



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

Report No.: 50-348/90-05 and 50-364/90-05

Licensee: Alabama Power Company
 600 North 18th Street
 Birmingham, AL 35291-0400

Docket No.: 50-348 and 50-364

License No.: NPF-2 and
 NPF-8

Facility Name: Farley Units 1 and 2

Inspection Conducted: February 12-16, 1990

Inspection at Farley site near Dothan, Alabama

Inspectors: *Ron Gibbs* *FCB* 3/7/90
 L. S. Mellen Date Signed

Ron Gibbs 3/7/90
 R. D. Gibbs Date Signed

Approved by: *P. J. Kellogg* 3/8/90
 P. J. Kellogg, Section Chief Date Signed
 Operational Programs Section
 Division of Reactor Safety

SUMMARY

Scope:

This special announced inspection was conducted to review the results of corrective actions taken to correct deficiencies identified during the Operational Program Assessment and the Procurement Inspection.

Results:

In the areas inspected, no violations or deviations were identified. The licensee's progress in the accomplishment of corrective actions for violations identified by the Operational Programs Assessment and the Procurement Inspection was good. Corrective actions were comprehensive and complete for all items reinspected.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *R. Coleman, Plant Modifications Manager
- *S. Fulmer, Supervisor SAER
- *H. Garland, Mechanical Maintenance Supervisor
- *R. Hill, Assistant General Manager - Operations
- *R. Marlow, Technical Supervisor
- *L. Stinson, Assistant General Manager - Support
- *B. VanLandingham, Unit Supervisor - Operations

Other licensee employees contacted included engineers, operators, technicians, mechanics, personnel, and office personnel.

NRC Resident Inspectors

- G. Maxwell, Senior Resident Inspector
- W. Miller, Resident Inspector

*Attended exit interview

Acronyms used throughout this report are listed in Appendix A.

2. Action on previous inspection Findings (92701, 92702)

- a. (Closed) Violation 50-348,364/87-11-01, Inadequate Control and Installation of Purchased Equipment.

This violation was issued in escalated enforcement package EA 87-142 on November 3, 1987, and contained two parts. The licensee's response was issued in two memoranda dated December 17, 1987. Additional correspondence which was reviewed during the close-out of this item included: the May 18, 1988, Order Imposing a Civil Monetary Penalty issued by the NRC; the licensee's response to the NRC Order, dated June 17, 1988; and the July 21, 1988, NRC response to concerns raised in the licensee's response to the NRC Order. The EQ issues addressed by inspection report 50-348,364/87-30 and tied into this EA package by NRC letter were not reviewed during this inspection.

Part A. Nine circuit breakers were reported as having unconfirmed seismic qualification and voltage ratings in violation of 10 CFR 50, Appendix B, Criterion VII. When the NRC questioned the qualification of the breakers during the initial inspection, the licensee removed all Satin American breakers from service and replaced them with spare original replacements. The licensee's original response to this deficiency denied the violation and provided technical justification for the denial. NRC review of the licensee's technical justification concluded that three of the examples in the violation should be withdrawn (FCLO3 - MCC 1C, FEE3 - MCC 2E, FMH2 - MCC 2U) and the other six examples remained valid.

The licensee's corrective action for this violation included removal of the breakers (which occurred during the original inspection). Additionally, the licensee committed to obtain NRC approval prior to use of these breakers in any safety related applications. The inspectors reviewed the work requests that covered the replacement of the six circuit breakers and verified that they had been replaced. The specific work requests which accomplished this work were:

MWR 158261 - FAK4L - MCC 2A
MWR 158255 - FBM4L - MCC 1B
MWR 158253 - FBD2L - MCC 1B
MWR 158252 - FB03 - MCC 2B
MWR 158246 - FBH3 - MCC 2B
MWR 158243 - FBD6 - MCC 2B

Part B. Numerous commercial grade parts were installed without adequately evaluating their suitability for use in safety-related applications in violation of 10 CFR 50, Appendix B, Criterion III:

