

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-329/84-23(DRP); 50-330/84-24(DRP)

Docket Nos. 50-329; 50-330

License Nos. CPPR-81; CPPR-82

Licensee: Consumers Power Company
1945 W. Parnall Road
Jackson, MI 49201

Facility Name: Midland Nuclear Plant, Units 1 and 2

Inspection At: Midland Nuclear Plant Site, Midland, MI

Inspection Conducted: June 25-29 and July 9-13, 1984

Inspectors: C. H. Scheibelhut

V. J. Elsbergas

Reviewed By: *R. N. Gardner*
R. N. Gardner
Project Inspector

8/14/84
Date

Approved By: *J. J. Harrison*
J. J. Harrison, Chief
Projects Section 1D, Midland

8/14/84
Date

Inspection Summary

Inspection on June 25-29 and July 9-13, 1984 (Report No. 50-329/84-23(DRP); 50-330/84-24(DRP))

Areas Inspected: Routine safety inspection by regional personnel of licensee action on previous inspection findings and evaluation of licensee action with regard to IE Bulletins and Circulars. This inspection involved a total of 140 inspector-hours onsite by two NRC regional inspectors, including 0 inspector-hours onsite during off-shifts.

Results: In the two areas inspected, no items of noncompliance or deviations were identified.

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DETAILS

1. Persons Contacted

Consumers Power Company (CPCo)

- *D. L. Quamme, Site Manager
- #R. A. Wells, Executive Manager, Midland Plant QA Department (MPQAD)
- *#R. J. Landon, Site Licensing Supervisor
- *B. H. Peck, Construction Superintendent
- #N. Reichel, Assistant Construction Superintendent
- *#D. J. Harris, Field Manager, MPQAD
- *P. F. Strachan, Engineer, Site Management Office (SMO)
- #W. R. Bird, Manager, MPQAD
- #R. E. Whitaker, Special Projects, MPQAD
- #T. A. Buczwinski, Technical Engineer, Nuclear Operations
- #G. W. Rowe, Sr. Engineer, SMO
- #J. S. Kreple, Sr. Engineer, SMO
- #J. J. Fremeau, Administrator, Nuclear Activities Plant Org. (NAPO)
- *F. J. Yanik, Engineer, NAPO

Bechtel Power Company (BPCo)

- *G. Hierzer, Site Manager
- *#M. A. Dietrich, Manager, Plant QA Engineer (PQAE)

#Attended the June 29, 1984 exit meeting.

*Attended the July 13, 1984 exit meeting.

The inspectors also interviewed other licensee and contractor personnel during the course of the inspection.

2. Licensee Action on Previous Inspection Findings

- a. (Closed) Unresolved Item (329/82-22-20; 330/82-22-20): The inspector found that field welds made in a 3 in. ASME Section III, Division 1, Class 3 pipe had not received nondestructive examination (NDE) prior to QC acceptance. The applicable ASME code calls for NDE on pressure retaining welds made in pipe larger than 4 in. However, the code is silent with respect to NDE requirements for piping diameters of 4 in. or less.

The licensee addressed a code query to the ASME. The question was: "Is NDE required for pressure retaining Class 3 circumferential welds in piping, pumps, and valves for 4 in. nominal pipe size and smaller?" In a letter dated June 14, 1984, the ASME answered the question by saying "No". This item is closed.

- b. (Closed) Item of Noncompliance (329/82-22-18; 330/82-22-18):
(1) Measures were not established to control retired Field Change

Requests/Field Change Notices (FCRs/FCNs). (2) Procedures were not followed which control the use of field sketches. (3) Adequate control of field sketches was not formulated.

- (1) This part of the item was closed in Inspection Report 50-329/84-20; 50-330/84-21.
- (2) Field Sketch (FSK) CY-1035 which illustrated the bottom gusset plates for HVAC fan supports was not identified as "Q" nor was there a reference to the affected drawing on the sketch as required by Procedure FPD-5.000 (Preparation of Field Sketches).

