

Enclosure 2

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

SACRAMENTO MUNICIPAL UTILITY DISTRICT

RANCHO SECO

NUCLEAR GENERATING STATION

NOVEMBER 23, 1982

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I. INTRODUCTION

Purpose and Overview

The Systematic Assessment of Licensee Performance (SALP) is an integrated NRC staff effort to collect the available observations on an annual basis and evaluate licensee performance based on those observations with the objectives of improving the NRC Regulatory Program and Licensee performance.

The assessment period is July 1, 1981 through September 30, 1982. This assessment contains pertinent observations of NRC and licensee activities. Evaluation criteria used during this assessment are discussed in Section II. Each criterion was applied using the "Attributes for Assessment of Licensee Performance" contained in NRC Manual Chapter 0516.

1. SALP Board Meeting: November 23, 1982, Region V Office.

Board Members: D. M. Sternberg, Chief, Reactor Projects
Branch No. 1 (Board Chairman)
T. Young Jr., Chief, Reactor Projects
Section No. 2
H. North, Radiation Specialist, Region V
R. F. Fish, Emergency Preparedness Analyst, Region V
P. H. Johnson, Reactor Inspection, Region V
D. J. Willett, Reactor Inspector, Region V
H. Canter, Senior Resident Inspector
Rancho Seco Nuclear Plant
J. O'Brien, Resident Inspector
Rancho Seco Nuclear Plant
A. McQueen, Physical Security Inspector, Region V
G. Hernandez, Reactor Inspector, Region V
S. Miner, Licensing Project Manager, NRR
M. L. Padovan, Licensing Engineer, Region V

2. Rancho Seco Station Activities July 1, 1981 through September 30, 1982

The unit operated at close to full power during July and most of August 1981, experiencing one trip during this period.

In mid August, the number two low-pressure main turbine rotor (which was the source of problems during the June 1980-July 1981 SALP period) experienced vibration and the unit was shut down. Damage had occurred to the rotor, fixed blades, and condenser. A replacement rotor was installed. In late October, after balancing the rotor, the unit was placed back in service.

The unit operated at reduced power from late October until April 4, 1982. Much of the time, the plant operated at reduced power because of maintenance, surveillance, testing, and an administrative limit of approximately 50 percent power for several months because of excess hydro generating capacity. During this period, the unit experienced four trips.

Because of events at other Babcock and Wilcox plants, the unit was shut down on April 4, 1982, to inspect all of the high-pressure injection nozzles and their thermal sleeves. This inspection revealed deficiencies that resulted in the installation of new thermal sleeves on the A and B lines. It was discovered, also, that the thermal sleeve in the A nozzle (the normal make-up nozzle) was missing. An attempt to recover the missing thermal sleeve (from the normal A make-up nozzle) will be made during the upcoming refueling outage scheduled for late January 1983.

During the high-pressure injection system thermal sleeve outage work, entry was made into the steam generators to inspect the auxiliary feedwater headers. As a result both steam generators internal auxiliary feedwater headers were abandoned in place and replaced with new external ring headers. Tests to demonstrate the adequacy of these modifications were successfully performed and the unit was returned to operation August 21, 1982. During the remainder of the evaluation period the unit operated at near full power, experiencing: Turbine Electro-Hydraulic Control system difficulties; condenser vacuum leakage; and an increase in number 5 main turbine bearing vibration. Turbine balancing successfully reduced the bearing vibration.

Other safety-related maintenance, repairs, and modifications accomplished during the appraisal period were as follows:

- a. Replacement of "A" and "B" control rod drive AC breakers.
- b. Appendix R modifications.
- c. Makeup Pump motor was rewound.
- d. Steam generator - refueling interval inservice inspections.
- e. Steam generator tube plugging (10 in "A" and 9 in "B").
- f. Decay Heat Pump seal leak repaired.

- g. Power operated relief valves and pressurizer spray valves reworked.
- h. Power operated relief valves and code safety position indication was installed.
- i. Security program changes were made.
- j. An instrument air moisture reduction program was instituted after valve problems developed.
- k. Technical Support center and other TMI modifications in the Auxiliary Building are nearing completion.
- l. The Nuclear Service Electrical Building is completed, in preparation for the installation of TMI-related components.

3. Inspection Activities

Two NRC resident inspectors were onsite for the entire appraisal period.

Total NRC Inspection Hours: (Resident and region based)
Distribution of inspection hours is shown on Table 2.

A tabulation of inspection activities is shown in Table 2 and a tabulation of violations is shown in Table 3.

II. CRITERIA

The following evaluation criteria were applied to each functional area:

1. Management involvement in assuring quality.
2. Approach to resolution of technical issues from a safety standpoint.
3. Responsiveness to NRC initiatives.
4. Enforcement history.
5. Reporting and analysis of reportable events.
6. Staffing (including management).
7. Training effectiveness and qualification.

To provide consistent evaluation of licensee performance, attributes associated with each criterion and describing the characteristics applicable to Category 1, 2, and 3 performance were applied as discussed in NRC Manual Chapter 0516.

The SALP Board conclusions were categorized as follows:

Category 1: Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2: NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved.

Category 3: Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appeared strained or not effectively used such that minimally satisfactory performance with respect to operational safety and construction is being achieved.

III. SUMMARY OF RESULTS

| <u>FUNCTIONAL AREAS</u> | <u>CATEGORY 1</u> | <u>CATEGORY 2</u> | <u>CATEGORY 3</u> |
|--|-----------------------|-----------------------|-----------------------|
| 1. Plant Operations | | X | |
| 2. Radiological Controls | | | |
| o Radiation Protection | | | |
| o Radioactive Waste Management | | | |
| o Transportation | | | |
| o Effluent Control and Monitoring | | X | |
| 3. Maintenance | | X | |
| 4. Surveillance (Including Inservice Testing) | | X | |
| 5. Fire Protection | | X | |
| 6. Emergency Preparedness | | X | |
| 7. Security and Safeguards | X | | |
| 8. Refueling | X | | |
| 9. Licensing Activities | | X | |
| 10. Plant Modifications | | | X |

IV. PERFORMANCE ANALYSIS

1. Plant Operations

Inspections of plant operations have been performed on a continuing basis throughout the SALP evaluation period by the Resident Inspectors and periodically (from inspections) by region-based operations inspectors. As a result of these inspections, certain weaknesses have been identified. Since the last SALP period, additional licensee staff effort has been expended on procedural updates and procedure accuracy, but licensee management has not promulgated a strong policy on procedural adherence.

