U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-373/82-57(DETP); 50-374/82-24(DETP)

Docket Nos. 50-373; 50-374 Licenses No. NPF-11; CPPR-100

Licensee: Commonwealth Edison Company
P. O. Box 767
Chicago, IL 60690

Facility Name: LaSalle County Station, Units 1 and 2

Inspection At: LaSalle Site, Marseilles, IL

Inspection Conducted: November 29 and 30, December 1-3, 14-17, 1982 and January 11 and 12, 1983

Inspectors: F. Maura 2/17/83

K. Naidu 2/14/83

M. Ring 2/22/83

Approved By: I. N. Jackiw, Chief 2/25/83
Test Programs Section

Inspection Summary

Inspection on November 29 and 30, December 1-3, 14-17, 1982 and January 11 and 12, 1983, (Reports No. 50-373/82-57(DETP); 50-374/82-24(DETP))
Areas Inspected: Unannounced special safety inspection to review a sampling of work in process and a sampling of completed work records performed by Morrison Construction Company. This inspection was conducted in response to concerns documented in inspection reports (50-373/82-40 and 50-374/82-10) and was intended as a further check of some of the areas inspected in those reports. In addition, witnessing of a start-up test, and review of a special maintenance procedure on Unit 1 was performed. The inspection involved 218 inspector-hours onsite by three NRC inspectors including 15 inspector-hours onsite during off-shifts.
Results: Of the four areas inspected three items of noncompliance were identified in one area (failure to follow procedures for temporary removal of support-restraints - Paragraph 4; failure to perform effective inspections - Paragraph 7.c(7); and failure to take adequate corrective action - Paragraph 7.c(7)).

DETAILS

1. Persons Contacted

Commonwealth Edison Company (CECo)

*D. L. Shamblin, Site Project Construction Superintendent
*T. Quaka, QA Superintendent
*R. E. Waninski, QA Engineer
*J. L. Woldridge, QA Supervisor
*W. Vahle, PCD Lead Mechanical Engineer
*D. Skoza, PCD Engineer
S. Wimmer, Technical Staff Engineer
B. Westphal, Technical Staff Engineer
J. Coonan, Assistant Superintendent, Maintenance

Morrison Construction Company (MCCo)

*T. G. O'Connor, Superintendent
*K. J. Hamilton, Project Manager
*K. Kranz, Welding Supervisor
*J. Zappia, Project Engineer
*L. J. Butler, QC Inspector
*M. Wherry, QC Supervisor

The inspectors also interviewed other licensee employees including members of the operations, technical, and maintenance staff.

*Denotes those attending the exit interview.

2. Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (374/82-19-01): The licensee has revised MCCo's Welding Materials Control Procedure No. PC-2 as stated in their letter (L. O. DelGeorge to J. G. Keppler) dated December 2, 1982.

3. Morrison Work in Progress

The objective of this portion of the inspection was to select approximately ten items of work in process, determine if those items were being performed correctly in accordance with design specifications and determine whether the records for those items reflected the actual work in progress. The inspectors observed the following work items in process:

a. Tightening of bolts on piping support associated with Valve SF-004
b. Welding of Piping Support RH04-2834S to baseplate
c. Installation of baseplate and anchor bolts for Piping Support RHG3-2403A
d. Welding of lugs to pipe for pipe support, Traveler RH7269
e. Installation of instrument line Piping Supports LPA8-2998G
f. Welding of piping support for Traveler RH13-2870
g. Installation of piping support per MRD No. 535-14949
h. QC inspection of completed Hanger HP02-2844S

i. NCR 1176 installation of Pipe Support NBC 3-2975G and associated welding and application of torque.
j. Installation of Piping Support IN18-2410A
k. Installation of Piping Support RH03-2879S

The inspectors observed the work in progress for the following attributes:

a. Proper weld rod for application specified, weld rod documentation available, rod stored in oven, oven energized.
b. Traveler, procedures, drawings as required available on work site
c. Conduct of work in accordance with procedures, accepted practices
d. Visual examination of welds, thread engagement and tightness check for nuts and bolts
e. Calibration check of instrumentation and torque wrenches
f. Appropriate approvals, QC inspection signatures complete for current stage of work

The inspectors utilized the below listed references to inspect work in process and completed work.

a. MCCo Standard Operating Procedure PC-16, "Erection of Supports - Restraints and Final Installation Verification," Revision 10, dated October 1982.

