

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-387/83-30
50-388/83-25

Docket No. 50-387
50-338

License No. NPF-14
CPPR-102

Category C
B

Licensee: Pennsylvania Power and Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Facility Name: Susquehanna Steam Electric Station, Units 1 and 2

Inspection At: Berwick, Pennsylvania

Inspection Conducted: November 28 - December 2, 1983

Inspectors: P. K. Eapen 1/5/84
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Inspection Summary: Inspection on November 28 - December 2, 1983
Inspection Report Nos. 50-387/83-30 and 50-388/83-25)

Areas Inspected: Special, announced team inspection to review changes instituted by the licensee since April, 1982 and to assess the licensee's readiness to assume Unit 2 operation. Functional areas reviewed were operations, training, maintenance, instrumentation and control, technical support, and QA/QC. The inspection involved 262 hours on site by five region based inspectors and one supervisor.

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Results: Three violations were identified: (1) Licensee's failure to follow his own procedure by not providing the necessary training to personnel (paragraph 4.4), (2) Licensee's failure to control temporary setpoint changes (paragraph 7.4) and (3) lack of coverage and assessment of effectiveness for audits (paragraph 8.4).

Table of Contents

<u>Item</u>	<u>Page</u>
1. Persons Contacted	3
2. Introduction	4
3. Plant Operations	5
4. Training	10
5. Maintenance	13
6. Instrumentation & Control	18
7. Technical Support	20
8. Quality Assurance/Quality Control	23
9. Licensee's Operational Readiness Review	28
10. Unresolved Items	30
11. Exit Meeting	30

1. Persons Contacted

Pennsylvania Power & Light Company Personnel

T. Abbatiello, Quality Control (QC) Supervisor - Modification
J. Blakeslee, Senior Results Engineer
*R. Beckley, General Supervisor - QC
V. Bogetti, Shift Supervisor
J. Buczynski, Senior Project Engineer - QC
*F. Butler, Instrumentation and Control/computer
(I&C/C) Supervisor
*R. Byram, Technical Supervisor
*J. Calhoun, Senior Vice President
L. Casperson, Unit Supervisor
T. Creasy, Engineer
B. Darrack, Shift Technical Advisor
M. DeFabo-Edwards, Training Document Control Specialist
*S. Denson, Assistant Manager, Nuclear Quality Assurance (NQA) - Site
M. Detamore, Supervisor, Plant Engineering
A. Domingney, Lead Engineer
*J. Edwards, Personnel and Administrative Supervisor
*J. Everett, Power Production Supervisor
F. Fitzen, Resident Engineer
*J. Graham, Senior Compliance Engineer
E. Gorsky, QC Supervisor - Maintenance
F. Gruscavage - Supervisor, Site Nuclear Safety Assessment Group
R. Harris, Senior Licensing Specialist
H. Keiser, Superintendent of Plant
G. Kuczynski, Electrical Maintenance Supervisor
R. Lombard, Power Production Engineer
W. Lowthert, Supervisor, Nuclear Instrumentation
*T. Markowski, Day Shift Supervisor
J. McCain, Nuclear Plant Specialist
*J. Miltenberger, Manager, Nuclear Safety Assessment
*C. Myers, Assistant Superintendent of Plant-Outages
*L. O'Neil, Supervisor of Maintenance
H. Palmer, Supervisor of Operations
M. Papinsick, Administrative Supervisor
R. Peal, Nuclear Operations Training Supervisor
*R. Prago, QA Supervisor - Operations
J. Rimsky, Lead Engineer
G. Robinson, I&C Foreman
D. Roth, Mechanical Maintenance Supervisor
B. Rutkosbie, I&C Assistant Foreman
A. Sabol, Manager NQA
C. Smith, Reactor Engineer Supervisor
T. Steingass, Project Engineer NDE
P. Taylor, Lead Shift Technical Advisor
D. Thompson, Assistant Superintendent Plant
K. Tutorow, Maintenance Foreman
J. Vambaco, Supervisor Bechtel Corporation

G. Ward, Manager, Nuclear Training
R. Wehry, Shift Technical Advisor
*C. Whirl, Senior Project Engineer - NQA
J. White, Nuclear Training Support Supervisor
J. Williams, Unit Supervisor

Nuclear Regulatory Commission

*R. Jacobs, Project Engineer
G. Rhoades, Senior Resident Inspector
*L. Plisco, Resident Inspector

*Denotes those present at the exit meeting discussed in paragraph 11 of this report.

2. Introduction

The purpose of this inspection was to assess the licensee's readiness for operating a second unit at the site. NRC Region I had conducted a detailed inspection (50-387/82-09) on March 22 - April 2, 1982 to assess the licensee's overall readiness to operate Unit 1. This inspection is one of a series of NRC inspections that are to be completed prior to the issuance of an operating license for Unit 2. In addition, the hardware readiness for Unit 2 operation was assessed by a NRC team during inspection 50-388/83-19.

This inspection primarily reviewed the changes instituted by the licensee since NRC inspection No. 50-387/82-09. The functional areas inspected during this inspection were Operations, Training, Maintenance, Technical Support and Quality Assurance/Quality Control. For each functional area, the inspectors reviewed the overall program, program adequacy, implementation of the program and the management involvement. The program implementation was reviewed by choosing activities associated with shared systems between Units 1 and 2. The inspector reviewed the quality and effectiveness of activities carried out for Unit 1, the licensee's expectation and estimate of increased activities associated with Unit 2 operation and the licensee's efforts to support the increased load resulting from Unit 2 operation.

Sections 3 through 9 of this report discuss the details of the inspection in Operations, Training, Maintenance, Instrumentation and Control, Technical Support, QA/QC and the licensee's own readiness review for Unit 2 operation. Each paragraph is subdivided into References, Discussions, Documents Reviewed, and Findings.

On the basis of the areas sampled during this inspection, except for the items noted in the Finding sections in the following paragraphs, the licensee appears to be ready for assuming operation of Unit 2.

3. Plant Operations

3.1 References/Requirements

- Proposed Technical Specifications, section 6, Administrative Controls
- Final Safety Analysis Report, Section 13.1, Conduct of Operations
- Regulatory Guide 1.8 Revision 1; ANSI/ANS-3.1-1978, Personnel Selection and Training
- Regulatory Guide 1.33 Revision 2; ANSI 18.7 - 1976, Administrative Control and Operational QA
- NUREG 0737, Clarification of TMI Action Plan Requirements

3.2 Discussion

The operational activities and administrative controls were reviewed to assess the licensee's ability to safely operate a dual unit single control room site. The review included: (1) current staffing versus projected staffing needs and utilization of experienced licensed operators; (2) the existing or modified administrative systems to control plant operations, such as "operator at controls", equipment and system status, maintenance and surveillance, Technical Specifications and LCO's, and control and operation of shared plant systems.

