

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-456/84-15(DE); 50-457/84-15(DE)

Docket Nos. 50-456; 50-457

Licenses No. CPPR-132; CPPR-133

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Facility Name: Braidwood Station, Units 1 and 2

Inspection At: Braidwood Site, Braidwood, Illinois

Inspection Conducted: June 18 and 19, 1984

Inspectors: C. A. VanDenburgh

Che A.V. VanDenburgh

6-28-84

Date

Maura for
D. L. Williams

6-28-84

Date

Roger S. Walker for

Approved By: L. A. Reyes, Chief
Test Programs Section

6-28-84

Date

Inspection Summary

Inspection on June 18 and 19, 1984 (Reports No. 50-456/84-15(DE);
50-457/84-15(DE))

Areas Inspected: Routine, announced inspection to review licensee action on previous inspection findings, test organization and IE Bulletin responses.

The inspection involved a total of 29 inspector-hours onsite by two NRC inspectors including 6 inspector-hours onsite during off-shifts.

Results: No items of noncompliance or deviations were identified.

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DETAILS

1. Persons Contacted

*C. Tomashek, Superintendent, Project Startup
*C. Schroeder, Superintendent, Project Licensing and Compliance
*J. Galligan, Startup Testing Supervisor, Project Startup
*E. Willmere, Supervisor, QA Operations
*R. Rowland, QA Operations
*P. Barnes, Project Licensing and Compliance

*Denotes personnel present at the exit interview.

Additional station personnel were contacted by the inspectors during the course of the inspection.

2. Action on Previous Inspection Findings

- a. (Closed) Open Item (456/83-20-01(DE)): Licensee review of recent previous preoperational test problems encountered at other plants. This review by the licensee was to address whether administrative controls are in place to minimize the occurrence of similar problems at the Braidwood Station. The review indicated an adequate response with the following exceptions: housekeeping/cleanliness control and preventative maintenance/equipment protection. Since these concerns are addressed in open items 465/83-20-04 and 456/83-20-05 (discussed in paragraphs 2.d and 2.e below), this item is considered closed.
- b. (Open) Open Item (456/83-20-02(DE)): Applicability of administrative procedures is not specified. Licensee had committed to review the present administrative procedures and specify whether they would be applicable for preoperational testing. The licensee has developed a new procedure, BWAP 1300-7, to request department heads to identify to the Station Procedure Coordinator those procedures or portions of procedures which will not be implemented until the operational phase. Further action is necessary by the licensee to implement this program, develop a list of applicable procedures and determine if additional procedures applicable to the preoperational testing phase will be required. This item is considered open.
- c. (Closed) Open Item (456/83-20-03(DE)): Lack of definitive limits on troubleshooting and minor repairs as allowed by the Startup Manual. The licensee has taken action to include additional guidance in Revision 7 to the Startup Manual. Paragraph 4.1.3.4 requires that troubleshooting and minor work be completed in less than six hours and a description of the work be logged in either the preoperational test summary or the Project Startup Construction Work Permit (CWP) log depending upon whether the STE is present during the performance of work. This item is considered closed.