- 1) Commercial grade circuit breakers were installed into safety-related motor control centers 1U and 2U. The licensee's response to this deficiency stated that the problem was caused by inadequate procedural guidance to document fully the evaluation of the suitability of commercial grade parts for installation in safety-related applications. Corrective actions included replacement of the breakers, establishment of interim procedures to prevent installation of unqualified parts, and development of a commercial grade dedication program to prevent recurrence of the deficiency. The inspectors reviewed MWR 158249, dated June 5, 1987, which installed a qualified breaker, FU-Z3, in the Unit Two Accumulator 2C Discharge MOV compartment and MWR 158247, dated July 7, 1989, which installed a qualified breaker, FU-Z3, in the Unit One Accumulator 1C Discharge MOV compartment. Additionally, the inspectors verified the establishment of a commercial grade dedication program, in accordance with the licensee's commitment, by review of Appendix A of FNP-0-AP-9, Revision 13.
- 2) A commercial grade "NAMCO" limit switch was installed as a replacement for a safety-related switch for the accumulator tank isolation valve. The licensee's response to this deficiency stated that the problem was caused by inadequate procedural guidance to document fully the evaluation of the suitability of commercial grade parts for installation in safety-related applications. Corrective action included obtaining a letter from "NAMCO" which verified that the switches were qualified by "NAMCO" test report QTR107.

Additionally, the licensee established interim procedures to prevent installation of unqualified parts, and developed a commercial grade dedication program to prevent recurrence of the deficiency. The inspectors reviewed the letter from Namco, dated June 1, 1987, that verified that the Namco limit switches were qualified. The inspectors, also, verified the establishment of a commercial grade dedication program, in accordance with the licensee's commitment, by review of Appendix A of FNP-0-AP-9, Revision 13.

- 3) A commercial grade torque switch was installed into a safety-related Limitorque motor actuator, the "B" Motor Driven Auxiliary Feedwater Pump Service Water Suction Isolation Valve, Q1N23MOV3210. The licensee's response to this deficiency stated that the problem was caused by inadequate procedural guidance to document fully the evaluation of the suitability of commercial grade parts for installation in safety-related applications. Interim corrective action for this deficiency included removal of power from the valve until a new safety-related torque switch could be procured and installed. The torque switch was replaced on December 10, 1987. The inspectors reviewed MWR 142741, dated December 10, 1987, which replaced the unqualified torque switch. Additional corrective action included a review of surveillance test data to verify that the commercial grade torque switch was operable while installed. In addition, the licensee established interim procedures to prevent installation of unqualified parts, and developed a commercial grade dedication program to prevent recurrence of the deficiency. The inspectors verified the establishment of a commercial grade dedication program, in accordance with the licensee's commitment, by review of Appendix A of FNP-0-AP-9, Revision 13.
- 4) Commercial grade hinge pin bushings were installed in safety-related Anchor/Darling tilting disk check valves in the auxiliary feedwater system. The licensee's investigation determined that this problem was caused by personnel error in that personnel were not aware that bushing failure would affect the intended safety function of the valves. Appropriate plant and corporate personnel were instructed on the safety significance of the bushings. The procurement classification for these items was changed to require purchase as safety-related items. The licensee obtained a letter from the vendor, which stated that the bushings were treated as safety-related even though they had not been purchased as such. The inspectors reviewed the letter from Anchor/Darling, dated May 29, 1987, which stated that the replacement bushings were furnished as safety-related parts within the scope of their nuclear quality system.

- 5) Commercial grade Agastat Timing Relays were installed as replacements in safety-related load distribution panels. The licensee's response to this part of the violation agreed with the example concerning the ATR in panel Q2R16B007-B. Corrective action was to replace the ATR. This action was verified complete by inspector review of completed MWR 142743. The licensee's response to the examples in panels Q1R43E506-B and Q2R43E501B-B denied the violation and provided technical justification for the denial. After review of the licensee's response, the part of the violation concerning the ATRs in terminal box #Q1R43E506-B was withdrawn by the NRC Order Imposing a Civil Monetary Penalty, dated May 18, 1988. The examples cited in panel Q2R43E501B-B were assessed as being valid by the Order. No further commitments concerning this part of the violation were issued by the licensee. Inspection of the ATRs in panel Q2R43E501B-B during this follow-up inspection determined that the ATRs specified as being in the panel by the Order were not in the panel on February 22, 1990. Additionally, it was determined that this panel is not needed for safe shutdown of the unit even though it is treated as safety-related by the licensee. The fact that the ATRs were not found in the panel, combined with the lack of a commitment concerning their replacement by the licensee caused the inspectors to investigate the unit 1 panel with the same number (i.e., Q1R43E501B-B). Inspection of this panel by the senior resident inspector on February 22, 1990, did not find the ATRs specified in the NRC Order, but did discover two more ATRs which had been replaced after unit start-up without proper dedication (ATR serial numbers 79091378 and 79091375). Licensee management was immediately advised of this condition by the senior resident inspector. This part of the violation is closed based on the licensee's ongoing ATR replacement program which will replace all safety-related ATRs in both units by the end of the next refueling outage for each unit.