At present with Unit 1 operational and Unit 2 approaching fuel load, the licensee is manning the plant with five rotating shifts. Each shift consists of one Shift Supervisor, a Senior Reactor Operator (SRO), two SRO licensed Unit Supervisors, one Assistant Unit Supervisor (Contractor SRO qualified assigned to Unit 1), three Plant Control Operators and a minimum of three Nuclear Plant Operators/Auxiliary System Operators on any shift. When Unit 2 loads fuel the shift complement will change as follows:

- The number of Plant Control Operators (PCO's) will be increased from three to four to have two PCO's/Unit.
- The number of Assistant Unit Supervisors will be increased from one to two.
- There will be four Nuclear Plant Operators and three Auxiliary System Operators per shift.

The licensee intends to use the Assistant Unit Supervisors for Managing outside control room activities. Currently the licensee does not have enough licensed operators to man 5 shifts for both units, but does have enough licensed operator candidates (5 SRO's and 9 RO's) prepared to take the NRC licensing examination in December. If these licensee candidates pass and the Unit 1 licensed operator pass the "differences exam" for a

Unit 2 license, the licensee will be able to meet their plant staffing commitment. This staffing plan exceeds Technical Specification minimum requirements by four license positions per shift. The concept of a licensed operator interfacing with the Shift Supervisor (Assistant Unit Supervisor) to attend and monitor plant activities outside the control room should provide more positive control of routine and emergency plant operations.

A review of the station administrative procedures (identified in section 3.3 of this report) and the Operations Department Operations Instructions (OI) was performed to verify that the licensee had established or modified their program for the operation of a dual unit site.

The areas reviewed included:

- Control of procedures at plant work stations, including permanent and temporary changes.
- Drawing control, including current as-built information available in the control room prior to system return-to-operation.
- Controls for preparation of operating log, including active surveillance log, Limiting Conditions for Operations (LCO) log, alarm status and management log reviews.
- Shift manning for dual unit operations, including minimum technical specification (TS) manning, overtime requirements, and shift turn-overs.
- System and Equipment Status control including Technical Specification Limiting Conditions for Operation, Reactor Mode Change, Containment Isolation Valves and other controlled Valves (i.e., locked, throttled sealed etc.).
- Equipment tagging and release for maintenance or surveillance including personnel safety and equipment operability status (i.e., LCO's).
- Common plant systems control for operation, maintenance, surveillance and system status (i.e., LCO's).
- Temporary jumper and bypass control for safety system including 50.59 reviews and safety evaluations.

To verify that the administrative controls were established, understood by the licensed operators, and adequately implemented, the inspector reviewed and/or discussed the following completed or in-progress documents, logs and procedures with plant operators and shift supervision:

- Equipment Release Forms for Emergency Service Water (ESW), RHR Service Water, Containment Spray, Units 1 and 2.
- Completed Checkoff List for ESW, RHR Service Water, Containment Spray Unit 1.
- Equipment Status File for ESW, Diesel Generators and Standby Liquid Control.
- Bypass and Jumper Logs for Unit 1 and 2, including approved bypass form and safety evaluation for the isolation of core spray.
- LCO Log for Unit 1 and the status of each current LCO.
- Completed shift turnover forms including equipment and annunciator status.
- Operations Technical Data Book.
- Required reading for Operators including the Operation Modification Information Summaries (OMIS).
- Several control room procedures to verify current revision and if temporary changes were posted, if applicable.
- Surveillance Authorization Forms for December 1, 1983.

To provide better control of plant activities the licensee utilizes a Unit Coordinator, currently a licensed SRO, and a daily planning meeting to organize and schedule plant maintenance and surveillance/calibration activities. This meeting is attended by the daylight shift supervisor and other management representatives from Maintenance, Health Physics, Chemistry, Instrument and Control, and Engineering, as applicable. Each task/activity (Work Authorization and Equipment Release Form) is reviewed for plant impact, tagging adequacy and technical specification LCO considerations, and then prioritized. Recently the Equipment Release Form (ERF) has been modified to require more detailed information to support the tagging permit. Specifically, ERF requires the originating department to provide details of the impact of the removed equipment on other plant systems. This will provide an improved basis for the licensed operator to check and verify the tagging from both personnel and plant safety (i.e., T.S. operability - LCO's) perspectives. The inspector discussed ERF's and the daily maintenance and surveillance schedules with shift supervision and operations department management to ensure the process was being implemented as noted above. As of November 30, 1983 the completion status for the operations procedures was:

Operating Procedures - - - - - 100% complete
 Emergency and General Operating Procedures - - 67% complete
 Operations Surveillance Procedure - - - - - 60% complete
 Alarm Response Procedure - - - - - 88% complete
 Overall Status - - - - - about 75% complete

The inspector reviewed/cr walked through with plant control operators, the shared operating, off-normal, surveillance and response procedures for the Emergency Service Water System to assess the adequacy of these shared system procedures. This review included valve position and system line-up, pump and valve logic checks, administrative controls including references, cautions and format.

3.3 Documents Reviewed

AD-QA-100 Station Organization and Responsibilities* (Rev. 2)

AD-QA-101 Procedure Program (Rev. 9)

AD-QA-103 Protective Permit and Tag System* (Rev. 3)

AD-QA-104 Duties and Responsibilities of Unit Coordinator (Rev. 0)

AD-TY-104 Unit Coordination Work Review Group (Rev. 0)

AD-QA-115 Qualification and Training of Station Personnel*

AD-QA-131 Plant Management Callout Procedures (Rev. 1)

AD-QA-300 Conduct of Operations* (Rev. 3)

AD-QA-301 Operation Procedure Program (Rev. 2)

AD-QA-302 System Status and Equipment Control* (Rev. 1)

AD-QA-303 Shift Routine* (Rev. 2)

AD-QA-306 System/Equipment Release* (Rev. 3)

AD-QA-307 Electrical and Mechanical Bypass Control* (Rev. 4)

AD-TY-307 Temporary Jumper, Link and Bypass Control* (Rev. 1)

AD-QA-309 Primary Containment Access & Control (Rev. 3)

OP-054-001 Emergency Service Water, Revision 0 (Hold)

DN-054-001 Loss of Emergency Service Water, Revision 0 10/6/83

SO-054-001 Emergency Service Water Monthly Alignment Check, Revision 0
(Draft)

SO-054-002 Emergency Service Water Valve Exercising, Revision 0, (Draft)

SO-054-003 Emergency Service Water Quarterly Flow Verification, Revision
0 (Draft)

*Indicates procedures used for the review discussed in paragraph 5 of this report.

