

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/84-17(DRS)

Docket No. 50-461

License No. CPPR-137

Licensee: Illinois Power Company
500 South 27th Street
Decatur, IL 62525

Facility Name: Clinton Nuclear Power Station, Unit 1

Inspection At: Clinton Site, Clinton, Illinois

Inspection Conducted: June 11-15, 1984

Inspectors: *Roger S. Walker for*
T. E. Vandel

7/26/84
Date

Roger Smeenge
R. D. Smeenge

7/26/84
Date

Approved By: *Roger S. Walker for*
F. C. Hawkins, Chief
Quality Assurance Programs Section

7/26/84
Date

Inspection Summary

Inspection on June 11-15, 1984 (Report No. 50-461/84-17(DRS))

Areas Inspected: Routine, unannounced inspection of licensee action on previous inspection findings; qualification records of electrical QC inspectors; nonconformance report handling and control; document control; records control; program and procedure changes; use of document exception lists and generic resolutions; and follow-up on allegations. The inspection involved a total of 76 inspector-hours onsite by two NRC inspectors.

Results: Of the eight areas inspected, one item of noncompliance was identified (failure to follow procedures - Paragraph 6).

DETAILS

1. Persons Contacted

Licensee Personnel

- *R. Campbell, Director QS & A
- G. Conner, QA Records Review Group (RRG)
- L. Floyd, Supervisor of Quality Systems
- *D. Hall, Vice President
- *M. Hassebrock, Director - QE & V
- *J. Locmis, Construction Manager
- M. Murry, QA Surveillance
- *T. Plunkett, Plant Manager
- J. Reid, QA RRG
- M. Shanbhag, QA Surveillance
- *J. Sprague, Station QA Specialist
- K. Strong, Acting Supervisor RRG
- *G. Wullen, Supervisor - Licensing

Contractor Personnel (Baldwin Associates)

- C. Anderson, Manager QA
- B. Blair, Manager Document Control
- P. Bryant, Manager Project Procedure Control
- B. Chapman, QC Training Coordinator
- E. Courtney, Level III Electrical Document Review Group (DRG)
- W. Culumberg, QC Piping, Mechanical Lead Inspector
- P. Dahl, QA Discipline Training Coordinator
- A. Elliott, Senior QA Staff Engineer
- J. Halford, Generic Resolution Group Leader
- J. Hawkins, Assistant QA Manager
- D. Janecke, QA Training/Certification
- P. Judd, Vault Area Supervisor
- *A. King, Jr., Project Manager
- R. Lebkuecher, Document Reviewer DRG
- F. Newcomer, Lead Reviewer, Electrical DRG
- D. Nelson, Supervisor Document Control Field Location
- R. Praznik, Lead QA Engineer DRG
- T. Provencher, Senior QA Engineer DRG
- D. Shumway, Staff Engineer
- P. Simpson, Nonconformance Review Group Records
- C. Vincent, Senior Electrical QC Level III
- C. Wells, Level III Piping/Mechanical DRG
- M. Wells, Lead QA Engineer DRG
- *L. Young, Assistant Manager Q & TS

Other licensee and contractor employees were contacted during the course of the inspection.

*Denotes those persons in attendance at the exit meeting held at the conclusion of the inspection on June 15, 1984.

2. Action on Previous Inspection Findings

(Closed) Unresolved Item (461/84-10-01): The basis for certification of the Senior Electrical QC Engineer (Level III) did not appear adequate.

The qualification file folder for the Level III inspector was reviewed and the following observations were noted:

- . The original resume provided experience information directed towards supervision and management experience with little information regarding related work experience.
- . Approximately the past 11 years experience has been in supervisory roles in related areas of QA and QC inspection.
- . The previous employer had certified the employee as Level III in the Electrical, Mechanical and Civil/Structural disciplines.
- . A supplemental information resume has recently been added to the original resume to expand on the related work experience history. A time period well in excess of 10 years with Bailey Controls Inc. was verified by the BA Training Coordinator as applicable related work experience in the electrical/instrumentation discipline.
- . The Level III certification was approved for BA by the Chairman of the Board of Directors on March 21, 1984.

Based on these details, the NRC inspector has concluded that the Level III inspector's qualification/certification meets the requirements of ANSI N45.2.6-1978.