Based on the above, the violation is closed.

- b. (Closed) violation 50-348,364/87-11-02, Inadequate Corrective Actions and Inspections

This violation was issued in escalated enforcement package EA 87-142 on November 3, 1987, and contained two parts. The licensee's response was issued in two memoranda dated December 17, 1987. Additional correspondence which was reviewed during the close-out of this item included: the May 18, 1988 Order Imposing a Civil Monetary Penalty issued by the NRC; the licensee's response to the NRC Order, dated June 17, 1988; and the July 21, 1988, NRC response to concerns raised in the licensee's response to the NRC Order. The EQ issues addressed by inspection report 50-348,364/87-30 and tied into this EA package by NRC letter were not reviewed during this inspection.

Part A Five examples of inadequate corrective action in violation of 10 CFR 50, Appendix B, Criterion XVI were reported in this part of the violation:

- 1) The licensee had failed to take adequate corrective action for a 10 CFR Part 21 notification by the Henry Pratt Company in May 1985 which detailed problems with Pratt valves using Limitorque operators installed below the horizontal. The licensee determined that this problem was caused by a personnel error concerning improper voiding of MWRs. The licensee's corrective action for this deficiency included: inspection of all affected valves and staking of keyways as required to prevent separation of the operators from the valves, verification that all potentially defective valves in both units had been identified and corrected, and verification of the operability of defective valves during the time the problem had existed. Action to prevent recurrence included: revision of the appropriate maintenance procedures to require staking of keyways on valves with actuators below the horizontal, revision of plant procedures to separate Part 21 investigations from investigations of other industry events to provide additional emphasis on the Part 21 investigations, and revision of the plant procedure governing voiding of MWRs to require individuals to annotate the reason that an MWR is being voided. The inspectors reviewed two of the motor operated valve maintenance procedures (FNP-O-MP-45.0, Revision 6 and FNP-O-MP-45.4, Revision 7) and verified that the procedures included requirements for staking of drive sleeves and keys when required. The inspectors also verified that investigations for Part 21 were separated from investigations of other industry events by procedure FNP-O-M-028, Revision 14. Additionally, the commitments concerning voiding of MWRs were verified in FNP-O-AP-052, Revision 14. Further, the inspectors reviewed the MWRs associated with staking of the defective valves to verify completion of work. MWRs which were reviewed included:

MWR 159934	Q2P16V0507
MWR 159933	Q2P16V0506
MWR 159932	Q1P16V0507
MWR 159931	QSV49V0001B
MWR 159930	QSV49V0009
MWR 159929	Q1P16V0506
MWR 159928	QSV49V0008

- 2) The licensee had failed to take adequate corrective actions concerning 10 CFR Part 21 notification by the Anchor/Darling Valve Company in June 1985 which detailed failures with tilting disk check valve hinge pin bushings. This violation was issued based upon erroneous information provided to the NRC inspection team by the licensee during the inspection. The licensee's investigation after the inspection confirmed that the Auxiliary Feedwater valves were the only valves with the identified failure mechanism and these valves had been repaired. Therefore there was no technical deficiency, and the licensee took no further corrective actions.
- 3) The licensee evaluated a Colt Industries Service Information Letter, but failed to include all applicable sections in the controlled vendor manual. The inspectors verified that Colt Industries SIL A-2 was incorporated into FNP manual #4184804, Volume 1.
- 4) Maintenance Work Requests which were supposed to correct control room fire damper deficiencies were not completed in a timely fashion. The licensee does not take credit for these dampers in their fire hazards analysis and as such their untimely corrective action had no safety impact. The inspectors discussed this item with the shift supervisor and a planning engineer and was informed that the circuitry in question was removed under Plant Change Notice PCN B-82-0-1236, Replacement of Control Room Fire Dampers, completed June 15, 1988.
- 5) Safety-related station batteries had cracked cells caused by improper use of cleaning solvents despite the fact that NRC Information Notice 84-83 identified potential problems with hydrocarbon-based cleaning solvents. This example of the violation was withdrawn by the NRC Order Imposing a Civil Monetary Penalty, dated May 18, 1988.