3.4 Findings

- 1) As discussed in paragraph 3.2, the licensee is currently using a licensed operator to interface with Shift Supervision for controlling plant evolutions outside the control room (i.e. radwaste operations, valve operations, safety system local operations etc.) The use of a licensed operator outside of the control room and additional licensed operators in the control room is well above the Technical Specification staffing requirements and is perceived to be a strength in the operations department.
- 2) The licensee has selected Unit 1 as the "lead" unit for dual unit operations. Therefore, the responsibility for operation, system status and equipment control for the shared systems (i.e., diesel generators, EWS, fire protection) has been given to Unit 1. The inspector verified that the plant operators were aware of this responsibility, although it has not yet been delineated in a procedure or instruction. The licensee acknowledged the inspector finding. The licensee also made a commitment to delineate the Unit 1 lead responsibilities for shared systems either in station administrative procedures or other applicable procedures prior to fuel load for Unit 2 (387/83-30-01 and 388/83-25-01).
- 3) The licensee has committed to utilizing licensed operators outside the control room and an extra licensed operator in the control room for each shift when Unit 2 loads fuel. The licensee will be able to meet the above commitments using the present experienced licensed operators and licensed operator candidates. However, the use of both experienced and newly licensed operators will result in an overall reduction in shift experience level for each unit. This reduction in experience level was discussed with the licensee's management.

The licensee's management stated that they were aware of this reduction of experience level but that the existing administrative and management controls were adequate to compensate the consequences of such a reduction in experience level. The impact of the reduction in experience level for control room operators will be reviewed in future NRC inspections.

- 4) In addition the inspector reviewed the status of the plant operations procedures for Unit 2 and common plant systems and noted that some procedures (e.g. Safety Parameter Display System Procedures) were not written. The licensee's representatives stated that their procedures would be completed by January, 1984.

Except for the items discussed above, the inspector found the licensee's efforts in plant operations to be adequate for two unit operation.

4.0 Training

4.1 References

- Final Safety Analysis Report (FSAR). Chapter 13 "Conduct of Operations" and Chapter 17 "Quality Assurance"
- Technical Specification Section 6 "Administrative Controls"
- ANSI/ANS-3.1-1978 "American National Standard for Selection and Training of Nuclear Power Plant Personnel"
- NUREG-0737 "Clarification of TMI Action Plan Requirements" Items I.A.1.1, I.A.2.1, I.A.2.3, I.A.3.1, and II.B.4.

4.2 Discussion

The Susquehanna Nuclear Training Group (NTG) procedures, organization, personnel qualifications, and implementation effectiveness were reviewed to determine if the NTG could meet the training needs of both Unit 1 and 2 personnel. Primary inspection emphasis was directed toward determining the extent of training received by or planned for licensed and non-licensed personnel on Unit 2 specific and shared systems.

The effectiveness of the licensee's training activities was assessed by:

- Reviewing the administrative procedures and training instructions identified in Section 4.3 to determine qualifications and responsibilities of training personnel and to verify that the training program met applicable requirements.

- Reviewing the training matrices of non-licensed personnel in the areas of operations, electrical and mechanical maintenance, instrumentation and controls (I&C), technical staff, and shift technical advisors against individual training records.
- Reviewing qualification and training records of the Manager - Nuclear Training Group, Superintendent of Operations, I&C/Computer Supervisor, Maintenance Supervisor, Technical Supervisor and Plant Superintendent against ANSI/ANS-3.1, 1978, requirements.
- Interviewing the Nuclear Operations Training Supervisor and the Nuclear Training Supervisor and the Nuclear Technical Training Supervisor to determine and identify how Unit 2 has affected their training program.
- Interviewing the Supervisor - Nuclear Training Support Services and members of his staff to determine their system for maintaining students records, evaluating program effectiveness and identifying training needs.
- Interviewing the Manager - Nuclear Training and Supervisor - Nuclear Instruction to develop an understanding of the operations, interfaces, and responsibilities of the Nuclear Training Group.

4.3 Documents Reviewed

- AD-QA-100 "Station Organization and Responsibilities" (Rev. 2)
- NTI-1100 "Individual Students Training Responsibilities" (Rev. 1)
- NTI-2000 "Training Management" (Rev. 0)
- NTI-QA-2100 "Supervisor-Technical Training" (Rev. 2)
- NDI-QA-10.3.1 "Nuclear Department Qualification and Training" (Rev. 4)
- NTI-QA-3002A
 - a. "Mechanical Maintenance" Training Matrix (Rev. 2)
 - b. "Instrumentation and Control" Training Matrix (Rev. 0)
 - c. "Operation - SSES" Training Matrix (Rev. A)
 - d. "Electrical Maintenance" Training Matrix (Rev. 3)
 - e. "SSES Technical Staff" Training Matrix (Rev. 0)
- NTI-QA-3050 "Mechanical Maintenance Training and Qualification" (Rev. 0)

NTI-QA-3070 "Health Physic Section - Training and Qualification Program" (Rev. 2)

NTI-QA-3080 "Chemistry Personnel - Training and Qualification" (Rev. 0)

NTI-QA-3310A "Susquehanna Unit 1 and Unit 2 Differences" (Rev. 20)

NTI-QA-7300 "On-the-Job Training" (Rev. 0)

NTGI-QA-5000 A "Instructor Certification Program Formal Training" (Rev. 0)

NTGI-QA-5000B "ICP Professional Instructional Certification" (Rev. 0)

NTGI-QA-5000D "ICP Industry Documents" (Rev. 0)

NTGI-QA-5000E "ICP Comprehensive Certification" (Rev. 0)