3. Review of Allegations

The following paragraphs paraphrase allegations received by the NRC from individuals working at the Clinton Site. To form a basis for evaluating the allegations, a technical review was conducted in all the areas identified in the allegations. The detailed results of these technical reviews are presented in the following sections of this report. A brief summary from the technical review is provided in the conclusion for each allegation.

- a. Allegation: Document reviewers were either being coerced into accepting bogus documents or were coercing others to accept bogus documents.

Conclusion: Baldwin Associates (BA) has established a unique method of resolving discrepancies identified by the reviewers on Document Exception Lists (DELs). There are some 50 different generic preapproved resolutions used to resolve discrepancies without going through a review group. The generic resolutions, their preparation and use has been reviewed by the inspectors and found to be acceptable.

The individual who made the allegation would not discuss the issue with the Resident NRC Inspector and stated that he did not want to pursue the matter further. Without the benefit of being able to discuss this allegation, the inspectors assume that this unique method of resolving DEL items is the basis of the allegation of accepting "bogus documents." The allegation was not substantiated.

- b. Allegation: Several allegations were provided to the NRC resident inspector regarding release of outdated documentation to the field because of a backlog in the document control area.

Conclusion: The inspectors audited the BA document control area and the transmittal of documentation to the field locations. BA had made a recent management change, increased the work force in this area, and had implemented a program which has reduced a backlog that did exist. At the end of work on June 16, the backlog was expected to be eliminated. Progress during the week of June 16, as observed by the inspector, indicated that this goal would be easily met. The inspector's audit of Document Control found documents located in the field were current with the documentation control records. The installed condition of equipment with respect to field documents will be verified as adequate by the reinspection effort associated with Stop Work Orders 007, 010, 014, 015, 016, 017, 018, 019 and 020. The allegation was substantiated that there was a backlog; however, effective corrective action has been taken to correct the problems.

- c. Allegation: A Sargent and Lundy (S&L) pipe hanger drawing violated a design specification and was identified on an NCR. Specifically, two different changes to a drawing were implemented by one revision.

Conclusion: The NCR identified in the allegation was reviewed. The NCR stated that two changes were implemented in a single revision of the drawing. A paragraph in the design specification was quoted in the NCR as allowing only one change to be implemented per revision. The changes made to the S&L drawing involved updating the revision level of two referenced vendor drawings. Because the paragraph referenced in the NCR applied only to vendor documents, the NCR was invalidated. The paragraph in the design specification which permitted S&L to make this change was also identified in the disposition. The allegation was not substantiated.

- d. Allegation: A memorandum written by the BA Manager of Quality Control violates the intent of the BA QA Manual. The memo, in essence, tells the QC inspectors to put blinders on to all work that is not in their immediate job subject.

Conclusion: The inspector reviewed the referenced memorandum and the BA QA Manual. Both documents instruct the inspector to identify suspect areas, where quality appears to be indeterminate, to the attention of the appropriate organization for investigation. The appropriate organization is defined in the memorandum to be an organization having the necessary BA certification and experience to determine if the concern is an acceptable condition or possibly a discrepancy. In the NRC inspectors opinion, the memo did not violate the intent of the QA Manual. The memo reinforced the

concept of letting those qualified make the determination in those cases where a discrepancy is identified. Eleven other inspectors were interviewed and none interpreted the memo as the alleged had. This allegation was not substantiated.

- e. Allegations: Several allegations were provided to the NRC resident inspector regarding pressure being applied to QC inspectors to invalidate NCRs.

Conclusion: There have been 27,249 NCRs initiated at the Clinton Site. The first 10,778 did not have a disposition which invalidated the NCR. Of the remaining approximately 17,000 NCRs only 205 have been invalidated. The eleven inspectors interviewed in paragraph d above stated that they had never been pressured to invalidate an NCR. The allegations could not be substantiated.

4. Personnel Qualifications

A follow-up review was conducted of the qualification of QC electrical inspectors in the BA Quality and Technical Services Department. The selected sample for review of qualification records included (1) one trainee, (2) three Level I inspectors, (3) two Level II inspectors, (4) one contract Level II inspector, (5) one Ebasco Level II inspector, and (6) one Level III inspector. The review established that the qualifications for the inspectors reviewed met the requirements outlined in the BA Quality Control Training and Qualifications Manual, Revision 7 and the referenced ANSI standard N45.2.6.

