

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-289/84-06

Docket No. 50-289

License No. DPR-50 Priority -- Category C

Licensee: GPU Nuclear Corporation
P.O. Box 480
Middletown, Pennsylvania 17057

Facility Name: Three Mile Island Nuclear Station, Unit 1

Inspection At: Middletown, Pennsylvania

Inspection Conducted: February 12-April 12, 1984

Inspectors: *H.H. Nicholas* 7/5/84
H.H. Nicholas, Lead Reactor Engineer date
R.J. Paolino 7-2-84
R.J. Paolino, Lead Reactor Engineer date
F.P. Paulitz 7-5-84
F.P. Paulitz, Reactor Inspector date
Peter C. Wen 7-5-84
P.C. Wen, Reactor Inspector date
Approved by: *C.J. Anderson* 7/5/84
C.J. Anderson, Chief, Plant Systems date
Section

Inspection Summary: Inspection Period - February 12-April 12, 1984
(Inspection Report No. 50-289/84-06)

Areas Inspected: Routine unannounced inspection of 1) licensee restart modifications relating to fire protection/prevention; 2) the preoperational test program/procedures; and 3) status of previously identified NRC findings.

The inspection involved 176 inspection-hours on site for four (4) region-based inspectors.

Results: One violation was identified in the area of Fire Protection/Prevention (failure to document engineering justification for "use-as-is" disposition of non-conforming items).

DETAILS

1.0 Persons Contacted

1.1 General Public Utilities - Nuclear (GPUN)

- P. Bouchard, Environmental Qualification Engineer (Parsippany)
- * J.K. Gulati, Manager TMI Projects (Parsippany)
- C. Hartman, Lead Electrical Engineer
- T.M. Hawkins, Manager TMI-1 Startup/Test
- * N.R. Hollerbush, Supervisor of Documents
- * H.D. Hukill, Director TMI-1
- * C.L. Incorvati, TMI-1 Audit Supervisor (Acting)
- R. Knight, Senior Licensing Engineer
- * D.P. Kowalchick, Site Liaison Engineer
- P. Levine, Senior Electrical Engineer
- * F.G. Maus, Equipment Qualification Manager (Parsippany)
- J. Marsden, QA Engineering Manager
- * S.P. Mervine, Fire Protection Coordinator
- M. Nelson, Supervisor TMI-1 Review Program
- * T.A. O'Connor, Lead Fire Protection Engineer
- G. Oswald, Engineer III
- I. Porter, Assistant Manager TMI-1 Startup/Test
- R.N. Prahbaker, Quality Assurance Manager
- * M.J. Press, Site Quality Assurance Auditor
- D.E. Quarello, Site Quality Assurance/Quality Control Program Engineer
- * C.A. Shorts, Technical Functions Supervisor
- * C. Smythe, TMI-1 Licensing Manager
- J. Tiejn, Quality Assurance Supervisor
- * J.A. Torcivia, Electrical Power Manager (Parsippany)
- W.S. Wilkerson, Lead Nuclear Engineer
- H. Wilson, Preventive Maintenance Supervisor

1.2 Gilbert Associates, Inc.

- * D.E. Aunkst, Pipe Support Designer
- * R.R. Brems, Project Manager
- * J.F. Glova, Project Structural Engineer
- * A.W. Grammes, Senior Quality Assurance Program Manager
- * E. Johnston, TMI Project Piping Engineer
- * N.A. Manning, Manager Corporate Quality Assurance Programs
- * C.C. Paschall, Manager P&ISD-R Quality Management
- * C.N. Rentschler, Section Manager-Support Design
- * R. Villforth, Manager Projects

1.3 U.S. Nuclear Regulatory Commission

- F.I. Young, Resident Inspector
- R.J. Conte, Senior Resident Inspector

* denotes personnel present at meetings held at various times during this inspection period.