The June 1982 Civil Penalty was for two Severity Level III enforcement actions in the plant operations area which related to diesel generator and high pressure injection pump inoperability. In addition, a level IV violation was issued for inaccurate plant drawings and a level V violation for failure to follow procedures.

The licensee submitted ten Licensee Event Reports (LERs) attributed to the plant operations area. Evaluation of these LERs indicates a number of events caused by personnel error. Licensee management attention appears necessary to evaluate the various aspects of facility operation to minimize the personnel error occurrence rate.

The Quality Assurance department has been increasingly active as compared to last year's SALP period. A new Corrective Action System has been implemented. Management and the Management Safety Review Committee are now involved with corrective actions. No items of noncompliance have been issued in this area over this SALP period.

Conclusion:

Performance Assessment - Category 2.

Board Recommendation:

The board recommends a return to the routine inspection program, with particular emphasis towards procedural adherence.

2. Radiological Controls

A total of seven inspections were performed by the Reactor Radiation Protection Section during the Appraisal period. A total of 279 inspector-hours were expended in the areas of:

- a. Operational and Outage Radiation Protection
- b. Environmental Protection
- c. Waste Management
- d. Confirmatory Measurements
- e. Transportation Activities

In addition, the resident inspectors provided continuing observation in these areas.

During the appraisal period two Severity Level IV violations were identified involving failure to report a release of radioactive noble gas and measure and record flows from various plant stacks and vents as required by the Technical Specifications. No deviations were identified in this area during the appraisal period.

A total of twelve LERs in these areas were received and evaluated. Eleven of the LERs were associated with nonradiological aspects of liquid effluents, Appendix B of the Technical Specifications. (Note: Non-radiological liquid effluents are no longer considered to be within NRC jurisdiction and the technical specifications in this area will be deleted upon issuance of Standard Radiological Technical Specifications.) One LER related to the detection of gaseous radio activity in the secondary side of the OTSG during a period of plant shutdown. The source of the problem was identified and appropriate corrective action taken.

The inspections identified continuing management support of the radiation protection program. A number of significant program improvements have occurred or were occurring at the conclusion of the SALP period. These included:

- a. Employment of a qualified plant Health Physicist;
- b. Significant increases in staffing levels in the radiation protection group;
- c. Creation of several additional Senior Chemistry-Radiation Assistant positions;

- d. A strengthened Training Department, which improved and expanded General Employee Training and assumed responsibility for and began refresher training for Chemistry-Radiation Department personnel;
- e. A formal ALARA program and the supporting training program approached completion and commenced operation;
- f. An interim, computer-based, dose assessment program was developed and implemented in support of steam generator work during the year;
- g. A computer-based, multichannel analyzer and radiation protection records system was procured. The system should correct deficiencies previously identified in the confirmatory measurements program as well as provide necessary support for improved radiation control and ALARA activities when fully operational.

Areas of concern include: the failure to fill the position of Nuclear Chemist in spite of the licensee's continuing recruiting efforts; the reduction in the average experience level of Chemistry-Radiation Assistants brought about by staff losses and replacement staffing. Licensee management recognizes concerns in this area and is taking action to speed the technician qualification process.

Beginning in February 1983 the licensee will commence an extended refueling and TMI backfit outage. Therefore, although the licensee has improved the capability for effective radiation control during this rating appraisal, a continued high level of attention is still necessary in this area.

Conclusion:

Performance Assessment - Category 2

Board Recommendation:

In view of the planned extended outage and the significant radiological problems which may arise, the Board recommends no change in inspection effort.

3. Maintenance

Maintenance activities have been inspected on a monthly basis by the resident inspectors during this SALP evaluation period. These inspections have verified that the licensee's maintenance program, both corrective and preventive, has been effective.

Enforcement actions in the maintenance area consisted of two Severity Level V violations. One violation was related to use of a superseded procedure to perform speed stop settings on the emergency diesel-generator governors. The other involved poor procurement practices that resulted in an AC solenoid being installed for a failed DC solenoid on a containment isolation valve. These deficiencies were promptly corrected and reported to the NRC. A significant maintenance effort related to the repair of the High Pressure Injection (HPI) nozzles and thermal sleeves was satisfactorily accomplished. The licensee has redesigned and installed a new external auxiliary feed header. Planning testing and reporting requirements of these items were conducted properly.

Conclusion:

Performance Assessment - Category 2.

Board Recommendation:

No change in inspection program.

4. Surveillance

The surveillance program has been inspected on a monthly basis by the Resident Inspectors throughout this SALP period. Activities performed by the licensee include all surveillance activities required by the Technical Specifications, which were performed in accordance with periodic calibration, operational and inservice testing procedures. The program has been well implemented. Problems identified by the licensee as a result of surveillance activities have been properly documented and promptly resolved.

There were no enforcement actions taken by the NRC with respect to surveillance activities during this SALP period. LERs have identified certain weaknesses in some parts of the program. One dealt with reporting the utilization factor and status of reactor vessel material samples. Others dealt with missed procedure steps or steps performed out of sequence. The procedural errors were promptly analyzed by the licensee, and where safety-related concerns were generated the procedures were reperformed. All scheduled surveillance tests were performed; however, refueling related surveillance tests have been postponed due to the NRC approved extension of the refueling interval. This extension was requested by the licensee due to the extensive plant down time due to turbine generator and steam generator repairs.

Conclusion:

Performance Assessment - Category 2.

Board Recommendation:

No change in inspection program.

5. Fire Protection

Two inspections of fire protection activities were conducted, by region-based inspectors, during the assessment period. These inspections covered: administrative controls associated with fire protection; fire brigade staffing, training and equipment; control of combustible materials, liquids and gases, and housekeeping.

During this assessment period, general fire protection activities and housekeeping were under continual review by the resident inspectors. No violations in this area were identified. Two LERs were submitted; one involved 14 unacceptable fire doors and the other involved 16 unacceptable fire stops. These two LERs were the result of new, first-time specific surveillance programs instituted by the licensee.

