U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 84-11

Docket No. 50-410

License No. CPPR-112 Priority -- Category A

Licensee. Niagara Mohawk Power Corporation
300 Erie Boulevard
Syracuse, New York 13202

Facility Name: Nine Mile Point, Unit 2

Inspection At: Scriba, New York

Inspection Conducted: June 18-July 27, 1984

Inspectors: R.A. Gramm — 8/10/84
R.A. Gramm, Resident Inspector — date

A.C. Cerne, Senior Resident Inspector — 8/15/84 date

J.M. Grant — 8/20/84
J.M. Grant, Reactor Engineer — date

Approved by: S.J. Collins — 8/22/84
S.J. Collins, Chief, Reactor Projects
Section 2C, DPRP — date

Inspection Summary:

Inspection on June 18-July 27, 1984 (Report No. 50-410/84-11)

Areas Inspected: Routine inspection by the assigned resident inspector and a site detailed senior resident inspector of work activities, procedures and records relative to document control; containment supports; design and design change controls; main stack installation; battery installation; and protection of permanent plant equipment. The inspectors also reviewed licensee action on previously identified items and performed plant inspection tours. The inspection involved 196 hours including off-shift inspection by the inspectors.
Results: Two violations were identified: Failure to implement procedural hold point controls (paragraph 5); and Inadequate design change control implementation (paragraph 6a).

Region I Form 12
(Rev. February 1982)

DETAILS

1. Project Organizations

Niagara Mohawk Power Corporation (NMPC)

Stone and Webster Engineering Corporation (SWEC)

General Electric Company (GE)

ITT-Grinnell Industrial Piping, Inc. (ITT)

Johnson Controls, Inc. (JCI)

Reactor Controls, Inc. (RCI)

2. Plant Inspection Tours

The inspectors observed work activities in-progress, completed work and plant status in several areas during general inspection tours. Work was examined for any obvious defects or noncompliance with regulatory requirements or license conditions. Particular note was taken of the presence of quality control inspectors and quality control evidence such as inspection records, material identification, nonconforming material identification,housekeeping and equipment preservation. The inspectors interviewed craft personnel, supervision, and quality inspection personnel in the work areas. Observations are noted below:

The inspector checked rattle joint (ie: building/structure isolation joints) location plans in several areas of the plant against the applicable EA-4 series drawings. Specific details were randomly examined and gap dimensions spot-checked. He also inspected the general areas around the rattle joints for any unauthorized rigid component connections which could be adversely affected by the movement implicitly assumed in the rattle joint design.

At one location between the Turbine and Control Buildings, the inspector identified some rigid conduits crossing the rattle joint in apparent conflict with Specification E061A. Further inspection revealed those conduits to be nonsafety-related and SWEC QA Inspection Report (IR) E4-04-5464 was issued to clarify this discrepancy. Since the inspection of several other areas identified no other questionable items, the problem conduit runs appeared to be an isolated case. In conjunction with the inspection of rattle joint installation for seismic movement, the inspector also reviewed a specific design analysis for utilization of continuous cable tray risers in the solid bottom tray application, vertically run in the Reactor Building. Structural engineering personnel provided confirmation of the flexibility of the raceway system to sustain the calculated seismic differential movement and committed to placement of these analysis/calculations in the permanent engineering records. An engineering check for any rigid wall-to-slab tray support configurations was also conducted to respond to an additional question on differential movement. No such connections were identified.

The inspector also examined several field items whose erection involved construction interfaces, such as support welding to concrete imbed plates, structural steel bolting to concrete anchors, containment liner welding to the penetration plate assemblies, and electrical component erection to its structural supports. Procedural process controls, welding records, engineering change documents and nonconforming item disposition reports were reviewed as necessary to confirm component installation in line with design and quality criteria.

The inspector reviewed Engineering and Design Coordination Report (E&DCR) P01211 which generally classified ASME pipe support members and welds to be linear items. The noted exceptions involved three ITT standard component supports which were identified to be plate and shell items. The inspector requested the licensee to provide the engineering analysis performed to support the generic support classification and to provide assurance that plate and shell designs have not been issued since E&DCR P01211 was released (84-11-01).

Questionable markings were observed by the inspector on the exterior of the Reactor Pressure Vessel (RPV). The licensee issued QA Surveillance Report (SR) M-84-712 to document the questionable markings. The inspector was further informed that SWEC was processing a Nonconformance and Disposition (N&D) report and he observed the posting of signs in the field to prohibit further uncontrolled markings on the RPV.

