLY TO FIRE BRIGADE MEMBERS WHO DID NOT COME FROM THE OPERATIONS ORGANIZATION.*
- *PERCEIVED PRIORITY OF OPERATOR LICENSING TRAINING OVER FIRE BRIGADE TRAINING.*
- *INAPPROPRIATE SUPERVISORY GUIDANCE.*



APPARENT VIOLATION 93-202-04 (EXAMPLES 1 & 2) (CONT'D)

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.

CORRECTIVE ACTIONS:

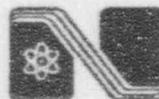
- DRs 93-556, 557 INITIATED.
- NON-CONFORMANCE REPORTS 93-228, 229 AND 243 INITIATED.
- TRAINING DELINQUENCIES RESOLVED.
- VICE-PRESIDENT NUCLEAR ISSUED MEMORANDUM THAT REAFFIRMED MANAGEMENT COMMITMENT TO TRAINING.



APPARENT VIOLATION 93-202-04 (EXAMPLES 1 & 2) (CONT'D)

CORRECTIVE ACTIONS (CONT'D):

- REVISED TRAINING PROGRAM DESCRIPTION FOR STA AND FIPE BRIGADE.
- REDESIGNING TRAINING TRACKING SYSTEM.
- DEVELOPING A TRAINING COMPLIANCE MATRIX.
- CAUSES ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [EMM-94-02, EMM-94-07].



DISCUSSION OF APPARENT VIOLATIONS

FIRE DOORS

E.M. MACE



FIRE DOORS OVERVIEW

93-202-06

CAUSE SUMMARY

- *INADEQUATE MANAGEMENT OVERSIGHT OF FIRE DOOR INSPECTION PROGRAM*

FOCUS OF CORRECTIVE ACTIONS

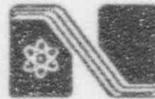
- *INTERIM ACTIONS*
 - *TAILGATE*
 - *PROCEDURE UPGRADES*
 - *FPE OVERSIGHT*
- *TRAINING PROGRAM UPGRADES*
- *MAINTENANCE PROCEDURE UPGRADE*
- *FIRE PROTECTION PROGRAM SELF-ASSESSMENT*
- *ORGANIZATION AND ACCOUNTABILITY IMPROVEMENTS*



FIRE DOORS OVERVIEW

RESULTS ACHIEVED

- *INTERIM ACTIONS MAINTAINING FIRE DOOR OPERABILITY*
- *CRAFT FEEDBACK FROM PROCEDURE INADEQUACIES*



APPARENT VIOLATION 93-202-06

IT WAS DETERMINED THAT SEVERAL FIRE DOORS WERE INOPERABLE DUE TO GAP WIDTHS AND OTHER HARDWARE DEFICIENCIES.

NPPD AGREES THAT HAVING FIRE DOORS INOPERABLE IS A VIOLATION OF TECHNICAL SPECIFICATION 3.19.A.

CAUSES:

- *INADEQUATE MANAGEMENT OVERSIGHT OF FIRE DOOR INSPECTION PROGRAM.*
 - *TRAINING OF INSPECTION PERSONNEL NOT FORMALIZED.*
 - *ERRONEOUS ASSUMPTION THAT PERSONNEL INSPECTING FIRE DOORS HAD NECESSARY SKILLS.*
 - *BASED ON ACTUAL SKILL LEVEL OF PERSONNEL, PROCEDURE 6.4.5.2.12 WAS INADEQUATE.*

SIGNIFICANCE:

- *MINIMAL SAFETY SIGNIFICANCE.*
- *SOME REGULATORY SIGNIFICANCE.*



APPARENT VIOLATION 93-202-06 (CONT'D)

CORRECTIVE ACTIONS:

- *POSTED FIRE WATCHES (COMPENSATORY MEASURES PER TECHNICAL SPECIFICATIONS).*
- *INITIATED MWRs 93-3914, 93-4068, 93-4069, AND 93-4129 TO REPAIR DOORS.*
 - *DETAIL PROVIDED ON HOW TO PERFORM INSPECTIONS -- WALK-THROUGHS WITH FIRE PROTECTION PERSONNEL.*
- *NCRs 93-226, 227, 239, 247, AND 249 ISSUED.*
- *FIRE DOORS REINSPECTED WITH FIRE PROTECTION PERSONNEL PRESENT AND REPAIRED AS NEEDED AND PROMPTLY RETURNED TO FULL OPERABLE STATUS.*
- *FIRE PROTECTION ENGINEERING EVALUATIONS PERFORMED ON EFFECTS OF DISCREPANCIES ON FIRE PROTECTION CAPABILITIES.*
- *PROCEDURE REVISED AS APPROPRIATE.*