The licensee issued Nonconformance Report (NCR) MO1-9-2-155 dated November 5, 1982, to document and resolve the noncompliance. FSK CY-1035 was revised and designated "Q" and referenced to design drawing C-1004. Project Engineering reviewed and approved the sketch. Training of responsible personnel in the specifics of FPD-5.000 has been completed. An extensive review of FSKs by the electrical, mechanical, and civil Field Engineering Departments was conducted. For FSKs that detailed "Q" design drawings, revised FSKs have been issued with a "Q" annotation and referenced to the Bechtel Design Drawing. The licensee performed an audit, MO1-21-3 to evaluate the implementation of NCR MO1-9-2-155 corrective actions and to evaluate the adequacy and implementation of the Bechtel procedures governing the control and use of FSKs. Several audit findings and observations were identified and subsequently corrected. Future implementation of FPD-5.000 will be verified by periodically scheduled licensee audits. The inspector reviewed FSKs and the complete audit file and concluded that the licensee is now in compliance. This part of the item is closed.

- (3) Procedure FPD-5.000 (Preparation of Field Sketches) did not require design drawings to reference appropriate field sketches to ensure a complete quality record. No cross reference log existed to enable one to find what FSKs apply to each design drawing.

The licensee revised FPD-5.000 (Rev. 3, dated April 15, 1983) to require cross reference logs listing the FSKs applicable to each design drawing. Existing FSKs were reviewed and a cross reference log prepared so that all FSKs pertinent to all design drawings can be readily determined. FPD-5.000 and a sampling of the logs were reviewed and found to be in compliance. This part of the item is closed.

The item of noncompliance is closed.

- c. (Closed) Item of Noncompliance (329/82-22-12; 330/82-22-12): As of November 10, 1982, two nonconforming conditions identified by the NRC on October 12, 1981, and confirmed by the licensee on October 19

and 25, 1981, respectively, had not been documented in a nonconformance report (NCR), a quality action request (QAR) or other appropriate reports. The two nonconforming conditions were: (1) The diesel generator exhaust hangers were not classified, designed, or built as "Q" as committed to in the FSAR. (2) The design of the diesel generator monorail was not analyzed to seismic Category 1 design requirements as committed to in the FSAR.

- (1) The licensee wrote NCR M01-5-2-166 on November 16, 1982, to document the hangers listed on SCN #36 to Specification M-326 as being nonconforming as a result of their original "non-Q" designation.
- (2) The licensee wrote QAR F228 on November 16, 1982, to document the monorails in the diesel generator building as missing the required seismic analysis.

The NCR and QAR were reviewed and found to properly document the nonconforming conditions. This item is closed.

- d. (Open) Item of Noncompliance (329/82-22-09; 330/82-22-09): (1) Slots were not cut in the diesel generator (DG) muffler support plates as shown in the drawings. (2) Some concrete embedded jacking plates required by the drawings were not installed under the DG muffler supports.
- (1) The licensee wrote an NCR to cover this deficiency. However, the corrective work required to correct the deficiency is not completed and this part of the item remains open.
 - (2) The licensee wrote NCR No. 4694, dated November 12, 1982, to cover the missing jacking plates found during the NRC inspection. Further inspection by the licensee found jacking plates missing in two other DG bays. NCR No. 4738, dated November 23, 1982, was written to cover the missing plates. Both NCRs were dispositioned "Use As Is" since loadings from the jacking screws on the concrete were found to be acceptable by calculation. (Project engineering calculation 6-45-1 (Q) Rev. 1). Vendor drawing 7220-M18-250-6 was revised to reflect the as-built condition. The vendor confirmed the acceptability of the disposition (Telex #33-5304, Chron #097233). A review of the revised drawing, closed NCRs, calculation, and telex showed that the nonconforming condition was resolved. This part of the item is closed.
- e. (Closed) Unresolved Item (329/81-22-01; 330/81-22-01): Storage procedures and maintenance procedures for Motor Operated Valves do not require the energization of heaters in the limit switch compartment. This was in apparent violation of Regulatory Guide 1.38 which adopts ANSI N45.2.2-1972. The ANSI standard required energization of space heaters enclosed in electrical items. The Midland FSAR was

revised to delete this requirement if the items were stored in a space meeting level B requirements or were included in a scheduled maintenance (sampling) program that required visual inspection to verify that condensation or corrosion had not occurred.

The item was considered unresolved until the adequacy of the maintenance program could be evaluated.

The licensee asked the vendor of the motor operators (Limatorque Corporation) if the storage and maintenance procedures in effect met the intent of Limatorque's recommended storage procedure P-233. Limatorque answered that they did.

The inspector reviewed the results of the periodic (90 day) inspections of the limit switch compartments required by the procedures. No evidence of condensation was reported and only minor corrosion was noted. This indicates that the storage and maintenance requirements that are in effect are adequate to limit damage to the limit switch compartments. The item is closed.