2.0 Status of Previously Identified Items

- 2.1 (Closed) Unresolved Item No. 289/82-15-03 pertaining to the fire barrier penetration notification form requirement when a fire barrier is breached. The licensee was unable to produce the notification form for circuit No. EA-6864/EA-6891 through penetration No. A146. Based on the quality control plant inspection report PIR No. CS/33263/83, work authorization No. WA-A25A-G1396 and Turn-over package T/O-277-1 the licensee issued a duplicate fire barrier notification form for the above referenced circuit No. EA-6864. The inspector verified that functional seals exits around the conduit for EA-6891 and on both sides of each pullbox.

This item is closed.

- 2.2 (Closed) Unresolved Item No. 289/83-09-01 pertaining to the qualification of Struthers-Dunn Relays.

The inspector reviewed licensee file No. 466-E-093-0082-02 which documents the seismic and environmental qualification of the Struthers-Dunn Relays which was determined to be acceptable.

This item is closed.

- 2.3 (Closed) Violation No. 289/83-19-02 pertaining to inadequate inspection activities resulting in the acceptance of a nonconforming installation. The licensee has issued a material non-conformance Report (MNCR)-0194-83 to document the violation and to request a technical evaluation regarding the acceptability of the non-conforming condition. In addition, the licensee has re-instructed quality control personnel on the requirements of a proper installation to prevent recurrence. The inspector reviewed the MNCR and the Field Change Request (FCR) Nos. C-008402 and C-008365, none of the documents provided technical justification for the "use-as-is" disposition.

This item is closed. However, the issue of documenting technical justification for "use-as-is" disposition will be addressed in violation No. 84-06-01.

- 2.4 (Open) Unresolved Item No. 289/83-11-03 pertaining to inadequate installation procedures for wire and cable. Procedure No. 1420-Y-23 used in the installation of wire/cable does not address nor allow for cable sidewall pressure. IEEE-422-1977 presents an acceptable method for determining sidewall pressure in the absence of cable manufacture's instructions.

This item remains open.

- 2.5 (Open) Unresolved Item No. 289/83-16-01 pertaining to the qualification of task No. RM-13J transmitters. Test Results and documentation necessary to qualify this equipment were not available for NRC review during this inspection.

This item remains open pending NRC review of qualifying documentation.

- 2.6 (Open) Unresolved Item No. 289/83-16-02 pertaining to the qualification of the In-Containment Radiation Monitor's (RM-G22/23) cable assembly No. 907341.

The inspector reviewed Field Change Request (FCR)-C-000122 revisions 1 through 4, and drawing attachments 1 and 2 of the connector assembly and the installed configuration. Sheet 2 of FCR-C-000122, revision 1 indicates that suitability of cable and cable terminations cannot be ascertained. The documentation package does not contain any test or qualification data to indicate the cable assembly is qualified for the containment environment.

This item remains open.

- 2.7 (Open) Unresolved Item No. 289/83-18-01 pertaining to the use of the Shift Maintenance foreman as the brigade leader. The current NRC position, as stated in Appendix R, is that the Shift Supervisor shall not be a member of the fire brigade and that the brigade leader and at least two brigade members shall be knowledgeable of plant safety-related systems. The licensee has submitted a revised Fire Protection Plan No. 1292, Revision 0 (Transmittal No. 5211-83-359, dated January 7, 1984) to the office of Nuclear Reactor Regulation (NRR) for review. The licensee's position on the use of the Shift Maintenance Foreman as the brigade leader has not changed (reference Section 3.0 of Fire Protection Plan).

This item remains open pending completion of NRR review.

- 2.8 (Closed) Violation No. 289/83-18-02 pertaining to licensee's failure to specify and/or provide quarterly classroom training to each fire brigade member in accordance with paragraph 2.c.(4) of licensee No. DPR-50.