Five special reports were made during the assessment period. Three of these reports involved fire watches not posted as required. The first instance was attributed to personnel error. The second occurred because the fire watch lacked respirator training and had to be removed because of a radio-active spill and the last because a malfunctioning door latch kept the fire watch from his assigned area. The remaining two reports pertained to fire barrier penetrations. The first resulted from the discovery of a through-path for a potential fire. The second was a notification by the licensee of

reduced reporting for fire barrier penetrations during a construction phase because of the large volume of penetrations due to modifications (Licensee Special Report, 1-7-1982).

Management involvement in this area is evidenced by the assignment of a full time safety technician and recent implementation of procedures to provide improved surveillance of fire doors and fire stops.

A weakness identified by the NRC inspection program is the licensee's lack of a welding permit system, this concern was brought to the attention of licensee management, and has not yet resulted in corrective action.

Conclusion:

Performance assessment - Category 2.

Board Recommendation:

No change in inspection activity.

6. Emergency Preparedness

During this assessment period, two special inspections were performed in the area of emergency preparedness. In addition, a licensee emergency preparedness exercise was observed. The prompt notification system was declared operational on April 30, 1982. The meteorological tower had been reinstrumented in November 1981. In response to the findings of the Emergency Preparedness Appraisal, performed during the previous SALP assessment period, the licensee has significantly modified and issued a complete set of new emergency plan implementing procedures. Significant weaknesses in the scenario and its implementation were identified during the observed exercise. The licensee has improved the emergency preparedness program, particularly in the area of the implementing procedures. There is a need to complete the permanent Technical Support Center and Emergency Operations Facility as soon as possible. Improvement in the scenario and its implementation during emergency planning exercises is necessary. The problems identified in this area will be followed up during the next SALP period.

Conclusion:

Performance Assessment - Category 2.

Board Recommendation:

Continue the routine inspection program in the area of emergency preparedness. A new routine inspection program in this area is expected to be implemented by January 1, 1983. The result of follow up inspections will dictate future inspection frequencies.

7. Security and Safeguards

During the period July 1, 1981 through September 30, 1982, ten inspections were conducted at the Rancho Seco Nuclear Generating Plant by the Region V Safeguards Branch. Three inspections concerned plant physical security and seven were related to International Atomic Energy Agency (IAEA) inspections monitored by Region V material control and accountability (MC&A) inspectors. One item of noncompliance was identified.

Physical security inspections indicated that licensee management appeared to be actively and effectively involved in the plant security program. Security force staffing was in compliance with the Physical Security Plan and supervision and management of the force appeared appropriate to the force size and functions.

The item of noncompliance (Severity Level V) resulted from a licensee failure to control essential vehicles on site in accordance with the NRC-approved physical security plan. Three incidents leading to this citation were verified during one inspection. The licensee took immediate action to secure and monitor control of vehicles on site, and implemented long-term actions to discourage future recurrence.

Several changes in the physical security plan, security training and qualification plan, and site security procedures were developed and implemented during this assessment period. Many are still to be evaluated in the inspection program. The licensee is still in the process of fine-tuning some changes for a more effective implementation.

The seven MC&A inspections during this period were conducted to accompany and observe IAEA inspectors during their inspections of the licensee's facility. Rancho Seco was one of the two U.S. nuclear power plants selected for IAEA inspections under the President's offer of 1967. Although this participation was not required, the licensee has been cooperative in responding to IAEA and related NRC initiatives. One incident of inadvertent breakage of IAEA seals occurred during the assessment period, but was apparently resolved to IAEA satisfaction.

In evaluating licensee activities in the safeguards area, the Division of Safeguards, NMSS, has concluded:

- o Sacramento Municipal Utility District (SMUD) management has been actively involved in the development and implementation of the physical security program. SMUD's cooperation and coordination between the corporate and site levels and the NRC safeguards reviewer was comprehensive and constructive.
- o SMUD has generally exhibited well planned approaches to technical safeguards issues and has proposed acceptable resolutions to identified issues.
- o Throughout safeguards licensing activities SMUD has responded quickly and accurately to NRC initiated comments and suggestions.
- o SMUD has provided for a primary safeguards contact with appropriate authority and responsibility to deal directly with NRC reviewers in modifying or amending the facility's safeguards program.

Conclusion:

Performance Assessment - Category 1.

Board Recommendation:

No change in inspection program.

8. Refueling

The last refueling outage was completed in May 1981, during the last SALP period. The licensee performed the post start-up power ascension testing during the current SALP period. The licensee did an excellent job of physics testing during this period. Near the end of the current SALP period, new fuel receipt took place without a difficulty, in preparation for the January 1983 refueling/maintenance outage.

No enforcement actions were taken with respect to refueling activities performed after the 1981 refueling outage. No LERs were related to refueling activities.

Conclusion:

Performance Assessment - Category 1.

Board Recommendation:

No change in inspection program.

9. Licensing Activities

The licensee's performance evaluation is based on a consideration of seven attributes as given in the NRC Manual Chapter. For most of the licensing actions considered in this evaluation, only three or four of the attributes were of significance. Therefore, the composite rating is heavily based on the following attributes:

- Management involvement
- Approach to resolution of technical issues
- Responsiveness

a. Management Involvement in Assuring Quality

Overall rating for this attribute is Category 2. There is evidence of assignment of priorities, and decision making seems to be at a level that ensures management review. Several submittals were not thorough or technically sound. Typical areas where management involvement was evident are IAEA Safeguards, and ESF Filter Technical Specifications.

b. Approach to Resolution of Technical Issues from a Safety Standpoint

The overall rating for this attribute is Category 2. In general, licensing issues handled by the Rancho Seco plant staff were technically sound and thorough, with conservatism routinely exhibited regarding safety. However, the approach used in SMUD's handling of the Tower Crane issue did not exhibit conservatism, (letter - J. Stoltz, NRR to J. Mattimoe, SMUD - 8-12-81, et. al.).

c. Responsiveness

The overall rating for this attribute is Category 3. Of particular concern is the licensee's repetitive failure to inform the staff of delays in making submittals, even when the schedule was originally established by the licensee. Considerable NRC effort to obtain acceptable resolutions was necessary, as responses lacked thoroughness and depth, and frequent extensions of time were required. Particular examples of this include Tower Crane, Atmospheric Dump Valves, HPI Lube Oil Cooling, NUREG-0737 Items II.E.1.2/II.K.2.10, and Control of Heavy Loads.

d. Reportable Events

The overall rating for this attribute is Category 2. Events are generally reported in a timely manner and are accurately identified. However, information is sometimes lacking and some analyses are marginal as evidenced by numerous amendments to LERs. Occasional repeat occurrences are reported, indicating corrective action taken is not always effective.

e. Staffing

The overall rating for this attribute is Category 2. Two vacant licensing positions were filled during this report period, and several more Emergency Planning personnel were hired. As appropriate, SMUD engages contract help in the engineering design and evaluation area.