4.4 Findings

- 1) PP&L procedures (NTI-QA-3050, 3070, 3080, etc.) require that the Nuclear Training Group supply individual training summaries monthly to the appropriate supervisor. Since the supervisor uses these summaries to identify individual training needs, these summaries should be an accurate reflection of the training listed in the training matrix for that individual's job position. However, there were numerous cases found where the training listed in the training matrix was not listed on the individual's summary sheet. (387/83-30-02 and 388/83-25-02).
- 2) Training records were randomly selected and reviewed to assure that individuals were being trained in accordance with the licensee requirements of NDI-QA-10.3.1 (Rev. 4). NDI-QA-10.3.1 requires that each individual receive all required (R) training as soon as possible, but no later than one year after the date of appointment. Any exceptions need to be authorized in writing by the senior Vice President-Nuclear. Three individuals were identified who had neither received all their R training or a letter from the Senior Vice President-Nuclear excusing them from taking it. All three individuals had been in their respective positions for over three years. The inspector stated that the above failure to follow licensee's own procedures is contrary to 10 CFR Part 50 Appendix B criterion II and as such constitutes a violation (387/83-30-03 and 388/83-25-03).
- 3) In the training matrix established for each job description, PP&L has designated the identified training course into one of three categories: R-required training, CA-company assigned training, or S-suggested training. As discussed under finding above, R-training must be completed within one year. However, for CA-training and S-training, PP&L has established no time goals for completion of

training. As a consequence, a majority of this training is not being given, even though some of it appears valuable or necessary to the work assigned. (387/83-30-04 and 388/83-25-04).

- 4) Training appropriateness appears to be lacking or weak. For example:
 - a. Some courses listed in the various training matrices are only suggested (S) courses but probably should be designated as R-training or CA-training. (e.g. "QA Training and Indoctrination" for Electrical Assistant Foremen in the Maintenance area.)
 - b. On-the-job training sometimes appears inadequate for the job position (e.g. FSAR and Regulatory Guide Training for engineers in the Technical Section).
 - c. There are no periodic reassessments of the training matrices used for the Electrical Maintenance and Technical Staff to assess the appropriateness and completeness of training needed by individuals in these two groups.

These examples indicate an overall self-assessment weakness in the training program (387/83-30-05 and 388/83-25-05).

- 5) Periodic assessment of training effectiveness is lacking. Examples were found where individuals in the Technical Staff department and Electrical Maintenance department had not received sufficient training to effectively perform their jobs. (387/83-30-06 and 388/83-25-06).
- 6) At the time of this inspection, Shift Technical Advisors neither received training nor developed guidelines on how to approach two unit scrams or failures occurring concurrently. Prior to Unit 2 startup, training needs to be provided on the approach to two unit scrams or failures occurring concurrently.

This is identified as a weakness to the licensee's representatives (387/83-30-12 and 388/83-25-12). The licensee's representatives acknowledged the identified weakness.

- 7) Management of the Nuclear Training Group (NTG) is well qualified.

Except for the items discussed above, the inspector found the licensee's training program to be adequate to support two unit operation.

5. Maintenance

5.1 References

- 10 CFR 50, Appendix B, Quality Assurance Criteria
- Technical Specifications

- Final Safety Analysis Report (FSAR)
- Regulatory Guide 1.30/ANSI N 45.2.4 - 1972; Electrical Installation, Inspection & Testing
- Regulatory Guide 1.116, Rev. O-R/N45.2.8 - 1975; Mechanical Installation, Inspection and Testing

5.2 Discussion

This section discusses the assessment of the effectiveness of the licensee's management and control of facility maintenance activities. Particular attention was given to the ability of the existing maintenance group to manage and control the additional responsibilities due to the operation of Unit 2.

The maintenance group is divided into three sections: mechanical maintenance, electrical maintenance, and maintenance services (clerical, records, and data analysis). Both the electrical and mechanical sections have the work planners and engineers associated with their function. The mechanical section also includes the "labor support" manpower that provides housekeeping and utility services. At the working level during the inspection, there were 47 mechanical workers and 28 electrical workers. The budgeted staffing levels for 1984 provide increased worker levels to 51 and 32, respectively. These workers are supplemented by licensee personnel from the Construction Division during high workload periods, e.g., outages. Subcontracted workers are also available. The inspector reviewed a periodic management review of open Work Authorizations (WAs) for the prior four weeks and a similar review for the month prior. These reviews showed a steady level of open WAs over the last four weeks and a slightly lower level of currently open WAs compared to the prior month. This demonstrates the licensee's management of workload on a continuing basis. Based on the recent steady level of open WAs and the current level of overtime, the current and planned staffing levels appear to be adequate.

The Training Curriculum for Mechanical Maintenance, Rev. 2 and the Training Curriculum for Electrical Maintenance, Rev. 2, provide the required and suggested classroom training for the maintenance workers. Progression to the top job classification (mechanic) includes a written exam and a practical exam based upon material covered during the training program. This appears to provide additional incentive for workers to apply themselves during training. The inspector noted that the present staff was adequately qualified and trained. Additionally, the licensee's training program is adequate to support the increased staffing level for 1984.

The inspector reviewed the station administrative procedures identified in paragraph 5.3 to confirm that work is administratively controlled and that the observed work practices were consistent with the approved administrative program. Also, the inspector reviewed maintenance group pro-

cedure MI-PS-001, Maintenance Work Planners Guide, Revision 4, which is used by the planners to properly specify the maintenance job requirements. The above procedure includes attachments which coordinate the various equipment requirements such as Technical Specification thermal overload bypass requirements, and the ASME Inservice Testing (IST) Program for Pumps and Valves.

The inspector reviewed the Table of Contents of Maintenance Procedures, Revision 99, November 23, 1983 and selected maintenance procedures (identified in paragraph 5.3 below) to verify that the maintenance group had sufficient procedures to perform their work and that the procedures had sufficient detail to properly control the actual work process.