The licensee has revised administrative Procedure No. 1038, as well as the Training Department's Fire Protection Training Program to require quarterly classroom instructions for each brigade member. The new Training Program was placed in effect on January 7, 1984. Current brigade members and all new brigade members will be qualified to the new Training Program in accordance with applicable sections of the TMI-1 Fire Protection Plan, Revision 0, dated January 7, 1984. The inspector reviewed fire brigade training records and verified the new training program has been implemented.

This item is closed.

- 2.9 (Closed) Unresolved Item No. 289/83-18-03 pertaining to the lack of training program that ensures that brigade members receive all of the training necessary for qualification and maintenance of fire brigade member status.

The licensee has revised Section 4.0 of Administrative Procedure No. 1038, Revision 8, dated February 8, 1984. This section delineates the initial training requirements for fire brigade members and the required training to maintain status as a fire brigade member. Course objectives and outlines for the initial training program are identified in Training Procedure No. 6210-ADM-2620.03. The program conforms to 10CFR50 Appendix R guidelines for Brigade Member Training.

This item is closed.

- 2.10 (Open) Unresolved Item No. 289/83-18-04 pertaining to inadequate "Hands-On" type of fire protection training for fire brigade members.

The licensee is in the process of constructing a "Burn Building" training structure to create actual fire situations for extinguishment by brigade members. The design of the structure has been completed. Approval by local and state authorities is pending with construction expected to start in July 1984.

This item to remain open pending completion and verification of training center.

- 2.11 (Closed) Unresolved Item No. 289/83-18-05 pertaining to use of walk-through drills in lieu of preplanned fire brigade drills that test brigade members' response, reaction and ability to coordinate team activities in the event of a fire.

The licensee has revised the fire protection Training Procedures stating that walkthrough drills will not be used in lieu of pre-planned fire drills to qualify brigade members.

This item is closed.

- 2.12 (Closed) Inspector Followup Item No. 83-SC-08 pertaining to licensee amendment No. 81 which grants the licensee Technical Specification changes in order to perform low power natural circulation test.

The inspector reviewed test procedure No. TP-700-2, "Low Power Natural Circulation Test", revision STR-1 and verified that the procedure contains all licensee proposed tests as described in the associated Safety Evaluation.

This item is closed.

- 2.13 (Closed) Licensee Event Report No. 80-L0-01 pertaining to overload condition that could exist on 480 volt engineered safeguard busses. The inspector reviewed licensee technical data report (TDR) no. 185 which detailed deficiencies associated with the loading of the safeguard busses and the modification task no. LM-32 which provides for automatic tripping of selected loads on the affected busses to aid in preventing an overload condition.

The inspector noted that the LM-32 task had been reviewed and accepted in NRC inspection report No. 289/83-09 with one unresolved item no 289/83-09-01.

This item (80-L0-01) is closed. Item No. 83-09-01 is addressed and closed in paragraph 2.2.

- 2.14 (Closed) Inspector Followup Item No. 289/82-SC-03 pertaining to 480 volt bus undervoltage trip modification task no. NM-34 and solid state under voltage relay task no. RM-22 to protect safety related electrical equipment from degraded voltage conditions. The inspector reviewed the turnover package (T/O-045-3) for Task no. NM-34 and T/O-125-1 for Task no. RM-22 noting that three undervoltage relays and one overvoltage relay had not been tested as required by test procedure (TP)-250/2.3. Discussion with the licensee indicate that these relays (nos. E27-1, E27-2, E27-3 and E59-1) were out of tolerance and had drifted from the set point following calibration. The licensee indicated the relays would be replaced.

The analysis for degraded grid voltage effect upon class 1E electrical system was reviewed and accepted by the NRC (ref. NRC letter to GPU dated January 19, 1984) contingent upon design/operational changes that include (1) changing of taps on the auxiliary Transformers (UATIA, UATIB) from 230 KV to 224.25 KV during power operations, and (2) institute new procedures to preclude starting any 4KV or 6.9 KV motor during electrical system block loading sequence.