The position of Assistant General Manager (AGM) and Chief Engineer is currently vacant. A corporate officer should clearly be responsible for nuclear activities without having ancillary responsibilities that might detract from his attention to nuclear safety matters. The AGM and Chief Engineer previously performed this function. This position should be filled on a high priority basis.

f. Training

The overall rating for this attribute is Category 2.

A defined training program is implemented for a large portion of the staff. Only one set of operator examinations was administered during this reporting period. Two out of two reactor operators (RO) passed and two out of two senior reactor operators (SRO) passed. While the number of candidates receiving operating licenses is low, the quality of instruction is obviously high.

Conclusion

Performance Assessment - Category 2.

Board Recommendation

No change in inspection program.

10. Plant Modifications

Eight inspections were conducted during the assessment period by regional based inspectors of construction and/or modification related activities. These inspections revealed a need for greater licensee attention to the management of contractors performing work important to safety, especially in the case of contractors who have had no prior nuclear related experience. This conclusion is based upon the number of enforcement items identified in this functional area during the assessment period, as follows:

- a. Noncompliance No. 50-312/81-24/01 involved a failure by the onsite testing laboratory contractor to have approved quality assurance implementing procedures prior to the commencement of site Quality Class I work. (Severity Level V)
- b. Noncompliance No. 50-312/82-02/01 involved a failure by the prime construction contractor to control and monitor weld filler material in accordance with approved procedures and specifications. (Severity Level V)
- c. Noncompliance No. 50-312/82-02/02 involved a failure by the licensee to take appropriate measures to assure that the cause of conditions adverse to quality are promptly identified, and appropriate corrective action taken to preclude repetition. (Severity Level V)
- d. Noncompliance No. 50-312/82-02/03 involved a failure by the prime construction contractor to store, protect, and control high strength bolting material within the requirements of ANSI N45.2.2. (Severity Level V)
- e. Noncompliance No. 50-312/82-20/01 involved a failure by the onsite testing laboratory contractor to follow quality procedures to assure that measuring and test equipment is properly controlled, calibrated and adjusted within specified limits. (Severity Level V)
- f. Noncompliance No. 50-312/82-32/01 involved a failure by the licensee to assure that procurement documents comply with the requirements of the licensee's established Quality Assurance Program. (Severity Level IV)

On the positive side, the Board notes that the licensee's responses to the above enforcement items were complete and timely. In addition, inspector identified concerns were acknowledged and, if applicable, licensee commitments were immediately implemented.

Conclusion

Performance Assessment - Category 3.

Board Recommendations

The Board recommends that inspection emphasis be continued in this area, particularly in view of the number and extent of plant modifications and construction activities scheduled for the coming year.

V. SUPPORTING DATA AND SUMMARIES

1. REACTOR TRIPS

July 1, 1981 through september 30, 1982

| <u>Date</u> | <u>Cause</u> |
|-------------|--|
| 8-7-81 | Auto - Unit separated from Bus due to loss of Turbine Control - RCP failed to transfer to Off-Site Bus |
| 10-28-81 | Auto - RCS pressure high due to swing in Feed-water |
| 12-4-81 | Auto - Reactor trip due to generator trip caused by H ₂ Cooler Control valve failure |
| 1-14-82 | Auto - Reactor Trip caused by Switchyard testing which isolated unit from the grid |
| 1-19-82 | Auto - (inverter trip caused) Reactor Trip which caused a high RC pressure trip |
| 8-20-82 | Auto - EHC malfunction |
| 8-25-82 | Auto - EHC malfunction |
| 9-16-82 | Auto - Mini-flow bypass line blowout which caused a loss of feedwater pump. |

TABLE 1

2. SYNOPSIS OF LICENSEE EVENT REPORTS (7/1/81 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Functional Area</u> | <u>SALP Cause Codes*</u> | | | | | | <u>Totals</u> |
|----------------------------|--------------------------|----------|----------|----------|----------|----------|---------------|
| | <u>A</u> | <u>B</u> | <u>C</u> | <u>D</u> | <u>E</u> | <u>X</u> | |
| 1. Plant Operations | 5 | 1 | | | 3 | 1 | 10 |
| 2. Radiological Controls | 1 | 7 | | | 1 | 3 | 12 |
| 3. Maintenance | 2 | 4 | | 1 | 3 | | 10 |
| 4. Surveillance | 3 | | | | 3 | | 6 |
| 5. Fire Protection | | 2 | | | | | 2 |
| 6. Emergency Preparedness | | | | | | | 0 |
| 7. Security and Safeguards | | | | | | | 0 |
| 8. Refueling | | | | | | | 0 |
| 9. Licensing Activities | | | | | | | 0 |
| 10. Design/Modifications | 1 | 8 | 2 | | | | 11 |
| Totals | 12 | 22 | 2 | 1 | 10 | 4 | 51 |

Cause Codes:

- A - Personnel Error
- B - Design, Manufacturing, or Installation Error
- C - External Cause
- D - Defective Procedure
- E - Component Failure
- X - Other

Licensee Event Reports reviewed
Report No. 81-33 through 82-25

*Multiple LER Numbers are counted only once.