APPARENT VIOLATION 93-202-06 (CONT'D)

CORRECTIVE ACTIONS (CONT'D):

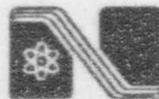
- *INITIATED ACTIVE PARTICIPATION BY FIRE PROTECTION SUPERVISION IN FIRE DOOR INSPECTIONS UNTIL PROCEDURES ARE REVISED AND EFFECTIVENESS OF TRAINING CONFIRMED.*
- *A CORRECTIVE ACTION REVIEW BOARD (CARB 93-03) WAS FORMED TO EVALUATE THIS EVENT AND TO MAKE RECOMMENDATIONS TO MANAGEMENT FOR RECURRENCE PREVENTION.*
 - *PROGRAMMATIC CONTROLS ON FIRE DOORS HAVE BEEN REVISED TO ENSURE THAT OPERABILITY REQUIREMENTS CAN BE PROPERLY ASSESSED AND APPROPRIATE FIRE DOOR CONTROL PROCEDURES WILL BE REVISED.*
 - *A PM PROGRAM FOR HIGH TRAFFIC FIRE DOORS IS IN PROGRESS.*
 - *A FIRE DOOR INSPECTION TRAINING PROGRAM IS UNDER DEVELOPMENT.*
- *DETERMINE THAT SUFFICIENT TECHNICAL DETAIL HAS BEEN INCORPORATED INTO MAINTENANCE PROCEDURES TO ALLOW CRAFT TO PERFORM THE ACTIVITY [RLG-94-01].*



DISCUSSION OF APPARENT VIOLATIONS

CONFIGURATION CONTROL

J.E. LYNCH



CONFIGURATION CONTROL AND DESIGN MODIFICATION OVERVIEW

93-202-05 & 93-202-07

CAUSE SUMMARY

- EXISTING PROCEDURES NOT USED
- CULTURAL
 - AWARENESS OF REQUIREMENTS
 - WORKING AROUND PROBLEMS
 - MANAGEMENT MONITORING AND EXPECTATIONS

FOCUS OF CORRECTIVE ACTIONS

- REW-94-03
 - EVALUATE THE CONFIGURATION CONTROL AND DESIGN CHANGE PROCESS.
- CULTURAL
 - WORK ON IT EVERY DAY



CONFIGURATION CONTROL AND DESIGN MODIFICATION OVERVIEW

93-202-05 & 93-202-07

RESULTS ACHIEVED

- OVERVIEW
- THIRD-PARTY ASSESSMENT OF DESIGN CHANGE PROCESS COMPLETE
- TAILGATE SESSIONS
- WALKDOWNS
- PROCEDURE IMPROVEMENTS



APPARENT VIOLATION 93-202-05 (EXAMPLE 1)

MWR 93-2691 WAS USED TO FABRICATE A REPLACEMENT RESTRICTING ORIFICE PLATE FOR HPCI-RO-137C. NPPD FABRICATED A DUPLICATE BASED ON AN ORIFICE TO AN ADJACENT FLANGE RATHER THAN DETERMINING THE DESIGN REQUIREMENTS FOR THE MISSING ORIFICE PLATE.

NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION II.

CAUSES:

- *ALTHOUGH DESIGN REQUIREMENTS WERE ADDRESSED, EXISTING PROCEDURES WERE NOT UTILIZED.*
- *INFLEXIBILITY BUILT INTO COMPONENT FABRICATION PROCEDURE.*
- *CULTURE WAS NOT CONSISTENT WITH MANAGEMENT EXPECTATIONS.*



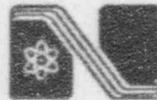
APPARENT VIOLATION 93-202-05 (EXAMPLE 1 CONT'D)

SIGNIFICANCE:

- NO SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.

CORRECTIVE ACTIONS:

- DR 93-552 INITIATED.
- TAILGATE SESSIONS HAVE BEEN HELD WITH ALL ENGINEERING PERSONNEL ON PROCEDURAL ADHERENCE AND WORKING AROUND PROBLEMS.
- ENGINEERING PROCEDURE 3.21, "FABRICATION OF REPLACEMENT PARTS" WILL BE REVIEWED TO FACILITATE THE APPLICATION OF THE PROCEDURE.
- CAUSES ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [REW-94-03].



APPARENT VIOLATION 93-202-05 (EXAMPLE 2)

MWR 93-0855 WAS USED TO MODIFY A DRAIN LINE FROM A RESIDUAL HEAT REMOVAL PIPE IN ACCORDANCE WITH TWO MEMORANDA FROM THE NUCLEAR ENGINEERING DEPARTMENT RATHER THAN UNDER AN APPROVED DESIGN PACKAGE.