- f. (Closed) Open Item (329/82-26-01; 330/82-26-01): In response to a 10 CFR Part 21 notification, the licensee determined that material on site intended for use in the modified auxiliary feedwater header was of questionable quality.

NCR M-03-9-3-016, Rev. 1, dated January 7, 1983, was issued to document the inconsistencies.

In accordance with the ASME Code, Section III, NCA 3867.4(e) and (f), a destructive examination of the spare hardware supplied with the original material was made. Certified chemical and physical analyses show that the material meets the requirements of the ASME Code for SA234 Grade WPB (SA515 Grade 70), the material specified for the system.

A review of the certified test results and the Code requirements showed this to be true. This item is closed.

- g. (Closed) Item of Noncompliance (329/82-22-25; 330/82-22-25): The inspector found that some horizontal cable trays containing metal dividers had cables that crossed over the dividers. The inspection also identified some cases where the cables were stacked higher than the dividers. It was also found that the pertinent inspection plan (PQCI No. E-3.0) did not address verification of cable segregation in horizontal runs.

The licensee issued NCR M01-9-2-151 on November 1, 1982, to document the discrepancy.

Electrical field procedure FPE-4.000 "Installation and Rework of Electrical Cables" was revised (Rev. 10, dated April 11, 1984) to

add a requirement for tying down cables in horizontal divided cable trays, and, if, after tying, the cables are above the level of the tray, to write a Field Change Request (FCR) for Project Engineering disposition.

Project Quality Control Instruction (PQCI) No. E-4.0, "Installation of Electrical Cables" was revised (Rev. 15, dated June 6, 1984) to include the requirements of FPE-4.000 noted above.

In order to resolve other problems with electrical cables (see Inspection Report 50-329/81-12, 50-330/81-12 for details), the licensee performed a complete reinspection of all cables installed in the plant. This reinspection, which was completed May 19, 1983, would have found other instances of improper segregation as in this case.

A review of closed NCR M01-9-2-151, FPE-4.000, Rev. 10, PQCI E4.0, Rev. 15, the "final report for cable reinspection," and the "evaluation final report for cable reinspection" was made. The review showed that the immediate problem was corrected, procedures were changed to ensure that the problem would not recur, and a reinspection was made to find other possible violations of the same. The item is closed.

- h. (Closed) Item of Noncompliance (329/82-22-21; 330/82-22-21): Failure to establish adequate measures to control the distribution of red line drawings. Field Instructions FIP-1.112, Rev. 5, "Field Marking of Prints for Pipe Supports" was used to control red line changes. While the engineering and approval procedures were adequate, the field engineering log used to control the changes was not controlled and distribution to the document control center was being bypassed.

The licensee discontinued the use of red line drawings to affect minor field required changes and withdrew the Field Instruction. The use of Field Change Request/Field Change Notice Procedure (FPD-2.000, Rev. 14, dated May 16, 1984, was substituted for use in making all field required design changes.

A review of FPD-2.000 showed that adequate measures were established to control the issuance of these document changes. The item is closed.

- i. (Open) Item of Noncompliance (329/83-12-01; 330/83-13-01): Four ASME Section III, Class 1 pipe hangers were chosen at random for a detailed review of the as-built condition and quality records associated with the hangers. The hangers were installed by Babcock and Wilcox Construction Company (BWCC) and accepted by the BWCC QA organization. BWCC failed to follow procedures in four instances in the fabrication and installation of the hangers as follows:
 - (1) During fabrication, dimensions were changed that exceeded established tolerances without initiating a deviation to the Field Construction Procedure (FCP).

- (2) A required nondestructive examination (NDE) of a weld was not performed.
- (3) A weld was found that was undersize for its entire length and ground to an unacceptable contour.
- (4) Two field welds were found on one hanger that were in the wrong location.

Items (2) and (3) were closed in Inspection Report 50-329/84-10, 50-330/84-10.

The licensee took the following corrective actions:

- (1) The hanger will be removed and replaced with one meeting the requirements.
- (2) The required NDE was performed and the weld found acceptable.
- (3) The nonconforming weld was ground out and replaced with a weld meeting the design requirements.
- (4) The hanger was removed. Because of a design change, the hanger has been voided and no new hanger will be installed.

Further corrective action was also taken by the licensee. Subsequent to the NRC inspection, MPQAD, Bechtel, and BWCC reinspections revealed further hanger discrepancies. As a result, BWCC QA stopped all BWCC work on hangers on October 5, 1983. The BWCC QC inspectors were given special training for hanger reinspection and an upgrading of the general BWCC training program implemented. A 100% reinspection of all hangers was started. The stop work order was rescinded on February 23, 1984, on demonstration that the necessary corrective actions had been accomplished.

