U. S. NUCLEAR REGULATORY COMMISSION REGION IV

Report: 50-285/82-20

License: DPR-40

Docket: 50-285

Licensee: Omaha Public Power District (OPPD)

1623 Harney Street

Omaha, Nebraska 68102

Facility: Fort Calhoun Station, Unit 1

Inspection at: OPPD Corporate Office, Omaha, Nebraska, and Fort Calhoun

Station, Blair, Nebraska

Inspection Conducted: September 7-10, 1982

Inspectors:

Dean Chaney, Radiation Specialist

Approved:

Lewete Blaine Murray, Chief, Facilities Radiation Protection

Section

Inspection Summary:

Inspection Conducted on September 7-10, 1982 (Report: 50-285/82-20)

Areas Inspected: Routine, unannounced inspection of environmental protection programs for operations including organization and administration; audits; radiological environmental monitoring; chemical and thermal monitoring; study and evaluation programs; quality control of analytical measurements; facilities and equipment, applicable incident and event reports; and a site tour which included environmental monitoring stations. The inspection involved 40 inspector-hours by two NRC inspectors.

Results: Of the nine areas inspected, no violations or deviations were identified. Three open items are discussed in paragraph 4.

DETAILS

Persons Contacted

*W. C. Jones, Division Manager, Production Operations

*R. L. Andrews, Section Manager, Operations

*F. A. Thurtell, Division Manager, Environmental and Regulatory Affairs

*L. G. Harrow, Manager, Chemistry and Environmental Technical Services

*M. A. Tesar, Supervisor, Environmental Sciences

*M. C. Winter, Manager, Quality Assurance

*K. J. Morris, Manager, Administrative Services

T. Costanza, Environmental Technician M. A. Wilson, Environmental Technician

J. Glashen, Quality Assurance Engineer R. Mueller, Instrument and Control Supervisor

J. Mixan, Instrument and Control Technician

*Denotes those present during the exit interview.

2. Scope of Inspection

The purpose of this inspection was to review the licensee's environmental protection programs for operations and to evaluate the adequacy of management controls for those programs for the period November 23, 1978, through September 10, 1982.

3. Licensee Action on Previous Inspection Findings

(Closed) Violation (50-285/78-17) - Chemical Releases: This item was discussed in NRC Inspection Report 50-285/78-17 and involved numerous releases from plant waste lagoons containing chemicals which exceeded Technical Specification Limits on pH. The licensee has taken actions to improve waste lagoon release procedures that provide for the adjustment in waste pH by hold up or dilution prior to discharge. A review of licensee records of waste lagoon discharges since July 1979 (licensee commitment date) indicated licensee actions appear to be adequate in mitigating abnormal pH waste releases. This item is considered closed.

(Closed) Unresolved Item (50-285/78-17-01) - Quality Assurance Audits: This item was discussed in NRC Inspection Report 50-285/78-17 and involved the audit frequency for the environmental, chemical, and special ecological study programs including various contractors. A review of licensee correspondence regarding this item, and current planned QA audit frequencies, indicate that QA audits were appropriate at the time of the 50-285/78-17 inspection. This item is considered closed.

(Closed) Unresolved Item (50-285/78-17-02) - I-131 and Sr-90 Analysis and TLD Response - This item was discussed in NRC Inspection Report 50-285/78-17 and involved insufficient information in contractor's procedures to allow the inspector to assure himself that: (1) analysis procedures for I-131 and Sr-90 in milk were adequate to meet required minimum detectable activity

(MDA), and (2) that the response of contractor's environmental TLD's to noble gases typically released from the plant was satisfactory. Contractor's records and correspondence to OPPD regarding this item were found to satisfactorily resolve the above questions and current contractor analysis and equipment met or exceed required sensitivities. This item is considered closed.

4. Open Items Identified During This Inspection

Open Item (285/8220-1) - Audit Team Personnel: The licensee did not regularly use personnel with specialized knowledge in environmental protection for the development of comprehensive audit checklists or include such an individual as a member of the audit team. See Section 6 for details.

Open Item (285/8220-2) - Procedures - The licensee had not developed official station approved procedures for the collection, preparation, and shipment of environmental samples. The licensee had not evaluated the need for contingency analytical measurement procedures of environmental samples. The licensee had not evaluated the suitability of existing nonradiological chemical analysis procedures for liquid chemical discharges as they pertain to the measurements of pH and suspended solids. See Section 8 for details.