3. SPECIAL REPORTS

| | <u>Event Description</u> | <u>Technical Spec.</u> | <u>Event Date</u> | <u>Letter Date</u> | <u>Rec'd Region</u> | <u>Apparent Cause</u> |
|----|---|--------------------------------------|-------------------------|--------------------|--------------------------------------|--|
| 1. | A through-path penetration for potential fire was discovered* | 6.9.5.E 3.14.6.2 | 9/16/81 | 10/22/81 | 10/29/81 2:34 pm | Penetration exceeded Tech. Spec. opening time |
| 2. | Continucous fire watch not posted as required* | 6.9.5.E 3.14.6.2 | 11/18/81 | 12/17/82 | 12/24/81 9:43 am | Personnel error |
| 3. | Notification of reduced special reporting for fire barrier penetration openings during construction phase* | 3.14.6 & 6.9.5.E | N/A | 1/7/82 | 1/21/82 11:26 am | Large volume of penetrations to fire barriers due to modifications |
| 4. | Fire watch not maintained due to radioactive spill (82-01)* | 6.9.5.E 3.14.6.2 | 12/6/81 | 1/12/82 | 1/18/82 11:21 am | Fire watch lacked respirator training |
| 5. | Fire watch out of assigned area due to malfunctioning door (82-02)* | 6.9.5.E & 3.14.6.2 | 1/4/82 | 2/2/82 | 2/4/82 12:35 pm | Door latch failed |
| 6. | Waste drum discovered to have nail hole (no leakage) (82-03) | Reg. Guide 1.16 section C.3.D | 3/12/82 | 3/23/82 | 4/14/82 1:50 pm @ Resident Office | Nail Puncture |
| 7. | Structural integrity inspection due to high vibration induced by failed main turbine rotor and Reactor Building routine inspections (82-04) | 6.9.5.B.1 10 CFR 50 Appendix K | 9/8/81 and 3/5/81 | 3/24/82 | 4/13/82 1:11 pm | Turbine rotor failure and Routine Building Surveillance |

*These items are casually linked to LER's 81-38 and 81-43.

4. LICENSEE EVENT REPORTS (7/1/81 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION*

| <u>LER No./Type</u> | <u>Summary Description</u> | <u>Functional Area</u> | <u>Cause Code*</u> | |
|--------------------------------------|---|------------------------|--------------------|-------------|
| | | | <u>LER</u> | <u>SALP</u> |
| 81-33/30 day | Diesel generator would not start due to a relay that was not reset | 1 | X | A |
| 81-34/30 day (Causally Linked) | Voltage in switchyard decreased to 207KV. Previous submitted minimum voltage analysis was 214KV (See 81-39 and 79-13) | 10 | C | C |
| 81-35/30 day | Low diesel governor oil level | 3 | E | A |
| 81-36/10 day (Causally Linked) | Plant effluent exceeded PH level's 12 times in June (See 81-42, 81-48, 82-06 82-08) | 2 | X | B |
| 81-37/30 day | Desiccant in instrument lines caused valve to exceed closure time | 3 | E | B |
| 81-38/30 day (Causally Linked) | 14 Fire doors were found unacceptable (See 81-43 and Special Reports) | 5 | X | B |
| 81-39/30 day (Causally Linked) | Voltage in switchyard decreased to 206KV (See 81-34 & 79-13) | 10 | C | C |
| 81-40/30 day | Plant discharge exceeded discharged solids limit | 2 | A | A |
| 81-41/30 day | Reanalysis of 20 inch main feedwater piping indicated seismic supports were over stressed | 10 | B | B |
| 81-42/10 day | Plant effluent exceeded PH limits 4 times in August | 2 | X | B |
| 81-43/30 day (Causally Linked) | 16 Fire stops were found to be unacceptable (See 81-38 and Special Reports) | 5 | X | B |

*Multiple LER numbers are counted only once in Table 2.

| <u>LER No./Type</u> | <u>Summary Description</u> | <u>Functional Area</u> | <u>Cause Code*</u> | |
|--------------------------------------|---|------------------------|--------------------|-------------|
| | | | <u>LER</u> | <u>SALP</u> |
| 81-44/30 day (Casually Linked) | Nitrogen system contamination from pressurizer (See 82-20 and 82-23) | 2 | E | B |
| 81-45/30 day (Casually Linked) | Decay heat removal seal leakage exceeded (See 82-12) | 1 | E | E |
| 81-46/30 day (Casually Linked) | 6 snubbers found inoperable (See 82-02 and 82-18) | 4 | E | E |
| 81-47/10 day | Loose wire on pressurizer heater breaker | 3 | A | A |
| 81-47/ Follow-up | Loose wire on pressurizer heater breaker | 3 | A | A |
| 81-48/10 day | Plant effluent exceeded PH limits 4 times in September | 2 | X | B |
| 81-49/30 day | Safety features valve failed to close due to improper setup at factory | 3 | E | E |
| 81-50/30 day | Safety features valve failed to stroke closed due to failure of solenoid valve | 3 | E | B |
| 81-51/30 day | Safety features valve failed to close in required time due to tight valve packing | 3 | E | E |
| 81-52/30 day | Nuclear service raw water pump tripped, cause unknown | 1 | X | X |
| 81-53/30 day | Safety features valve failed to close completely | 3 | E | E |
| 81-54/30 day | Surveillance step not completed on trip of RCS breaker | 4 | A | A |
| 81-55/30 day (Casually Linked) | RPS pressure transmitter drift exceeded setpoints (See 81-57 and 82-04) | 10 | E | B |

| <u>LER No./Type</u> | <u>Summary Description</u> | <u>Functional Area</u> | <u>Cause Code*</u> | |
|--------------------------------------|--|------------------------|--------------------|-------------|
| | | | <u>LER</u> | <u>SALP</u> |
| 81-56/24 hour | Surveillance testing on RPS system bypassed logic, violated minimum degree of redundancy | 4 | A | A |
| 81-56/14 day | Surveillance testing on RPS system bypassed logic, violated minimum degree of redundancy | 4 | A | A |
| 81-57/30 day (Causally Linked) | RPS pressure channel C has instrument drift exceeding limits (See 82-04 and 81-55) | 10 | E | B |
| 81-58/30 day | Failure to submit required reports | 1 | A | A |
| 82-01/24 hour | Airlock door malfunctioned | 1 | B | B |
| 82-01/14 day | Airlock door malfunctioned | 1 | B | B |
| 82-01/ Follow-up | Airlock door malfunctioned | 1 | B | B |
| 82-02/30 day (Casually Linked) | 2 Snubbers failed ISW 23823-13A, ISW 21007-7 (See LER 81-46 and 82-18) | 4 | E | E |
| 82-03/24 hour | B HPI pump breaker closing spring charging motor was switched off making pump inop. | 1 | A | A |
| 82-04/30 day (Casually Linked) | RPS channel C pressure transmitter out of tolerance (See 81-55 and 81-57) | 10 | E | B |
| 82-05/30 day | Diesel inoperable due to failure to reset reverse power relay | 1 | A | A |
| 82-06/10 day | Plant effluent PH was exceeded | 2 | B | B |
| 82-07/10 day | Plant effluent chlorine high | 1 | A | A |
| 82-08/10 day | Plant effluent PH was exceeded | 2 | E | B |