Using the Emergency Service Water (ESW) system, common to both units, the inspector sampled from the following work areas to verify that the work was correct and was being properly controlled:

- Preventive Maintenance (PM) Program
- Vendor Technical Manual
- Completed Work Authorizations (WAs)
- Quality Consideration Lists

5.3 Documents Reviewed

- AD-QA-110 Station Fire Protection Program (Rev. 1)
- AD-QA-197 Control of Installation, Operating and Maintenance Manuals (Rev. 1)
- AD-QA-500 Conduct of Maintenance (Rev. 4)
- AD-QA-502 Work Authorization System (Rev. 5)
- AD-QA-503 Housekeeping/Cleanliness Control (Rev. 4)
- AD-QA-540 Preventive Maintenance System (Rev. 3)
- AD-QA-541 Maintenance-Equipment Performance and Trending Analysis (Rev. 1) and procedures identified with * in paragraph 3.3.
- MT-GTE-003 Limitorque Valve Actuator Overhaul and Maintenance (Rev. 4)
- MT-GM-007 Coupling Alignment (Vertical Equipment) (Rev. 2)
- MT-16-001 RHR Service Water Pump Disassembly & Reassembly (Rev. 2)

MT-24-003 Diesel Air Start Compressor Maintenance (Rev. 1)

MT-54-001 ESW Pump Disassembly and Reassembly (Rev. 1)

5.4 Findings

- 1) During the review of the Preventive Maintenance (PM) Program, the inspector noted that all the applicable ESW valves were not yet included in the program. A licensee representative stated that the long term preventive maintenance work for motor operated valves was being evaluated and that incorporation of such items in the PM Program was incomplete. The representative stated that the short term actions (e.g. daily, monthly, etc.) were being performed and that the review concerned long term major overhaul and inspection issues (e.g., every six years). He stated that this review was scheduled for completion by January 1, 1984 with complete incorporation of the work items into the PM Program scheduled for June 1, 1984. The licensee representative stated that as part of the completion of this task, all motor operated valves would be reviewed to ensure that they had been included into the PM Program. This item (387/83-30-07 and 388/83-25-07) is open pending licensee action.
- 2) In procedure MI-PS-001, Maintenance Planner's Guide, the inspector reviewed the information concerning whether the motor operated valves in the ESW system, which control cooling flow to the diesel generators, were covered in the ASME Inservice Testing (IST) Program. The Guide incorrectly indicated that they were not in the IST Program. This incorrect information could potentially cause parts of the IST Program not to be implemented. This item (387/83-30-08 and 388/83-25-08) is open pending licensee action .
- 3) During review of completed Work Authorizations (WAs) with respect to the Q list, the inspector concluded that the use of the present administrative work control system is inadequate for quality system classification. Currently, the work groups (e.g., maintenance and I&C) classify WAs as Q or non-Q based on the Q list. Q WAs then are reviewed by Quality Control, non-Q WAs are not.

The inspector found this control to be inadequate based on the following:

- The wrong Q-List is being distributed. Although the Q-List being maintained by the licensee is Safety Related Systems, Structures, and Components, Rev. 0, July 6, 1982, the Q-List that had been provided by controlled distribution was Nuclear Quality Assurance Q-List, Rev. 11, February 10, 1981 by Bechtel.

- The licensee Q-List is too general. The Q-List does not provide sufficient detail to determine the boundary between Q and non-Q. For example, in the ESW system it lists "Electrical modules with safety function" and "cable, with safety function". This is an inadequate description.
- The Q-List is being misinterpreted when used to classify work. During the inspector's review of completed WAs some appeared to have been inappropriately classified as non-Q, specifically WAs 34413 (Fabricate and install diesel generator outboard bearing shaft guard), WA S 5188 (removal of a ladder attached to ESW piping on NCR 83-834), and WA T 27783 (temporary installation of pressure transducer into ESW piping).

The licensee stated that work was in progress to produce an accurate, detailed Q-List.

The poor control of the Q-List and the inadequate nature of the Q-List for controlling work in the plant is considered to be a major weakness.

This item (387/83-30-09 and 388/83-25-09) is unresolved pending licensee action.

- 4) The inspector found through discussions that the use of the S-List (Safety Impact Items) was poorly understood by station personnel and unevenly applied. Although there is a policy-type procedure (NDI-QA-8.2.6) which describes the S-List, the only reference to the S-List in station procedures found by the inspector was in a definition in AD-QA-502, Work Authorization System. This meager guidance appears to have caused a misunderstanding among maintenance and I&C personnel. Some supervisors stated that items on the S-List were equivalent to Q items, while other supervisors stated that the S-List was only for design considerations and did not affect maintenance or I&C work.

Also, the inspector found that tags labelled "Safety Impact Item" were still attached to components in the plant after completion of construction. The inspector reviewed three "Safety Impact Items" in the vicinity of a diesel air start compressor to see if they corresponded with the S-List and found that one did (#354-a conduit) and that two did not (#2828 - an instrument air line and #2834 - a service air line). This reflected poor use and implementation of the S-List.

This item (387/83-30-10 and 388/83-25-10) is unresolved pending licensee action.

The poor use and implementation of the S-List in controlling plant activities is considered a weakness.

- 5) The inspector found the licensee's housekeeping program to be adequate. This observation is based on numerous tours of various plant facilities.

6. Instrumentation and Control (I&C)

6.1 References

- 10 CFR 50, Appendix B, Quality Assurance Criteria
- Technical Specifications
- Final Safety Analysis Report (FSAR)
- Regulatory Guide 1.30/ANSI N45.2.4 - 1972; Electrical Installation, Inspection, and Testing
- Regulatory Guide 1.33, Rev. 2/ANSI N18.7-1976; Quality Assurance Program Requirements

6.2 Discussion

This section discusses the assessment of the effectiveness of the management and control of facility instrumentation calibration and control activities. Particular attention was given to the ability of the existing instrumentation and control group to manage the revised responsibilities due to Unit 2 operation.

The I&C group is divided into four sections. Unit 1 and common systems, Unit 2, Calibration Lab and Results Engineering. The budgeted staffing level for 1984 provides a total I&C staff of 95 people, including 38 people for unit 1/Common and 35 people for Unit 2. The staffing level for 1983 has been slightly above the projected 1984 staff levels with the decrease occurring in the preoperational testing support area. This staffing level has maintained open Work Authorizations at a roughly constant level over the past few months. The inspector noted that the group issued a periodic management report showing the weekly variations in open Work Authorizations, including how many were ready to be implemented. This demonstrates the licensee's management of workload on a continuing basis.

The I&C group participates in the station-wide training program, which utilizes a Training Curriculum with a matrix of required and suggested training topics for each skill level. In addition, the I&C group has its own technician certification program which utilizes both classroom and on-the-job training to ensure the technicians are qualified for the type of work they are performing.

The I&C group has the overall responsibility for measuring and test equipment (M&TE) at the site. Accordingly, the calibration lab administratively controls the recall of M&TE for calibration in addition to performing the M&TE calibrations themselves. The Lab has a series of approved procedures to perform the various M&TE calibrations.

The new or modified procedures needed for Unit 2 are being completed in time to support safe operation of Unit 2. At the time of the inspection, 94% of the 306 procedures needed had been approved. The present schedule for completion of these procedures is January 1984.

