U.S. NUCLEAR REGULATORY COMMISSION

Region I

Report No. 82-10

Docket No. 50-410

License No. CPPR-112 Priority -- Category A

Licensee: Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Facility Name: Nine Mile Point, Unit 2

Inspection at: Scriba, New York

Inspection conducted: July 26 to August 27, 1982

Inspectors: R D Schulz 9/8/82
R. D. Schulz, Resident Inspector date signed

date signed

date signed

Approved by: H B Kister 9/10/82
H. B. Kister, Chief, Reactor Projects Section 1C date signed

Inspection Summary:

Inspection on July 26, 1982 to August 27, 1982 (Report No. 50-410/82-10)

Areas Inspected: Routine inspection by the resident inspector of work activities relative to concrete mixing and testing, reactor head cavity pit, concrete expansion anchors, safety related piping, engineering and design coordination reports, and corrective action. The inspector also performed plant inspection tours and reviewed licensee action on previously identified items. The inspection involved 96 inspector hours.

Results: Three violations were identified in the following areas: Failure to control welding and take corrective action concerning previous inspection finding (paragraph 3), Failure to perform concrete aggregate testing (paragraph 5), and Failure to establish adequate inspection and test programs for concrete expansion anchors (paragraph 7).

DETAILS

1. Persons Contacted

Niagara Mohawk Power Corporation

W. D. Baker, Construction Engineer
L. T. Brown, Q. A. Technician
J. L. Dillon, Q. A. Engineer, Site Lead
G. J. Doyle, Q. A. Technician
L. G. Fenton, Senior Q. A. Technician
E. Manning, Q. A. Technician
S. Manno, Project Manager
J. P. Ptak, Manager of Construction, Site
J. Swenszkowski, Q. A. Technician

Stone & Webster Engineering Corporation

R. C. Bolick, Sr., Q. C. Inspector
L. W. Brown, Superintendent of Construction
S. W. Crowe, Assistant Superintendent Field Q. C.
T. Dean, Q. C. Inspector
C. Deban, Senior Records Supervisor
R. Huggon, Q. C. Engineer
R. Kelvin, Senior Q. C. Engineer
E. A. Magilley, Assistant Superintendent Field Q. C.
F. Novak, Preventive Maintenance Supervisor
G. W. Pierce, Q. A. Site Supervisor
B. Poythress, Material Manager
G. Richardson, Assistant Material Supervisor
L. Shea, Superintendent of Engineering
J. Shoffner, Q. C. Engineer
J. D. Simmons, Construction Rigging Supervisor
D. Smith, Structural Engineer
C. Sperling, Senior Material Controller
J. C. Thompson, Superintendent of Field Q. C.
G. Wilkins, Q. C. Inspector
W. G. Williard, Q. C. Engineer

ITT Grinnell Industrial Piping, Inc.

R. Askew, Welding Inspector
A. C. Carter, Chief Welding Engineer
G. DeRouse, Q. C. Inspector
D. R. Giguere, Q. C. Manager
D. L. Grodi, Inspection Supervisor
G. McDonough, Senior Office Engineer
L. Pela, Technical Supervisor

L. K. Comstock and Company

J. Schwarz, Field Engineer

2. Plant Tours

The inspector observed work activities in-progress, completed work and plant status in several areas during general inspections of the plant. Particular note was taken of the presence of quality control inspectors and quality control evidence such as inspection records, material identification, nonconforming material identification, housekeeping and equipment preservation. The inspector interviewed craft personnel, supervision, and quality inspection personnel as such personnel were available in the work areas.

Specifically, the inspector observed the loading in of recirculation piping in the primary containment, setting of the reactor head cavity pit liner at elevation 329', and welding of structural steel.

No violations were identified.

3. Licensee Action on Previous Inspection Findings

a. (Open) VIOLATION (82-03-01): In March 1982 the resident inspector identified several plate attachment fillet welds which had insufficient weld deposit. The welds had insufficient weld deposit because they were incorrectly designed and a violation was issued. The licensee notified the resident inspector on August 24, 1982 that this violation was ready for closure because corrective action measures had been taken and all the welds had been increased in length. The resident inspector toured the control room building and measured several plate attachment fillet welds designed to support the seismic cable tray cross braces. Due to the resident inspector's original findings, Stone & Webster Engineering Corporation had issued Engineering and Design Coordination Report #F40230 which required plate attachment fillet welds, detail H on drawing 12177-EE-340DE, to have a 6" center weld, both sides. Stone & Webster also had issued Nonconformance and Disposition report #3148, dated March 31, 1982, for the purpose of identifying, in the condition details, all the plate attachment fillet welds that had not been designed with sufficient weld deposit including a 6" center weld.