The hanger reinspection program is approximately 90% complete. A total of 206 nonconformance reports have been written to date during the reinspection.

This item remains open until item (1) above is accomplished, the reinspection completed, and any discrepancies detected resolved.

- j. (Closed) Item of Noncompliance (329/83-05-01; 330/83-05-01): Bechtel Specification 7220-M-326 (Q), Rev. 9, Section 5.13.5 requires the use of protective covers to protect mechanical snubbers from physical damage during construction. This requirement was not implemented and the snubbers were not protected in the field or in storage.

NCR MO1-9-3-157 was written on May 11, 1983, to document the nonconformance. Bechtel Storage, Handling and Maintenance Instruction F-10-359 was written and approved June 11, 1984, to require protection of the snubbers and establish an inspection schedule to ensure

continuing protection. BWCC Field Procedure FCP-800 was written and approved June 17, 1983, to require the same items as the Bechtel instructions. A 100% inspection of all installed snubbers was performed by Bechtel and BWCC to determine if any installed snubbers were damaged. Bechtel formed a permanent storage/maintenance team and implemented a program to ensure that all types of materials and equipment are adequately covered by the storage/maintenance program.

A review of the above documents showed that the NCR was properly closed and the corrective actions taken, the Bechtel maintenance instructions were being implemented, the BWCC field procedure was being implemented, and the 100% inspection of all installed snubbers was completed with two NCRs written to document damaged snubbers. The review showed that the requirements of the specification were being implemented. The item is closed.

k. (Closed) Item of Noncompliance (329/83-03-01; 330/83-03-01):

- (1) (a) It was found that the licensee was using non-quality documents (Attachment 10 forms) to document QC inspections, and therefore, nonconformances were not incorporated into the licensee's corrective action system.

The practice of using Attachment 10 forms was previously identified as an unresolved item in Inspection Report 50-329/82-22-27; 50-330/82-22-27. In response to the unresolved item, the licensee audited the practice (Audit MOI-333-2) and stopped it. The corrective action and action taken to prevent further noncompliance is described in (3) below. This part of the item is closed.

- (b) An out-of-date drawing was being used to review and approve certain remedial soils work.

The discrepant drawing was replaced with the proper revision on the same day. All controlled design drawings in the construction department were audited against the current drawing index. The audit showed a total of 257 discrepancies. Corrections were completed promptly. After the documents were brought up-to-date, they were reviewed. It was determined that no modifications to, or reauthorizations of, previously submitted Work Authorizations were required.

An evaluation of the problem led to a revision of the procedure for document distribution to simplify the flow paths for requests and to specify the method for back-fitting additional distribution requests. All construction department files are audited at least every three months to verify accuracy. The Document Control Center personnel were retrained on the processing and filing of documentation. This part of the item is closed.

- (2) An MPQAD audit had disclosed the misuse of Attachment 10 forms (noted in (1)(a) above) and resulted in the discontinuance of the use of the forms. However, the audit report did not present the Attachment 10 form problem as an audit finding. Therefore all of the audit results were not documented and the findings resolved.

Although the draft of the audit report contained the findings on the Attachment 10 forms, it was not included in the final report because the practice was stopped immediately after the auditors had identified the practice. Management was aware of the finding because they stopped the practice. The auditors were retrained in the importance of reporting all audit findings. This part of the item is closed.

- (3) A determination of the significance and corrective action was not taken on approximately 500 Attachment 10 forms which were identified as containing nonconformance (NCRs) and deviations that were adverse to quality.

The Attachment 10 forms were used only in conjunction with piping walkdowns prior to hydrostatic testing of systems. All of the Attachment 10 forms were reviewed to determine the impact of not having the same review received by NCRs. As a result of the review, it was concluded that:

- (a) Discrepancies were either reworked prior to the hydrostatic test or documented on NCRs and so noted on the form.
- (b) All discrepancies were resolved and properly documented during installation inspections performed prior to performance of the hydrostatic test. Consequently, corrective action was taken on all Attachment 10 identified nonconformances.
- (c) Performance of the hydrostatic test PQCI/IR T-1.00 was not compromised by the use of the forms.

Inspection personnel have been and are continuing to be instructed through the MPQAD training and certification program to document all observed nonconformances in accordance with approved nonconformance procedures. This part of the item is closed.