5. Nonconformance Reports

The inspector reviewed the BA handling and control of piping and hanger nonconformance reports (NCRs) in accordance with the following documents:

- . BAP 1.0, Revision 13, "Nonconformances"
- . BAP 3.5.12, Revision 0, "Conduct of Quality Control Inspections"
- . QCI-102, Revision 4, "General, The Conduct of Inspections"
- . QCI-300, Revision 5, "Inspection of Piping Component Supports"
- . QCI-302, Revision 3, "Piping/Mechanical QC Inspection Criteria Piping System Fabrication/Installation"

a. Procedural Review

Instruction procedures QCI-300 and QCI-302 provide detailed specific instructions for the inspections of piping and hangers. General inspection instructions for preparation, conducting, reporting the inspection, initiating NCRs, and review of inspection are provided by BAP 3.5.12. This BA procedure also provides instructions for HOLD tags when nonconformances are found. A HOLD tag status is maintained by the BA QC document coordinator and a surveillance inspection is performed monthly to verify that HOLD tags are in place. Missing HOLD tags are replaced. The HOLD tag surveillance is reported on an inspection report. NCRs closed in the process of an inspection are listed on the inspection report log, the tag is removed and sent to the QC document coordinator to reflect the closed status.

When an inspector finds a nonconforming condition he prepares an NCR and obtains an NCR number from the Nonconformance Review Group (NRG) of Quality and Technical Services (Q & TS). The NCR is reviewed by the inspector's supervisor for accuracy and completeness and is then forwarded to the NRG where it is reviewed for validity. Invalid NCRs, with written justification attached, are returned to the initiator's department manager. Valid NCRs are forwarded to the discipline superintendent/field engineer for disposition. Dispositions are specified as follows: Use-As-Is, Repair, Rework, Reject, or Nonhardware. The nonhardware disposition is used when a nonconformance does not affect permanent hardware. This disposition provides resolution to nonconformances, including procedural and programmatic violation/deficiencies.

NRG processes the valid NCRs. Returned invalid NCRs are evaluated by the department manager. If he concurs that the NCR is not valid he will indicate "NO" in the valid block of the NCR, sign and date. He will also provide written justification for the invalidation and interface with the initiator to address the invalidation justification. If the initiator does not concur, both parties will promptly interface with the manager of Q&TS for resolution. If the department manager determines the return NCR is valid he will return the NCR to the validator with validation justification and provide direction to validate the NCR and continue processing.

NCR dispositions are provided by the resident engineer or the discipline superintendent/field engineer. BAP 1.0 identifies 13 preapproved dispositions (PADs) for common conditions which can readily be reworked to correct the nonconforming condition. Examples of PADs are as follows:

| <u>Nonconformance</u> | <u>PAD</u> |
|-----------------------|------------------------------------|
| Defective Clamp | Remove and replace defective clamp |
| Loose Fastener | Tighten to design requirement |
| Missing Labels | Install required label |

b. Inspection/Surveillance Reports

The inspector reviewed 25 piping and 48 hanger inspection/surveillance reports of inspections performed during April, May and June, 1984. The dispositions of the NCRs initiated in these reports were evaluated. Four NCRs were initiated for piping and three for hangers. Of the seven, only four NCRs had been dispositioned, the remaining three had been initiated the previous day. Three of the four were dispositioned by PADs and the other was dispositioned by design engineering.

c. NCR Review

The inspector examined approximately 100 NCRs and their disposition. A large percentage of these NCRs examined were for arc strikes and loose jam nuts. The timing from initiation to disposition was found generally to be within two weeks. Only one required a month for

disposition. The disposition by the field engineer for one NCR was to "Use-As-Is", but later was changed by the design engineer to rework to design requirement. Two NCRs which were dispositioned Use-As-Is, required drawing changes. The oldest of the two was 12 working days old. The affected drawings were checked in documentation control and the appropriate changes had already been posted on the drawings.

d. Inspector Interviews

The inspector interviewed eleven inspectors (three from Mechanical, five from Electrical and three from Civil) and asked the following questions:

- . Do you feel you are being suppressed in writing NCRs?
- . What do you do if you see something outside your area of inspection that is a possible NCR?

None of the inspectors felt that they were being suppressed in writing NCRs and all thought they were writing enough NCRs. One civil inspector said that one of the inspectors in another shift thought he was being suppressed, but would not give his name.