The inspector reviewed I&C procedures to verify that they were consistent with the established administrative controls and that they were technically accurate. The reviewed procedures are listed in paragraph 6.3. Further, using the Emergency Service Water system common to both units, the inspector sampled from the following work areas to verify that the work was technically adequate and was being properly controlled:

- Preventive Maintenance Program (calibration of non-Technical Specification instruments)
- Vendor technical manuals
- Surveillance test procedures
- Completed Work Authorizations (WAs)
- Susquehanna Equipment List (listing of instruments, ranges, setpoints, qualify classification, etc.)
- Calibration history files

6.3 Documents Reviewed

IC-EC-004 Calibration/Calibration Check of Fluke 8200A Digital Voltmeter, (Rev. 1),

IC-EC-026 Calibration/Calibration Check of Heise Vacuum and Absolute Pressure Gauges, (Rev. 1)

AD-QA-600 Conduct of Instrument and Controls/Computer Section (Rev. 1)

AD-QA-605 Maintenance and Calibration of Installed Plant Instrumentation
(Rev. 2)

AD-QA-615 Control and Calibration of Plant Measuring and Test Equipment
(Rev. 1)

SI-054-301, 18 Month Calibration of the ESW Pump Discharge Temp TT-01106
A&B (Accident Monitoring), Rev. 0, November 23, 1983

6.4 Findings

- 1) The inspector did not identify any violations.
- 2) The issue concerning the quality consideration lists (Q-List and S-List in particular) discussed in paragraph 5 items 3 and 4 also applies to the I&C group.
- 3) The inspector concluded that the licensee's technician certification program was a perceived strength due to its detailed nature and due to its integration of classroom and on-the-job training components.
- 4) The inspector reviewed the activities of the M&TE Calibration Lab. The lab contains numerous highly accurate calibration equipment (standards) used to calibrate the portable M&TE in the plant. Many of these standards are sent directly to the National Bureau of Standards for calibration checks. Also, the lab is staffed with an assistant foreman, six technicians, and two clerical personnel. The licensee's commitment to procure high quality equipment and to provide ample full time personnel to administer the M&TE calibration program is considered a strength.

Except for the items discussed above, the inspector found the licensee's I & C programs to be adequate to support two unit operation.

7. Technical Support

7.1 References

- 10 CFR Part 50 Appendix B Quality Assurance Criteria for Nuclear Power Plants Fuel Reprocessing Plants
- Susquehanna Steam Electric Station Final Safety Analysis Report
- Regulatory Guide 1.33, Rev. 2, Administrative Controls & Operational QA
- ANSI N.45.2.11 - 1974 Quality Assurance Requirements for the Design of Nuclear Power Plants

7.2 Discussion

This inspection focused on the site Technical Organization's readiness to support unit 2 startup and operation. The specific work groups inspected included reactor engineering, compliance, shift technical advisor, and plant engineering. In the course of the inspection 24 procedures were reviewed and 14 individuals were interviewed.

The inspector reviewed the following aspects of the Technical Organization.

- Staffing
- Surveillance activity on Unit 1
- Impact of Unit 2 Startup and operation on the organization
- Procedure preparation and review activities
- Interface with the Plant Operations Review Committee (PORC)
- Participation in alternate procedure review as described in section 6 of the Unit 1 Technical Specification.
- Qualifications of the staff
- Participation in plant modification activities
- 10 CFR 50.59 Reviews
- Participation in set point control program

7.3 Documents Reviewed

- AD-QA-100 Station Organization and Responsibilities (Rev. 2)
- AD-QA-101 Procedure Program (Rev. 9)
- AD-QA-102 Plant Operations Review Committee (Rev. 4)
- AD-QA-115 Qualification and Training of Station Personnel (Rev. 0)
- AD-QA-400 Conduct of Technical Support (Rev. 2)
- AD-QA-402 Setpoint Change Control (Rev. 3)
- AD-QA-410 Plant Modification Program (Rev. 3)
- AD-QA-411 Plant Modification Design Control (Rev. 6)
- AD-QA-412 Local Leakage Rate Tests Program (Rev. 0)

AD-QA-414 Installation Engineering Activities (Rev. 0)
AD-QA-415 Post Transient/Reactor Scram Evaluation (Rev. 0)
AD-QA-422 Surveillance Testing Program (Rev. 4)
NDI-1.2.3 Charter Nuclear Plant Engineering (Rev. 2)
NDI-QA-7.2.1 In Core Fuel Management in Support of Susquehanna SES Operations (Rev. 1)
NDI-QA-7.2.2 Design Activities Related to Fuel/Core Performance (Rev. 0)
NDI-QA-15.2.1 Delegation of Design Authority to Plant Staff (Rev. 0)
RE-TP-012 Calibration of LPRM's (Rev. 3)
RE-TI-012 Operation of NSS Tape Interface System (Rev. 6)
RE-OTP-003 Core Thermal Hydraulic Performance Evaluation (Computer Method) (Rev. 0) not yet issued
SR-100-006 Reactivity Anomaly Check (Rev. 0) not yet issued
SR-131-001 Validating Rod Worth Minimizer Sequences (Rev. 0) not yet issued
PE-TI-016 Reactor Vessel Transient Surveillance Program (Rev. 0)
PE-TI-002 Processing of EWR's & SFR
PE-TI-005 Incident & Event Reports (Rev. 0)

7.4 Findings

- 1) The inspector observed that several expired temporary set point changes (e.g. 82-028T, 82-029T and 83-238T) were still in use. No provision was provided in procedure AD-QA-402 (Rev. 3) to assure that the temporary set point changes did not go beyond the established time limit. In addition, the required temporary procedure change to support the temporary set point change was not issued for 83-158T. Subsequent to the identification of the above concern by the inspector, the licensee conducted an additional investigation into temporary set point change activities and identified additional cases in which expired temporary set points were still in effect. The licensee's representatives stated that the following corrective actions would be taken immediately to address the identified concerns:

- (1) correct the use of expired temporary set points in accordance with approved procedures.

(2) Revise procedure AD-QA-402 to prohibit the use of expired temporary set points.

The inspector stated to the licensee's representatives that the failure to control the temporary set point change activities was contrary to 10 CFR 50 Appendix B criterion II and ANSI N 18.7 - 1976 requirements to control activities affecting quality. This is a violation (387/83-30-13 and 388/83-25-13). The licensee's representatives acknowledged the inspectors statement.