- (4) It was found that instructions for performing calculations to verify the adequacy of conduit hangers was contained in a field instruction that was identified as not containing "Q" material. Further inspection found two other instances of administrative and mechanical guidelines that were not reviewed for adequacy but described activities affecting the quality of "Q" listed items.

Audit finding report AMS-83-9-7F issued March 23, 1983, formally documented the nonconforming condition of procedure classification. The licensee issued Quality Actions Request (QAR) F-292 on March 4, 1983, to resolve the problem. NCR M01-9-3-152, dated March 15, 1983, was issued to identify the need for specific requirements to perform and document results of the verification of the adequacy of Class 1E hangers to carry the loads.

The "Non-Q" Field Instruction, FIE-3.320, "Numbering Raceway Supports" that contained the hanger load calculation instructions was revised to remove the load calculation instructions and reissued as a "Q" document on May 4, 1984. A new Field Instruction FIE-3.325, "Verification of Class 1E Hanger Capacity for Imposed Loads" was issued February 3, 1984, as a "Q" document.

QAR F-292 addressed the generic problem of "Non-Q" documents describing activities of "Q" listed tasks. A review of all "Non-Q" listed procedures/instructions/guidelines was made by MPQAD both at the Midland Site and Bechtel-Ann Arbor to determine those that contained material related to "Q" listed work or material. Many instances of misuse were found. The following are the results:

- . The documents were revised; either by upgrading the document to the "Q" list or producing two documents - one "Q" listed and one "Non-Q."
- . The procedures for producing documents were revised so that "Q" activities and "Non-Q" activities do not appear in the same document.
- . All documents, whether "Q" or "Non-Q" will be reviewed and approved by MPQAD before being issued for use. Previously, only "Q" listed documents were reviewed and approved by MPQAD.
- . The auditing procedures were revised to include the verification that quality-related activities are governed by approved procedures, instructions or drawings.

A review of the above listed documents indicates that the work has been completed. This item is closed.

No items of noncompliance or deviations were noted.

3. Evaluation of Licensee Action with Regard to IE Bulletins

- a. (Open) IE Bulletin 77-08 (329/77-08-BB, 330/77-08-BB), "Assurance of Safety and Safeguards During an Emergency-Locking Systems." The bulletin discussed concerns in providing means for prompt ingress and unimpeded egress under emergency conditions into/from certain

safety-related areas protected by electrically locked doors. The requirements include providing uninterruptible power supply to the electrical locking system, mechanical means and associated procedures to override the electrical locks which are required to fail in the secure mode for security purposes on loss of power, and periodic tests of all locking systems and mechanical overrides to confirm their operability. Also, the system design is required to be in conformance with the regulations of the Occupational Safety and Health Administration (29 CFR 1910), and the applicable state/local fire regulations and life safety codes.

The inspector's review of the Midland Plant Specification A-50 for the purchase of the Security System and of relevant administrative procedures, shows conformance to the subject bulletin requirements, except the procedures for periodic test of locking systems and mechanical overrides have not yet been developed. The item remains open pending the issuance and review by the NRC of these procedures.

- b. (Closed) IE Bulletin 83-01 (329/83-01-BB, 330/83-01-BB), "Failure of Reactor Trip Breakers (Westinghouse DB-50) to Open on Automatic Trip Signal." The bulletin informed licensees of failures of the reactor trip system Westinghouse DB-50 circuit breakers to open due to binding in the mechanical trip mechanisms of the undervoltage trip attachments. The Midland Plant reactor trip system Control Rod Drive Control System circuit breakers are General Electric Type AK-2. Therefore, the subject bulletin does not apply to the Midland Plant. The item is closed.

4. Evaluation of Licensee Action with Regard to IE Circulars

- a. (Open) IE Circular 78-16 (329/78-16-CC, 330/78-16-CC), "Limitorque Valve Actuators." The circular discusses failures of Limitorque Type SMB-0, -1, -2, and -3 valve actuators equipped with 3600 rpm motors. The failures resulted from clutch wear which was due to manual operation at the valves and improper heat treatment of the clutch parts. Evaluation of the problem by the Limitorque Corporation resulted in issuance of certain precautions in the operation of the valves.

The licensee identified 14 valves with the actuators of the type identified in the circular. As documented in the licensee's subject file, the concerned personnel were informed to include necessary precautions in the operating procedures. The item remains open pending satisfactory review of these procedures by the NRC.