All the inspectors stated that if they thought there was a nonconformance outside their area of responsibility, they would bring it to the attention of the responsible group. Only one stated that he would write an NCR if the responsible group did not take action.

e. NCR Log Review

The inspector examined the computerized log of NCRs. This log identified 27,249 NCRs. The first 10,778 NCRs did not identify any invalidated NCRs. The computerized log identified that only 205 NCRs had been invalidated.

f. Results

No items of noncompliance or deviations were identified.

6. Document Control

The inspector reviewed BA document control activities to verify compliance with the following documents:

- . BAP 2.0, Revision 11, "Document Control"
- . BAP 2.0.1, Revision 1, "Instructions for Maintaining Project Procedures/Specifications/Drawings"

a. Procedural Review

Document Control is responsible for issuing documents on controlled distribution to the field groups. The documents holder (recipient) at the field location is responsible for maintaining and updating documents he receives from Document Control. Documents transmitted

on controlled distribution are stamped "Approved For Construction." Documents requested by personnel not on controlled distribution are stamped "For Reference Only Not to be Used for Construction." Acknowledgement of receipt of documents from Document Control is provided by signing and returning the transmittal. The BA procedure does not identify a time period for issuing a document, however, the goal of Document Control is within 48 hours of receipt of a document or revisions to a document.

The current revision of documents is identified in the document management system. This system is a computerized log which is updated continuously. As recent as two months ago, this area was understaffed and a significant backlog in processing engineering changes was identified in IP Surveillance Finding C84-103. A management change and an increase in staff is reducing the backlog. In all areas except mechanical hangers, the inputs were current or less than a one week backlog. The changes being processed for mechanical hangers at the time of the inspector's review were 10 working days old. The manager of Document Control estimated that the backlog in all areas would be zero by June 16, 1984. The inspector revisited this area throughout this inspection trip and found the backlog significantly reduced each day. The estimate for zero backlog by June 16 was judged to be realistic.

The Document Management System (DMS) can be reviewed on computer terminals located throughout the plant. Changes to the data can only be entered by Document Control. Personnel questioning the current revision, with changes, can ask for the DMS on a computer terminal and check the status of any document.

b. Documents Review

Twelve documents, with recent changes, were randomly selected from the Document Control record cards. The DMS status was verified at a Document Control field location in the plant, at the QA/QC inspectors' areas, and at electrical field engineering. In all these areas, the inspector found the current revision of the documents with changes identified.

In BA Traveler Tracking (section where QC inspector travelers are prepared), the inspector randomly selected seven traveler packets for examination. The revision status of the documents was recorded and verified against the DMS. Two of the eleven documents in these seven packets were not the latest revision. The inspector was informed that prior to assigning the traveler to a QC inspector, the superintendent of the area to be inspected and one other group reviews the packet to verify current revisions of the document.

The inspector reviewed the document transmittal system. Recipients of documents from the Document Control center check the documents for accuracy against the transmittal, update the documents in accordance with the transmittal, and return a signed copy of the transmittal within ten working days to Document Control (BAP 2.0,

paragraph 5.4.2). If the transmittal is not returned within ten working days, the Document Control center sends a Follow-up No. 1 notice to the department head of the recipient notifying him of the outstanding transmittal (BAP 2.0, paragraph 5.4.4). Followup No. 2 is sent to the BA Project Manager/designated IPC supervisory personnel if no response from the recipient of Followup No. 1 is received within five working days (BAP 2.0, paragraph 5.4.5). There currently are 201 transmittals which are outstanding for more than 30 days.

c. Results

This failure of the licensee's contractor to followup the outstanding transmittals in accordance with BA Procedure BAP 2.0, paragraphs 5.4.4 and 5.4.5 is considered to be an example of an item of noncompliance with 10 CFR 50, Appendix B, Criterion V (461/84-17-01).

7. Quality Assurance Records

The inspector reviewed the BA document review group activities and document record center vault area to verify the processing and storage of quality records in accordance with the following documents:

- . BAP 2.1, Revision 7, "Record Control"
- . BAP 2.1.1, Revision 2, "Verification of Baldwin Associates Records"
- . BAQI-110-11, Revision 1, "QA Final Review of Piping/Mechanical Record Packages"
- . BAQI-110-14, Revision 5, "QA Final Review of Electrical Packages"

a. Procedural Review

BAQI documents provide detailed checklists of what is necessary to perform a complete quality record package review by the document review group (DRG). Exceptions to the checklists are recorded on the document exception lists (DEL) for resolution by discipline personnel. Completed packages are held for 10 days in the DRG document repository for Illinois Power Company to perform a 20% sampling review. After this holding period, the record package is transferred to the BA document record center for vault storage.

