

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Report: 50-498/82-13
50-499/82-13

Dockets: 50-498; 50-499

Category A2

Licensee: Houston Lighting and Power Company
P. O. Box 1700
Houston, Texas 77001

Facility Name: South Texas Project, Units 1 and 2

Inspection at: South Texas Project, Matagorda County and Houston, Texas

Inspection Conducted: August 1982

Inspectors:

for *S.E. Martin* 9/30/82
W. M. Hill, Senior Resident Inspector, Details
Section A (paras. 2, 3, 4, 6b, 10 and 11) Date

D.P. Tomlinson 9-28-82
D. P. Tomlinson, Reactor Inspector, Engineering
Section, Details Section A, (para 5) Date

K.A. Whittlesey 10/1/82
K. A. Whittlesey, Reactor Inspector, Engineering
Section, Details Section A, (para 6a) Date

for *S.E. Martin* 9/30/82
W. G. Hubacek, STP Coordinator, Details
Section A, (paras 1, 2, 7, 8, 9, 11, 12, and 13) Date

for *R.H. Brickley* 10/4/82
D. G. Breaux, Reactor Engineer, Vendor Program
Branch, Section B Date

Approved:

W.A. Crossman 10/1/82
W. A. Crossman, Chief, Reactor Project Section B Date

for *R.H. Brickley* 10/4/82
C. J. Hale, Chief, Reactor System Section, VPB Date

D. M. Hunnicutt
D. M. Hunnicutt, Chief, Engineering Section

10/4/82
Date

Inspection Summary

Inspection Conducted During the Period of August 1982 (Report 50-498/82-13;
50-499/82-13)

Areas Inspected: Construction activities related to the transfer of engineering and management functions from Brown & Root (B&R) to Bechtel Power Corporation (Bechtel); Bechtel review of the existing design; storage and maintenance activities; personnel training and certification; site tours; document control; essential cooling water (ECW); welding restart program; meeting with licensee representatives concerning restart of safety-related construction activities; test fill for Category I backfill; ECW piping installation; audits; and QA records. The inspection involved 354 inspector-hours by five NRC inspectors.

Results: No violations or deviations were identified.

DETAILS SECTION A

1. Persons ContactedPrincipal Licensee Employees

- *J. Geiger, QA Manager
- *H. Walker, Project QA Manager
- *D. Keating, Project QA General Supervisor
- *J. Williams, Site Manager
- *J. Barker, Supervising Project Engineer
- T. Zwick, Mechanical QA Specialist
- C. Wright, Project QA Supervisor, Mechanical/NDE
- T. McGriff, Civil QA Engineer
- *T. Morrow, Construction Superintendent
- G. Steinman, Lead Site Engineer

Other PersonnelBechtel Power Corporation (Bechtel)

- B. McCullough, Construction Manager
- *J. Downs, Deputy Construction Manager
- *L. Hurst, Project QA Manager
- W. Houston, Project QA Engineer
- R. Ayersman, BOP Manager
- R. Tietz, ECW Coordinator
- R. T. Kay, Training Coordinator
- J. Dallam, Project Administrative Supervisor
- *H. Reuter, Resident Project Engineer
- *W. Priest, Construction Manager
- R. Cantrell, Lead Auditor

Ebasco Services, Inc. (Ebasco)

- *J. Crnich, Construction Manager
- *C. Hawn, Quality Program Site Manager
- R. Grippardi, QC Site Supervisor
- J. Martin, Resident Engineer - Field
- *J. Thompson, Site Manager
- F. Miller, Project Welding Superintendent
- J. Murphy, Project Superintendent (Unit 1)

Pittsburgh Testing Laboratory (PTL)

- B. Triplett, Site Manager

*Denotes individuals attending one or more exit interviews during August 1982.

2. Site Tour

Routine tours of the site were conducted by the NRC inspectors to observe housekeeping activities; general cleanliness; protection and preservation of equipment and material; personnel access control; and plant status. Areas observed included:

a. Units 1 and 2

Reactor containment buildings, mechanical-electrical auxiliary buildings, fuel handling buildings, and diesel generator buildings.

b. Site

Reservoir, essential cooling pond, and storage areas, including the warehouses, laydown areas, and the welding fabrication shop.

With regard to the above areas, the NRC inspector confirmed the following:

Safety-related and storage areas were free from accumulations of trash, refuse, and debris.

Work areas were clean and orderly.

Tools, equipment, and material were returned to their proper storage locations when no longer in use.

