APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection Report: 50-458/84-16

Construction Permit:

CPPR-145

Docket: 50-458

Licensee: Gulf States Utilities

Post Office Box 2951 Beaumont, Texas 77704

Facility Name: River Bend Station, Unit 1

Inspection At: River Bend Site, St. Francisville, LA

Inspection Conducted: July 9-13, 1984

Inspector: 7.4 Johnson

W. M. McNeill, Reactor Inspector, Project Section A, Branch 1 8/2/84

Date

Approved:

5. H dolusa

8/2/84

Fft J. P. Jaudon, Chief, Project Section A, Branch 1

Date

Inspection Summary

FML

Inspection Conducted July 9-13, 1984 (Report 50-458/84-16)

<u>Areas Inspected:</u> Routine, unannounced inspection of an in-depth QA inspection of document controls. The inspection involved 28 inspector-hours onsite by one NRC inspector.

<u>Results</u>: Within the one area inspected, one violation was identified (failure to effectively control documents, paragraph 2).

DETAILS

1. Persons Contacted

Gulf States Utilities (GSU)

*K. L. Burgess, QA Engineer

*T. C. Crouse, Manager Quality Assurance

*R. P. Hebert, Coordinator-Permanent Plant Files

*R. W. Helmick, Project Engineer

*I. C. Hockman, QA Engineer

*K. C. Hodges, Supervisor-Quality Systems

*R. B. Stafford, Director, Quality Services

Stone & Webster (S&W)

*G. M. Byrnes, Assistant Superintendent QC

*D. D. Castleberry, QC Engineer

*T. R. Chitester, Mechanical Systems Engineer

*W. I. Clifford, Resident Project Manager

M. Collins, ASME III Coordinator

*F. W. Finger, Project Manager Preliminary Test Operations

*A. Kamdar, Assistant Superintendent of Construction

*Salowitz, Senior QC Engineer

D. Scott, Administrative Aide

T. Shea, Senior Electical Office Engineer

*D. K. Smith, Records Supervisor

*R. L. Spence, Superintendent QC

W. Tucker, Surviellance Assistant to Superintendent

The NRC inspector also contacted other site personnel including administrative, clerical, document control, operations, and inspection personnel.

*Denotes those attending the exit interview conducted on July 13, 1984. The NRC resident inspector did not attend this meeting.

Document Control

The inspection objectives were to determine whether site work was being performed in accordance with NRC requirements, SAR commitments, and implementing procedure. Also, the objectives were to determine whether the QA/QC program is functioning in a manner to ensure that the above requirements and commitments are being met.

Eight document control stations for design drawing, procedures, specification, etc., which were identified as Station Nos. 8, 17, 21, 55, 64, 73, 84N, and 163 were inspected. In addition, seven ASME work packages that were in use were inspected at their work places. At the

stations, the documents used to verify revision and change status (IS-217, IS-256, procedure indices, etc.), were themselves verified to be current.

A sample of drawings, specifications, inspection plans, vendor documents, change documents (E&DCRS), and procedures were also verified to be current, controlled, color coded, and stamped as required. At each station, the station matrix identifying the documents assigned to that station was inspected. The inspection of the ASME packages included verification of the drawings (CDS) and procedures to be current. Note that at this site there is effectively two document control systems for design documents; one for ASME and one for non-ASME documents. In regard to the above inspection, the following procedures were reviewed which defined the document control system used at the site:

- Jobsite Document Control, RB-CMP 11.1, Revision D, dated August 9, 1982.
- Control of Level 1 Documents, CSI 11.0.1, Revision 3, dated August 19, 1982.
- Drawing Station Control, CSI 11.0.5, Revision 2, dated May 23, 1983.
- Field Fabrication, Installation, and Documentation of ASME III
 Piping Systems and Components Supports, RB-CMP 8.9, Revision E, dated
 August 15, 1983.
- Handling Changes to ASME III Control Erection Drawings On-Site, SEP 106.2, Revision E, dated May 17, 1984.
- Engineering & Design Coordination Report (E&DCR) Procedure, RBP 12.0, Revision 12, dated January 14, 1983.

S&W maintains control site-wide of all its design documents and procedures used by S&W and others on the site. About 90 stations have been established with some having satellite stations under a given station's control. The documents in this system are computer printouts (IS-217, IS-256, etc.), design drawings, bills of materials, changes (E&DCRs), inspection plans, vendor drawings and manuals, nonconformance reports (N&Ds), specifications, document indices, and procedures. The procedures included Construction Methods Procedures (CMPs), Field Procedures (FPs), Construction Site Instructions (CSIs), Material Processing Procedures (MPPs), Performance Qualification Manual, Site Engineering Procedures (SEPs), Construction Management Manual (CMM), Field Rigging Procedures (FRPs), Engineering Assurance Procedures (EAPs), Project Test Procedure Directives (PTPDs), and River Bend Project Procedures (RBPPs). The key element in the non-ASME document control system is that it is the user's responsibility to verify the latest information by use of current indices.

The ASME document control system differs in that its key element is that the data package should always contain the latest information. Packages are recalled when documents become out-of-date.

One open item was identified during this inspection dealing with the dual document control systems. The current procedure, RB-CMP-11.1, in paragraph 5.1.2 states that both procedures; one describing the non-ASME (RB-CMP 11.1) and one describing the ASME document system (RB-CMP 8.9), are applicapable to the ASME document system. Apparently, these two systems have evolved differently as time has gone on and RB-CMP 11.1 is no longer fully applicable to the ASME system. This procedure should be revised to reflect current practices. For example, the present ASME document control system does not require the use of indices. Some revision may be in order to RB-CMP 8.9 to add the elements of the non-ASME document control system that are applicable (Open Item 458/8416-02).

A second open item was identified during this inspection dealing with the "Activity Surveillance Reports" of the document control system issued by its own personnel. It was observed that a sample of these reports on station No. 8 did not reflect corrective action and close-out of problems identified, although such activities reportedly had taken place. The follow up had not been documented on the "Activity Surveillance Reports." Additional inspection of this activity is in order (Open Item 458/8416-03).

The document control system was found to be implemented and effective except for the following observed by the NRC inspector: (a) computer reports used to track all changes to design drawings and specifications (IS-217) and used to identify the current revisions (IS-256) were not updated at drawing station No. 8 daily as required by paragraphs 5.7.3 and 5.7.7 of the procedure CSI 11.0.5. The most recent update had been 6 days prior to the inspection. Immediate corrective action was taken by S&W at this station and such was verified by the NRC inspector; (b) housekeeping was not maintained as evidenced by numerous superceded documents found at stations Nos. 8 and 73 which were not marked "void," as required by paragraphs 5.5.3 and 5.9.3 of the procedure; and (c) a list which identifies all controlled drawings/documents belonging to the station had not been established by station No. 55 as required by paragraph 5.2.2 of the procedure. This was all identified in a single violation (458/8416-01).

3. Exit Interview

An exit interview was conducted on July 13, 1984, with those personnel denoted in paragraph 1 of this report. At this exit interview the NRC inspector summarized the scope and findings of this inspection.