All records in the DRG area are stored in the document repository except when they are being reviewed. Reviewers return the records to the repository at the end of their work shift. The repository is rated for one hour fire protection. No smoking is allowed in the area and extinguishers are immediately available. The document record center vault is rated for four hours fire protection. The vault is a controlled area. Records are stored in individual file folders or loose leaf notebooks in shelves or in file cabinets. All records packages are identified in the Record Index Matrix/Record Index System (RIM/RIS) Manual. Ten items were randomly selected from the RIM/RIS for a check of retrievability. All packages were provided in a timely manner. These record packages were examined and found to be clean, usable and complete. Two additional packages, which have been returned from the DRG, were selected for review.

Review and approval signatures, an index of the record package, and DEL resolution was provided in accordance with the BA procedures. The vault area was clean with a minimal number of record packages waiting to be filed.

b. Inspector Qualification Records

The qualification records for eleven piping/mechanical Level II BA inspectors, on file in the vault, were reviewed. Inspectors were selected from those identified in the review of QC Inspection/Surveillance Reports for NCRs. All inspectors satisfied the qualification requirements in Appendix B of the BA Quality Control Training and Qualification Manual. These requirements were consistent with Regulatory Guide 1.58 and ANSI N45.2.6 requirements.

c. Results

No items of noncompliance or deviations were identified.

8. Program For Procedure Change Control

A review was conducted of the BA program for procedures control to verify assurance of compliance with procedure BAP 2.15, Revision 3 ("Control of Project Procedures"). It was learned that a heavy revision workload was in progress, incorporating subtier documents into newly revised BA procedures. This was being done to eliminate the subtier documents. It is expected that the new procedures will number approximately 100 (currently 86-87) with the elimination of nearly 300 subtier documents.

All changes to documents are initiated by Form JV-350 and are assigned a control number. All procedures, once reviewed and approved by BA (on site), are further reviewed and approved by the architect engineer (S&L on site) and by the licensee (on site).

The NRC Inspector was informed that during the month of May, a total of 17 procedures were rewritten incorporating a total of 69 subtier documents, 35 additional procedures were revised along with 31 supporting documents, and in excess of 100 requests for changes were received.

In response to questions, it was determined that a staff of 12 employees plus three engineering discipline representatives are currently undertaking this work load. Additionally, a complete historical file is being maintained on all procedures.

Due to the limited amount of time available for this review, this item is considered open pending further review. (461/84-17-02).

9. Documents and Records Verification

The record verification program was reviewed to ascertain that the utilization of generic resolutions (GRs) and document exceptions list (DEL's) procedures are consistent with the licensee's quality assurance program and the applicable codes, standards and regulatory requirements.

a. Documents Reviewed

- . BAP 2.1.1, Revision 2, "Verification of Baldwin Associates Records"
- . BQA-184, Revision 2, "Qualification and Certification of QA Documentation Final Review Personnel"
- . BQA-109, Revision 0, "Generic Resolution Management"
- . BA Quality Assurance Form JV-935 and JV-935-1 (Continuation Sheet), Document Exception List (DEL)
- . BA Quality Assurance Form JV-1266, DRG DEL Resolution Log
- . BQAI-110-16, Approved July 28, 1983, "Generic Resolutions to Document Discrepancies"
- . BA Internal Audit Report I-300, dated October 20, 1983
- . BA QA Site Surveillance Report S-830, dated March 31, 1984
- . IP QAP 117.02C02, Revision 8, "Record Review Checklist"

b. Documents Verification

The BA document review group (DRG) performs final review of traveler packages in preparation for turnover. Identified deficiencies are listed on a DEL generated for the particular traveler package. This DEL is then turned over to the applicable resolution group for evaluation and disposition. The DRG reviewer has the option of using GRs (Generic Resolutions) and immediately resolving those exceptions for which GRs are directly applicable, or allowing the exception to be reviewed and resolved by the resolution group. A quality assurance final review checklist is utilized in the review process. This checklist is a compilation of document requirements from the codes, standards, specifications, procedures, and quality assurance manual which provides the criteria for acceptability of the reviewed records.