The licensee has complied with these items by including the tap change in the startup procedure no. 1102-2, revision 59 and replaced the wording "major motors" by specifying the 4 KV and 6.9 KV motors in the small break LOCA Procedure no. ATP-1210-6 and the large break LOCA procedure no. ATP-1210-7. The inspector reviewed licensee correspondence (GQL-1292) to the NRC, dated October 16, 1979 which indicates that all 480 volt motors which presently have 80% voltage starting capability will be tested to establish the 75% voltage starting capability or be replaced. The tests are to be completed prior to TMI-1 restart.

Field Questionnaire no. R-778 dated July 27, 1981 (task no. NM-34, ECM no. S-255) modifies motor operator nos. BS-V1A & BS-V1B to meet the 75% starting voltage. This change resulted in increasing the stroke time from 12.5 seconds to 16.65 seconds which was determined

acceptable (ref GPU Letter GPU-81-1:J). Neither the field questionnaire nor the memorandum indicates the commitment to test all 480 volt motors at the 75% starting voltage.

Inspector Followup item 289/82-SC-03 will be closed. However there are two unresolved items as a result of this inquiry, as follows;

- a. The testing and replacement of the undervoltage/overvoltage relays (289/84-06-03)
- b. Testing of 480 volt safety motors (289/84-06-02). To close out item b, the following data will be required:
 1. Copy of 75% starting voltage test procedure.
 2. List of all motors requiring 75% starting voltage test.
 3. Test results of motors tested.
 4. List of all motors replaced.
 5. List of MOV's to be modified.
 6. Test results of modified motors (MOV's).
 7. Written justification for MOV stroke time which differs from original purchase specification.

2.15 (Closed) Inspector Followup Item No. 289/83-SC-03 pertaining to Reactor Coolant System loop vent component qualification. (Item II B-1, NUREG-0737)

The inspector reviewed the Wyle Report no. 45592-4, dated May 5, 1982 verifying the qualification of Differential Transmitter nos DTP-1079, 1080 and 1081; Solenoid Value nos. RC-V44, V40A, V40B, V41A and V41B.

This item is closed.

3.0 Intake Screen Pump House (ISPH) Modifications

3.1 The inspector reviewed pertinent work and quality records for Fire Protection/Prevention modifications to the Screen House Building to ascertain whether the records meet established procedures and whether the records reflect work accomplishments consistent with NRC requirements and FSAR commitments for installing Emergency Lighting, Smoke Detectors and Roll-up Fire Door.

3.2 Documents examined for this determination include:

- Work authorization No. A25A-30347 and A25B-30388
- Field Change Request Nos. C-013009, C-013001 and C-008425
- Purchase Order Nos. 190216 and 295090
- Document Release Form (DRF) Nos. 5955, 12975, 12645, and 12662
- Cable Pull Slip for Circuit Nos. 1PH2, 1PH3, 1PH4, 1PH123, 1ZP-1380, 1ZP-1383, and 1ZP-1386

- Wire/Cable Procedure No. 1420-Y-23 Revision 4
- Cable Tray/Conduit Procedure No. 1420-Y-22 Revision 4
- Fire Barrier Procedure No. 1420-FB-1 Revision 7
- Safety Evaluation Report No. 412347-001
- Specification No. SP-1101-06-005 Revision 1
- Drawing No. ISK-E-1236 Revision 2
- Procedure Nos. EMP-015 Revision 1, DCP-2.05 revision 5

3.3 In addition, the inspector visually inspected the completed installations verifying as-built configuration.

3.4 No violations were identified.

4.0 Fuel Handling Building - Fire Sprinkler System

4.1 The inspector reviewed pertinent work and quality records for the installation of the Fuel Handling Building Fire Sprinkler System to ascertain whether the records meet established procedures and whether the records reflect work accomplishments consistent with NRC requirements and FSAR commitments in the areas of quality control and installation.