Part B. Both train B, 125 Volt Service Water battery racks were discovered in an unanalyzed seismic condition. The licensee determined that the cause of this deficiency was a misunderstanding of the proper installation of concrete anchors on the part of the individuals installing the battery racks. Corrective actions for this deficiency included: correction of the improper installation on the train "B" racks, inspection of the train "A" racks for similar conditions (none were found), and testing of train "B", rack Four in the as installed condition to prove operability.

Actions to prevent recurrence included establishment of a training program for the installation of concrete anchor bolts and training of personnel in these requirements, and inspection of previous concrete anchor bolt installations by electrical maintenance personnel. The inspectors verified that the licensee had developed a training course (course G-515), and had trained maintenance personnel in the proper methods for installation of foundation anchor bolts in accordance with the response to this NOV. The inspectors verified that the licensee had replaced and inspected the service water battery rack anchor bolts by reviewing the following completed MWRs:

153157	SW battery racks equivalent seismic test.
153117	Vibration test on battery rack three to support seismic analysis.
153090	Rework anchor bolt installation in battery racks for verification of proper bolt installation.
149927	Inspect nuts on Hilti bolts used for anchoring battery racks.
148597	Inspect Hilti bolts on SW battery three to verify proper loading.

Additionally, the inspectors discussed the program to inspect additional seismic restraints with the engineering planners.

Based on the above, this violation is closed.

- c. (Closed) Violation 50-348,364/88-05-01, Failure to take Corrective Action for Drawing and Peer Review Checks.

The inspectors reviewed the following FNP noncompliances, which provided the basis for this violation. This review verified proper closeout of the deficiencies.

NC-58-86/8(21)
 NC-65-86/12(15)
 NC-157-86/24(15)
 NC-35-87/4(15)
 NC-63-87/9(15)
 NC-103-87/15(34)
 NC-136-87/20(34)

The inspectors conducted a review of the SAER group audits performed since March 1988 (the date of the inspection). The review was conducted to determine if the SAER group had reported any noncompliance in the areas of improper signoff of "s" points and also, to determine if any deficiencies had been found concerning incorrect revision of drawings or procedures in the field. The review determined that there had been several cases where signoffs had been made in error, but no cases were reported where mechanics had signed a supervisors signoff or where signoffs were backdated.

The review also verified that noncompliances had not been written concerning incorrect revisions of drawings or procedures in the field.

The inspectors verified that maintenance personnel were annually receiving training in the areas of procedural adherence and attention to detail. The inspectors reviewed the attendance records and the course materials for FNP-0-AP-15, Conduct of Maintenance Operations, Revision 11, and FNP-0-AP-51, Instrumentation and Control Group Conduct of Operation, Revision 8. Additionally the Inspectors discussed the annual retraining with the course instructor. This training and the course material were in accordance with the licensee's commitments in response to the violation.

The inspectors reviewed the FNP-0-M-64, Writers Guide for Maintenance Procedures, Revision 0, which delineates the requirements for Maintenance Check Points, Supervisor Check Points, Independent Inspection Hold Points, and Verification Check Points. The formats for the hold points and check points were explicitly described. Additionally, the inspectors discussed the status of implementation of the writers guide into existing maintenance procedures with the manager of maintenance. The results of this review concluded that the Writers Guide and the schedule for the maintenance procedure revisions were in accordance with the licensee's commitments in response to the violation.

The inspectors verified that a program was in place to control issuance of drawings received from outside sources.

The resident inspectors conducted a review to verify that the latest issued revisions of a sample of procedures/drawings were available in the field. The results of this review were satisfactory. Details concerning this review are documented in the resident inspectors' monthly report 50-348,364/90-07.

Based on the above, this violation is closed.