Each discipline (i.e., engineering, quality control, technical services, etc.), has its own resolution group subtiered into piping, electrical, instrumentation, and HVAC areas. Resolution of exception list items may take numerous forms; i.e., writing an NCR for disposition (the DEL remains open until completion of the NCR), obtaining needed document information and closing the DEL, or perform research to reestablish adequacy/acceptability of information. Once turnover packages have been completely resolved of all exceptions, the package is then ready for "field verification" (installation walkdown and verification).

c. Generic Resolutions (GRs)

A generic problem is defined, in procedure BQA-109, as highly similar and repetitive document exceptions. The generic resolution is a preapproved formally written resolution for a generic problem. A special Generic Resolution Group (GRG), is made up of representatives from Quality Assurance, Quality Control, Technical Services, and Resident Engineering. This group prepares, reviews, and issues proposed generic resolutions. A proposed generic resolution must include reference to applicable procedures and codes, backup documentation, a problem description and proposed resolution or resolutions.

Approvals required include the following: (1) action designee's initials signifying that resolution meets project requirements, (2) designated QA engineers initials signifying that resolution is consistent with QA Manual and FSAR requirements, (3) senior QA engineer DRGs signature that resolution can be implemented by DRG reviewers without detrimental effect on the DRG program, (4) manager of QA's signature that overall acceptability of resolution and approval for implementation, and (5) concurrence by IP QA prior to issuance of the approved resolution.

Review of the generic resolutions table of contents established that a total of 78 GRs have been issued since the beginning of the program. Some of the GRs have been combined with other GRs, eliminated as not a generic resolution, or superseded by other GRs. A total of 51 GRs are currently in effect. In addition, it was learned that 27 GRs had been issued during 1983 in accordance with procedure BQAI-110-16 and that this procedure has been replaced by an even more stringent procedure (BQA-109) in December, 1983. All subsequent GRs meet the new procedure.

d. Reviewer Qualifications

QA engineers performing document review are required by BA procedure BQA 184 to be trained, examined, and certified as document review QA engineers. A review of the following selected qualification files was performed by the NRC Inspector:

- . Senior QAE Level III
- . Electrical QAE Level III
- . Three Level II QAEs from both Electrical and Mechanical disciplines

The selected qualification files were of review personnel that were interviewed by the NRC Inspector and observed during their review of traveler packages.

e. Traveler Package Review

Those traveler packages observed and discussed with the reviewers included the following:

- . Electrical package AP-348-EE
- . Hanger package E28-1003-02A-L5, R1
- . Hanger package E30-1002-01A-H45, R2 (4 exceptions total, 1 generic resolution included)
- . Mechanical package H-MS-4-E (Hanger)

The NRC inspector determined that in the opinion of the reviewers, the packages arriving for review are significantly improving in completed quality and that the use of generic resolutions and the number of exceptions listed is consistently being reduced. In addition, only three GRs are most often being used to resolve exceptions. Those are as follows:

- . GR-8 R/1 - Initial and Final Review Sign-offs on Travelers
- . GR-10 R/1 - Missing and incorrect governing procedures and procedure revisions on travelers
- . GR-12 a-d R/2 & R/0 - Incorrect revision numbers listed for drawings identified on traveler

f. IP Records Review

The licensee's Records Review Group (RRG) conducts an overview of approximately 20% of completed BA DRG packages. Illinois Power checklists (i.e.; QAP 117.02C02, R1, Piping/Mechanical) that incorporate extra steps for determining compliance are used for review of BA DRG packages. Deficiencies identified are documented on a Record Deficiency Report (RDR) and the complete package is then returned to BA. A 20% selection sample is randomly picked by a computer program.

It was noted that the backlog of BA unresolved DELs is increasing, with 7500 open DELs at the end of May. The number has increased to over 8000 at the time of this inspection. This matter is considered open pending further review. (461/84-17-03).

g. Results

No items of noncompliance or deviations were identified.

10. 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. Open items disclosed during the inspection are discussed in Paragraphs 8 and 9.

12. Exit Interview

The inspectors met with licensee representatives denoted in Paragraph 1 at the conclusion of the inspection on June 15, 1984. The inspectors discussed the purpose, scope and findings of the inspection.