- b. (Open) IE Circular 79-05 (329/79-05-CC, 330/79-05-CC), "Moisture Leakage in Stranded Wire Conductors." During an NRC review of the results of environmental qualification testing of certain electrical equipment, the phenomenon of water penetration in stranded wire conductors, was identified. Following this disclosure, leak tests were performed at Sandia Laboratories. The tests confirmed that stranded wire conductors will leak steam or moisture when subjected to a differential pressure across the conductor ends.

An examination of the relevant systems in the Midland Plant by Bechtel and B&W, resulted in a recommendation by B&W to cover the nuclear instrumentation detector connector assembly with heat shrink tubing to prevent moisture incursion. A Corrective Action Request (CAR) 2-SEB-I-004 was issued to procure and install the tubing, and the Preoperational Test Procedure 2T-P-NIS.03, "Nuclear Instrumentation Detector and Cabling Tests" was revised to assure completion of installation. As of this date, however, the installation has not yet been completed. The item remains open until the CAR is closed.

- c. (Open) IE Circular 80-10 (329/80-10-CC, 330/80-10-CC), "Failure to Maintain Environmental Qualification of Equipment." Degradation of environmentally qualified equipment due to improper maintenance or use has occurred at several nuclear power plants. The circular directs all licensees to enforce adequate administrative controls, and provide necessary maintenance procedures to prevent such occurrences. Appropriate training of personnel involved is also required.

The inspector's review of Midland Plant procedures ST 1151.1, "Request for Maintenance," MAINT 1151.1, "Maintenance Department Responsibilities Associated with Maintenance Orders," Rev. 4, and TPM 5-2, "Testing Program Maintenance Procedures," Rev. 3, shows that the concerns of the subject circular have been taken into consideration and that the procedures include warnings to prevent degradation of equipment. The licensee has further committed to develop administrative procedures to address this issue, and to include material on equipment environmental qualification in procedure ST 1353.4, "Maintenance Department Training." The item remains open pending a satisfactory fulfillment of these commitments.

- d. (Closed) IE Circular 81-02 (329/81-02-CC, 330/81-02-CC), "Performance of NRC-Licensed Individuals While on Duty." An NRC inspector observed that licensed reactor operators were not fully attentive to their duties. A subsequent NRC investigation concluded that management controls were inadequate to prevent such a problem. The subject circular discusses need for administrative controls regarding operator performance, type of activities that are prohibited while licensed personnel are on duty, and control of access to the control room. It is also required that the licensee have their licensed personnel review the subject circular and IE Information Notice 79-20, Rev. 1, as well as Regulatory Guide 1.114.

The inspector's review of relevant Midland Plant procedures, ST 1101.1 "Shift Operations," Rev. 1, OPS 1101.2, "Operations Shift Turnover," Rev. 0, shows conformance to the requirements of the subject circular regarding operator performance and access to the control room. Also, as documented in the subject file, the circular was distributed to all

personnel in Cold License Training, and the subject circular, Information Notice 79-20, and Regulatory Guide 1.114 have been included for information in the NOTD program 12.6.7.B, "RO/SRO/STA Training Requalification." The item is closed.

- e. (Closed) IE Circular 80-21 (329/80-21-CC, 330/80-21-CC), "Regulation of Refueling Crews." This circular emphasized that refueling of a reactor was an operation that directly affects the reactivity of a reactor and, therefore, the regulations applicable to manipulating the controls of a reactor are also applicable to the refueling of a reactor.

The licensee revised his technical specifications (Chapter 16, Section 6.2.2.d) to require that all core alterations be performed by a licensed Reactor Operator (RO) under the general supervision of a Senior Reactor Operator (SRO) or by a nonlicensed operator (facility trained and certified in the operations) under the direct supervision of an SRO who has no concurrent responsibilities during the operation.

Station Procedure ST 9400.1, "Core Assembly" was reviewed and found to require an RO to perform the core alterations under the direct supervision of an SRO. Operations Procedure OPS 1358.1, "Refueling Operations" indicates the training requirements for all members of a refueling crew. The reviews indicate that the technical specifications and pertinent procedures are consistent with the requirements of the circular. The item is closed.

No items of noncompliance or deviations were noted.

5. Exit Interview

The inspectors and the Midland Site Supervisor met with the licensee representatives (denoted in paragraph 1) at the conclusion of each week's inspection on June 29 and July 13, 1984. The Site Supervisor summarized the scope and findings of the inspection. The licensee acknowledged the inspectors' findings.