| LER No./Type | <u>Summary Description</u> | Functional Area | <u>Cause Code*</u> | |
|--------------------------------------|--|--------------------|--------------------|-------------|
| | | | <u>LER</u> | <u>SALP</u> |
| 82-09/24 hour | Unacceptable high pressure injection nozzle cracks | 10 | B | B |
| 82-09/14 day | HPI Repairs | 10 | B | B |
| 82-09/ Followup | HPI Repairs | 10 | B | B |
| 82-10/24 hour | Auxiliary feed header deformations | 10 | B | B |
| 82-10/14 day | Auxiliary feed header deformations | 10 | B | B |
| 82-10/ Followup | Auxiliary feed header deformations | 10 | B | B |
| 82-11/30 day | 3/4 Check valves leaked from Spray Additive tank discharge | 3 | E | B |
| 82-12/30 day (Casually Linked) | Decay heat pump oil leakage from partial seal failure (See 81-45) | 1 | E | E |
| 82-12/ Followup | Decay heat pump oil leakage from a misalignment problem | 1 | E | E |
| 82-13/10 day (Casually Linked) | Plant effluent exceeded limits from high chlorine (See 82-16) | 2 | None | B |
| 82-14/30 day | Safety features system pressurizer liquid sample valve breaker failure | 1 | E | E |
| 82-15/30 day | Loss of decay heat removal flow during preventative maintenance | 3 | D | D |
| 82-16/10 day (Casually Linked) | Plant effluent exceeded chlorine limits (See 82-13) | 2 | E | E |
| 82-17/30 day | 4 failed bolts on polar crane track hold down clips | 10 | E | B |

| LER No./Type | Summary Description | Functional Area | Cause Code* | |
|--------------------------------------|---|-----------------|-------------|------|
| | | | LER | SALP |
| 82-18/30 day (Casually Linked) | ISW 23823-7A snubber failed functional test (See 81-46 and 82-02) | 4 | E | E |
| 82-19/30 day | CRD Breaker failed to trip due to linkage adjustment | 10 | E | B |
| 82-20/30 day (Casually Linked) | Water flow from pressurizer to nitrogen system due to temporary hose connection. Caused N ₂ system contamination (See 81-44 and 82-23) | 2 | B | B |
| 82-21/30 day | Tendon surveillances not performed as per procedure | 4 | A | A |
| 82-22/30 day | Diesel Generator A failure to start due to air start motor problems | 3 | E | B |
| 82-23/30 day (Casually Linked) | Nitrogen system contamination (See 81-44 and 82-20) | 2 | X | B |
| 82-24/30 day | Class I cable raceways were cut without review or authorization | 10 | A | A |
| 82-25/10 day | Oxygen level, in creek offsite, low | 2 | Z | X |

*Cause Codes:

- A - Personnel Error
- B - Design, Manufacturing, or Installation Error
- C - External Cause
- D - Defective Procedure
- E - Component Failure
- X - Other

Licensee Event Reports reviewed Report No. 81-33 through 82-25

5. SUMMARY OF OTHER RELATED DATA (7/1/81-9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

A. Part 21 reports:

- (1) Defective Cable Code K2S-Brand Rex Company.

B. Investigations and Allegations: No substantiation

C. Escalated Enforcement Actions:

- (1) Civil Penalties

February 11, 1982 - Diesel Generator Limiting Condition of Operation (LCO) Violated.

March 1, 1981 - High pressure injection LCO Violated.

- (2) Orders

July 10, 1981 John F. Stolz, Chief ORB No. 4 DOL to J. J. Mattimoe, Assistant General Manager, SMUD, commitments to implementing NUREG 0737 requirements that were requested to be complete by June 30, 1981.

May 21, 1982, D. G. Eisenhut, Director DOL, NRR to J. J. Mattimoe, Assistant General Manager, SMUD, requested for additional information on HPI nozzles.

- (3) Confirmation of Action Letters

October 19, 1981, R. H. Engelken, Regional Administrator, RV, to J. J. Mattimoe, Assistant General Manager, SMUD, Instrument Air System.

August 31, 1981, R. H. Engelken, Regional Administrator, RV, to J. J. Mattimoe, Assistant General Manager, SMUD, Confirmation of Actions being taken on significant findings.

D. Management conferences held:

8-18-81 - Discussion of Emergency Planning

10-28-81 - SALP Review Meeting.

4-21-82 - Enforcement Conference.

5-13-82 - Scheduling and Planning Forecasting.

TABLE 2

SUMMARY OF INSPECTION ACTIVITIES (7/1/81 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Functional Area</u> | | <u>Inspection*</u> <u>Hours</u> | <u>Percent</u> <u>of Effort</u> |
|------------------------|---------------------------------|------------------------------------|------------------------------------|
| (1) | Plant Operations | 1226 | 32.8 |
| (2) | Radiological Controls | 279 | 7.4 |
| | Radiation Protection | 102 | |
| | Radioactive Waste Management | 79 | |
| | Transportation | 2 | |
| | Effluent Control and Monitoring | 32 | |
| | Independent Measurement | 64 | |
| (3) | Maintenance | 380 | 10.3 |
| (4) | Surveillance | 270 | 7.3 |
| (5) | Fire Protection | 80 | 2.2 |
| (6) | Emergency Preparedness | 494 | 13.2 |
| (7) | Security and | 142 | |
| | Safeguards | 56 | 5.3 |
| (8) | Refueling | 60 | 1.6 |
| (9) | Licensing Activities | 258 | 6.9 |
| (10) | Design Changes and | | |
| | Modifications - Construction | 258 | |
| | - Operations | 209 | 12.5 |
| (11) | Review and Audit | 18 | 0.5 |
| Total | | 3730 | 100 |

* Allocations of inspection hours vs. functional areas are approximations based upon inspection report data.