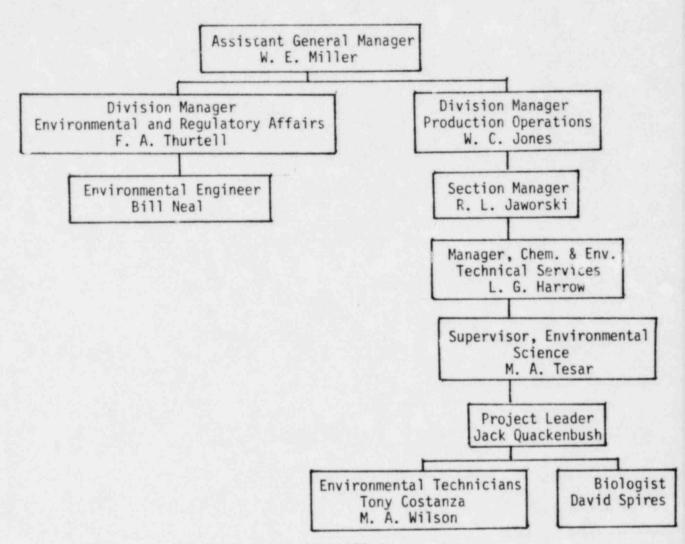
Open Item (285/8220-3) - Environmental Monitoring Equipment: The licensee had not evaluated: (1) the suitability of the air particulate sampler (APS) located at the Fort Calhoun City Hall and the effect the surrounding foilage has on the APS's functional ability to provide representative environmental sampling, and (2) the need for the prefilters on the air samplers. The licensee had not implemented procedures for the leak testing of the sample flow tracts on the air particulate samplers. See Section 9 for details.

5. Environmental Protection Organization and Management Controls

The NRC inspectors examined the licensee's organizational structure and management controls established to carry out the environmental protection programs during the operations phase to determine compliance with Technical Specifications and license commitments.

a. Organization

The organization for OPPD environmental protection activities at the time of this inspection is depicted by the following chart:



No violations or deviations were identified.

b. Management Controls

The NRC inspectors noted no significant changes in staffing, responsibilities, facilities, and equipment in the environmental area. The manager, chemistry and environmental technical services had lead responsibility for the environmental protection monitoring programs. The assignment of responsibilities and duties were described in the individual's position description. The position descriptions had been updated to reflect current assignments.

The NRC inspectors noted that there had been some minor changes in the environmental protection programs, however, the changes did not cause a reduction in the effectiveness of the program. These changes provided at least the same level of management control as noted in previous NRC inspections.

A licensee representative stated that due to the extended duration of time that the environmental personnel have been with the licensee, performing the same functions, their retraining consisted of an ongoing review of technological changes in industrial applications and changes in both vendor and OPPD station approved procedures. The licensee was aware that his training program for new environmental personnel was outdated and had initiated the process of updating the training program.

With respect to the above, and the licensee's indicated concerted efforts to review pertinent reports prior to publication and improve the environmental protection programs reflect an adequate management control in the area of review and oversight of the environmental protection programs at Fort Calhoun Station.

No violations or deviations were identified.

6. Licensee Audits

The NRC inspectors reviewed the licensee's quality assurance (QA) audits of internal programs and offsite contracted services that implement the environmental monitoring program to determine compliance with 10 CFR Part 50, Appendix B and Regulatory Guides 1.33, 4.13, and 4.15.

a. Audits of the Licensee's Environmental Monitoring Program

Documents Reviewed

- Quality Assurance Manual, Quality Assurance Procedure (QAP) No. 17, "Audit Planning, Performance, and Reporting," Revision 1, dated December 1, 1982.
- Audit No. 20-80 (80-ERA/QA-116), dated June 26, 1980
- Audit No. 22-81 (81-ERA/QA-185), dated July 8, 1981
- Audit No. 25-82 (82-ERA/QA-154), dated May 25, 1982

The corporate QA department had performed three audits (20-80, 22-81, and 25-82) of the licensee's environmental monitoring program since the previous NRC inspection conducted in 1978. These audits covered both onsite and offsite (corporate) environmental monitoring and radioactive waste disposal programs with nearly all emphasis on the onsite radioactive waste program during the 1980 and 1981 audits. The NRC inspectors noted that the audit checklists for the aforementioned audits listed many items under the heading of "Environmental Monitoring," but the majority