4.2 Documents examined for this determination include:

- Task NM-40, Engineering Change Modification Nos. (ECM)-160 and 081
- Field Change Request (FCR) Nos. 00423, 003320, and 005021
- Anchor Installation Documents (AID) Nos. FS-12-008, FS-12-011, FS-12-020, FS-12-026, FS-12-064, and FS-12-057
- Drawing No. 13012-12
- Inspection Report Nos. PIR-CS/33699/82 and CS/33793/82
- Turnover Package T/O 160-1 & 2
- Anchor Installation Procedure No. 1410-Y-61 Revision 0
- Support Nos. FSH-619, FSH-661, FSH-673, FSH-733, and FSH-740
- Cable Circuit Nos. 1RK901, 1RK902, 1RK908, and 1RK909
- Turnover Package Nos. T/O-081-1 & 2, Attachments 11, 12, 10-1, and 11-1

4.3 In reviewing the quality control records on cable pulling for ECM-081, the inspector noted several inconsistencies in completion dates relative to completion of cable pull, construction approval dates and megger test dates. For example, cable Nos. 1-RK-908 and 1-RK-909 in attachment 11 and 12 of ECM-081, indicate completion of cable pull on January 26, 1981 for both cables and megger test date of January 8, 1981 for 1-RK-908 and January 8, 1980 for 1-RK-909. The approval for construction on both cables was dated February 5, 1981. The above inconsistencies in completion dates imply that the cable megger test was performed prior to cable pull and that the cable was pulled prior to construction approval. Based on this observation, the licensee has agreed to expand the scope of an existing fire protection audit (No. S-TMI-8403) to include a

review of the quality control records for ECM-081 to determine the extent and basis for the inconsistencies in completion dates. This item is unresolved pending NRC review of licensee evaluation and corrective action. (289/84-06-01).

- 4.4 For ECM-160 (Fire Sprinkler System Hangers and Support Bracket), the inspector reviewed FCR-00423 (as-builts), FCR-003320 (inspection program) and FCR-005021 (inspection findings).

The nonconformances identified by the licensee in FCR-005021 (sheets 1-40) include:

- Loose fit "U" bolts
- Anchor bolt spacing violations
- Undersized welds
- Skewed anchor bolt
- Domed washers
- Less than full thread nut engagement

- 4.5 The licensee's resolution (sheet 1a of 40, Section III of FCR-C005021) for the above noted deviation states, in part, that: ". . . Engineering analysis and evaluation concludes that the deviations noted are insignificant and do not reduce the factor of safety beyond engineering acceptance. No repairs or additional inspections are required".

- 4.6 In Section II of FCR-C008353, the resolution for material non-conformance report (MNCR)-0201-83, sheet 3 of 5, which identifies anchor spacing violations to existing anchors, free edge of concrete, embedded plates and pipes concludes that three of eighteen supports must be reworked to meet the spacing criteria and the remaining supports have been evaluated for use-as-is, no rework required.

The inspector was not able to verify the engineering analysis or evaluation that was the basis for the Use-As-Is disposition noted above. Discussions held onsite with licensee personnel and the Architect Engineer's (A/E) personnel on March 2, 1984 at the A/E's home office indicate that the technical justification for Use-As-Is is not documented and that the Use-As-Is disposition is based on engineering judgement and that the designated technical reviewer's signature in FCR verification block is sufficient.

To support this position, a slide presentation was prepared and presented by the A/E on March 9, 1984. The presentation was an attempt to provide a degree of confidence in the reliance placed on engineering judgements for Use-As-Is dispositions.

Discussions during and after the presentation provided a better understanding of the verification process, however, the issue of documenting the technical justification for Use-As-Is dispositions was not resolved.

The inspector informed the licensee that this was contrary to 10CFR50, Appendix B, Criterion XV which states, in part, that: "non-conforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

Section 4.5.1 of licensee Procedure No. EMP-015 states, in part, that: "the cognizant engineer will perform an evaluation of the non-conformances, proposed dispositions and complete section 4 of the MNCR. For all MNCR's, the appropriate disposition category shall be checked and the technical justification stated for Repair or Use-As-Is disposition".

