#### U. S. NUCLEAR REGULATORY COMMISSION

#### REGION I

Report No. 50-293	/82-25		
Docket No. 50-293			
License No. DPR-3	5 Priority -	Category _ C_	
	Edison Company 1ston Street in, Massachusetts 02199		
Facility Name: Pi	lgrim Nuclear Power Station	, Unit 1	
Inspection At: Pl	ymouth, Massachusetts		
	ted: September 14 - 17,		
Inspectors: A.R.	obert a. M. Brearty A. McBrearty, Reactor Cosp	ector	October 5, 1982 date
	P. Durr, Chief, M&P Section	n, EPB	10/5/82 date

Inspection Summary:

Inspection on September 14 - 17, 1982 (Report No. 50-293/82-25)

Areas Inspected: Routine, unannounced inspection of Inservice Inspection (ISI) program and ISI drawing control, licensee action on previous inspection findings, and licensee response to IE Bulletins. The inspection involved 25 inspection hours onsite by one regional based inspector.

Results: No violations were identified.

### Details

#### 1. Persons Contacted

### Boston Edison Company

J. Ashkar, Deputy Engineering Manager

H. F. Brannan, QA Manager

R. J. DeLoach, QC Group Leader F. N. Famulari, ISI Group Leader

J. Jeffries, Nuclear Engineer - S&SA Group

C. J. Mathis, Station Manager

T. M. Thurston, Licensing Engineer G. G. Whitney, Plant Engineer

E. J. Ziemianski, Mgt. Services Group Leader

#### USNRC

J. R. Johnson, Senior Resident Inspector

\*Denotes those present at the exit meeting. \*\*Contacted by telephone.

#### 2. Licensee Action on Previous Inspection Findings

(Closed) Unresolved item (78-12-01): Liquid penetrant material certification not available for penetrant materials used for inspection by Programmed and Remote Controls Corporation (PAR) of Poison Spent Fuel Racks for Pilgrim, Unit 1. The Yankee Atomic Electric Company (YAEC) Surveillance Report Number 78-4-7, covering audits of welder qualifications and control of liquid penetrant materials at PAR on December 19, 1978, was reviewed by the inspector. The YAEC audit of PAR indicated that although traceability of penetrant materials was not maintained for each examination, PAR met their contractual obligations; and, further, only materials for which certification was documented was released to production for use. The surveillance report indicated that no uncertified penetrant material was found in possession of PAR.

Based on the above, this item is considered closed.

(Closed) Unresolved item (78-12-02): Welder identification lacking on weld procedures. The item concerned welding procedure qualification records. Form QW-483, suggested for procedure qualification record (PQR), provides a space for a welder's name, but this is not required information to qualify the procedure. This item is considered closed.

## Licensee Response to IE Bulletins

#### IE Bulletin No. 79-03A

The inspector found that the licensee had reviewed records to ascertain whether or not ASME SA-312, type 304, stainless steel fusion-welded pipe was used in the plant.

The licensee verified that no SA-312 or A-312, type 304 series, fusion-welded pipe, subject to design stresses greater than 85 percent of the Code allowable stresses, is used in safety-related systems in the plant. A-312, type 304, fusion-welded pipe was used at the plant in the following areas:

- a. Suction side of the stand-by liquid control pumps.
- b. Spent fuel pool skimmer drains.

Licensee letter 80-152, dated July 24, 1980, completes the licensee's action on this item.

This item is closed.

#### IE Bulletin No. 80-08

The licensee has agreed to review and clarify his response to item 2.a and item 2.b of the Bulletin, as provided in his letter dated May 16, 1980, to the NRC, Region I. These actions will complete the licensee action on this item.

This item remains open.

#### IE Bulletin No. 80-13

The inspector reviewed the results of the remote, visual examination of the core spray sparger system performed during the October 1981 refueling outage. The inspections were performed by Southwest Research Institute (SWRI) personnel under contract to the licensee. The report issued by SWRI indicates that improved inspection techniques show that the majority of the indications found in 1980 and reported to the NRC are non relevant. Two indications of cracking were verified as exhibiting no change since the 1980 inspection.