- d. (Withdrawn) Violation 50-348,364/88-05-02, Failure to take Corrective Actions to Known Safety-related Design Deficiencies (Hydrogen Entrapment in Residual Heat Removal to Charging Pump Crossover Piping).

On January 12, 1990, the Atomic Safety and Licensing Board received a Joint Motion for Approval of Settlement Agreement and Termination of the Proceeding that resulted from a lengthy legal dispute concerning the interpretation of the Technical Specification for the Charging System. The purpose of this agreement was for the NRC to withdraw the apparent violation with the provision that the licensee would comply with certain conditions of the agreement. For purposes of settlement, Alabama Power Company acknowledged that a violation of 10 CFR part 50, Appendix B, Criterion XVI occurred. The order implementing the approved agreement was served on January 24, 1990.

The inspectors reviewed the licensee's current status for the non-cited violation of 10 CFR part 50, Appendix B, Criterion XVI. The licensee's plant modifications to correct the complications associated with Hydrogen entrapment were delineated in Plant Change Notices (PCNs) 88-1-4979 and 88-2-5055. The inspectors reviewed the completed Plant Change Notices and their associated accomplished Maintenance Work Requests. The inspectors discussed the work requests with the MWR originator and discussed a few minor discrepancies between the requirements of FNP-0-AP-52, Equipment Status Control and Maintenance Authorization, Revision 14, and the MWRs written for these modifications. The identified discrepancies were exclusively in the paperwork and did not effect the equipment installation or post-modification testing.

The conclusions reached in the licensee's engineering evaluations of the piping vents installation was that the use of these vents for periodic venting of system high points should diminish the hydrogen accumulation in the affected piping. The inspectors reviewed these evaluations and did not identify any discrepancies in the evaluation or the supporting documentation.

As the result of the investigation and the discussions detailed above and the Atomic Safety and Licensing Review Board order, the apparent violation identified in NRC Inspection Report 348,364/88-05 involving the intrusion of hydrogen in the High Head Safety Injection system will be formally withdrawn and will be removed from our records.

- e. (Closed) Voluntary Licensee Event Report (LER) 364-88-06, Gas Accumulation In The Piping From The A Train RHR To The A Train Charging Pump, dated February 2, 1988, was written to report the results of the licensee's evaluation of hydrogen accumulation in the supply line from the RHR pump to the Charging Pump suction. Based on the evaluation of withdrawn violation 88-05-02 this item is closed.
- f. (Closed) Unresolved Item 50-348,364/88-05-03, Applicability of Technical Specification 6.5.3.1B Specifically General Manager Approval for Minor Departures.

This item will be tracked under IFI 348,364/89-17-01, Clarification of Review and Approval Authority for Modification Meets the Intent of TS 6.5.3.1B and is considered administratively closed.

3. FSAR Review

During the review of open items the inspectors noted a typographical error in the FSAR. Section 17.3.3E.6 refers to subsection H.6. It should refer to subsection H.5. This item was reported to the licensee and will be tracked and corrected during a routine FSAR update.

4. Exit Interview

The inspection scope and results were summarized on February 16, 1990, with those persons indicated in paragraph 1. The inspectors described the areas inspected and described the inspection results listed below. No dissenting comments were received.

<u>Item Number</u>	<u>Status</u>	<u>Description and Reference</u>
348,364/87-11-01	Closed	Violation, Inadequate control of purchased equipment.
348,364/87-11-02	Closed	Violation, Inadequate corrective actions and inspections.
348,364/87-11-03	Deleted	This item was incorrectly referenced in inspection report 348,364/88-05 and has been <u>deleted</u> .
348,364/88-05-01	Closed	Violation, Failure to take corrective actions for drawing and peer review checks.
348,364/88-05-02	Withdrawn	This item was withdrawn by an order from the Atomic Safety and Licensing Board on January 24, 1990.
348,364/88-05-03	Closed	Unresolved Item, Minor Departures from Design.
LER 348-88-06	Closed	License Event Report, Hydrogen Entrapment.

