

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-247/84-16

Docket No. 50-247

License No. DPR-26 Priority -- Category C

Licensee: Consolidated Edison Company of New York, Inc.

4 Irving Place

New York, New York 10003

Facility Name: Indian Point Unit No. 2

Inspection At: Buchanan, New York

Inspection Conducted: June 25-29, 1984

Inspectors: L. Narrow
L. Narrow, Lead Reactor Engineer

8/27/84
date

Approved by: Jacque Durr
C. P. Durr, Chief, Materials and
Processes Section, EPB

8/31/84
date

Inspection Summary: Inspection on June 25-29, 1984 (Report No. 50-247/84-16)

Areas Inspected: Routine unannounced inspection by one region based inspector of the programs for surveillance inspection and functional tests of snubbers; in-service inspection of pipe supports; and review of Bulletins and outstanding items. The inspection involved 31 hours of direct inspection time on site.

Results: No violations were identified.

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DETAILS

1.0 Persons Contacted

Consolidated Edison Company (Con Ed)

- *M. Blatt, Director, Regulatory Affairs
- *A. J. Budnick, Manager, Quality Assurance
 - A. Corvese, Senior QA Engineer
 - A. Dunnigan, QA Examiner
- *E. F. Eich, Performance Supervisor
 - F. Giaccone, Technician
 - K. Krieger, Technician
 - F. Phillips, Manager, Site QC
- *J. Quirk, Test and Performance Engineer
 - J. Schwartz, QA Examiner
- *M. Smith, Acting, General Manager, Technical Support
 - J. Weiss, Lead Auditor
- *G. Wasilenko, Principal Consultant, QA&R
 - M. Whitney, Associate Engineer, Regulatory Affairs
 - H. Zitzelsberger, Senior QA Engineer

*Denotes attendance at Exit Meeting

2.0 Snubber Surveillance and Test Program

The inspector reviewed surveillance and test procedures and records, observed testing of several snubbers and observed the condition of installed snubbers in the AF3 area of the plant.

All snubbers are hydraulic and, except, for steam generator restraints (ITT-Grinnell), are supplied by Bergen-Paterson (B-P). Surveillance inspection of the B-P snubbers had been completed. Testing of the required sample was in progress and was completed prior to conclusion of the inspection.

2.1 The following procedures were reviewed:

- No. P1-V1 (A) Rev. 7, "Hydraulic Shock Suppressor (Snubber) Inspection".
- No. P1-V1 (B) Rev. 6, "Hydraulic Shock Suppressor (Snubber) Inspection".
- No. PT-R34, Rev. 4, "Shock Suppressor (Snubber) Functional Test".

All of the procedures were clear and explicit with regard to conduct of the inspections and tests. However, the instructions for review of the inspection/test results were not clear. As examples:

- The requirement for engineering evaluation of identified deficiencies was not defined.
- The procedure requires review of the inspection/test results by the Performance Supervisor, the Senior Watch Supervisor, the Chief Operations Engineer (in some cases), and the Test Engineer. The purpose and authority of each of these reviews and reviewers is not clearly defined.

From discussions with licensee representatives and observation of action taken to resolve identified deficiencies, the inspector concluded that despite the lack of clarity in the procedures; personnel involved had a good understanding of the requirements for review, that deficiencies requiring engineering evaluation had been referred to engineering for evaluation; and that the review by personnel in operating line positions did not affect proper correction of deficiencies. This question was discussed at the exit interview and the licensee stated that the procedures would be revised to clarify such requirements.

- 2.2 The inspector observed tests of a 20 kip snubber and two 3 kip snubbers. The tests confirmed that the snubbers were operable. The technicians appeared knowledgeable and conscientious in conducting the tests and recording the test results. Operation of the test equipment and its calibration had been witnessed by a B-P representative who had also qualified the technician for performance of the tests.
- 2.3 The inspector observed the condition of installed snubbers and spring hangers in the AFB area. Observations included freedom of movement, proper settings, visual evidence of corrosion and indications of oil leakage.

Records of surveillance inspections and tests were reviewed after completion of the tests. All snubbers tested had met the requirements for operability. All deficiencies identified during surveillance and testing were evaluated by the performance supervisor. Those considered to be potential major problems or which did not meet the established requirement for the length of extension plus oil level had been referred to engineering; twelve had been informally accepted and three were still being reviewed. The inspector was informed that formal evaluation will be provided in writing by engineering.

No violations were identified and, except as discussed in Paragraph 2.1 above the inspector had no questions concerning the surveillance and test program.

3.0 In-Service Inspection (ISI) of Pipe Supports

ISI of supports for Class 1 and Class 2 piping is performed by Westinghouse Nuclear Service Division (NSD) as a part of the overall ISI program. ISI of supports for Class 3 piping is performed by the licensee's on-site QA organization.