The inspector identified several 3/8 inch threaded stud weld attachments at elevation 227 within the suppression pool area which appeared to lack the requisite flash deposit in accordance with AWS D1.1. The inspector was presented with SWEC IR E4045175 which documented QC acceptance of these items. At the inspector's request the studs were torque tested to demonstrate their mechanical strength; none failed during the test.

The inspector reviewed the following N&Ds which pertain to linear indications in the bio-shield wall welds: 7109, 7274, 6814, 7437, 7092 and 7051. The indications were detected during the examination of adjacent overlay welding for the bio-shield wall doors. The inspector requested SWEC engineering to analyze the potential defect initiation mechanisms and measures to prevent the defect initiation. This item will be followed up in a further inspection (84-11-02).

The inspector noted correspondence from the NRC office of Nuclear Reactor Regulation dated June 15, 1984 and June 26, 1984 which documented two cases of current licensing disagreement. The concerns involved the marking of Class 1E electrical cables and the installation of instrumentation and control tubing. The inspector ascertained that site quality assurance personnel had not received notification of the potential problem issues. He transmitted the concerns and was apprised of the current site status regarding tubing installations of greater than ½ inch diameter and the divisional marking intervals.

The inspector reviewed E&DCR P21339 which upgraded a portion of the turbine building to QA Category I. The area in question served as a foundation for Category I instrumentation racks. The inspector reviewed the design change relative to FSAR commitments and regulatory requirements; he reviewed structural drawings of the adjacent areas; he examined relevant tubing design drawings; and discussed the change with appropriate SWEC engineers. The inspector has no further questions regarding this issue.

The inspector observed Class IE cable 2ENSYYC306 which was unsupported between conduit 2CC521YC and cable tray 2TC521Y. SWEC QC examined the installation and found it to be acceptable. The inspector further identified two Class IE cables exiting from tray 2TK561G which upon examination by QC were found to exceed the allowable unsupported span. SWEC IR E4008134 was written and the cables were tie wrapped accordingly.

During the course of the above mentioned plant tours no violations were identified.

3. Licensee Action on Previously Identified Items

a. (Closed) UNRESOLVED (82-02-02): Traceability of calibrated torque wrenches. ITT currently inspects and verifies the acceptability of concrete anchor bolts in accordance with FQC procedure 4.2-16, "Testing of Installed Category 1, 2 and 3 Anchor Bolts." The use of calibrated torque wrenches during the installation process is witnessed by QC and documented within their inspection report. All ITT anchor bolts installed prior to January 20, 1983 were reinspected and torque tested. All ITT anchor bolts installed after that date have been QC inspected in accordance with the above procedure. The Measuring and Test Equipment (M&TE) issue stations maintain logs to identify the calibrated tool usage and associated work packages. This item is closed.

b. (Closed) FOLLOWUP ITEM (83-01-05): Incorporation of pipe support clearance criteria into ITT inspection checklist. The inspector reviewed ITT procedure FQC-4.2-14-11 "Inspection of Installed Pipe Supports" inspection attributes and verified that spacial clearances are to be checked. The inspector noted that inspection checklists used since January 28, 1983 were amended to provide for the clearance check. This item is closed.

c. (Closed) UNRESOLVED (83-02-03): Inspection of field welded connection plates. A re-inspection of 60 field welded structural steel connection plates was performed. The plate dimensions, configurations and weld attributes were inspected in accordance with the applicable Cives shop prints and found to be satisfactory. Inspection plan N20S204XFA001, "Erection of Structural and Miscellaneous Steel-Category I" was modified to include a hold point to assure inspection of the field welded plates utilizing the requisite Cives prints. This item is closed.

d. (Closed) VIOLATION (83-05-05): Intermittent tubing support welds not in accordance with design details. SWEC Engineering issued E&DCRs C01743/C01899 to define the interpretation of intermittent

weld symbols. JCI reinspected previously installed supports to verify design compliance. Eleven supports were reworked as a result of the re-inspection findings. The inspector reviewed JCI procedures QAS-1101 and 1005 and identified that intermittent weld requirements were contained therein. This item is closed.

e. (Closed) FOLLOWUP ITEM (83-07-01): Design of masonry block wall in the diesel generator building. The inspector reviewed E&DCR P40647 which promulgated design information regarding the steel enclosed masonry block wall. The design was found to be in accordance with FSAR Section 3.8.4.4 details. This item is closed.