APPENDIX A

AE	Architect Engineer
ANSI	American National Standards Institute
ASME	American Society of Mechanical Engineers
ATR	Agastat Timing Relay
CC	Component Cooling
CCW	Component Cooling Water
CFR	Code of Federal Regulation
EA	Enforcement Action
EQ	Environmental Qualifications
ESF	Engineered Safety Features
F	Fahrenheit
FNP	Farley Nuclear Plant
FSAR	Final Safety Analysis Report
HX	Heat Exchanger
I&C	Instrument and Control
MCC	Motor Control Center
MWR	Maintenance Work Request
MOV	Motor Operated Valve
NRC	Nuclear Regulatory Commission
NRR	Nuclear Reactor Regulation
PM	Preventive Maintenance
PO	Plant Operator
RHR	Residual Heat Removal
RO	Reactor Operator
SAER	Safety Audit and Engineering Review
SRO	Senior Reactor Operator
TS	Technical Specification
URI	Unresolved Item

INSPECTOR'S REPORT
Office of Inspection and Enforcement

PRINCIPAL INSPECTOR (NAME) AND TITLE (SEE INSTRUCTIONS)

REVIEWER

NRC FORM 850
1-79
IF NRC O&E

INSPECTORS
C. B. ...

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8889) OR LICENSE NO. (BY PRODUCT) (13891)	REPORT		NEXT INSP. DATE	
			NO.	SEC.	MO.	YR.
EPA - 1120	X - INSERT	51 - 240	9-1-75	A		
	M - MODIFY	51 - 244	9-2-75	B		
	D - DELETE			C		
	R - REPLACE			D		

PERIOD OF INVESTIGATION/INSPECTION			INSPECTION PERFORMED BY:			ORGANIZATION CODE OF REGION WHO CONDUCTING ACTIVITY (See NRC O&E Manpower Reporting - Shape, Manpower Reporting ID Code)		
FROM	TO		1 - REGIONAL OFFICE STAFF	2 - OTHER		REGION	DIVISION	BRANCH
MO	DAY	YR	2 - RESIDENT INSPECTOR			I	DRS	1083
02	12	70	3 - PERFORMANCE APPRAISAL TEAM					

REGIONAL ACTION (Check one box only)		TYPE OF ACTIVITY CONDUCTED (Check one box only)				14 - INQUIRY	
1 - NRC FORM 50	2 - REGIONAL OFFICE LETTER	01 - SAFETY	02 - INCIDENT	03 - ENFORCEMENT	04 - MGMT AUDIT	05 - MGMT VISIT	06 - SPECIAL
		07 - SPECIAL	08 - VENDOR	09 - MAT ACCT	10 - PLANT SEC	11 - INVENT VER	12 - SHIPMENT REPORT
					13 - IMPORT		15 - INVESTIGATION

INSPECTION RESULTS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAINS THE INFORMATION				LETTER OR REPORT TRANSMITTAL DATE					
A	B	C	D	A	B	C	D	A	B	C	D	A	B	C	D	MO	DAY	YR	MO	DAY	YR
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				1 - CLEAR				NO				NO									
				2 - VIOLATION																	
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MODULE INFORMATION												MODULE INFORMATION											
REC ORG	MODULE NUMBER INSP				PRIORITY	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REG FOLLOWUP				REC ORG	MODULE NUMBER INSP				PRIORITY	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REG FOLLOWUP			
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B		9217011			A	100																	
		CLOSEOUT																					
B		3017031			A	100																	
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• CHECK SEQUENCE OF INSPECTION

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50

NRC FORM 951 A (11-81) NRC 0532 INSPECTOR'S REPORT (Continuation) Office of Inspection and Enforcement	DOCKET NO. (5 digits) OR LICENSE NO. (8) PRODUCT (13 digits)		REPORT NO. SEQ. NO.		MODULE NUMBER 9271011
	50-249 50-249	90-05 90-05	A B C D	VIOLATION SEVERITY OR DEVIATION D 1 2 3 4 5 6	

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the entry exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

1	DEVIATION CODE -				
2					
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4	50-249(4) 2711-11	Investigate controls and effectiveness of packaged equipment - REF EA 97-142.			
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7	50-249 24/97 11-12	Investigate corrective actions and inspections. REF. EA 97-142.			
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11		these items were administratively			
12		removed from the inspection			
13		because not a part of the items			
14		which equipment package EA 97-142			
15		was covered. These items were			
16		also covered by this violation.			
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