Section 2.4 of Design Control Procedure (DCP)-2.05 for Field Change Request (FCR) and Design Verification Records (DVR) states, in part, that "Verification shall be recorded on the DVR form GAI468 (attachment 1). Attachment 1 requires that verification package include documents to be verified, supporting documents, extent of verification and results of verification. (289/84-06-02)

5.0 TMI-1 Restart Preoperational Test Program

References

- Restart Project Organization and Responsibility Document
- TMI-1 Startup and Test Manual
- Recommended Requirements for Restart of TMI Unit 1 (Restart Report) Volumes 1, 2 and 3
- TMI-1 Restart Report, Supplement 2, Operational QA Plan
- TMI-1 Startup and Test Instructions
- NUREG-0680 and Supplements 1, 2, and 3 TMI-1 Restart
- RG 1.68, Initial Test Program for Water Cooled Nuclear Power Plants

5.1 Preoperational Test Procedure Review

Scope

The inspector reviewed STP 141/6 Revision 0, Approved February 23, 1984, Intermediate Building Ventilation Fans Functional Check of Control Circuit and Air Flow Measurements. The procedure was reviewed for management review and approval, procedure format, test objectives clearly stated, prerequisites, environmental conditions, acceptance criteria, technical references, initial conditions, test performance documentation and verification, detailed instructions for performance of test, recording details of conduct of test, restoration of system to normal after test, documentation of personnel conducting test and evaluating test data, and independent verification of critical steps or parameters.

5.1.1 Findings

The inspector determined that the test procedure was technically and administratively adequate. No discrepancies were noted during this review and the inspector had no further questions.

5.2 Preoperational Test Results Evaluation

Scope

The inspector reviewed 12 completed preoperational test procedures, 3 supplemental generic test procedures, and 1 generic test procedure, to ascertain whether uniform criteria are being applied for evaluating completed preoperational tests and to assure technical and administrative adequacy by the licensee's review, evaluation and approval of the completed procedures listed below.

5.2.1 Preoperational Test Procedures

(1) Task RM-G-24, SP 366/4 Revision STR-1, Approved May 24 1983, Post-Accident High Range Containment Purge Monitor Calibration
Test results approved November 18, 1983.

(2) Task RM-G-25, Sp 366/5 Revision STR-1, Approved May 24, 1983, Post-Accident High Range Condenser Off-Gas Monitor
Test results approved November 18, 1983.

(3) Task LM-25A, SP 366/6 Revision 0, Approved May 3, 1983, Post-Accident High Range Steam Line Monitor Calibration and Functional Test
Test results approved November 18, 1983.

(4) Task RM-A5H, A8H and A9H, SP 366/7, Revision 0, Approved April 18, 1983, Post-Accident High Range Atmospheric Monitors Calibration
Test results approved December 12, 1983.

(5) Task RM-A5G, SP 366/8, Revision 0, Approved July 21, 1983, Calibration and Verification of Condenser Exhaust Monitor
Test results approved November 17, 1983.

(6) Task RM-L-12, TP 366/10, Revision 0, Approved December 9, 1983, IWTS-IWFS Discharge Monitor Calibration and Functional Test
Test results approved February 1, 1984.

(7) Task LM-25B, TP 377/1, Revision 0, Approved December 10, 1982, Post-Accident Iodine Sampling System Functional Test

Test results approved February 23, 1984.

(8) Task LM-29, TP 401/1, Revision 0, Approved June 3, 1982, High Radiation Alarm System Improvements Functional Test

Test results approved January 11, 1984.

(9) TP 636/1, Revision 0, Approved February 25, 1982, Main Feedwater Control Valve Leakage Test

Test results approved January 5, 1984.

(10) TP 677/2, Revision STR-1, Approved August 4, 1981, Nuclear Chemical Addition and Sampling System Operational Test

Test results approved February 2, 1984.