b. MCCo Standard Operating Procedure PC-23, "Utilization of Mechanical Revision Directive," Revision 4, dated February 1980.

c. MCCo Standard Operating Procedure PC-43, "Final Line Walk Inspection and Verification of Specified Piping Systems, Supports and Restraints," Revision 0, dated September 1980.

d. MCCo Standard Operating Procedure PC-42, "Expansion Anchor Control Program for Installation of Concrete Expansion Anchors," Revision 7, dated August 1982.

e. ECN No. SD-1057 to LS-CEA (S&L specification for Concrete Expansion Anchors) dated May 14, 1981.

f. MCCo Work Instruction WI-11 "Component Support Restraint Problem Resolution Activities," Revision 0.

No items of noncompliance were identified.

4. Morrison Completed Work

The objective of this portion of the inspection was to select a sampling of completed work items in the field and examine the records for those items. The intent was to determine if the records adequately documented the actual work and showed it to be built correctly in accordance with design specifications. The inspectors chose the following work items:

a. Piping Support LP02-2824S
b. Piping Support RI24-2834S
c. Piping Support RH04-2857V

d. Lug Welding for MRD 540-13365
e. Piping Support IN52-2003G
f. Piping Support RIA2-2999S
g. Piping Support RIA2-2998S
h. Piping Support RIA2-2995S
i. Piping Support MS04-2658C
j. Piping Support RH01-2822S
k. Piping Support HP09-2804X
l. Piping Support HP14-2805X
m. Piping Support HP08-2810X
n. Piping Support RI02-2811
o. Piping Support RH04-2816
p. Piping Support LP06-2838

All of the work items were selected during plant tours because of potential discrepant conditions such as a disconnected completed hanger, loose nut and bolts, inadequate thread extension, excessive or inadequate bolt protrusion, unusual numbers or types of washers and cut anchor bolts. The records were then inspected to determine if these conditions were appropriately documented and dispositioned.

Four of the piping supports, LP02-2824S, RIA2-2995S, RIA2-2999S and RIA2-2998S were found disassembled in the field. When the inspectors examined the records for these hangers, it was found that no mechanical revision directives (MRD) had been issued for any of the four as required by MCCo Standard Operating Procedure PC-16. Additionally, no production drawings had been reissued to document disassembly and reassembly requirements for RIA2-2995S, RIA2-2998S and RIA2-2999S. Failure to follow the requirements for disassembly of completed piping supports is considered to be a violation of 10 CFR 50, Appendix B, Criterion V and item of non-compliance (374/82-24-01).

5. Review of Torque Wrench Calibration Records

a. Objective

To ascertain whether the calibration records of torque wrenches were consistent with the specification requirements.

b. Objective Accomplished By

(1) Review of the requirements in S&L Specification LS-CEA for the torque wrench and the tester (Paragraphs 3.3.4 and 4.2.2.a).

(2) Review MCCo Procedures PC-31, Revision 4, "Measurement and Test Equipment Calibration and Usage Procedure," PC-31C, Revision 1, "Calibration Check of Torque Wrench," and PC-31E, "Measurement and Test Equipment Calibration by MCCo Approved Testing Laboratories."

(3) Review of MCCo calibration records.

(4) Review of Nonconformance Reports relative to calibration.

c. Results

The inspectors reviewed over one hundred torque wrench calibration sheets. Of these, 34 appeared incorrect in that the calculated tolerance values (±4% clockwise and ±6% counter clockwise) shown on the actual calibration sheets were not consistent with the requirements of PC-31C, Revision 2, which is currently in effect. On closer examination, however, all of these calibrations were noted to have been performed while Revision 0 of PC-31 was in effect. Revision 0 of PC-31 required that torque wrench values be within ±4% clockwise and ±6% counter clockwise of full scale on the wrench versus ±4 or 6% of the desired reading for Revision 2. All of the questioned calibrations met the Revision 0 criteria.

Review of NCR's 1119, 1158, 1169, 1176, 2010 and 2055 indicated that out-of-calibration torque wrenches were adequately corrected.

No items of noncompliance or deviations were identified.

6. Review of Welding Records

a. Objective

To ascertain whether welding activities were controlled to the extent that:

(1) Surveillances were performed to assure that welders performed welding within the voltage and current ranges specified in the respective weld procedure specifications (WPS).

(2) The weld rod used was adequately controlled relative to issue and storage.