NPPD AGREES THAT THIS IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION II.

CAUSE:

- FAILURE TO IMPLEMENT PROCEDURE FOR PLANT MODIFICATIONS.



APPARENT VIOLATION 93-202-05 (EXAMPLE 2 CONT'D)

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.

CORRECTIVE ACTIONS:

- DR 94-246 INITIATED.
 - A PROCEDURAL PROCESS WILL BE DEVELOPED FOR A GRADED APPROACH TO DESIGN CHANGE EVALUATIONS.
- CONFIGURATION CONTROL BEING ADDRESSED BY SITE-SPECIFIC INDUSTRY EVENTS TRAINING.
- CAUSES ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [MGMT-94-01].



APPARENT VIOLATION 93-202-05 (EXAMPLE 3)

MWR 93-0801 WAS USED TO REPLACE THE RHR PUMP SUCTION SPOOL PIECES. THE SPOOL PIECE WAS TORQUED TO THE MAXIMUM VALUE ALLOWED IN MAINTENANCE WORK PRACTICE 5.1.2. WHEN THE PIPE WAS FILLED WITH WATER FOR INSERVICE LEAK TESTING, ONE OR MORE OF THE JOINTS LEAKED. THE CRAFTSMEN SUBSEQUENTLY TIGHTENED THE BOLTS TO PREVENT LEAKAGE. NO ENGINEERING INVOLVEMENT WAS OBTAINED TO ENSURE THAT THE BOLTS HAD NOT BEEN OVERSTRESSED.

NPPD BELIEVES THAT THE FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V (INADEQUATE PROCEDURE) INSTEAD OF CRITERION II (QUALITY ASSURANCE PROGRAM).

CAUSES:

- FAILURE TO STRICTLY FOLLOW PROCEDURE REQUIREMENTS.
- THE PROCEDURE WAS TOO LIMITING -- USE OF THE TERM "MAXIMUM" IN THE MAINTENANCE INSTRUCTION WAS INCORRECT -- CONSISTENT WITH INDUSTRY GUIDANCE, THE "MINIMUM" TORQUE VALUE SHOULD HAVE BEEN PROVIDED.
- CULTURE.



APPARENT VIOLATION 93-202-05 (EXAMPLE 3 CONT'D)

SIGNIFICANCE:

- MINIMAL SAFETY SIGNIFICANCE.
- SOME REGULATORY SIGNIFICANCE.

CORRECTIVE ACTIONS:

- DR 93-551 INITIATED.
- CONDUCTED VISUAL INSPECTION TO IDENTIFY IF FLANGE DEFORMATIONS HAVE OCCURRED.
- ASSESSED MAXIMUM TORQUE FOR BOLTS.
- CHECKED SAMPLING OF BOLT BREAK-AWAY TORQUE.



APPARENT VIOLATION 93-202-05 (EXAMPLE 3 CONT'D)

CORRECTIVE ACTIONS (CONT'D):

- AS AN ENHANCEMENT TO FLANGE/BOLT TORQUING PRACTICES, NPPD WILL PROVIDE MINIMUM AND MAXIMUM BOLT TORQUE CRITERIA FOR TORQUING IN MAINTENANCE WORK PRACTICES.
- CAUSE ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [RLG-94-01, MGMT-94-01].



DISCUSSION OF APPARENT VIOLATIONS

DESIGN MODIFICATIONS

J.E. LYNCH



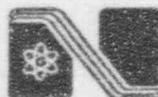
APPARENT VIOLATION 93-202-07

CHANGES TO THE DESIGN AND CONFIGURATION OF PIPING AND EQUIPMENT INSULATION WERE ROUTINELY MADE WITHOUT THE USE OF THE DESIGN CHANGE PROCESS. AS A RESULT, REVIEWS WERE NOT PERFORMED IN A MANNER COMMENSURATE WITH THOSE APPLIED TO THE ORIGINAL INSULATION DESIGN.

NPPD AGREES THAT THIS FINDING, WHICH WAS IDENTIFIED BY NPPD, REPRESENTS A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION III.

