

U.S. NUCLEAR REGULATORY COMMISSION

Report No. 50-362/82-17

Docket No. 50-362 Licensee No. CPPR-98 Safeguards Group _____

Licensee: Southern California Edison (SCE) Company
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770

Facility Name: San Onofre Unit 3

Inspection at: San Onofre, California

Inspection Conducted: August 23 - September 3, 1982

Inspectors: J. P. Stewart, Reactor Inspector J. Hernandez 8/16/82
Date Signed

Date Signed

Date Signed

Approved by: J. Hernandez J. Hernandez 8/16/82
D. F. Kirsch, Chief, Reactor Projects Section No. 3 Date Signed
Reactor Projects Branch No. 2

Summary: Inspection on August 23, 1982 - September 3, 1982 (Report No. 50-362/82-17)

Areas Inspected: Routine, unannounced inspection of the Unit 3 Preoperational Test Program including the following areas: operational staffing; operational staff training; comparison of as-built to FSAR description; test program records; safety committee; and test results evaluation. The inspection activities involved 65 inspection hours by one regional based inspector.

Results: Of the six areas examined, no items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

- +*J. Iyer, Compliance Engineer
- +*D. Schone, Project Quality Assurance Supervisor
- +*P. Croy, Manager, Configuration Control and Compliance
- +*J. Curran, Manager, Quality Assurance
- + P. King, Unit 2/3 Operations Quality Assurance Supervisor
- + W. Lazear, Startup Quality Assurance Engineer
- +*D. Breig, Project Startup Engineer
- +*C. Horton, Startup Quality Assurance Supervisor
- + C. Patterson, Startup Quality Assurance Engineer
- *W. Moody, Deputy Station Manager
- *T. Garven, Unit 2/3 Operations Quality Assurance Lead Engineer
- *W. McRory, Unit 2/3 Operator Training Administrator
- *G. Gibson, Compliance Engineer
- H. Mathis, Manager, Nuclear Training Division
- J. Bankovich, Unit 2/3 Maintenance Supervisor

+Denotes those attending exit interview on August 27, 1982.

*Denotes those attending exit interview on September 3, 1982.

The inspector also interviewed and talked with other licensee employees during the course of the inspection. These included control room operators, computer data processors and station and contractor quality assurance personnel.

Also present at the September 3, 1982 exit interview was Mr. G. Johnston, NRC Reactor Inspector.

2. TMI Action Plan Requirements

Item II.B.4.1 Training for Mitigating Core Damage (Closed)

The inspector reviewed training memorandum 8-80, Revision 1, February 23, 1981 "Training for Mitigating Core Damage," and the individual training records of several shift technical advisors and licensed reactor operators. Based on this review, the inspector concluded that the licensee's training program for "Training for Mitigating Core Damage," is implemented and meets the requirements of this item.

This item is closed.

3. Preoperational Test Results (Open)

The inspector reviewed test report 3PE-230-01, "Component Cooling Water." The inspector noted that the administrative procedures were adhered to in processing test changes and test deficiencies. Quality Assurance (QA) reviews were verified by examining QA holdpoints and appeared to be conducted in accordance with administrative procedures with two exceptions.

The two exceptions were the absence of QA hold-point signatures in the test report copy. The licensee's representative stated that the quality assurance engineer, who had witnessed the test had retired several days after witnessing the test. This item and the retests associated with the fifteen outstanding Test Exceptions Reports (TER) will be reviewed during a future inspection. All of the tests which were to be examined by the inspector had not yet undergone review by the test working group. These tests will be examined during a future inspection. (50-362/82-17-01)

4. Comparison of As-Built Plant with FSAR Commitments (Open)

The inspector examined portions of the High Pressure Safety Injection (HPSI), Low Pressure Safety Injection (LPSI), and the Safety Injection Tank Systems to verify that the as-built systems conform to commitments contained in the FSAR. The inspection consisted of a visual observation that the as-built installations were in agreement with Table 7.5-1 (pages 7.5-10 through pages 7.5-12) of the FSAR and the following safety-injection system piping and instrumentation diagrams (F&ID): (1) Drawing No. 40112, FSAR Figure 6.3-1; and (2) Drawing No. 40113, FSAR Figure 6.3-2.

Based upon these visual observations, the inspector determined that the as-built plant systems which were examined conformed to the P&ID in the FSAR with four exceptions. The first exception was the temporary removal of HPSI pump no. 1 (P017) minimum flow discharge piping/orifice (including a bypass valve) to the refueling water storage tanks. A temporary carbon steel piping line was installed in place of the orifice to allow required diesel load sequency testing. The second exception was the removal of the suction piping relief valves on HPSI pumps no. 1 and no. 3. These valves were apparently removed for repair and testing. The third exception was the installation of an additional check valve in the suction piping of both LPSI pumps. The modification of the LPSI pump no. 2 (P016) was still in progress at the time of the inspection. The fourth exception was the absence of several valve indication and controllers on control room panels no. CR57 and CR58 associated with the shutdown cooling system. It was determined that the LPSI suction check valve modification and shutdown cooling system modifications which were still in progress were part of three approved

Design Change Packages (DCP) 41-N, 44-N and 52-N which had not yet been incorporated in the P&ID in the FSAR. These four exceptions will be re-examined during a future inspection (50-362/82-17-02).