(3) Weld rod used met the specification requirements.

b. Objective Accomplished By

(1) Witnessing a typical "Verification of amperage/voltage" surveillance.

(2) Review of the "Verification of amperage/voltage" surveillance records.

(3) Review of nonconformance reports.

(4) Observing the weld rod storage and issue at three tool room stations.

(5) Review of weld rod material certification for E-7018 type weld rod.

c. Results

(1) On December 15, 1982 at the NRC inspector's request, MCC performed verification of amperage/voltage surveillances on two welding machines which were being used.

Volt/ampere instrument with ID VA-1 was used for the verification. Welding Procedure Specification (WPS) P1-3LS was being used by two welders identified as R-36 and 0-14 on items 1NE5-2428G and 1A70-2976G respectively. The parameters of WPS P1-3LS were verified and determined to be within the range.

(2) The records indicate that surveillances were performed. NCRs were initiated when QC inspectors observed that welding was being performed outside the range of the parameters specified in the WPS.

(3) The following NCRs were reviewed:

(a) NCR 1180 dated August 18, 1982, identifies that a weld was performed on Item 2REH 7A-2 1/2"-6 out of the range of the welding procedure. The parameters for weld Procedure P1-20LS, Revision 4 for Gas Tungsten Arc Welding were 16-25 volts and 60-110 amps. The surveillance on the welding machine measured 12 volts. The weld was cut, removed and rewelded. The welder was reinstructed. Additionally the welding voltage parameter was revised from 16-25 volts to 6-30 volts. MCC personnel stated that several WPSs were revised in 1976 as a result of NCR 80.

(b) MCC initiated NCR 80 on October 20, 1976 to document discrepancies in the welding parameters used in various welding procedures. These procedures were qualified to ASME Section IX. These discrepancies were discovered after Morrison Construction Company purchased a recently marketed Volt Ammeter Test Box to measure welding parameters (volts and amps) during in-process welding. During the initial WPS qualification, a Simpson Voltmeter and Columbia Ammeter were used to measure the voltage and current. During the original WPS qualification, the measured parameters were 16-24 volts and 90-94 amperes; with the test box the parameters measured were 9-11 volts and 90-94 amps.

MCC resubmitted the WPSs with the revised parameters and both CECo and the Authorized Nuclear Inspector concurred with the disposition. A number of WPS were revised. However WPS P1-20LS, Revision 4 (identified in NCR 1180) was not revised until August 14, 1982.

(4) The inspector reviewed a CECo QA special audit dated July 8, 1982. The audit identifies in Finding No. 7, three instances where the amperages were out of the WPS tolerance. One of

the WPS was identified as P1-20LS, Revision 4. The audit team with the benefit of a Sargent & Lundy Engineer, determined that based on a review of the WPS, the material welded and the weld inspections, it did not appear that a quality concern existed.

(5) The inspector accompanied by the MCC Welding Supervisor observed the weld rod control in the tool rooms at the following locations:

(a) In tool room No. 5 at elevation 710', welder identified as T-11 returned the unused weld rod. Earlier, he had withdrawn 60 pieces of 3/32" diameter Type E-7018 weld rod identified as 8C. The weld rod was returned in the portable weld rod container. The symbol 8C was an abbreviation for weld rod with heat No. 53021. Other types of electrodes were stored in designated electrode ovens and calibrated thermometers indicated the temperatures of the electrode ovens.

(b) In tool room No. 3, at elevation 740' the various electrodes were stored in designated places in electrode ovens. Calibrated thermometers indicated the temperatures inside the ovens. At the time of the visit a welder identified as F-47 returned the portable electrode container issued to him earlier. The unused portion of 60 pieces of 3/32" diameter Type E-7018 weld rod identified as 8C was being returned. The weld rod was still warm.

(c) In tool room No. 2, at elevation 687', the weld rod was being stored in designated ovens. Calibrated thermometers indicated the temperatures inside the ovens. At the time of the visit, welders identified as 0-10 and C-86 returned the unused portion of 25 pieces each of 3/32" diameter Type E-7018 weld rod which had been issued earlier.

In the three tool rooms, MCC Procedure PC-2, Revision 9, dated October 10, 1982 was being followed.

(6) MCC performs Rod Control Field Surveillances (SRCFS) semi monthly. The inspector reviewed a typical SRCFS dated December 1, 1982. The report indicates that the rod control program described in MCC Procedure PC-2 was verified in the reactor building at elevation 694' between columns C and 16.