(70 percent) of the listed items were not applicable to the environmental monitoring program. Neither of these audits (20-80, 22-81) involved personnel knowledgeable in Technical Specifications or Health Physics aspects as they applied to the environmental monitoring program. The NRC inspectors noted that the licensee's QA audit of the environmental monitoring program was improved during the 1982 audit due to the inclusion of items on the audit checklist that reflected a thorough review of the Technical Specification requirements for the plant environmental protection program. The NRC inspectors considered the 1982 environmental monitoring program audit adequate and that it reflected the QA department's self-recognition of poor past performances in this area and implementation of adequate corrective actions. However, the NRC inspectors are concerned that the licensee's audits seem to only verify material compliance with the Technical Specifications and that the audits do not verify whether or not the reported results are obtained using accepted industry standards and in accordance with NRC Regulatory Guides.

The licensee's response to QA deficiencies was timely and an adequate response was normally provided. Lead time for corrective actions were monitored by the corporate QA manager and also twice yearly by the offsite Safety Audit and Review Committee's (SARC) review of outstanding deficiencies/corrective actions.

The licensee is currently revamping all QA department procedures to more effectively identify key items to include in audit checklists so that all critical areas of specific programs or plant operations are covered during future audits.

No violations or deviations were identified.

b. Audits of Analytical Services Contractors

Documents Reviewed

- Audit No. 16-80 (80-ERA/QA-83), dated May 21, 1980
- Audit No. 17-82 (82-ERA/QA-90), dated April 19, 1982

The licensee has performed two audits of the vendor (at the vendor's facilities) contracted to perform analytical measurements of licensee supplied environmental samples since the 1978 NRC inspection.

NRC Inspection Report 50-285/78-17 discussed apparent laxity in the frequency of licensee's QA audits of contractors performing analytical measurements for the licensee's environmental monitoring program. The NRC inspectors reviewed correspondence between the licensee and

the NRC, and reviewed the audits performed on current contractors (the licensee has changed contractors, since the 50-285/78-17 NRC inspection). The NRC inspectors found that the licensee's audit program appeared to provide a satisfactory frequency of contractor audits. Also, the licensee's audit frequency prior to Inspection Report 50-285/78-17 was found to be acceptable based on licensee audit findings. The licensee was preparing a revised plan for QA auditing such that all required plant activities and contractors are covered in a 3-year cycle.

The licensee's audits of the contractor's analytical services at the contractors facilities were conducted in both 1980 and 1982. The 1980 audit only identified one area of concern which involved a lost precipitation sample, of which no additional sample was available from the licensee. To prevent a future recurrence the licensee installed additional precipitate sample collection facilities. This audit was conducted to the general requirements of the contract and was considered somewhat shallow by the NRC inspectors since none of the auditors were experienced in the field of environmental sciences, radiochemical or radioisotope analysis, or familiar with NRC authorized environmental programs for operating reactors. Basically, the audit was not performed to a sufficient depth to verify compliance with all aspects of the Technical Specifications applying to the environmental monitoring program.

The NRC inspectors noted that the 1982 OA audit included a person familiar with environmental monitoring programs and requirements of the plant's Technical Specifications as they applied to the licensee's environmental monitoring program. This audit appeared to be satisfactory and to a sufficient depth to verify compliance with contracted specifications; however, the audit did not sufficiently address whether or not the contractor was conducting operations in a manner acceptable to established industry practices, or NRC regulatory guidance, such as that found in ANSI 545-1975, "Performance, Testing, and Procedural Specifications for Thermo-luminescence Dosimetry (Environmental Applications)" and NRC Regulatory Guide 4.15, "Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment." The NRC inspectors agreed that the licensee's planned improvements in the way QA audit checklists are developed, and the structuring of QA audits for all activities around a 3-year cycle, should improve the licensee's QA program in this area. The NRC inspectors were concerned that the licensee had not regularly employed the use of personnel with specific knowledge in the area to be audited for the development of comprehensive audit checklists, nor included such an individual in the audit team.

This item (285/8220-1) is considered open pending licensee completion of an evaluation into the inclusion of personnel with

specialized knowledge into audit teams for future audits of the environmental monitoring programs and the broadening of audit checklists to include verification of compliance with acceptable industry practices and regulatory guidance.

No violations or deviations were identified.

7. Environmental Monitoring Programs

a. Radiological

The radiological environmental monitoring requirements are contained in Section 3.11, Appendix A, Technical Specifications. Environmental media samples are collected from sampling locations at designated frequencies by the OPPD staff and shipped to the analytical contractor.