Contrary to the above, after taking several measurements and from a subsequent investigation, the resident inspector discovered that Nonconformance and Disposition report #3148 did not identify eight plate attachment fillet welds that required a 6" center weld. These eight fillet welds, detail H on drawing 12177-EE-340DE, were found on August 24, 1982 to have only a 5" center weld. The subject pl te attachment fillet welds were designed to support seismic cable tray cross braces between SP-159-1 and SP-159-2.

In addition, one fillet weld designed to support a seismic cable tray cross brace at TR-214 and one fillet weld designed to support a seismic cable tray cross brace at TR-121 were 5 3/4" long. These welds had been accepted by quality control as meeting the 6" length

requirement and had been documented on Nonconformance and Disposition report #3148.

This is a violation of 10 CFR 50, Appendix B, Criterion XVI and Criterion IX. The licensee failed to fully identify and correct the nonconforming conditions delineated in Inspection Report 82-03 and welding was not controlled and accomplished in accordance with the special requirements designated in Engineering and Design Coordination Report F40230. (410/82-10-09)

b. (Closed) VIOLATION (92-03-11): Failure to include applicable regulatory requirements in purchase orders. Training programs have been implemented concerning the inclusion of 10 CFR 21 statements, 10 CFR 50 - Appendix B statements, and ASME requirements in procurement documents. Various purchase orders were reviewed verifying the inclusion of the applicable requirements.

4. Licensee Action on Construction Deficiency Reports (CDR's)

Final reports have been issued by the licensee on the following CDR's which will be closed out when corrective action measures have been fully implemented and verified by the resident inspector.

a. 80-00-03 This deficiency regards the quality of certain spent fuel heat exchanger materials. The licensee issued a final report on December 31, 1981.

b. 80-00-05 This deficiency involved handling and rigging of safety related equipment. The licensee issued a final report on January 26, 1981.

c. 81-00-01 This condition involves the potential failure of the reactor pressure vessel support skirt access hole cover plates. The licensee issued a final report on September 1, 1981. The resident inspector will verify that the existing reactor pressure vessel support skirt access hole covers have been replaced with new ones made from thicker plate capable of withstanding the annulus pressurization loads.

d. 81-00-04 The deficiency concerned water leakage into the fire emergency core cooling system pump suction barrel pits. The licensee issued a final report on January 15, 1982. Liners are to be installed in the barrel pits by December 1, 1982.

e. 81-00-06 Serrated nuts manufactured by Power Strut have potential defects in serrations which could affect their capability to restrain the tray supports. The licensee issued a final report on April 2, 1982.

f. 82-00-01 Limitorque motor operated valves have a potential for failure due to loose screws and other loose parts. The licensee issued a final report on June 30, 1982.

5. Concrete Mixing and Testing

The inspector reviewed Stone & Webster Specification S203A, Mixing and Delivering Concrete, Revision 2, dated May 29, 1979, including Addendum 1. The Specification included requirements for the batch plant, quality control inspection records, and documentation submittals as discussed below.

a. Batch Plant

A tour was made of the batch plant resulting in the following observations:

-- Cement was stored in dry, weather tight silos with adequate provision for prevention of absorption of moisture.

-- Aggregate was stored to prevent overlapping and was identified by size, source, and controlling specification.

-- Batch plant was adequately monitored by quality control personnel.

-- Calibrated measuring equipment was being used.

-- Older cement was used first.

-- Admixtures were properly controlled.

A registered professional engineer of the National Ready Mixed Concrete Association certified the batch plant on August 20, 1980 with an expiration date of August 25, 1982.

b. Quality Control Inspection Records

The following records were reviewed:

-- Central mixer inspections, including blade wear and accumulation of constituents.

-- Truck mixer inspections, including blade wear and accumulation of constituents.

-- Storage inspections.

-- Temperature of the cement.

-- Temperature of the concrete.

-- Calibrated equipment inspections.