It was observed that the area required cleanup; two E-7018 type stubs (partially consumed electrode) were on the floor. The MCC QC inspector picked up the stubs and discarded them in the designated rod barrel at 710' elevation tool crib.

(7) MCC performs monthly rod control inspection checks (MRCIC). Review of a typical MRCIC performed on November 3, 1982, indicates the following:

(a) The welder's name and stamp was checked.
(b) Use of rod bucket to dispose consumed electrode.
(c) Portable electrode rod oven was in use and energized.
(d) Oven temperature test record was correct.
(e) The electrodes/filler wire were in compliance with Weld Procedure Specifications.
(f) The electrodes/filler wire were entered in the designated space on the Weld Data Record.
(g) Verification that the weld rod container was issued to the welder using it.
(h) Welding Electrode Tag had been completed and retained in Rod Issue Facility.
(i) Posting of MCC Procedure PC-2 in the tool room facility.

(8) MCC started the above surveillances in November 1982. Prior to this period MCC QC inspectors performed random surveillances and documented their findings in departmental correspondence. Corrective action taken on receipt of this correspondence was verified during a subsequent surveillance. Review of a typical Departmental Correspondence dated February 18, 1981, indicates that in areas in the Unit 2 containment and Turbine Buildings, and the Unit 1 Auxiliary Building, weld rod was found lying on the floor. The letter stated that a follow up audit would be conducted in a week. Review of the follow up audit performed a week later on February 26, 1981, indicates no unacceptable findings.

(9) The inspector reviewed the material certifications for two lots of weld rod purchased by MCC and determined the following:

(a) Certificate of analysis by Chemetron Corporation dated April 3, 1978, indicates that 30,000 lbs of 3/32" diameter weld rod Type E-7018, trade mark "Atom Arc" conforms to Specifications ASME SFA 5.1, Section II, Part C and Section III 1974 Edition. The weld rod was marked with abbreviation "CE" for traceability to the heat No. 432B5961 lot No. 02-2-C801P. The results of the chemical analysis, tensile, yield, elongation and charpy "V" notch impact tests were furnished in the certificate.

(b) Certificate of analysis by Alloy Rods Division of Chemetron Corporation dated October 18, 1979, indicates that 31,400 lbs of 3/32" diameter weld rod Type E-7018, trade mark "Atom Arc," conforms to specifications ASME SFA 5.1, Section II, Part C and Section III 1974 Edition. The weld rod was marked with abbreviation 6C for traceability to lot No. 2J901Q02 and heat No. 401JG461. The results of the chemical analysis, tensile, yield, elongation and charpy "V" notch impact tests were furnished in the certificate.

No items of noncompliance or deviations were identified.

7. Review of Mechanical Installation Records Unit 2

a. Objective

To ascertain whether the installation records generated by Morrison Construction Company (MCCo), the prime mechanical contractor, reflect the work performed in the areas of:

(1) Prescribed weld rod and the weld rod used
(2) Appropriate QC inspections
(3) Non Destructive Examinations (NDE) prescribed and actually performed

b. Objective Accomplished By

Review of selected installation records relative to work in-process and work completed to verify the following:

(1) The weld rod prescribed and the weld rod actually used. MCC engineering personnel enter the engineering data on the WDR and send it to the field. The craft foreman verifies that the material and components specified on the WDR are correct.

(2) QC signatures and their dates to indicate that timely inspections were performed. For pipe welds, QC and Authorized Nuclear Inspectors indicate "Hold Points" on the WDR. Work is not to progress until the work is inspected and determined acceptable. In-process inspections are not specified for attachment welds such as gamma plugs, lugs and name plates.

(3) The NDE prescribed on the WDR and the relevant NDE Report. The MCC engineering department identifies any of the four NDE required, such as, Visual Examination (VE), Liquid Penetrant Examination (PT), Magnetic Particle Examination (MP), Radiographic Examination (RT) including the relevant NDE procedure to be used and at what phase of the welding operation the examination is to be performed. Similarly, for attaching gamma plugs, lugs, and name plates, the MCC engineering department prescribes two of the three possible NDE such as VE, MT, or PT.

c. Results

Several MCC traveler packages were examined and the relevant observations are documented. Each traveler contained one or more WDRs on pipe and attachment welds.