CAUSES:

- *INADEQUATE TRAINING.*
- *UNCLEAR GUIDANCE ON MAINTENANCE OF THE PLANT CONFIGURATION.*
- *MANAGEMENT OVERSIGHT LESS THAN ADEQUATE.*



APPARENT VIOLATION 93-202-07 (CONT'D)

SIGNIFICANCE:

- *MINIMAL SAFETY SIGNIFICANCE.*
- *SOME REGULATORY SIGNIFICANCE.*

CORRECTIVE ACTIONS:

- *DR 93-522 INITIATED.*
- *TAILGATE SESSIONS HAVE BEEN CONDUCTED TO INFORM CNS ENGINEERS OF THIS ISSUE AND RESULTING ACTION PLANS.*
- *INTERIM INSULATION CONTROLS DEVELOPED AND DISCUSSED WITH CRAFT AND ENGINEERING -- ENSURES THAT ALL WORK IS CAPTURED UNDER THE MWR PROCESS (ENSURES ENGINEERING INVOLVEMENT).*
- *PERFORMED WALKDOWN OF A SAMPLE OF ACCESSIBLE IMPORTANT TO SAFETY SYSTEMS.*



APPARENT VIOLATION 93-202-07 (CONT'D)

CORRECTIVE ACTIONS (CONT'D):

- PERFORMED WALKDOWN OF REMAINING ACCESSIBLE IMPORTANT TO SAFETY SYSTEMS.
- PLANNED INSPECTIONS OF INACCESSIBLE IMPORTANT TO SAFETY SYSTEMS.
- INCORPORATED LESSONS LEARNED INTO GOT TRAINING AND INDUSTRY EVENTS TRAINING.
- CONTINUED MANAGEMENT EMPHASIS ON IMPROVED PERSONNEL PERFORMANCE INCLUDING A HEIGHTENED QUESTIONING ATTITUDE [MGMT-94-01].



CLOSING REMARKS

G.R. HORN



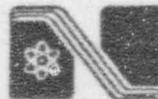
CLOSING REMARKS

- *MAJORITY OF VIOLATIONS OCCURRED BEFORE NPPD HAD DEVELOPED AND IMPLEMENTED CULTURE/PERFORMANCE IMPROVEMENTS.*
 - *NO LONGER REPRESENTATIVE OF THE WAY BUSINESS IS DONE AT CNS.*
- *HOWEVER, NPPD STILL HAS NOT ACHIEVED A LEVEL OF PERFORMANCE THAT MEETS NPPD EXPECTATIONS.*
- *MANAGEMENT IS PROMPTLY ADDRESSING PROGRAMMATIC AND ISSUE-SPECIFIC CONCERNS.*
- *NPPD MUST AND WILL CONTINUE IMPLEMENTATION OF PERFORMANCE IMPROVEMENT EFFORTS*
 - *WILL NOT BE SATISFIED WITH SUBSTANDARD PERFORMANCE -- WE MUST FOLLOW THROUGH COMPLETELY.*



CLOSING REMARKS (CONT'D)

- *NPPD REQUESTS ENFORCEMENT DISCRETION WHEN APPROPRIATE.*
- *SEVERAL VIOLATIONS:*
 - *WERE IDENTIFIED AS PART OF NPPD CORRECTIVE ACTION EFFORTS.*
 - *HAVE MINIMAL SAFETY AND REGULATORY SIGNIFICANCE (NPPD RECOGNIZES THE ADDITIONAL IMPACT FROM CUMULATIVE EFFECTS OF THE VIOLATIONS).*
 - *HAVE THE SAME OR SIMILAR ROOT CAUSE AS VIOLATIONS FOR WHICH ESCALATED ENFORCEMENT ACTION HAS ALREADY BEEN TAKEN.*
- *THE VIOLATIONS DISCUSSED TODAY WERE OR WILL BE CORRECTED WITHIN A REASONABLE TIME FOLLOWING IDENTIFICATION.*
- *ADDITIONAL EXAMPLES OF VIOLATIONS ADDRESSED IN PREVIOUS ESCALATED ENFORCEMENT ACTIONS DO NOT SUBSTANTIALLY CHANGE THE SAFETY SIGNIFICANCE OR THE CHARACTER FOR THE REGULATORY CONCERN ARISING OUT OF THE INITIAL VIOLATION.*
 - *UNCLEAR REGULATORY BENEFIT FROM ADDITIONAL ESCALATED ENFORCEMENT.*



CLOSING REMARKS (CONT'D)

- *NPPD REQUESTS THE OPPORTUNITY TO FOCUS ON AND ADJUST PERFORMANCE IMPROVEMENT EFFORTS -- THE NRC'S MESSAGE CONTINUES TO BE RECEIVED, UNDERSTOOD, AND ACTED UPON.*

- *TODAY'S MANAGEMENT MEETING ON PERFORMANCE IMPROVEMENT STATUS WILL PROVIDE GOOD AND BAD NEWS.*
 - *GOOD NEWS IS INTERPRETED BY NPPD AS A SIGN THAT WE ARE ON THE RIGHT TRACK, NOT AS A BASIS FOR RELAXING EFFORTS.*

 - *BAD NEWS IS CONSIDERED A SIGN THAT ONGOING EFFORTS MUST BE MODIFIED -- ADDITIONAL NEW PROGRAMS ARE NOT THE ANSWER!*