No violations or deviations were identified.

3. Storage and Maintenance

The NRC inspector observed activities in several warehouses and other designated storage areas with particular attention paid to the following:

- a. Equipment in various storage areas was segregated and classified as levels A through D to provide appropriate storage and environmental control for various types of equipment.
- b. Storage areas were not being used to store food, drink, or salt.
- c. An active program was in effect to control rodents and small animals.
- d. Racks, crates, and cribbing were carrying the full weight without component distortion.
- e. All items were labeled and stored in a manner that allowed access for inspection.
- f. Fire protection systems and equipment were available for use.
- g. Sufficient dunnage was available to protect materials and components in storage.
- h. Canvas or plastic covering was available for weather protection, as required.

- i. Protective covers and seals were properly attached.
- j. Personnel access to the storage locations was adequately controlled.

No violations or deviations were identified.

4. ECW Piping Installation

The NRC inspector conducted a review of the specifications and drawings applicable to the ECW pipe installation. Bechtel Drawing 5Y57-Y-10001, Revision 0, dated August 9, 1982, "Yard-Civil Essential Cooling Water Pipe Installation Details," provides a drawing of a typical trench section and associated piping installation details. The notes provide amplifying remarks as follows:

"(3) The supply, testing, and placing of concrete for the mud mat and the pipe bedding shall be in general conformance with specification Nos. 2A010CS001, 2A010CS027, and 2A010CS028 subject to the extent defined herein:

"(3.1) Concrete Supply: The concrete constituents: cement, admixtures, aggregates, and water shall be in conformance with specification CS001, except that the qualification and in-process testing, the certification, and the QA program requirements are not mandatory. The water for mixing concrete shall be clean as described in subsection 4.4.1, but chemical analyses and comparisons per subsection 4.4.2 are not mandatory."

The NRC inspector discussed note 3.1 of the drawing with Houston Lighting and Power (HL&P) and Bechtel representatives to confirm his understanding. The NRC inspector was unable to determine if the note (drawing) was acceptable with regard to the Quality Assurance program. This item is unresolved pending further review (8213-01). The NRC inspector was also unable to determine if installation of the bedding (beneath the piping) constitutes a design change and if any additional engineering review (evaluation) was necessary. This item is also unresolved pending further review (8213-02). The NRC inspector had no further questions regarding ECW drawings or specifications.

5. ECW Pipe Welding Restart Program

The NRC inspector reviewed 16 Ebasco procedures related directly to the welding of the aluminum bronze ECW piping and 5 others related to the general welding program. Those directly related included the requirements for personnel training and qualification, weld procedure qualification, control of weld filler material, documentation, repairs, liquid penetrant

examination, and radiography. All of the procedures reviewed appeared to be consistent with the requirements of the ASME Boiler and Pressure Vessel Code, Section III, V and IX.

The NRC inspector toured the only active weld filler material issue station onsite. The attendant was informally interviewed and found to be fully aware of the procedural requirements for the storage, issuance, and return of weld filler material. Only one rod storage oven was in operation. The lot and heat numbers of the stored material were affixed to the oven door and agreed with the receiving inspection documentation. Three thermometers for monitoring oven temperatures were found to have current calibration stickers and the oven temperature was within ASME and procedural limits. Only two types of material were currently being issued from the rod room and both were identified not only by the manufacturers identification but by the color-code painted ends as specified in Ebasco Procedure CSP-88, Revision 1. A receptacle was present for the segregation and disposal of returned rod stubs and damaged welding rod. No uncontrolled filler material or rod stubs were observed.

The NRC inspector reviewed the qualification records of all 10 welders presently qualified to weld aluminum bronze piping. Each qualification was accomplished in accordance with Ebasco Procedure CSP-81, Revision 1, and Section IX of the ASME Code. Radiographs for each of the 10 tests were reviewed to assure that the required acceptance criteria were met and the proper radiographic quality was achieved. Each radiograph exhibited the required identification, penetrometer, coverage, density, and sensitivity.