The NRC inspectors discussed the program with OPPD representatives and reviewed the analytical procedures submitted by the analytical contractor. The NRC inspectors also reviewed the licensee's semiannual environmental monitoring reports of June 30, 1980, December 31, 1980, June 30, 1981, and December 31, 1981. These reviews and discussions with licensee representatives indicated that the Technical Specification requirements had been met in this area.

No violations or deviations were identified.

b. Nonradiological

The nonradiological environmental monitoring requirements are contained in Appendix B of the Technical Specifications. The NRC inspectors noted that the study and evaluation programs had been deleted from the Technical Specifications and the remaining requirements were in the areas of chemical and thermal monitoring. Sample collection, analysis, and evaluations are conducted by the OPPD plant staff. The NRC inspectors reviewed the licensee's semiannual environmental monitoring reports noted above, and the operations incident reports for 1979, 1980, 1981, and to date for 1982. The reviews and discussions with licensee representatives indicated that the Technical Specification requirements had been met in this area.

No violations or deviations were identified.

8. Quality Control of Analytical Measurements

The NRC inspectors reviewed the licensee's program for compliance with the requirements of 10 CFR Part 50, Plant Technical Specifications, FSAR

and the guidelines presented in Regulatory Guides 4.1, 4.8, 4.15, and ANSI N42.12-1980. It should be noted that the licensee has contracted to have all environmental monitoring program radiological measurements performed by a contractor and the licensee only performs limited radiation dose rate measurements and nonradiological measurements of pH and suspended solids in nonradiological liquid releases.

cuments Reviewed

Procedure for soil and forage crop collection, origin unknown, maintained at site environmental office.

- * Eberline Procedure "Field Sampling and Analytical Procedures," dated 1975.
- Eberline Procedure "Eberline Midwest West Chicago, Illinois, Laboratory Procedures Manual," No. 10, Revision 2, dated May 9, 1982.
- OPPD Procedure Fort Calhoun Nuclear Power Station Unit No. 1 "Environmental Radiological Monitoring Program Procedure Manual," draft not dated.
- OPPD Procedure, "Procedure for the Collection of Adult Fish for the Ft. Calhoun Environmental Monitoring Program," draft not dated.

The NRC inspectors found that the licensee did not have any official station approved process control procedures for the collection, preparation, and shipment of environmental samples. The personnel performing environmental sampling appeared to be proficient at the task and very knowledgeable of sample collection techniques designed to protect samples from adultration. Each technician has performed sample collection for several years and had available, for reference, nonsite specific procedures covering sample collection and preparation of samples for shipment. The licensee did maintain shipping records of samples for tracking purposes even though no official shipping procedure existed. The environmental group did not se the plant central shipping organization and depended on an as needed selection of a shipper from locally available overnight shippers. The licensee appeared to have no contingency procedures for the analysis of environmental samples if the occasion arose. The NRC inspectors are concerned that the entire environmental sampling and analysis program is dependent on the knowledge of two to three employees and the reliability of one contractor to provide the services necessary to satisfy plant Technical Specifications on a continuous basis. This item (285/8220-2) is considered open pending licensee action in the following areas:

Implement detailed station approved procedures that provide site specific and industry approved techniques for the collection, and if required, preparation for shipment of all environmental samples obtained per station Technical Specifications, and the shipment of those samples to contractor laboratories.

- Evaluate the need for preparing contingency analytical measurement procedures that would allow the licensee to perform analysis of environmental samples to the sensitivities required by the station Technical Specifications.
- Evaluate the suitability of existing nonradiological chemical analysis procedures for liquid chemical discharges as they pertain to the measurements of pH and suspended solids per the limits of Appendix B of the Technical Specifications of the Operating License DPR-40.

No violations or deviations were identified.

9. Facilities and Equipment

The NRC inspectors reviewed the licensee's facilities and equipment used to collect, measure, analyze, and transport environmental samples and the preventive maintenance program provided for the equipment. Currently, the licensee does not perform any radiochemical or radioisotopic analysis on environmental samples and in the area of nonradiological environmental monitoring, the licensee only performs monitoring of discharge canal temperature and certain chemical characteristics of the Missouri River and the station liquid discharges.

Since the licensee only gathers bulk environmental samples, there is no need for the environmental group to have facilities for chemical or radio-isotope analysis. The licensee stated that existing inplant radiochemistry facilities, normally used to analyze plant effluents, could be used to analyze environmental samples in an emergency situation, should such a need develop.