Reports 81-21 through 82-36

INSPECTIONS CONDUCTED (7/1/81 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Report No.</u> | <u>Inspector(s)</u> | <u>Areas Inspected</u> |
|-------------------|--|--|
| 50-312/81-21 | Resident 171 hours | Maintenance, Surveillance, Operations, LER's, Independent |
| 50-312/81-22 | Regional | Emergency Planning |
| 50-312/81-23 | Regional Safeguards 12 hours | Special Safeguards (IAEA) records, Physical inventory of fuel and camera installation |
| 50-312/81-24 | Regional Construction 28 hours | Construction; Quality Assurance, Personnel Qualifications, handling and storage of material and drawing control |
| 50-312/81-25 | Resident 170 hours | Maintenance, Surveillance, Operations Independent Inspection |
| 50-312/81-26 | Regional Operations 60 hours | Organization, Bulletins, Independent Inspection |
| 50-312/81-27 | Regional Security 38 hours | Physical Protection, Procedures, Records Alarms and Barriers |
| 50-312/81-28 | Regional Health Physics 59 hours | Organization, Staffing Radioactive Waste systems, procedures, effluents, testing and sampling, analysis |
| 50-312/81-29 | Resident 139 hours | Maintenance, Surveillance, Quality Assurance, Independent Inspection |
| 50-312/81-30 | Regional Construction 22 hours | Plant Modifications, Construction procedures, concrete placement |
| 50-312/81-31 | Resident 212 hours | Operations, Maintenance, Surveillance Independent Inspection, Follow-up on Regional/Headquarters requests |
| 50-312/81-32 | Regional Health Physics 49 hours | Radiation protection program, Organization, Staffing, Training, Procedures, Audits Control of Access |

INSPECTIONS CONDUCTED (7/1/81 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Report No.</u> | <u>Inspector(s)</u> | <u>Areas Inspected</u> |
|-------------------|--------------------------------------|---|
| 50-312/81-33 | Resident 91 hours | Operational, Safety, Maintenance Surveillance, Independent Inspection |
| 50-312/81-34 | Regional Safeguards 7 hours | Records and Reports, Installation of Film |
| 50-312/81-35 | Regional Safeguards 74 hours | Safeguards, Barriers, Alarms, Procedures, Organization, Audit, Records, Testing Locks, Lighting, Cameras, Access Controls, Detection Aids, Communications Training, Emergency Plans. |
| 50-312/81-36 | Resident 157 hours | Operations, Maintenance, Surveillance, Follow-up on Requests, Independent Inspection |
| 50-312/81-37 | Regional Construction 28 hours | Design Changes and Modifications, Independent Inspection |
| 50-312/82-01 | Regional Safeguard 7 hours | Safeguards - Records, Installation of Film and Batteries for Cameras |
| 50-312/82-02 | Regional Construction 32 hours | Plant Modifications, Construction, Quality Assurance, Handling and Storage of Materials, Drawing Control |
| 50-312/82-03 | Regional | CALP Review Board between NRC and SMUD |
| 50-312/82-04 | Resident 158 hours | Maintenance, Surveillance, Audit Program, Training, Independent Inspection |
| 50-312/82-05 | Regional Safeguards 30 hours | Safeguards - Maintenance, Barriers, Lighting, Cameras, Access Controls, Alarms, Communications Training, Qualifications, Contingency Plan |
| 50-312/82-06 | Resident 168 hours | Plant Operations, Maintenance, Surveillance, TMI Modifications, Independent Inspection |

INSPECTIONS CONDUCTED (7/1/81 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Report No.</u> | <u>Inspector(s)</u> | <u>Areas Inspected</u> |
|-------------------|--|---|
| 50-312/82-07 | Regional Safeguards 7 hours | Safeguards - Records and Reports Service Cameras |
| 50-312/82-08 | Resident 51 hours | Follow-up of Two Special LER's; Diesel and HPI-Inoperability |
| 50-312/82-09 | Regional 2 hours | Health Physics (Drum Leak) |
| 50-312/82-10 | Regional Health Physics 32 hours | Organization, Staffing, Training, Waste Management, Audits, Independent Inspection |
| 50-312/82-11 | Resident 165 hours | Operations, Maintenance, Surveillance, Independent Inspection |
| 50-312/82-12 | Regional Safeguards 6 hours | Records and Reports Film and Batteries and seals |
| 50-312/82-13 | Regional Construction 22 hours | Special Inspection of Safe End nozzels |
| 50-312/82-14 | Regional 28 hours | Environmental Protection, Quality Control, Quality Assurance, Surveillance |
| 50-312/82-15 | Regional 6 hours | Appraisal of Meteorological Emergency Preparedness Activities |
| 50-312/82-16 | Resident 160 hours | Operations, Maintenance, Surveillance, Independent Inspection, Follow up Items |
| 50-312/82-17 | Regional 64 hours | Laboratory Quality Control Program and Independent Confirmatory Measurements |
| 50-312/82-18 | Regional 18 hours | Enforcement Conference |
| 50-312/82-19 | Regional Operations 22 hours | Fire Protection, Independent Inspection |
| 50-312/82-20 | Regional Construction 36 hours | Plant Modifications, Quality Implementing Procedures Review of Quality Records, HPI and Steam Generator Repairs |

INSPECTIONS CONDUCTED (7/1/82 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Report No.</u> | <u>Inspector(s)</u> | <u>Areas Inspected</u> |
|-------------------|--|--|
| 50-312/82-21 | Resident 162 hours | Operations, Maintenance, Surveillance, Follow-up items, new fuel receipt, independent inspection. |
| 50-312/82-22 | Regional Operations 72 hours | Follow up of Bulletins, Circulars, Open items, unresolved items. |
| 50-312/82-23 | Regional 20 hours | Prompt notification system installation |
| 50-312/82-24 | Regional Health Physics 14 hours | Radiation protection, surveys, auxiliary feedwater header repair work, monitoring of personnel. |
| 50-312/82-25 | Resident 176 hours | Operations activities, Maintenance, surveillance design changes, Follow-up and independent inspection. |
| 50-312/82-26 | Regional Safeguards 7 hours | Safeguards - Records & Reports Film and Batteries |
| 50-312/82-27 | Regional Operations 19 hours | Follow-up of Bulletins, Circulars and Open items. |
| 50-312/82-28 | Resident 172 hours | Maintenance, Operations, Surveillance, TMI verification, independent inspection, Follow-up on Open items and requests. |
| 50-312/82-29 | Regional Construction 28 hours | Modification of Steam generator Auxiliary Feedwater Header and HPI nozzel makeup lines. |
| 50-312/82-30 | Regional 138 hours | Emergency Plan exercise and critiques |
| 50-312/82-31 | Regional Operations 20 hours | Fire prevention, Training, Independent inspection. |
| 50-312/82-32 | Regional Construction 36 hours | Plant modifications, Nuclear service electrical building, Auxiliary Feedwater Header, Review of procurement documents, handling and storage of electrical equipment. |