3.1 ISI of Class 1 and Class 2 Pipe Supports

NSD Procedure ISI-8, "Visual Examination Procedure" was reviewed. This procedure includes a requirement for recording load indicator settings for spring hangers but excludes inspection of snubber position readings which are inspected under the Con Ed snubber surveillance program. Records of ISI inspections performed during the 1984 outage were also reviewed.

No violations were identified.

3.2 ISI of Class 3 Pipe Supports

The inspector discussed this program with licensee representatives; reviewed Con Ed Procedure No. QA-8403, "Inspection of Quality Group C Component Supports"; and reviewed records of the inspection which is presently in progress.

The records requested for review were readily retrievable, legible and documented the inspection results acceptably. However, the system appears inadequate for the control of the records and their use during the 10-year ISI program and for long term retention of the records. This program and the Con Ed ISI group has been organized recently and the final records retention program has not been established. The licensee agreed that improvements in the records retention system were required and would be carried out.

No violations were identified.

4.0 QA/QC Activities

The inspector reviewed the Con Ed QA procedures listed below and discussed QA and QC organizations and activities with the licensee's representatives.

- QA-761, "Nuclear Power Quality Assurance Organization and Responsibilities"
- QA-700-1, "QA Surveillance Procedure"
- QA-7101 and Supplement 1, "Nondestructive Testing Personnel Qualification and Certification"

On-site QA/QC activities are the responsibility of Nuclear Power Quality Assurance (NPQA) which includes a QC group (QC) and a QA Engineering group (QAE). The manager, NPQA reports to the Director, Quality Assurance and Reliability (QA&R). Also reporting to the Director, QA&R is a QA Audit group which, in addition to other responsibilities, audits site activities.

The activities of these organizations with respect to the ISI, Surveillance and Test Programs were reviewed.

- 4.1 QC personnel in the recently established ISI group report to the Manager, NPQA through a QA Engineer. As discussed in Paragraph 3.2 this group is responsible for ISI of Class 3 pipe supports.
- 4.2 ISI of Class 1 and 2 pipe supports is performed by NSD under contract to the licensee for the overall ISI program under supervision of task force consisting of QC, QAE and QA&R personnel.
- 4.3 The Surveillance and Test Program is conducted by the Test and Performance Group (T&P) as discussed earlier in this report. QAE performs surveillance (monitors) all Tech Spec surveillance programs. The QAE monitoring program is described by an annual surveillance plan and scheduled monthly. The annual surveillance plan did not include monitoring of the Snubber Surveillance and Test Program but the licensee stated that it would be included in the monthly schedules.
- 4.4 The Audit Group had performed Audit No. 83-02-E of snubber inspection in November and December 1983. Audits of this activity are conducted annually. This audit and corrective action for the one finding were reviewed by the inspector. The finding was "a delay in sign-off of data sheets". The response to this finding was also delayed beyond the 30 days established in the audit transmittal.

No violations were identified with respect to QA/QC activities.

5.0 Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (79-16-05): Verification of Snubber and Spring Hanger Settings:

The inspector verified that NSD Procedure ISI-8 requires verification of spring hanger settings; that Con Ed procedure No. QA-8403 required verification of snubber setting; and that these settings had been verified during the inspections.

6.0 Bulletin Status

Bulletin 83-05: ASME Nuclear Code Pumps and Spare Parts Manufactured by the Hayward Tyler Pump Company.

The inspector reviewed documentation stating that a records search by engineering shortly after receipt of the Bulletin had confirmed that there were no Hayward Tyler ASME pumps or spare parts on site. An additional independent search by the Failure Analyses Engineer of the United Engineers and Constructors Data System and the plant reliability system during this inspection had not identified any Hayward Tyler equipment.

This item is closed.

Bulletin 83-07: Apparently Fraudulent Products sold by Ray Miller, Inc.

The inspector reviewed documentation which confirmed the licensee's search of vendor files, requisitions and material receipts for evidence of Ray Miller products on site. No material identified in the Bulletin had been supplied for use at this plant. However, the licensee had identified some products supplied by Ray Miller, Inc. and had dispositioned this material except for the following:

- Two 4 inch x 3 inch reducers which had been installed on the pressurizer relief valve lines, and
- Some Ray Miller material in storage which had been identified recently.

An investigation of these items was in progress at the time of the inspections.

This item is unresolved pending completion of the investigation and disposition of the two installed reducers and the material in storage; and review of the licensee's response to NRC Region I letter of June 18, 1984 concerning generic potential problems of fraudulent materials.

7.0 Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on June 29, 1984, at the Indian Point Unit No. 2 plant. Mr. T. Kenny, the NRC Senior Resident inspector was also present. The inspector summarized the scope and findings of the inspection. The licensee acknowledged the inspector's comments. At no time during this inspection was written material provided to the licensee by the inspector.