-- Calibration records on cement weighing equipment.

-- Calibration records on aggregate weighing equipment.

-- Calibration records on water measuring equipment.

-- Calibration records on admixture dispensers.

c. Documentation Submittals

The following documentation and corresponding specifications were reviewed:

Documentation	Specification
Certified material test reports for Portland Cement, type II, low alkali	ASTM C150
Test reports for air entraining agent	ASTM C260
Pits or quarries for aggregate	Approved by engineers
Certifications for aggregate including:	
-- petrographic	ASTM C295
-- specific gravity	ASTM C127/C128
-- soundness	ASTM C88

Documentation	Specification/Frequency**
Air content tests*	ASTM C231/50 cubic yards
Slump tests*	ASTM C143/50 cubic yards
Compressive strength tests*	ASTM C39/100 cubic yards
Unit weight tests/water-cement ratios*	ASTM C138/100 cubic yards

*Specification S203A with the addition of Engineering Design Change and Coordination Report F00449, dated June 8, 1982, stipulated the acceptance criteria for compressive strengths, unit weights, slumps, and water cement ratios for specific applications. Air content acceptance criteria was stated in Specification S203A and ACI-301, Table 3.41, Specification for Structural Concrete for Buildings, 1975.

**Frequency of testing was per Stone & Webster Specification S203H, Concrete Testing Services, Revision 1.

Records indicated fine and coarse aggregates conformed to ASTM C33 and contained less than 15 percent by weight, flate and elongated particles as determined by CRD C119.

The inspector discovered that although four aggregate pits have been approved for use, neither the licensee nor Stone & Webster verifies that all the aggregate is being taken from these pits. In addition, no documentation is being submitted to the licensee or Stone & Webster certifying the source of the aggregate. U. S. Nuclear Regulatory Commission Report 81-10, dated September 1981 identified aggregate being taken from an unqualified pit and the problem was not corrected for two years. The inspector is concerned with the adequacy of corrective action to prevent repetition of the problem. This item is unresolved. (50-410/82-10-01)

Specification 203H, Concrete Testing Services, Revision 1, states in part under the frequency of tests section, page 1-24, that Soundness Tests and Los Angeles Abrasion Tests shall be performed every six months after initial tests for each gradation of coarse aggregates to be used during subsequent concrete production.

Contrary to the above, Soundness Tests and Los Angeles Abrasion Tests were not performed since January 28, 1981 for aggregate gradation #8, resulting in eight pours in which the aggregate was used from April 20, 1982 to May 19, 1982 violating the six month test frequency.

The eight pours and the dates in which the #8 aggregate was used are listed below:

Pour	Date
3-328-400P	April 20, 1982
3-328-401P	April 21, 1982
3-328-402P	April 28, 1982
3-328-403P	April 29, 1982
3-328-404P	April 30, 1982
3-328-405P	May 6, 1982
3-328-406P	May 12, 1982
3-328-407P	May 19, 1982

This is a violation of 10 CFR 50, Appendix B, Criterion V, failure to follow procedures. (410/82-10-02)

6. Reactor Head Cavity Pit

The objective of this part of the inspection was to determine that the fabrication of the reactor head cavity pit was in accordance with Specification NMP2-P283V, Revision 1, dated September 2, 1981. The following Stone & Webster drawings were checked for dimensions, arrangement, and welding details:

12177-EV-2A-3, Reactor Head Cavity Pit Liner and Details

12177-EV-2B-5, Reactor Head Cavity Pit Canal Liner and Details

12177-EV-2C-4, Reactor Head Cavity Pit Fuel Canal Liner

12177-EV-2D-3, Reactor Head Cavity Pit Refueling Seal Support

12177-EV-2E-4, Reactor Head Cavity Pit Misc. Details and Sections

12177-EV-2L-3, Reactor Head Cavity Pit Skimming Tank Details

Industrial Engineering Works produces fabrication drawings and these drawings were checked for conformance to the corresponding Stone & Webster drawings delineated below:

Industrial Engr. Works Drawings	Corresponding Stone & Webster Drawings
2670Q-E-2A, Revision 4	12177-EV-2A-3
2670Q-E-2B, Revision 4	12177-EV-2B-5
2670Q-E-2C, Revision 6	12177-EV-2C-4
2670Q-E-2D, Revision 7	12177-EV-2D-3
2670Q-E-2E, Revision 5	12177-EV-2E-4

The inspector discovered that on Stone & Webster drawing 12177-EV-2D-3, Section 28-28, the welding detail for the back-up strip required a 3/16" fillet both sides, 2" increments with 6" centers. The Industrial Engineering Work drawing 2670Q-E-2D, Section 28-28 required only a tack weld. The inspector requested the licensee to verify that a tack weld was acceptable.