(1) 2RH - T229

No problems were identified in the documents.

(2) 2RR - T33

No problems were identified in the documents.

(3) 2RH - T230

Two WDRs contained alterations on the type of NDE prescribed in the MT and PT boxes designated. However, the correct NDE was performed; PT for stainless steel and MT for carbon steel as indicated by the relevant NDE reports.

(4) 2RH - T233

This package contained a Nonconforming and Disposition Report No. 2066, dated October 25, 1982, which identifies that welder B93 was not qualified to weld lugs per WPS P8-1LS. Disposition recommended to cut the lugs, perform VE and PT and reweld the lugs with a welder who was qualified to weld with WPS P8-1LS. The work had not been accomplished yet and the NDR was open.

(5) 2RH - T232

The NDRs for welds W-RH 1692 A, B and V attaching the ASME code name plates, the NDE for the areas where the name plates were removed were not specified. However, PTs were performed and the PT reports were attached.

During the examination of records in this traveler, the inspector observed a check mark on the accept column and an asterisk in the reject column of Radiograph Reader Report No. 7430, dated May 10, 1979. The Segment 38-39-36 of the circumferential Weld W 1693 had been reshot. The NRC inspector viewed the radiographs in the presence of the licensee and contractor personnel and concurred with the interpretation that the welds were acceptable.

(6) Traveler RH-T231

On the WDR for weld No. W-RH-1683A, name plate to pipe, the MT box was checked even though PT was performed on the area where the name plate was removed.

On the WDR for Weld WRH 1684C, also name plate to pipe, the MT box was "whited out" and PT was checked and performed.

On the WDRs for Welds WRH 1684D and WRH 1688A, name plates to pipe, neither the PT nor the MT boxes were checked. However, a statement indicates the PT was performed in the areas where the ASME name plates were removed. In all the above instances the correct NDE was performed and PT reports were attached to the WDR's.

(7) Traveler 2RH-T272

This package contained a WDR reflecting the welding of a gamma plug to a pipe spool 2RH 56B 18" - 1 RHX2019. Examination of this WDR indicated that Magnetic Particle Test was performed on stainless steel material. Subsequent

discussions with the licensee and contractor personnel and reviews of the design documents indicate the following errors on the WDR which went undetected:

(a) The material for the spool piece is entered as 2RH 56B S&L design Table B 340 (stainless steel SA-358, 304 Class 1) instead of B 307 (carbon steel).

(b) Weld Procedure Specification entered is P8-1LS which is for stainless steel welding instead of P1-18LS which is for carbon steel.

(c) The weld rod entered is Type E-308, instead of E-7018.

(d) Type of NDE prescribed was Magnetic Particle Testing which can only be performed on carbon steel material.

As a result of the inspectors finding, on December 2, 1982, MCC initiated a PC 163, Revision 0 Form titled "Report of Missing Document" to correct the error in documentation. This is in accordance with MCC Work Instruction (WI) 23, dated July 1982. This WI describes the process of correcting or replacement of "Lost Documentation" and requires the use of Form PC-163. Report 139 initiated on December 2, 1982, states that the incorrect piping design table and wrong WPS were listed on the WDR. This was done without verifying the actual material used. On December 14, 1982, the inspector observed that this spool piece is installed at elevation 673' 4" between colums 17 and b. The inspector observed that a carbon steel "puppy" was welded to the stainless steel spool piece by the fabricator using a dissimilar weld process. However, a stainless steel gamma plug Type 304 had been screwed to the carbon steel "puppy" and welded.

The inspector informed the licensee that ineffective QC inspections had been performed on February 2, 1980, in that the QC inspection did not identify and correct that a stainless steel gamma plug was inserted in a carbon steel pipe and welded with E-7018 type weld rod, which is normally used for carbon steel material. The inspector informed the licensee that ineffective QC inspection was contrary to the requirements of 10 CFR 50, Appendix B, Criterion X and is an item of noncompliance. (374/82-24-02) In addition the inspector informed the licensee that MCC took inadequate corrective action by correcting the records without verifying the actual components in the spool piece. The inspector informed the licensee that inadequate correction action taken was an item of noncompliance contrary to the requirements of 10 CFR 50, Appendix B, Criterion XVI (374/82-24-03).

(9) The following weld data reports of Unit 1 were reviewed and similar paperwork problems were identified.