5. Operational Staffing (Closed)

The licensee's operational staffing was examined against the requirements of the San Onofre FSAR, Chapter 13, section 6.2, Organization of the Draft Technical Specification for San Onofre Unit 3, and pertinent industry standards. The following inspection findings resulted:

- a. The organizational structure was found to be in accordance with the San Onofre Unit 3 organization chart (Figure 6.2-2 of the Technical Specifications and Figure 13.1-3 of the FSAR).
- b. All required staff positions were filled for San Onofre Unit 3 operation.
- c. San Onofre Unit 3 staff personnel satisfied the minimum qualification requirements of ANSI/ANS 3.1-1978 and ANSI N18.1-1971 for the positions listed in Section 13.1.3 of the FSAR and Figure 6.2-2 of the Technical Specifications.
- d. Staff personnel filling the Shift Technical Advisor and Independent Safety Engineering Group positions exceed the minimum qualifications described in paragraph 6.2.3 and 6.2.4 of the Technical Specifications.
- e. The Engineering and Technical Services (reporting to Technical Manager) organization was staffed for San Onofre Unit 3 in accordance with Figure 13.1-3 of the FSAR.
- f. The Quality Assurance/Quality Control organization had been designated as indicated in Figure 17.2-1 of the Topical Quality Assurance Manual (Topical Report SCE-1A).
- g. Quality Assurance/Quality personnel in the following positions met the minimum requirements of ANSI 45.2.6-1973, and ANSI N45.2.23-1978 as applicable:
 - (1) Auditors
 - (2) Lead Auditors
 - (3) QC Inspectors (Station and Contractor)
 - (4) Welders and non-destructive Test Inspection Personnel (Contractor)

No noncompliance items or deviations were identified.

6. Preoperational Test Records (Closed)

a. Program Review

The inspector examined the following procedures:

QAP N18.04, "QA Organization Audits-Scheduling, Planning, Performance and Followup"

QAP N18.05, "Qualification of Quality Assurance Auditors"

QAP N17.04, "Quality Assurance Record Transmittal to EDM"

QAP N17.05, "Identification, Correction and Modification of Quality Records"

TI-5, "Document Control"

TI-17, "System Turnover"

TI-22, "Design Change Control"

TI-24, "Maintenance and Repair"

TI-26, "Startup Training"

Based on review of the above procedures, and the findings of the San Onofre Unit 2 records inspection (Report No. 50-361/81-28) the licensee's program establishes the administrative controls for proper maintenance and storage of records during the preoperational testing period.

b. Program Implementation

The inspector examined selected records in the areas of startup preoperational tests, personnel training and qualifications and based on this inspection and the referenced Unit 2 inspection report findings, the inspector determined that the licensee is maintaining the records in accordance with the specified administrative control procedures.

7. Safety Committee Activity (Closed)

The inspector determined based on the present activity of the safety committees on Unit 2 operations and previous inspections on Unit 2 safety committee program review and program implementation that the safety committee's review activities are being carried out in accordance with the program responsibilities stated in the San Onofre Unit 3 technical specification draft.

8. Operating Staff Training (Open)

a. Program Review

The inspector examined the following program descriptions, procedures and training memorandums (TM):

- (1) San Onofre Units 2 and 3 FSAR section 13.2, "Training"
- (2) NE&O Jurisdiction Statement, Revision 0, November 3, 1981, "Nuclear Training Division"
- (3) TM 4-80, "San Onofre Nuclear Generating Station Training Record Maintenance"
- (4) TM 5-80, "Maintenance Personnel Training and Retraining"
- (5) TM 8-80, "Training for Mitigating Core Damage"
- (6) TM 4-81, "Feedback of Significant Operating Experience Into Training Programs"
- (7) TM 9-81, "General Employee Orientation Training"
- (8) TM 7-81, "Professional Radiation Training and Retraining Program"
- (9) TM 20-81, "Nuclear Operator Training and Requalification Programs, San Onofre Unit 1 or Units 2/3"

Based on review of the above programs and procedures the inspector determined that the licensee has documented a training program consistent with the FSAR training commitments and that responsibilities for administering the training programs have been established.

b. Program Implementation

The inspector reviewed the training records of the following job classifications:

- (1) Principal staff members
- (2) Reactor operator candidates
- (3) Senior reactor operator candidates
- (4) Maintenance craftsmen
- (5) Instrument and Control Technicians
- (6) Radiochemistry Technicians
- (7) Quality Assurance/Quality Control Technicians
- (8) Radiation Protection Technicians
- (9) Shift Technical Advisors

The inspector determined by reviewing the individual training records described above and by discussions with the licensee's representatives that the training programs committed to in FSAR were being implemented.

The inspector identified the following concerns in the maintenance of individual training records:

- . TM 4-80 has not been revised to define the actual training documentation forms presently being used by the Nuclear Training Division in the individual training records.
- . Licensed operator individual training records did not contain oral exam/interview or operator on shift training/retraining documentation as described in TM 4-80.

- . The individual training summary form was missing from non-licensed individual training records.
- . The individual training summary form was not being updated quarterly as described in TM 4-80.
- . The qualifications of non-licensed individuals is generally not substantiated by documentation in the individual's training record.
- . Maintenance of all training records were inconsistent in that some records contained examinations/tests while others did not.
- . One record reviewed contained an individual's performance appraisal.
- . General employee training documentation was missing from several training records.

In response to the above concerns, the licensee agreed to review and revise training memorandum 4-80 to resolve the identified concerns.

The licensee's corrective action will be examined during a future inspection. (50-362/82-17-03)

9. Exit Interviews

The inspector met with the licensee's representatives (denoted in paragraph 1) on August 27 and September 3, 1982. The inspector informed the licensee during the meeting on August 27, 1982, that, review of preoperational test results by the test working group was required before test results review could be completed. During the September 3, 1982 exit meeting, the inspector noted that the training records deficiencies, though taken individually appeared to be minor, indicated that a major review effort of all personnel training records should be undertaken, after it has been established what documents should be included in the training records to meet commitments established in the training programs. The licensee acknowledged the inspector's concerns.