Subsequently, Stone & Webster issued an Engineering and Design Coordination report authorizing the tack weld on Stone & Webster drawing 12177-EV-2D-3. The inspector considers this issue resolved.

Material certifications for the following parts were reviewed for compliance to Specification NMP2-P283V requirements:

-- Liner Plates - ASTM A240, Type 304 - Solution annealed and water quenched

-- Stiffeners - ASTM A36

-- Nelson Studs - ASTM A108 GR. 1015

-- Welding Rod - E308 including delta ferrite content

-- Bolts - ASTM A193 GR. B8, Class 1

-- Nuts - ASTM A194 GR. 8F

-- Pipe - ASTM A312-TP-304 solution annealed and water quenched or certified to ASTM A262

The inspector had concerns with regard to three test reports and requested the licensee to review the following material certifications:

a. Pipe - 8" sch. 40 SA-312-TP-304, heat #8052167, identified on drawing 2670Q-214, did not include heat treatment statements. The pipe was welded per the certification, and the inspector requested the licensee to verify if welded pipe was acceptable without nondestructive examination requirements. While reviewing the 8" pipe certifications for the reactor cavity pit liner, the inspector came upon the 6" pipe certifications for the skimming tank, fuel storage pool and the results of that review are stated in b.

b. Pipe - 6" s/40 SA-312-TP-304, heat #8654956, identified on drawing 2670Q-335, did not include heat treatment statements or the specification for corrosion testing. The inspector could not determine if the material was water quenched or capable of meeting the requirements of ASTM A262, intergranular attack in stainless steels. The pipe was fusion welded per the certification, and the inspector requested the licensee to verify if welded pipe was acceptable without nondestructive examination requirements.

c. 3/4" heavy hex nuts for the reactor cavity pit skimmer tank, heat #A9370, identified on drawing 2670Q-214, were furnished to ASTM A194 GR. 8 instead of to ASTM A194 GR. 8F as required by Specification P283V.

Based on the inspector's findings, the licensee decided to take the following actions:

-- Issue a Nonconformance and Disposition Report and a risk release to allow the lift of the reactor cavity pit into its final location. Without a risk release the reactor cavity pit could not be lifted because of an outstanding nonconformance.

-- Review all the material certifications on the liners including the reactor cavity pit, internal pool, cask storage, and fuel pool liner.

Pending review by the licensee, the material certifications will remain an unresolved issue and be examined in a future inspection period. (410/82-10-03)

An inspection was made of the reactor cavity pit being assembled on the ground. Horizontal and vertical seam welds were examined as were structural support welds. Fit-ups and welding documentation was reviewed for the joints detailed below:

Weld No.	Weld Detail	Joint Type
CL27	base ring - W75G	single bevel, full penetration
CL28	base ring - W75G	single bevel, full penetration
CL29	base ring - W76K	double bevel, full penetration
CL12	horizontal plate seam weld - W76K	full penetration with 3/16" back-up strip
CL13	vertical plate seam weld - W76K	full penetration with 3/16" back-up strip
CL14	horizontal plate seam weld - W76K	full penetration with 3/16" back-up strip
CL15	vertical plate seam weld - W76K	full penetration with 3/16" back-up strip
CL16	horizontal plate seam weld - W76K	full penetration with 3/16" back-up strip
CL17	vertical plate seam weld - W76K	full penetration with 3/16" back-up strip

In addition, the inspector reviewed welding material certifications for the rod used on the joints detailed above and found the certifications to be in compliance with ASME Boiler and Pressure Vessel Code, Section II, Part C. Welder's qualification records were examined and found to be in compliance with ASME Boiler and Pressure Vessel Code, Section IX.

No violations were identified.