The only pieces of environmental monitoring equipment other than river water temperature monitors (maintenance and calibration procedures for temperature monitors were not reviewed during this inspection) that require a specialized maintenance program are the five air particulate samplers (APS). These samplers are maintained by the Fort Calhoun Instrument and Calibration (I&C) Shop.

The NRC inspectors reviewed the calibration procedures and maintenance records of all five APS units. Calibrations were up-to-date and maintenance appeared satisfactory. Also, three units were observed in operation at their field locations; (1) behind the Fort Calhoun City Hall, (2) north of the station's protected area, and (3) south of the station's security building. During the inspection of the OPPD APS's it was noted that a State of Nebraska APS unit located adjacent to the OPPD unit north of the plant was operating, but not functional due to a break in the suction tubing behind the filter which allowed air to bypass the sample collection filter. The OPPD representative accompanying the NRC inspectors notified the appropriate state representative of the damaged APS. The inspection of the OPPD APS's gave rise to two concerns of the

NRC inspectors: (1) the location of the APS at the Fort Calhoun City Hall (the sampler is located under a tree, is surrounded on two sides by heavy brush, and is located close (within 15 feet) to a dirt driveway), and (2) some installed OPPD environmental samplers are factory equipped with a prefilter and piping in front of the particulate and iodine sample collection filters. Both of these conditions appear to distract from the representative sampling of airborne particulates which are severely affected by the mechanisms of particle deposition on materials placed between sample inlet and the sample filter, or the placement of samplers under natural environmental filters such as trees and shrubs. Even though cursory comparisons of collected filters did not show apparent signs of excessive dust loading on the Fort Calhoun City Hall filter, this aspect must be considered on sampler placement.

The NRC inspectors noted that the two licensee APS's, located adjacent to the plant security fence, appeared to be out of calibration; however, upon review of calibration records and discussion with the responsible I&C person, it was determined that the required annual calibration/maintenance had been performed and the proper labels had not been attached. The NRC inspectors further noted that the annual calibration frequency for APS's appears not to satisfy the semiannual calibration requirements for air sampling devices contained in NRC Regulatory Guide 8.25, "Calibration and Error Limits of Air Sampling Instruments for Total Volume of Air Samples." It was further noted that the licensee's surveillance and calibration procedures for the APS's did not provide for leak testing of sampling equipment to identify conditions that would allow sample flow to bypass the installed collection media, which should be accomplished at least each time the filters are changed out. The licensee's gas flow calibration device used for calibrating APS's is itself only calibrated annually which also does not appear to meet the recommendations for calibration of gas flow measuring standards contained in Regulatory Guide 8.25.

This item (285/8220-3) is considered open pending licensee actions to:

- Evaluate the suitability of the APS located at the Fort Calhoun City Hall and the effect the foilage surrounding the APS has on the APS's functional ability to provide representative air sampling.
- Evaluate the effect of the factory provided prefilters on the APS's representative sampling.
- Implement procedures for leak testing the sample flow tracts on APS's.
- . Evaluate the frequency of APs and gas flow calibration device calibration.

No violations or deviations were identified.

10. Licensee Event and Operations Incident Reports

There were no Licensee Event Reports (LER) made in the areas and time frames covered by this inspection. The NRC inspectors noted that operations incident reports were documented as follows:

Area	No. of Reports	No. T.S. Violations
Radiological Monitoring	12	2
Chemical Discharge Limits	13	9
Thermal Discharge Monitoring	0	0

The NRC inspectors determined that these incidents were reviewed and evaluated by the licensee as required by the Technical Specifications.

No violations or deviations were identified.

11. Site Tour

The NRC inspectors visited eight sampling/monitoring stations to verify the adequacy of installation and operability of associated equipment. All necessary environmental equipment required by the licensee's Technical Specifications were found to be operating at these stations.

12. Exit Interview

The NRC inspectors met with the licensee representatives denoted in paragraph 1 at the conclusion of the inspection on September 10, 1982. The NRC inspectors discussed the scope and findings of the inspection.