The inspection results were reported to the NRC and resulted in the issuance of Amendment No. 54 to the Pilgrim operating license and a supporting safety evaluation by the Office of Nuclear Reactor Regulation.

The above completes the licensee's action. This item is closed.

# 4. Inservice Inspection (ISI) Activities

#### a. ISI Program

The first ten-year inspection interval at Pilgrim Unit 1 will end on December 8, 1982. The licensee's review of the ISI program status for the first interval indicated that the following items were not examined:

- Reactor vessel shell-to-flange weld from 116° to 120° (1 1/2 feet)
- Reactor vessel studs #46 and #47
- Reactor vessel nuts #46 through #56
- Hydrostatic pressure tests for Class 2 and 3 piping systems.
- Internal inspection of MOV 2301-4

Boston Edison Company has proposed to include these inspections as part of the first period of the second inspection interval, which will be considered as an extension of the first inspection interval for the above items. Extension of an inspection interval by as much as one year to permit inspections to be concurrent with plant outages is permitted by ASME Section XI, 1974 Edition, paragraph IWA-2400. The above information was submitted by BECo letter No. 82-185, dated July 2, 1982, to the NRC. The RPV stud, nut, and weld examinations will be in accordance with Section XI, 1974 Edition, and the hydrostatic test will be governed by the 1977 Edition of Section XI.

The inspector was advised that the licensee is considering installing a computerized ISI data control system which should minimize the possibility of missing required examinations in the future.

In accordance with the requirements of 10 CFR 50.55a(g), a revised ISI program must be submitted six months prior to the start of the next ten-year inspection interval. Because the first interval will end on December 8, 1982, the revised program was due on June 8, 1982. The licensee has requested an extension to December 8, 1982, for their submittal to the NRC. The inspector was informed that the anticipated submittal date is December 3, 1982. The licensee additionally stated that requests for relief from Code requirements will be submitted at that time. Such requests must be approved by the NRC. The governing Code for the second inspection interval will be ASME, Section XI, 1980 Edition, including the Winter 1980 Addenda.

## b. Control of ISI Drawings

Selected drawings were reviewed to ascertain that controlled drawings reflect the as-built plant system configuration. The following were included in the inspector's review:

- P&ID-ISI-M-250, CRD Hydraulic System
- P&ID-ISI-M-245, RCIC System

Changes to the CRD system, which were made during the 1981 refueling outage, were not depicted on the drawings. An attachment to the drawings, dated 3/12/82, indicated that the CRD system no longer ties into the RCIC system as shown on drawing M-245 and that an updated drawing (P&ID) is required.

As a result of licensee QA audit #81-32, deficiency report (DR) #DR844, dated 1/20/82, was issued and addressed the problem concerning P&ID control. Initially, the licensee anticipated that ISI-M-200 series drawings would be updated and entered in the Document Control System by June 1, 1982. The inspector was informed that the reason for missing the June 1 date is that the scope of the work was found to be greater than originally anticipated.

An office memorandum, dated July 7, 1982, regarding the extension of the completion date for DP844 assigns the responsibility for updating the ISI-M-200 series drawings to the ISI group leader.

NUTECH has been contracted by the licensee to update P&ID's and will make recommendations regarding a procedure for placing ISI and IST items in the program.

At the exit meeting on September 17, 1982, the inspector stated that there appeared to be a problem regarding control of ISI drawings because P&ID's and isometric weld drawings were not being kept current. He further stated that ISI program status cannot be determined if accurate drawings are not available and that the status of the ISI drawings will impact on the accuracy of the ISI program revision to be submitted in December 1982 to the NRC.

The licensee stated the following:

- O Update of boundary P&ID's will be completed by NUTECH.
- QA procedures will be revised to assure that the plant ISI group reviews Plant Design Change Requests (PDCR) to select items that must be entered in the ISI program.

The update of isometric drawings will be looked at.

The inspector stated that the above will be examined during a subsequent NRC inspection. (82-25-01).

No violations were identified.

#### 5. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on September 17, 1982. The inspector summarized the scope and findings of the inspection.