(11) TP 346/2, Revision 0, Approved December 3, 1982, Backup Incore Thermocouple Display Functional Test

Test results approved September 26, 1983.

(12) Task LM-21a, TP 675/1, Revision 0, Approved April 1, 1982, RCS High Point Vent Functional Test

Test results approved December 21, 1983.

5.2.2 Supplemental Generic Test Procedures

(1) Task LM-26B, SP 250/3.1, Revision 0, Approved January 14, 1983, Post-Accident Monitoring Containment Hydrogen Sampling (Flush-Leak Test)

Test results approved July 15, 1983.

(2) Task LM-43B, TP 250/1.1, Revision 0, Approved December 18, 1981, ICS Valve Fail Position Modification Test

Test results approved March 25, 1982.

(3) Task LM-43B, TP 250/1.2, Revision 0, Approved October 7, 1982, Power Source, Status Indication For MS-3's and MS-4's - Test

Test results approved October 11, 1982.

5.2.3 Generic Test Procedure

The generic test procedures used in the preoperational test program are:

-- TP 250/1 Generic Instrumentation

- TP 250/2 Testing of Electrical Equipment
- TP 250/3 Hydrostatic Testing
- TP 250/4 Flushing Piping Systems
- TP 250/5 Testing of Mechanical Equipment

A review was made of the generic procedure TP 250/5 for the modification task package LM-26B.

The inspector reviewed the test results and verified licensee evaluation of test results by review of test changes, test exceptions, test deficiencies, "As-Run" copy of test procedure, QA inspection records, and, test results evaluation and approval.

5.2.3.1 Findings

No discrepancies were noted during review of the above listed test procedures and no open or unresolved test exceptions existed to any of the procedures. The inspector had no further questions on these items.

6.0 Restart Startup Test Procedure Review

6.1 The inspector reviewed test procedures and discussed procedure content with licensee personnel to assure that the following criteria were met:

- FSAR, Technical Specification, and specific licensee provisions (as applicable) were incorporated;
- Procedure reviews and approvals were performed in accordance with the licensee's administrative controls;
- Test objectives are clearly stated;
- Pertinent prerequisites are identified;
- Acceptance criteria against which the test will be judged are clearly identified and procedure requires comparison of results with acceptance criteria;
- Step-by-step instructions for the performance of the procedure are complete to the extent necessary to assure that test objectives are met;
- The procedure requires that temporary connections, disconnections or jumpers be restored to normal or reference their control by another procedure;
- The procedure provides identification of personnel conducting the testing and evaluating test data.

The procedures which were reviewed and discussed are listed in the following:

- TP 800-1, Revision 0 (draft), Controlling Procedure for Power Escalation.

- TP 800-5, Revision 0, Unit Load Steady State Test.
- TP 836-1, Revision 0, Feedwater System Operation and Tuning.
- TP 849-1, Revision 0, ICS Tuning at Power.
- SP 1303-1.2, Revision 4, RC Flow Surveillance.

No violations or deviations were identified.

- 6.2 As part of ICS Tuning at Power procedure review, the inspector inquired about QA/QC involvement on this subject, particularly on the modification of power supply to the ICS system. The inspector reviewed QC's final acceptance inspection for ECM-S-123 and QC's test results review for the associated test TP 250/2.1. The inspector noted the QA/QC verification of these activities. The inspector also verified through discussions with control room operators that the operators are familiar with and aware of this modification.

No unacceptable conditions were identified.

6.3 Unresolved Items

Unresolved Items are matters about which more information is required in order to ascertain whether they are acceptable items, items of non-compliance or deviations. Unresolved item(s) disclosed during this inspection are discussed in Detail, paragraph 2.14 and 4.3.

6.4 Exit Interview

The inspectors met at various times with the licensee (denoted in Details, paragraph 1) at the conclusion of each inspection performed during the inspection period. The inspectors summarized the purpose and scope of each inspection and findings were applicable. At no time during this inspection period was written material given to the licensee or his representatives.