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A - VIOLE NUMBER A DROCEDING A	ATION & DEVIA	DORECT INSTECT	DEPCENTAGE OF THE PERCENTAGE	COMPLETED 2	STATUS	MODU	APTER STE	OCEDURE 3	WBER OWO.	0 13/31 0 0	NUMBER OF	PHASE	CHAPTER	PROCEDURE	NUMBER	LEVEL	0 0 8 C	PHOHIIY O	TION EFFORT IN STAFF HOURS	INSPECTION	SHCEN: AGE	ODATE	TATUS	мо		T	JRE	
A - VIOLE NUMBER A DROCEDING A	ATION & DEVIA	DORECT INSTECT	DEPCENTAGE OF THE PERCENTAGE	COMPLETED 2	STATUS	MODU	APTER STE	OCEDURE 3	WBER OWO.	0 13/31 0 0	NUMBER OF	PHASE	CHAPTER	PROCEDURE	NUMBER	LEVEL	0 0 8 C	PHOHIIY O	TION EFFORT IN STAFF HOURS	INSPECTION	SHCEN: AGE	ODATE	TATUS	мо		T	JRE	
MODULE NUMBER MANNAN	ATION & DEVIA	DORECTINSES	2 0	COMPLETED 2	STATUS	PHASE	CHAPTER	PROCEDURE 33	NUMBER	0 13/31 8	NUMBER OF	PHASE	CHAPTER	PROCEDURE	NUMBER	LEVEL	0 0 8 C	PHOHIIY O	TION EFFORT IN STAFF HOURS	INSPECTION	SHCEN: AGE	ODATE	TATUS	мо		T	JRE	
A - VIOLE NUMBER BUNDER	ATION & DEVIA	DORECT INSTECT	2 0	COMPLETED 2	STATUS	PHASE	APTER STE	PROCEDURE 33	NUMBER	0 13/31 8	NUMBER OF	PHASE	CHAPTER	PROCEDURE	NUMBER	LEVEL	035 A B C O A B C O A	PHOHIIY O	TION EFFORT IN STAFF HOURS	INSPECTION	SHCEN: AGE	ODATE	TATUS	мо		T	JRE	
A - VION MANUAL WANNER WANNAL WANNA WANNA WANNA WANNA WANNA WANNA	ATION & DEVIA	DORECTINSES	2 0	COMPLETED 2	STATUS	PHASE	CHAPTER	PROCEDURE 33	NUMBER	0 13/31 8	NUMBER OF	PHASE	CHAPTER	PROCEDURE	NUMBER	LEVEL	035 A B C O A B C O A	PHOHIIY O	TION EFFORT IN STAFF HOURS	INSPECTION	SHCEN: AGE	ODATE	TATUS	мо		T	JRE	
A - VIONE MANUAL WANNAL OF PROCEDURE OF PROC	ATION & DEVIA	DORECTINSES	2 0	COMPLETED 2	STATUS	PHASE	CHAPTER	PROCEDURE 33	NUMBER	0 13/31 8	NUMBER OF	PHASE	CHAPTER	PROCEDURE	NUMBER	LEVEL	035 A B C O A B C O A	PHOHIIY O	TION EFFORT IN STAFF HOURS	INSPECTION	SHCEN: AGE	ODATE	TATUS	мо		T	JRE	

ATTACHMENT B

OPEN ACTION ITEMS LIST

ate: 9/23/82 ocket No: \$5\$\$\$285

Type Code:

EQUIPMENT.

A=Allegation B=Bulletin

C=Circular D=Deviation

M=Miscellaneous 0=Open Item

R=Part 21 Report T=Temporary Instructions

lote -	Max characte		or each entry sho	own in (1)	E=50.55(e) L=LER	U=Unresolved Item V=Violation	n
1	2	3	4	5	6	7	8
lype Ltem	Item No. (8)	Report Paragraph (6)	Responsible Section (4)	Module (7)	Description (186)	Update/Closeout Report (30)	Status Code (1)
V	78-17	6	T-RP	8¢716B	THE PH OF LIQUID CHEMICAL RELEASE EXCEEDED TECH. Spec. LIMITS.	822ø	С
u	78-17	4	T-RP	807108	ENVIRONMENTAL PROGRAMS AUDIT	82ZØ	C
и	78-17	5	T-RP	807108	INSUFFICIENT INFORMATION IN CONTRACTOR'S ANALYTICAL PROCEDURES.	8220	c
0	822¢-1	6	T-RP	807108	AUDIT TEAM PERSONNEL.		
0	822Ø-2	8	T-RP	807103	OFFICIAL STATION APPROVED PROCEDU	RES.	
0	822Ø-3	9	T-RP	80710B	ENVIRONMENTAL MONITORING		