f. (Closed) UNRESOLVED (83-07-06): Seismic design of floor to ceiling cable tray supports. The inspector reviewed the design reanalysis provided by SWEC to the Structural Engineering Branch of NRR which accounted for the seismic differential movements. The worst case stresses within the support member were determined to be within the allowable limits. This item is closed.

g. (Closed) UNRESOLVED (83-16-01): Maintenance of the warehouse storage conditions. The inspector was informed that supervisory warehouse personnel were instructed to monitor maintenance of a weather-tight enclosure for the warehouse. The warehouse roof dampers were weatherproofed to preclude further entry of rain through them. The affected welding material was inspected as documented on SWEC IR X40000296 and found to be acceptable. This item is closed.

h. (Closed) VIOLATION (83-16-09): Acceptance of nonconforming installations. The inspector examined RCI drawing NMP-023 revision 2 which incorporated additional clarification regarding the acceptable weld configurations. The inspector reviewed RCI design calculation SA-1659 and verified that the field weld configuration had been analyzed. The joint RCI and SWEC reinspection of the supports in question verified that the welding was in accordance with the design criteria. RCI has revised several quality procedures which govern the identification and control of nonconforming conditions. The appropriate RCI personnel have been trained in the use of the revised procedures. This item is closed.

i. (Closed) UNRESOLVED (84-01-02): Utilization of carbon steel clamps on stainless steel piping. The licensee stated that the carbon steel clamps will normally be painted which minimizes the galvanic corrosion effects. In the event the carbon and stainless steels come in contact, the carbon steel will oxidize in lieu of the stainless steel. The corrosion rate of the carbon steel will not produce detrimental results over a 40 year period. SWEC Engineering analyzed a carbon clamp on a stainless pipe geometry at 500° F and found that acceptable stress conditions were present. This item is closed.

j. (Closed) UNRESOLVED (84-01-04): Auditor qualification packages for ITT personnel. The inspector reviewed revised ITT lead auditor qualification packages and found that the documents are consistent with ANSI N45.2.23 requirements. This item is closed.

k. (Closed) UNRESOLVED (84-05-01): Improperly coiled electrical cable. The minimum bend radius violation was documented on SWEC IR E4006392 and N&D 7743. The cable was reworked to the appropriate bend radius. The inspector was informed that SWEC QC has identified few problems with the temporary cable coiling and no further instances were identified during the current NRC inspection. This item is closed.

4. Document Control

a. Because of the importance of the PGCC, and General Electric's use of a design change and document control system which is different than that normally used by SWEC and the other contractors, the inspectors reviewed the program for establishing the work package that is used by craft, engineers and QC inside the PGCC. The inspector spoke with PGCC personnel concerning their responsibility to ensure that the documents being used for installation are accurate and of the latest revision. The inspectors spoke with a SWEC supervisor in the PGCC who illustrated how the work packages were used in the field. The inspector met later with two supervisors from SWEC-SEG (PGCC section), who explained how the GE documents were received, reviewed, and transmitted as a SWEC documents via an E&DCR. The system requires the work package to be reproduced and distributed by document control - with one package being stamped as work tracking copy for the Work Tracking Group.

Based on the discussions with SWEC personnel and review of the program, no violations were identified.

b. As a result of the NRC CAT inspection finding of inconsistent and inaccurate posting of changes on affected drawings, specifications and procedures, SWEC has initiated a new program for providing the engineers, QC and craft with the most recent design change information. SWEC will maintain computerized reports at each work station. These reports will list every drawing, specification, and/or procedure used at that station and all changes that have either not yet been incorporated or will never be incorporated into a revision. SWEC Engineering will be responsible for data input, and SWEC Document Control will be responsible for verification of the data as well as for the update and maintenance of the report located at each station. Maintenance of the actual change documents at each station will remain the responsibility of SWEC and/or the other contractors.

The inspector discussed this new program with the Document Control Supervisor, and observed a training film on the new system. No violations were identified.

5. Containment Supports

The inspector examined several pipe supports and supporting structures and restraints within the drywell area of containment. He inspected the star truss structure, which provides lateral support to the biological shield wall, for welding, configuration, and dimensional clearances in accordance with the design drawings. He also sampled SWEC Weld Data Sheets, inspection records, and material certifications for evidence of compliance with Specification requirements and code commitments. SWEC Welding Technique Sheet W3-01 was reviewed against its referenced Procedure Qualification Records for direction and criteria in line with the essential variables and supplementary essential variables (for impact tested material) of ASME Section IX.