- 2) The inspector reviewed the licensee's program for controlling the transfer of technical information including recommendations for procedure changes , regarding plant modification, between Engineering and Operations. Procedure AD-QA-410 is the licensee's controlling document in this area. Engineering transfers the necessary technical information to operations using the Operations Modifications Information Summary Sheet (OMISS).

The inspector noted a lack of promptness on the part of operations to distribute the technical information received through OMISS. For example, the OMISS dated October 15, 1983 pertaining to the Plant Modification Request (PMR) 83-620 for Emergency Service Water System (a common system shared by both Units 1 and 2) was not distributed as of the time of this inspection. The inspector also noted that operations had not distributed any OMISS issued after August 29, 1983.

The inspector stated to the licensee's representatives that the above lack of promptness in distributing the OMISS was a weakness. (387/83-30-14 and 388/83-25-14). The licensee's representatives acknowledged the inspector's statement.

Except for the items discussed above, the inspector found the technical support organizations to be adequate for two unit operation.

8. Quality Assurance/Quality Control (QA/QC)

The QA/QC organization program and activities were reviewed to assess the overall effectiveness and to assure:

- The organizational structure is adequate to provide coverage for two unit operation
- The qualification and training of the staff and the staffing levels are adequate
- The QA/QC Program is consistent with the licensee's committment
- The QA/QC procedures are developed to implement the program requirements

- The Licensee's Management is involved in QA/QC activities and is responsive to QA/QC needs
- The QA/QC activities do address all aspects of the licensee's QA program and have measures to verify the effectiveness of the areas covered

8.1 References

- 1) 10CFR Part 50 Appendix B Quality Assurance Criteria
- 2) Final Safety Analysis Report
- 3) ANSI N 45.2 - 1977
- 4) ANSI N 18.7 - 1976
- 5) ANSI N 45.26 - 1978
- 6) ANSI N 45.2.6 - 1977

8.2 Discussion

Since the NRC inspection (50-387/82-09) to assess the Unit 1 Operational Readiness, two major changes were made by the licensee to the QA/QC organization. They were:

- 1) The permanent appointment of a new on-site Assistant Nuclear Quality Assurance Manager.
- 2) Reorganization of the Quality Control Organization to provide coverage for modifications and maintenance and to enhance the overall level of technical and management expertise.

The licensee's management personnel discussed the organizational changes with the inspectors and stated that the bases for the change were:

- 1) Lessons learned from the licensee's past performance and from industry,
- 2) Need for increased QC Coverage during facility modifications,
- 3) Lack of on-site supervision,
- 4) Lack of technical depth and experience of the staff and
- 5) The results of the licensee's management evaluation of the QA/QC activities.

The inspector discussed the functional areas under the on-site QC organization with the licensee's representatives. A substantial amount of

safety related activities are expected in the facility modification and unit outages. The licensee established a separate QC organization to provide the required coverage of modification and unit outage related activities. The Licensee's own analysis of the QC activities indicated that QC Engineering Support and NDE Specialist Support are equally needed by the Maintenance QC group and Modification QC group. Therefore, the licensee organized the QC Engineering and NDE Specialists under separate groups. The inspector noted that the new QC organization enhances the effectiveness of QC coverage and promotes optimal allocation of scarce resources. The key positions in the new QC organization have been identified and staffed by adequately qualified people. The licensee expects to complete staffing and procedural development by mid April 1984. QA - Operations was staffed in accordance with licensee's FSAR commitments and a licensee's letter dated June 29, 1982.

The inspector reviewed the documents identified in Section 8.3, conducted detailed discussions with the corporate and site QA/QC personnel and reviewed the following QA/QC activities.

- 1) Audit No. 0-82-40 (January 10 - March 21, 1983) Technical Specification Audit
- 2) Audit No. 0-82-05 (February 22 - March 11, 1983) Conduct of Operation
- 3) Quality Control Inspection Reports (QCIR's) for Shared Systems between Units 1 and 2
 - QCIR No. 83-5918
 - QCIR No. 83-5962
 - QCIR No. 83-6195
 - QCIR No. 83-6172
- 4) Non Conformance Reports (NCR's)
 - NCR 80-193
 - NCR 80-203
 - NCR 80-318
 - NCR 80-329
 - NCR 81-266
 - NCR 81-332
 - NCR 81-469
 - NCR 81-622

The inspector noted that the QA/QC activities were conducted in accordance with the licensee's commitments and applicable standards, except for the items identified in paragraph 8.4.

8.3 Documents Reviewed (QA/QC)

- 1) NDI-QA-1.1.1 Charter Nuclear Quality Assurance (Rev. 2)

- 2) NQAP-12.1 NQA Surveillance of Operating Plant Activities (Rev. 1)
- 3) OP5-7 Auditing and Surveillance
- 4) AD-QA-101 Procedure Program (Rev. 9)
- 5) AD-QA-000 Procedure Changes (Rev. 0)
- 6) NDI-QA-2.4.4 Quality Considerations List (Rev. 1)

8.4 Findings

- 1) The licensee did not develop and implement procedures and job descriptions for the the new Site NQA organization. The licensee's representatives stated that the required procedures and job descriptions would be developed or revised by April 16, 1984. This is a weakness (387/83-30-15 and 388/83-25-15).
- 2) The licensee has not developed training goals and schedule for the newly appointed Assistant Manager for NQA. The licensee's representatives stated that the required training goals and schedule would be developed and the New Assistant Manager would be fully trained by April 16, 1984. The licensee's present program for training and qualifying the Assistant Manager includes:
 - (1) PP&L Indoctrination and Training
 - (2) PP&L Auditor Training Program
 - (3) Participation in QA Meetings and Task forces sponsored by EEI and other industry groups
 - (4) Special External Auditor Training by an independent third party
 - (5) Decision making guidance from the Manager of NQA during the training period

The inspector stated to the licensee's representatives that the adequacy of the licensee's efforts to provide the required training to the newly appointed site Assistant NQA Manager would be assessed in a future NRC inspection (387/83-30-16 and 388/83-25-16). This is a weakness.

- 3) Discussions were held with the Manager NQA and Assistant Manager NQA-site to understand the management philosophy for the Site QA/QC organization. The Assistant Manager has already started a review of tasks and available skills to obtain optimum utilization of the skills available within the NQA-site organization. A study of work load is also being undertaken to get ahead and provide for contingencies. The Assistant Manager NQA-site stated that the required

measures to control allocation and use of resources and to manage contingencies will be fully developed and implemented by April 16, 1984. Upon implementation of the required control system, the licensee expects to have an inventory of all the resources expended in the various functional areas. In addition, each functional area would develop monthly and quarterly schedules for planning activities and allocation of personnel.