- d. (Open) Open Item (456/83-20-04(DE)): Lack of administrative controls for preventative maintenance and equipment protection following preoperational testing. The licensee has identified and recognized that a comprehensive program for the construction, preoperational and operational phases of the plant is needed. Action is presently being taken to develop this program. This item will remain open until verification of the adequacy of these administrative controls can be accomplished.
- e. (Open) Open Item (456/83-20-05(DE)): Lack of administrative controls for housekeeping/cleanliness after turnover to operations. These activities are currently handled on a departmental basis and continuing problems have been identified by the licensee. A comprehensive plan is being developed that is expected to minimize problems. This item will remain open until verification of the adequacy of these administrative controls can be accomplished.
- f. (Closed) Open Item (456/83-20-06(DE)): Lack of administrative controls to permit evaluation of preoperational test data if permanently installed plant instruments are subsequently found out of calibration. The licensee revised Paragraph 4.7.5 in Revision 7 to the Startup Manual to adequately address this concern. This item is considered closed.
- g. (Closed) Open Item (456/83-20-07(DE)): Lack of administrative controls to permit evaluation of preoperational test data if portable test equipment is subsequently found out of calibration. BWAP 400-4, "Control of Portable Measuring and Test Equipment", has been revised to provide these controls and is considered adequate. This item is considered closed.
- h. (Closed) Open Item (456/83-20-08(DE)): Lack of administrative controls similar to those for permanent plant instruments to ensure that portable test equipment used to obtain acceptance criteria data has been calibrated within the previous 18 months. The licensee maintains that the periodicity of calibration for portable test equipment as specified in Quality Procedure 12-1, Table 1, of the Commonwealth Edison Quality Assurance Manual is sufficient to ensure that portable instruments remain in calibration. In response to the inspectors concern that ultrasonic flow meters currently in use were not addressed by Table 1, the licensee has added these meters to the Certified Instrument List and developed new procedure BWVP 1600-1, to provide for their calibration. A review of the periodicity of calibration for portable instruments identified in Table 1 indicates that with the exception of bridge-type electrical resistance-measuring instruments and potentiometric type temperature measuring instruments, all portable instruments are required to be calibrated at intervals of less than 18 months. Based upon the above this item is considered closed.

- i. (Closed) Open Item 456/83-20-09(DE)): Concerning the interpretation of the licensee's response to FSAR Question 423.2 which specified the minimum qualification of personnel who supervise or direct the conduct of individual preoperational tests. The licensee has submitted Amendment 45 to the FSAR to clarify the minimum qualifications of Startup Test Engineers (STEs). This item is considered closed.
- j. (Closed) Open Item (456/83-20-10(DE)): Inspector comments against the Braidwood Startup Manual which is the controlling document to ensure the programmatic testing commitments of 10 CFR 50, Appendices A and B are met. The licensee has taken action to resolve all five of the inspectors concerns in Revision 7 to the Startup Manual. This item is considered closed.
- k. (Open) Open Item (456/83-20-11(DE)): Concerned the use of Technical Staff Supervisor Memos as administrative directives to supplement the information provided by the Startup Manual. The inspectors indicated to the licensee those areas covered by the memos which would be more appropriately addressed in the Startup Manual. The licensee has developed a new method for implementation of administrative directives which relate to the performance of testing to the commitments of 10 CFR 50. This method involves the use of a Project Management Procedures Manual. The licensee is presently developing this manual and has stated that the applicable Technical Staff Supervisor Memos will be incorporated into this manual, the Startup Manual or training requirements. This item will remain open pending implementation and further inspector evaluation.

3. Test Organization

During the conduct of the inspection, the licensee discussed their plans to revise the Braidwood Startup Manual to reorganize the test organization. Preliminary plans were discussed to provide separate test organizations for preoperational and startup testing under the direction of the Project Startup Superintendent and the Station Superintendent respectively. This new organization would provide for additional Test Review Boards (TRBs) comprised of individuals qualified to the same level as is presently specified for the TRB. The licensee is presently in the process of developing this new program. The inspectors indicated and the licensee verified that action would be taken to ensure this new organization meets the commitments of the FSAR. This item will be followed as an open item pending finalization and further inspector evaluation of this new test organization. (456/84-15-01)

4. Licensee Action on Bulletins

(Open) IE Bulletin 83-05: "ASME Nuclear Code Pumps and Spare Parts Manufactured by the Hayward-Tyler Pump Co." The bulletin required actions to be taken by the licensee. These actions cannot be completed until a pump performance test is conducted. This bulletin will remain open pending completion of these tests and submittal of the results. (456/83-05-BB and 457/83-05-BB)

5. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. An open item disclosed during the inspection is discussed in Paragraph 3.

6. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) on June 19, 1984. The inspectors summarized the scope and findings of the inspection. The licensee acknowledged the statements by the inspectors with respect to the open item.