7. Drilled-In Expansion Type Concrete Anchors

The inspector reviewed the drilled-in concrete anchor installation and inspection program of the electrical and piping disciplines for compliance with regulatory requirements, Stone & Webster Specification NMP2-S203G,

Drilled-In Expansion Type Concrete Anchors, dated February 27, 1981, Revision 3, including Addendum 1, and Quality Assurance Directive 10.43, Hanger and Anchor Bolt Installation Inspection, dated September 25, 1979, Revision A.

The installation of several concrete anchor bolts was observed and installations were in accordance with specification requirements.

The inspector noted that ITT Grinnell procedure FQC 4.2-16-2, Testing of Installed Category 1, 2, and 3 Anchor Bolts, dated October 31, 1978 is in conflict with Specification NMP2-S203G. Specification NMP2-S203G through Engineering and Design Coordination Report F00173, states that drilled-in anchors are outside the scope of the ASME Boiler and Pressure Vessel Code. Procedure FQC 4.2-16-2, references ASME Boiler and Pressure Vessel Code requirements in Sections IV and VI. In addition, ITT Grinnell does not have a Stone & Webster approved procedure for inspecting concrete expansion anchors in accordance with the requirements of S203G, Addendum 1 to Revision 3, Sections 2.5 through 3.48. Stone & Webster did not require ITT Grinnell to have an anchor bolt inspection program, except for torque testing, until March 5, 1982. Pending review by the licensee, ITT Grinnell anchor bolt procedures are an unresolved issue and will be examined in a future inspection period. (410/82-10-04)

The Stone & Webster Quality Assurance Program in Quality Assurance Directive 10.43, Revision A, Hanger and Anchor Bolt Installation Inspection, and Installation Specification S203G including Addendum 1 to Revision 3, Drilled-In Expansion Type Concrete Anchors require that the following inspections and tests be performed by quality control:

(1) Perform a measurement to assure that the bolt is the correct diameter.

(2) Verify that the hole diameters and depths are as required by the Engineers drawings during drilling operations.

(3) Verify that bolts are embedded to the required depth either by measurement or by ultrasonic methods.

(4) Perform an angular measurement to assure that anchors are installed perpendicular to the plate.

(5) Perform measurements to assure that anchor spacing and concrete edge distance conform to those listed in the specification.

(6) Perform torque testing.

In addition, Engineering and Design Coordination Report #F00411 revised Specification S203G by allowing six holes to be drilled to locate one anchor. Before a seventh hole can be drilled, due to the previous six holes being rejected, the six holes, after being filled, must be allowed

to harden three days before further drilling is permitted. Specification S203G requires, for concrete repair, that all unused anchor or probe holes, after being cleaned and thoroughly dampened, be filled solid with dry pack consistency patching mortar.

Contrary to the above, neither the electrical nor piping concrete expansion anchor inspection programs provide for inspections of bolt diameters, anchor hole diameters and depth, embedded depth, bolt perpendicularity, anchor spacing and edge distance, torque testing, and repaired concrete anchor holes on a 100% basis or in accordance with a statistical sampling plan to assure that the requirements for anchor bolt installations have been satisfied through verification of quality by inspection and test.

The inspection programs, excluding torque testing, are established on a random sampling basis, rather than in accordance with a statistical sampling plan that, for example, would provide a 95 percent confidence level that less than 5 percent defective anchors, for that inspection attribute, are installed in any one seismic Category I system. Torque testing is established on a statistical sampling plan as detailed below:

SAMPLING PLAN - TORQUE TEST

Test Group Size: Number of Anchors Between	Test Sample Q. A. Category I
2-8	2
9-15	3
16-25	5
26-50	8
51-100	13

Based on the variables, random selection process, and quality control unverified attributes such as embedment depth, anchor holes, concrete repair, edge distance and spacing, a reasonable confidence level for the specific sampling plan is unattainable. Failure to verify quality through inspection and test is a violation of 10 CFR 50, Appendix B, Criterion II. (410/82-10-05)

8. Safety Related Piping

a. Hydrostatic Test

A hydrostatic test was observed on a 30" O. D., .375 wall, service water line. The test was conducted in accordance with ND-6200 of the ASME Boiler and Pressure Vessel Code, Section III, and the overpressure protection device met the requirements of ND-7000. The boundaries of the test were from field weld #1 on isometric #21-104 to field weld #1 on isometric #21-105. The test gauge was calibrated and identified with a calibration sticker. After a 20 minute pressure hold at 225 psig, the pressure was dropped to 170 psig and both shop and field welds were examined for leaks. The system design pressure was 150 psig and

therefore, a 170 psig met the requirements of ND-6215. The piping was properly vented during filling. Examination of all the welds took approximately one hour with no visible signs of leaks. The test was also witnessed and signed off as acceptable by the authorized nuclear inspector. The test records were reviewed including certifications of the water.