The inspector stated that the effectiveness of the management controls in the QA/QC area will be assessed in future NRC inspections (387/83-30-17 and 388/83-25-17). This is a weakness.

- 4) The training and qualification program for the QA/QC personnel is conducted at the corporate office. At the time of this inspection the training matrices, training records and training schedules for the site QA/QC personnel were not available at the site. The Assistant Manager NQA-site discussed an approach to manage the training program for the site QA/QC personnel and stated that the required measures to control the training activities for the site QA/QC staff would be established by mid April 1984. The inspector stated to the licensee's representative that the involvement and management of the training activities for the Site QA/QC personnel by the Site NQA management would be the subjects of future NRC inspections (387/83-30-18 and 388/83-25-18). This is a weakness.
- 5) The inspector reviewed the attrition rate in the QA organization. The new organization lost one individual to the engineering. The licensee's representatives stated that availability of increased opportunities and up-ward mobility were the reasons behind the individual's decision.
- 6) Four non-conformance reports (NCR's) each from calendar years 1980 and 1981 were noted to be open at the time of this inspection. The licensee's QC personnel indicated that the closure of the above NCR's required receipt of documentation and/or replacement parts from General Electric company and other vendors. In the above cases the vendors appeared not to be responsive to the requests from the licensee's working level staff. The inspector discussed this concern with the licensee's senior management. The licensee's senior management acknowledged the inspector's concern and stated that the open NCR's would be reviewed and a course of action prepared to resolve the concerns identified in the above NCR's. The licensee's efforts in resolving the concerns of the open NCR's will be reviewed in a subsequent NRC inspection (387/83-30-20 and 388/83-25-20). This is a weakness.
- 7) The inspectors reviewed the licensee's audits for the Technical Specifications (0-82-40) and Conduct of Operation (0-82-05). Both audits covered a very large number of areas. As a result, the auditors verified execution of the Technical Specification require-

ments or operational requirements from the records. The selected audits were not adequate to cover all Quality aspects of the program. In addition the audits did not have means to verify the overall effectiveness of the audited area. Generally the effectiveness was assessed within the confines of the audit check list. Observed compliance to the audited procedural steps was used as a measure of the effectiveness of the audited activity.

The inspectors stated that the inadequate coverage of the quality affecting aspects of the audited activity and failure to assess the effectiveness of the audited activity through detailed analyses of selected samples are contrary to the requirements of 10 CFR Part 50, Appendix B criterion XVIII, ANSI N18.7 and ANSI N45.2.12. This is a violation. (387/83-30-21 and 388/83-25-21).

The licensee's representatives acknowledged the inspector's statement and stated:

- (1) The present audit program relies heavily on QA surveillance activities conducted in between scheduled audits.
- (2) An approach will be developed to systematically program audits and surveillance so that the effectiveness of an audited activity may be assessed during a subsequent surveillance.
- (3) Licensee's overall philosophy for audits will be reviewed and revised, if necessary, to provide better coverage of the audit activity and meaningful assessment of the effectiveness.

With the exception of the above items, the inspector found that the licensee's on-site QA/QC organization, program and activities were adequate to meet the requirements of two unit operation.

9. Licensee's Operational Readiness Review

9.1 Discussion

The inspector interviewed both corporate and site management personnel to assess the licensee's overall readiness for Unit 2 fuel load.

The Nuclear Safety Assessment Group (NSAG) completed an independent assessment of Unit 2 Readiness to Load Fuel by performing an examination of the following areas:

- (1) Readiness of ECCS systems.
- (2) Status Control
- (3) Interface Control
- (4) Operating and Surveillance Procedures

(5) Set Point Control

(6) Manning and Training

The NSAG assessment identified some problems. However, based upon statements by the NSAG corporate manager their independent assessment findings overall, supported the fuel load readiness of Unit 2. The manager further stated that their assessment was limited in scope due to limited manpower availability. NSAG stated that the above listed areas were selected based on their significance to safety. However, Region I inspectors identified problems during this inspection in areas assessed by NSAG, as identified in paragraphs 4 and 7 of this report.

The corporate NSAG manager stated that he was also the chairman of the Susquehanna Review Committee (SRC). This committee met at the end of November to review the Unit 2 readiness for fuel loading. He stated that this SRC review included information from the NSAG assessment.

Discussions held with the Manager of Nuclear Quality Assurance confirmed that no specific quality assurance audits were conducted or planned to independently assess the readiness of Unit 2 for operations. The QA audits being conducted were basically of the routine type, which did not focus on readiness for Unit 2 fuel load.

Discussions with the station manager identified specific initiatives that the station line organizations were accomplishing to assure the operational readiness of Unit 2 for fuel loading. Among these initiatives are assuring that staffing for Unit 2 is qualified, procedures are in place, walkdown of certain procedures, administratively maintaining status control of activities and assuring and maintaining improved configuration control of the plant, including modifications. It was stated that a management decision had been made not to conduct a formal operational readiness review for Unit 2.

A new initiative is the development of a "system run-in" group (SRI) that will assure that outstanding items turned over from the Integrated Startup Group (ISG) are adequately dispositioned. The SRI will also shake down certain of the Unit 2 procedures for station operations.

9.2 Findings

The basic assessment of fuel load readiness for Unit 2 is that information which is being provided by the line organizations and line management. This does not provide an independent assessment. Considering inspection findings of problems in areas assessed by the independent NSAG, plus the limited breadth of the NSAGs work (six areas only assessed), the lack of depth in the independent QA audits, the fact that the Units will have shared systems (a new interface area) and other new procedural interfaces to control, a weakness appears to exist in not providing a comprehensive independent assessment of Unit 2 readiness to load fuel (388/83-25-22).

The inspector discussed the above weakness with the licensee's representatives and the licensee's representatives acknowledged the inspectors statement.

10. Unresolved Items

Unresolved items are matters about which more information is required to ascertain whether they are acceptable items, violations or deviations. Unresolved items disclosed during the inspection are discussed in paragraph 5.

11. Exit Meeting

The inspectors met with the licensee's representatives identified in paragraph 1 on December 2, 1983 to discuss the findings of this inspection. The licensee's representatives acknowledged the findings of the inspection.

At no time during this inspection, did the inspectors provide written information to the licensee's representatives.