The NRC inspector inspected the area where the ECW piping repairs were to commence. Each pipe in the repair area was situated on dunnage and was not in contact with the ground. Several excavated areas were observed on Joint No. 24 of Line No. 1202. Defective areas of this and other welds were identified by the previous constructor as part of their reinspection program but were not repaired at that time. Defect removal on this joint resulted in three through-wall excavations requiring a considerable amount of edge buildup and joint preparation prior to making the actual repair welds. The NRC inspector observed the preparation of the repair areas, the QC inspections performed, and reviewed the weld repair instructions. He also observed the QC monitoring of the welding process while it was in progress. The completed repair areas were examined by Ebasco QC using the liquid penetrant method and found to be acceptable. Subsequent radiographic examinations revealed that one repair contained a subsurface linear indication and was rejected. The NRC inspector reviewed the radiographs of these repairs and of seven other welds that were shot to confirm and evaluate existing defects. Each film was reviewed to ascertain that at least the minimum film quality requirements were being met. This examination was to determine the adequacy of film densities, penetrometer selection, penetrometer placement, proof of coverage, and film identification. Concurrently the film was examined to verify that correct interpretations and evaluation of each radiograph were made by the inspector

and the NRC results were compared with the attendant Ebasco interpretation sheets. No discrepancies between the film evaluations and the ASME Code requirements were noted.

During this portion of the inspection, no violations or deviations were identified.

6. Test Fill for Seismic Category I Backfill

a. Observation of Work

During the inspection conducted August 16-20, 1982, the NRC inspector observed progress of a test fill performed for qualification of backfill material, equipment, and procedures to be used in Category I structural backfill above ECW pipe. The inspection included review of specifications and procedures governing construction and quality control activities associated with the test fill program. Division of the test site into three rows and five test lanes provided for 15 test areas, and three 12-inch thick uncompacted lifts were to be placed, compacted, and tested. Previously qualified Category I structural backfill material supplied by Texas Industries from the Eagle Lake Area was slated for use in the test fill.

The NRC inspector observed excavation and subgrade preparation in the test fill area. Preparation of the subgrade included removal of an area of clayey soil, replacement of the removed soil with fill material, and compaction such that no pumping was evident under passage of the compaction equipment. Survey grade markers were established to aid lift thickness control. The base lift was spread over the entire area, moisture conditioned and compacted to meet minimum density requirements as stated in Ebasco Quality Control Procedure QCP-10.10, Revision 0, "Soils Inspection." PTL personnel performed in-place density tests by the sand cone method outlined in ASTM D1556-64 and collected samples for laboratory gradation and relative density tests to be conducted in accordance with ASTM D422-63, "Particle Size Analysis of Soils," and ASTM D2049-69, "Relative Density of Cohesionless Soils," respectively. Test locations were recorded on a grid map in order to preclude subsequent tests in the affected area. Following testing and sample removal, test areas were refilled and recompacted using hand propelled vibrating compactors before placement of subsequent lifts. After preliminary test results indicated that required in-place density had been achieved, Test Lift Number 1 was placed and the five test lanes were marked with survey stakes and string lines. Each pass lane was then moisture conditioned and compacted with the specified number of passes per Ebasco Construction Procedure CSP-18, "Soil Test Fill Procedure."

The NRC inspector observed in-situ density testing performed by PTL upon completion of Test Lift 1 and reviewed preliminary test results. PTL indicated several retests had been performed where preliminary results failed to give acceptable values for in-place density. The NRC inspector reviewed the qualification records of six PTL personnel performing field and laboratory tests to verify certification to perform work assigned. Test location frequency and scope are in accordance with Bechtel Specification 3Y069YS043, Revision 2, "Structural Excavation and Backfill," and CSP-18.

Sufficient QA and QC personnel were noted on location during all activities observed by the NRC inspector.

b. Review of Records

The NRC inspector reviewed the test fill results attached to transmittals from PTL to Ebasco/Bechtel as follows:

<u>Form</u>	<u>Description</u>
SF-4	Summary of In-Place Density Tests Non-Cohesive Material
SF-5	Summary of In-Place Density Tests - Cohesive Material
SF-6	In-Place Density Test by Sand Cone Material
ST-6	Report of Relative Density
ST-8	Report of Seive Analysis
ST-8A	Particle Size Analysis Graph

The data on the test fill record forms were acceptable. A spot check of the calculations was performed by the NRC inspector with satisfactory results. The QA/QC aspects of the tests were acceptable. The engineering results of the test indicated that additional "passes" from the vibratory roller would be necessary to achieve the desired compaction. These additional passes were scheduled in September. Review of additional test results is part of the routine inspection program for the ECW and Soils Test Program. The NRC inspector had no further questions regarding the above test results.

No violations or deviations were identified.