INSPECTIONS CONDUCTED (7/1/82 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Report No.</u> | <u>Inspector(s)</u> | <u>Areas Inspected</u> |
|-------------------|--|---|
| 50-312/82-33 | Regional Health Physics 31 hours | Transportation activities, Circulars, Information notices, Radwaste and Ventilation |
| 50-312/82-34 | Regional Safeguards 10 hours | Records and Reports Service Cameras |
| 50-312/82-35 | Resident 183 hours | Operations, Maintenance, Surveillance, Review Committee Activities, Follow-up of Open items, Headquarters and Regional requests, Independent inspection. |
| 50-312/82-36 | Resident 100 hours | Operations, Maintenance, Surveillance, Licensee Event Reports, Follow-up of Noncompliances and Regional requests, Plant Trips, and, Independent Effort. |

TABLE 3

ENFORCEMENT SUMMARY (7/1/82 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Functional Area</u> | <u>Severity Level*</u> | | | | | | <u>Deviations</u> | <u>Totals</u> |
|----------------------------|------------------------|-----------|------------|-----------|----------|-----------|-------------------|---------------|
| | <u>I</u> | <u>II</u> | <u>III</u> | <u>IV</u> | <u>V</u> | <u>VI</u> | | |
| 1. Plant Operations | | | 2 | 1 | 1 | | | 4 |
| 2. Radiological Controls | | | | 2 | | | | 2 |
| 3. Maintenance | | | | | 2 | | | 2 |
| 4. Surveillance | | | | | | | | 0 |
| 5. Fire Protection | | | | | | | | 0 |
| 6. Emergency Preparedness | | | | | 1 | | 1 | 2 |
| 7. Security and Safeguards | | | | | 1 | | | 1 |
| 8. Refueling | | | | | | | | 0 |
| 9. Licensing Activities | | | | | | | | 0 |
| 10. Plant Modifications | | | | | 6 | | | 6 |
| Totals | 0 | 0 | 2 | 3 | 11 | 0 | 1 | 17 |

* Severity levels prior to March 1982 were in accordance with the NRC's Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), which provided six severity levels. Severity levels for March 1982 and later are in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), which provides five severity levels.

Reports reviewed 81-21 through 82-36

ENFORCEMENT ITEMS (7/1/82 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Inspection Number</u> | <u>Inspection Date</u> | <u>Subject</u> | <u>Req.</u> | <u>Sev.*</u> | <u>Area</u> |
|------------------------------|----------------------------|--|--|--------------|-------------|
| 50-312/81-21 | 7/1-31/81 | Failure to follow procedures | Tech. Spec. | V | 1 |
| 50-312/81-22 | 6/22-26 & 7/2/81 | Emergency Preparedness Communications test not done | 10 CFR 50.54(s) | V | 6 |
| 50-312/81-24 | 6/12/81 | Failure to accomplish work in accordance with approved Quality Assurance instructions | 10 CFR 50 Appendix B Criterion V | V | 10 |
| 50-312/81-28 | 9/21-25/81 10/6-9/81 | Failure to monitor continu- ously and record flow of Auxiliary and reactor building stacks | Teck. Spec. Appendix B | IV | 2 |
| | | Failure to report an unplanned release to the environment | 10 CFR 50.72(A)(8) | IV | |
| 50-312/81-29 | 9/1-30/81 | Failure to follow procedures | Tech. Spec. | V | 3 |
| 50-312/81-36 | 12/1-31/81 | Failure to have drawings that accurately reflect plant conditions | 10 CFR 50 Appendix B | IV | 1 |
| 50-312/82-02 | 1/12-15/82 | Welding oven material control procedures were not followed | 10 CFR 50 | V | 10 |
| 50-312/82-02 | 1/12-15/82 | Failure to take appropriate corrective action to preclude repetition of discrepancies | 10 CFR 50 | V | 10 |
| 50-312/82-02 | 1/12-15/82 | Material storage and handling control was not established to prevent damage or deterioration of materials | 10 CFR 50 | V | 10 |

* Severity Levels for Inspection Report No. 82-01 and earlier are in accordance with the NRC's Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), which provided six severity levels. Severity levels after Inspection Report No. 82-02 are in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), which provides five severity levels.

ENFORCEMENT ITEMS (7/1/82 - 9/30/82)

RANCHO SECO NUCLEAR GENERATING STATION

| <u>Inspection Number</u> | <u>Inspection Date</u> | <u>Subject</u> | <u>Req.</u> | <u>Sev.</u> | <u>Area</u> |
|------------------------------|----------------------------|---|-------------------------------|-------------|-------------|
| 50-312/82-05 | 2/22-24/82 | Failure to control essential licensee vehicles onsite | | V | 7 |
| 50-312/82-08 | 2/11/82 3/10/82 | Diesel generator inoperability | Tech. Spec. | III | 1 |
| 50-312/82-08 | 4/28/82 | High pressure injection pump inoperability | Tech. Spec. | III | 1 |
| 50-312/82-20 | 5/10-14/82 | Quality Activities were not accomplished in accordance with written instructions | 10 CFR 50 Appendix B | V | 10 |
| 50-312/82-23 | 2/1/82 | Failure to install and test prompt alert system with in plume path of plant | 10 CFR 50 Appendix E | | 6 |
| 50-312/82-28 | 7/6-8/3/82 | Commercial spare part was installed without Quality Assurance approval and was wrong type | 10 CFR 50 Appendix B | V | 3 |
| 50-312/82-32 | 8/16-20/82 | Procurement documents did not specify provisions of 10 CFR 21.31 | 10 CFR 21 Section 21.31 | IV | 10 |