(a) WDR for Weld RH-793B attaching gamma plug to spool 1RH 56B 18"-1 is contained in Traveler RH-T203. The weld was accepted on June 6, 1978. The WDR erroneously indicates that the spool piece is in accordance with S&L design Table B-340 (Stainless Steel) instead of B-307 (carbon steel). On this WDR, boxes for PT and MT were checked. The MT check mark appeared to have been subsequently erased. PT and MT reports for the same weld were attached and indicate no unacceptable indications.

(b) WDR for weld RH 536B attaching gamma plug to spool piece 1RH 04DB-18"-3 is contained in Traveler RH-T62. The weld was accepted on June 9, 1978. The WDR erroneously indicates that the spool piece is in accordance with S&L design Table B-340 (stainless steel) instead of B-307 (carbon steel). The PT box was checked and a PT report dated June 9, 1978 was attached indicating no unacceptable indications.

(c) WDR for weld RH 533A attaching gamma plug to spool piece 1RH 04 DA-18"-4 is contained in Traveler RH-T61. The weld was accepted on June 9, 1978. This WDR also erroneously indicates the spool piece to be inaccordance with S&L Design Table B-340 (stainless steel) instead of B-307LS. The PT box was checked and a PT report dated June 9, 1978, indicated no unacceptable indications.

Review of a typical spool piece drawing indicates that the carbon steel "puppy" was welded by the spool piece fabricator, Benjamin F. Shaw to the stainless steel pipe with a dissimilar welding process. The demarcation line between B340 (stainless steel) and B-307LS is shown towards the end of the spool piece. The MCC personnel informed the inspector that in 1978, the MCC engineering personnel erroneously entered the material as B-340 on the WDR and went undetected until the NRC inspection. Craftsman, however used the correct welding procedure, weldrod and NDE personnel performed the correct examinations except in one instance identified in Paragraph 7.c(7).

8. Review of the Magnetic Particle Test Logs

The licensee contracted CONAM to perform Magnetic Particle (MT) and Radiographic Test (RT) on the welds performed by MCC. The dates of requests and reports are entered in the log maintained by MCC. Review of the log book documenting the request M82-001 through M82-245 for 1982 indicates that all the necessary information was adequately documented.

No items of noncompliance were identified in the above area.

9. Review of the Liquid Penetrant Test Log

The Liquid Penetrant Tests (PT) on MCC welds are performed by MCC inspectors. The request number and its date is completed. The PT report number is filled out in the body of the form. MCC personnel considered it redundant to repeat the information on the upper right hand corner of the report and except in a few instances, left them blank.

The NRC inspector does not consider this lack of repetitious information unacceptable.

No items of noncompliance were identified in the above area.

10. Startup Test Witnessing - Unit 1

The inspector witnessed, STP-31, Loss of Turbine Generator and Offsite Power on December 2, 1982. The test was performed in accordance with the appropriate revision of the test procedure at an initial plant power of ~22% of rated. A review of ~25% of the test prerequisites indicated proper completion. Following the loss of turbine generator and offsite power all signals to the transient recorder were lost until the diesel generator power became available (~9 secs.). Preliminary evaluation indicated the short signal loss will not affect the results evaluation since the transient was smaller than expected. The plant remained isolated from offsite power for at least 30 minutes with one SRV cycling towards the end of the period to control reactor pressure. Crew performance appeared correct and timely during the test. All data was collected for final analysis by the licensee. The inspector will also review the data in more detail during a future inspection.

11. Planned Maintenance on Recirculation Isolation Valve - Unit 1

As a result of difficulties experienced in the operation of recirculation isolation valve 1B33-F067A the inspector reviewed the licensee's plans and procedure for the repair of the valve internals without draining the vessel or the use of jet pump plugs. The maintenance procedure, which ensures that the split discs remain secure in the closed position while the valve bonnet is removed, is acceptable pending incorporation of the inspectors final comments given to the licensee on December 23, 1982, during a meeting at the Region III office. Contingency procedures in the remote case that the split discs would move from the fully closed position were also prepared by the licensee and were reviewed by the Senior Resident Inspector.

12. Exit Interview

The inspectors met with licensee representatives denoted in Paragraph 1 at the conclusion of the inspection on January 12, 1983. The inspector summarized the scope of the inspection and the findings. The licensee acknowledged the statements made by the inspectors with respect to the items of noncompliance in Paragraphs 4 and 7.c(7).