7. Bechtel Field Document Control

Bechtel Work Plan Procedure WPP-3.0, "Field Control of Design Documents," Revision 2, dated July 21, 1982, provides instructions for control of field receipt, recording, distribution, and storage to provide construction personnel with current design documents. Documents controlled by the Bechtel Field Document Control Center (FDCC) include: engineering design documents, drawing change notices (DCN), field change requests (FCR), supplier data and drawings, installation specifications, specification change notices, supplier rebar correction notices, design specifications, design change packages, and supplier deviation disposition requests. A file of current and superseded documents is maintained by the FDCC.

Receipt of documents is published in the Daily Notification List and Field Revision Log which are issued as control standards, in addition to selected documents which are available to users in the Field Reference Library and drawing stick files at controlled drawing stations. Documents are distributed and controlled in accordance with notices approved by the project field engineer (PFE). Contractors have their own document control systems. Distribution to contractors is approved by the PFE. The date that design documents are received by the FDCC is recognized as the date they are "released for construction."

Distribution and issuance of Bechtel site procedures is through the FDCC in accordance with procedure WPP/QCI-2.0, "Control of Work Plan Procedures and Quality Control Instructions Manual", Revision 1, dated June 23, 1982, and with procedure change notice dated July 6, 1982. A master file of the original current approved procedures is maintained for production of additional copies. A file of current procedures and previous changes and revisions is maintained in PFE administrative section files.

The NRC inspector reviewed implementation of the Bechtel document control system described in the above procedures. The NRC inspector had no questions related to document control at this time; however, further review will be performed in the future when the level of activities of the FDCC has increased.

No violations or deviations were identified.

8. Training and Certification of Bechtel QA/QC Personnel

The NRC inspectors reviewed procedures and records related to training and certification of Bechtel QA audit and quality control personnel at the South Texas Project (STP) site.

Bechtel Los Angeles Power Division QA Department (LAPD) Procedure 8.1, "Qualification of Auditors," Revision 8, dated May 20, 1982, contains provisions for certification of QA auditors at the STP site in accordance with ANSI 45.2.23 requirements. The LAPD QA manager/auditor prepares qualification record forms for site auditors and lead auditors and provides copies for retention in site QA Department files. The NRC inspector reviewed qualification records of one lead auditor and one auditor thus far certified to perform site audits. Both individuals appeared to possess the required training and experience to meet the certification requirements.

Bechtel STP Procedure QCI-8.0, "Qualification, Certification, and Training of Quality Control Personnel," Revision 1, dated June 18, 1982, prescribes requirements for certification of Bechtel site quality control personnel. The procedure involves the requirements of ANSI N45.2.6-1973; Regulatory Guide 1.58, Revision 0; and Regulatory Guide 1.58, Revision 1, positions c5, c6, c7, c8, and c10. The NRC inspector reviewed certification records of nine QC inspectors in the welding, electrical, mechanical, receiving and storage, and civil disciplines. All nine of the QC inspectors appeared to meet requirements for certification in accordance with procedure QCI-8.0

No violations or deviations were identified.

9. Site Concrete and Soil Testing

The NRC inspector was informed that changes have been made in assignment of responsibilities for evaluation and acceptance or rejection of concrete and soil tests performed by PTL. Previously PTL was assigned these responsibilities, now Ebasco QC has these responsibilities and will have control of concrete and soil testing. Test records produced by PTL will be submitted to Ebasco QC for review and approval and will be forwarded to the QA records vault by Ebasco QC. Ebasco will increase their QC staffing to provide coverage in these areas.

10. Audits

The NRC inspector reviewed the report of a Quality Assurance audit conducted during the week of June 14, 1982. The audit was performed by four representatives from various utilities. The scope of the audit was to assess the adequacy of the written quality assurance program; participation of responsible parties; and program effectiveness.

In the opinion of the auditors, the overall quality assurance program established for the resumption of limited safety-related activities was assessed as "adequate." This assessment was qualified with additional comments regarding increased involvement by HL&P management at all levels and particular actions by top HL&P management.