b. Welding

The following attributes were spot-checked during the installation of piping components:

-- Preheat control

-- Weld preparation

-- Alignment

-- Root pass

-- Final visual

-- Material identification - spool pieces and welding materials

-- Use of calibrated pyrometers

Specifically, the inspector examined the following weld joints and associated spool pieces for drawing and specification conformance:

System	Isometric	Weld No.	Size	ASME Class	Piping Spec.
Main Steam	1-13	009	26", 1.177 Wall	1	901
Feedwater	47-16	007	24", 2.062 Wall	1	1511
Residual Heat Removal	66-28	002	18", .375 Wall	2	151
Feedwater	47-13	007R-1	24", 2.062 Wall		1511
Low Pressure Core Spray	26-6	005	12", .375 Wall	2	151
Residual Heat Removal	66-18	001	18", .500 Wall	2	311

System	Isometric	Weld No.	Size	ASME Class	Piping Spec.
Service Water	21-126	010	4", .237 Wall	3	151
Service Water	21-134	010	4", .237 Wall	3	151

Field planners were reviewed including preheat and post-heat requirements for the Class 1 feedwater piping. Post-heat applications were in accordance with ASME Boiler and Pressure Vessel Code, Section III, NB-4600 including Tables NB-4622, mandatory requirements and exemptions. The preheat specified on main steam weld #009 met the requirements of NB-4600, taking into consideration the carbon content of the joined piping components.

No violations were identified.

9. Engineering and Design Coordination Reports

The inspector reviewed a random selection of Engineering and Design Coordination Reports for completeness and basis of changes, including correctly translating the design changes into specifications and drawings. The inspector requested the licensee to investigate the following engineering and design coordination reports and drawings for design basis and to determine whether an adequate design review has been done for all drawings not meeting the concrete edge distance requirements specified in Table II of S203G:

E&DCR #	Specification	Drawing
L. K. Comstock E-1029	E061A	EE-340AA-6
C41256	E061A	EE-420C-2
C13646	E061A	EE-460D-1
--	E061A	EE-420E-2

Numerous 1" concrete expansion anchor bolts were inspected that did not meet the edge distance requirement of Table II. This is an unresolved issue which will be examined in a future inspection period. (410/82-10-06)

The inspector requested the licensee to investigate the following engineering and design coordination report for regulatory requirements and design basis:

E&DCR #	Specification	Drawing
F00412	S204X	Material traceability of structural steel

It appears that Stone & Webster Engineering Corporation stated in E&DCR #F00412 that only high strength steel requires traceability throughout installation. The E&DCR did not address traceability requirements of structural steel, other than high strength, and did not provide justification for excluding traceability for other than high strength steel. This is an unresolved issue which will be examined in a future inspection period. (410/82-10-07)

No violations were identified.

10. Corrective Action

Numerous nonconformance and disposition reports (N&DCR's) were reviewed in order to determine that corrective action had been taken to preclude repetition. No violations were identified, however, the inspector has requested the licensee to address the following two concerns:

a. Anchor bolts and nuts received on purchase order #1264 were documented as being nonconforming on N&D Report #3024 but were subsequently released on March 12, 1982 for "temporary" Category I work. How is temporary material controlled to assure removal?

b. The disposition on N&D Report #3166 does not appear to be adequate in that since the material was purchased from an unapproved source, Stone & Webster's Q. A. program requires either approving the "manufacturers" as approved sources or testing the material for specification compliance. The N&D report states that testing is not feasible due to the fact that the hardware has already been installed. It appears that the corrective action is based on installation status instead of quality verification. These two concerns discussed above will remain unresolved pending licensee investigation and possible corrective action. (410/82-10-08)

No violations were identified.

11. Management Meetings

At periodic intervals during the course of this inspection, meetings were held with senior plant management to discuss the scope and findings of this inspection. The licensee acknowledged the inspectors concerns.