The following areas were audited and assessment, findings, and observations were presented:

- a. Inspection (HL&P)
- b. Redundant Inspection (Bechtel)
- c. Receipt Inspection (Bechtel)
- d. Test Control (HL&P)
- e. Control of Measuring and Test Equipment (HL&P)
- f. Control of Measuring and Test Equipment (Ebasco)
- g. Handling, Storage, and Shipping (HL&P)
- h. Inspection, Test, and Operating Status (HL&P)
- i. Training and Indoctrination (HL&P)
- j. Design Control and Special Process Control
- k. Records (HL&P)
- l. Records (Bechtel) Houston Office
- m. Corrective Action (HL&P)
- n. Nonconformance (HL&P and EST)
- o. Audits
- p. Nonconformance Reporting - ESI Quality Control
- q. Procurement and Identification and Control of Items

The NRC inspector reviewed the results of the audit and confirmed that no additional, immediate corrective action was necessary with regard to current construction activities. The NRC inspector confirmed that the licensee was preparing a response to the audit. The NRC inspector will review the response when it is completed. This item is unresolved pending completion of this review (8213-03).

11. Records

During a review of records and procedures, the NRC inspector determined that the procedure for "Quality Assurance Records" had been written and approved. However, the implementing procedure for administration of the Ebasco records office had been written but is still in routing for approval. A responsible representative from Ebasco's staff stated that the procedure would be in effect by the end of September and interim guidance provided to personnel handling records until the procedure was fully implemented. Due to the small number of documents affected, this was acceptable to the NRC inspector. This item is unresolved pending review of the implementing procedures (8213-04).

12. Meeting with Licensee Representatives Concerning Restart of Construction Activities

On August 26, 1982, a meeting was held between NRC Region IV and licensee representatives to discuss planned restart of construction activities at STP. Licensee representatives presented their plans for initiating construction restart in specific safety-related areas during the period of September 15 through October 15, 1982. It was anticipated that the licensee will submit a formal document to Region IV which will describe the areas and projected dates for initiation of safety-related construction.

The following individuals attended the meeting:

NRC Region IV

W. A. Crossman
W. M. Hill
W. G. Hubacek

HL&P Representatives

J. W. Williams, Site Manager
L. J. Klement, Licensing

Bechtel Representatives

B. L. Lex, Project Manager
E. A. Rumbaugh, Assistant Project Manager
L. W. Hurst, Project QA Manager
B. R. McCullough, Construction Manager
J. R. Downs, Deputy Construction Manager
J. M. Williams, Cost & Scheduling Supervisor
S. Morton, Scheduling

13. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. Four unresolved items disclosed during the inspection are discussed in paragraphs 4, 10, and 11.

14. Management Meetings

Meetings were held periodically with licensee management personnel during the course of this inspection to discuss inspection scope and findings.

DETAILS SECTION B

This section of the report details NRC activities with respect to surveillance/inspection of the Bechtel/B&R transition process. To assess the overall transition program and to keep track of the exact status of the Bechtel review and assessment of the existing B&R engineering design and associated data; an NRC Region IV inspector was placed on a full time basis at the A/E facility (Bechtel, Houston). For background information on transition activities prior to this report, refer to the details section of previous monthly reports.

Phase A of the Bechtel/B&R transition process is the review and assessment of the STP design. This task has been broken down to discretely defined systems and are defined as work packages. As the initial Bechtel review and assessment of a work package is completed, a draft final report is sent to HL&P for their review and comment. The HL&P comments are then incorporated into the generation of the work package final reports. When all of the final reports have been completed for the designated work packages, phase A of the transition will be completed. Some phase B activities are schedule to commence prior to the completion of phase A of the transition. The following is a status of draft and final work package review reports that have been issued since the previous monthly NRC report:

*EC171	*EM568	*EP706	EM566
*EJ368	*EM564	*EA013	EM559
*EA010	*EM406A	*EM411	EM563
*EM412	*EM567	*EM525	EM570
*EE204	*EM560	EM556	EM552
*EM526	*EP707	EC177	EM450
*EM524	*EM561	EM551	EM572
*EM569	*EE201	EM571	EC112
EE222	*EJ371	EC163	EC101
EP709	*EC145	EM413	*EN619
EN616	EN614	EP702	*EM456
EC161	EC130	EP703	EM400
EC176	EC113	EM514	
EC111	EC132	EC100	

*Final report sent to HL&P

1. Bechtel Transition Statistics (Approximations) As of August 27, 1982

Safety-Related Draft Final Reports Completed	93
Percent of Total Safety-Related Draft Final Reports	96%
Safety-Related Final Reports Completed	49
Percent of Total Safety-Related Final Reports	51%

Nonsafety Draft Final Reports Completed	98
Percent of Total Nonsafety Draft Final Reports	89%
Nonsafety Final Reports Completed	68
Percent of Total Nonsafety Final Reports	62%

2. Findings

The NRC inspector reviewed B&R Final Report 1A890SR181 entitled "Reexamination and Evaluation of Category I Safety-Related AWS Structural Steel Welds Made Prior to April 11, 1980," dated August 2, 1982. Reexamination of accessible welds was resumed in February 1982, and completed by the end of April 1982, although no further welding repairs were performed after November 1981, when B&R was removed from the project. Over 75% of the welds which required repair have been repaired. In order to identify the welds which have not been repaired, it is necessary to review the examination certificate filed in the project vault. This review will be conducted by BPC during phase B of the transition.

Roy B. McCauley (Ohio State University Center for Welding Research) has written an overview of Battelle Laboratories and B&R technical activities with respect to the weld evaluations. This report has been transmitted to B&R.

On July 23, 1982, HL&P notified NRC Region IV office of an item concerning the ECW self-cleaning strainer backwash discharge lines.

On July 27, 1982, HL&P notified NRC Region IV office of a potential deficiency involving the design of the auxiliary feedwater system (AFWS).

INSPECTOR'S REPORT
Office of Inspection and Enforcement

HILL, WILLIAM M. JR.
REVIEWER
W. A. CROSSMAN

INSPECTORS
D. P. TOMLINSON
K. A. WHITTLESEY
D. G. BREAU
W. G. HUBACEK

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSP. DATE	
			NO.	SEQ.	MO.	YR.
HOUSTON LIGHTING & POWER CO. P.O. BOX 1700 HOUSTON, TEXAS 77001	I - INSERT	05000498	8213	A		
	M - MODIFY	05000499	8213	B		
	D - DELETE			C		
	R - REPLACE			D		

PERIOD OF INVESTIGATION/INSPECTION						INSPECTION PERFORMED BY		ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See IEMC 0530 Manpower Reporting - Weekly Manpower Reporting for code)		
FROM			TO					REGION	DIVISION	BRANCH
MO.	DAY	YR.	MO.	DAY	YR.	1	2	33	34	35
08	01	82	08	31	82	X	1 - REGIONAL OFFICE STAFF	4	C	A
							2 - RESIDENT INSPECTOR			
							3 - PERFORMANCE APPRAISAL TEAM			

REGIONAL ACTION (Check one box only)		TYPE OF ACTIVITY CONDUCTED (Check one box only)			
<input type="checkbox"/> 1 - NRC FORM 591	<input checked="" type="checkbox"/> 2 - REGIONAL OFFICE LETTER	<input checked="" type="checkbox"/> 02 - SAFETY	<input type="checkbox"/> 03 - INCIDENT	<input type="checkbox"/> 04 - ENFORCEMENT	<input type="checkbox"/> 05 - MGMT. AUDIT
		<input type="checkbox"/> 06 - MGMT. VISIT	<input type="checkbox"/> 07 - SPECIAL	<input type="checkbox"/> 08 - VENDOR	<input type="checkbox"/> 09 - MAT. ACCT.
		<input type="checkbox"/> 10 - PLANT SEC.	<input type="checkbox"/> 11 - INVENT. VER.	<input type="checkbox"/> 12 - SHIPMENT/EXPORT	<input type="checkbox"/> 13 - IMPORT
		<input type="checkbox"/> 14 - INQUIRY	<input type="checkbox"/> 15 - INVESTIGATION		

INSPECTION/INVESTIGATION FINDINGS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAIN 2,790 INFORMATION				LETTER OF REPORT TRANSMITTAL DATE					
A	B	C	D	A	B	C	D	A	B	C	D	A	B	C	D	MO.	DAY	YR.	MO.	DAY	YR.
X	X															OCT	6	1982			

MODULE INFORMATION														MODULE INFORMATION													
REC. ORD.				MODULE NUMBER INSP.				MODULE REQ. FOLLOWUP				REC. ORD.				MODULE NUMBER INSP.				MODULE REQ. FOLLOWUP							
TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	STATUS	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	STATUS	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL						
B	1292		951	B	A	4					B	1230		703	B	A	5										
					B	4										B	5										
					C											C											
					D											D											
B	1292		953	B	A	4					B	1232		995	B	A	812										
					B	4										B	812										
					C											C											
					D											D											
B	1292		955	B	A	12					B					A											
					B	12										B											
					C											C											
					D											D											
B	1292		706	B	A	1810					B					A											
					B	1810										B											
					C											C											
					D											D											

* CIRCLE SEQUENCE IF VIOLATION OR DEVIATION