Certain structural steel connections (eg: monorail supports and moment connections off the radial plate girders) were also examined. The inspector discussed the AISC criteria for welded and bolted connections with SWEC structural engineering personnel, interviewed SWEC QC inspectors regarding high-strength bolting requirements, and reviewed both in-process inspection documents and E&DCR's to substantiate the acceptability of the sampled field conditions.

Several pipe supports within containment were noted to be configured with seal-welded tubular members. SWEC Specifications P301F and P301J both require vent holes to be installed in such assemblies for pressure equalization of the confined space during design basis events inside containment. During this inspection, the inspector identified several examples of seal-welded tube steel supports without the vent holdes, but noted that these supports had not yet been final inspected. He discussed the apparent discrepancies with both contractor and licensee QA personnel. Niagara Mohawk Corrective Action Request (CAR) 84-0041 was issued on 6/29/84 to seek action which would assure compliance with the vent hole requirements during support installation, rather than awaiting final QC inspection to identify the discrepancies. While the NRC inspector believes the technical significance of the vent hole installation may be minor, he concurs with the licensee approach to the problem as a programmatic issue. He has no further questions on the licensee corrective action.

The inspector reviewed the handling, installation, and inspection of a certain type of pipe rupture restraint, (Omni Restraints), within the containment drywell. The in-process condition of several partially installed restraints was observed. SWEC Specification (P301X) requirements were reviewed and commitments to ASME Section III, Subsection NF fabrication were checked (eg: NF4700 bolting criteria). The inspector examined the design drawings and noted the critical nature of the shim design, so that lateral loads are taken by shear blocks on the pipe rupture support and the stainless steel studs are loaded in tension only. Specification required procedures (P301X-ITT-G1 and FQCR4.2-34, written by the installation contractor, ITT Grinnell) were reviewed and found to provide specific controls for the Omni Restraint shimming process.

However, in checking the implementation of these controls for two sets of shims which had recently been cut, it was noted that certain procedural steps and QC hold points had been bypassed. Prior to cutting the shims, the referenced procedures called for construction notification to SWEC Engineering of the as-built side gap dimensions and for QC verification of pipe position, Omni base placement, and side gap measurements. These procedurally required steps were not followed for the initial sets of shims. The NRC inspector informed licensee QC and engineering management personnel that this failure to follow procedures constituted a violation of 10 CFR 50, Appendix B, Criterion V (84-11-03).

The inspector also noted that SWEC E&DCR F01632A had recently been issued to revise the shim design and installation details. However, the E&DCR failed to list Specification P301X as an affected document and provided specific installation requirements in conflict with the governing specification, and thus also in conflict with the applicable Specification-required procedures generated by Grinnell. This oversight appears to have contributed to the above violation and is discussed further below as one example of a design change control problem.

6. Design and Design Change Controls

a. The inspector sampled the program of controls for design change application and implementation from two different aspects: a selection of specific hardware in the field to determine compliance with the design change details; and a general review of E&DCRs to determine the adequacy of design direction to the installing contractor level. Questions on the applicability of retrofit work for E&DCRs of a generic nature were discussed with licensee and A/E engineering personnel. While the inspector found no specific examples of problems regarding design change retrofit interpretation, the A/E intends to clarify the responsibilities for determining retrofit applicability for all parties affected by the design change process.

The inspector did identify, however, three cases of design change control problems which led to questionable field installations or process control problems. The first, already discussed above in paragraph 5, involved E&DCR F01632A which issued a change to the design of the Omni Restraint shimming details in conflict with the existing specification and procedural requirements, to include QC implementation of holdpoint criteria, without revising the Specification. This led to misinterpretation on the part of the installation contractor.

The second case involved E&DCR F11411 which, in part, modified a QA and seismic Category 1 structural steel pin connection inside the Reactor Building. The design change intent called for the subject connection to be a nonstandard detail using both high-strength A325 bolts, supplemented by welds from the knife-plate, off the wall, to the web of the beam. While the E&DCR specified the weld data, it did not mention the bolts, since they were part of the original design. However, the installers and QC personnel interpreted the lack

of bolting information on the E&DCR to mean that the welds replaced the bolts and the bolts were incorrectly removed from the connection. Thus misinterpretation of E&DCR F11411 led to a questionable field installation which was not in accord with the final design.

The third case of questionable design change control application involved the apparently unauthorized use of A325 bolts in the split ring collars on the secondary containment side of the two containment access hatches and the emergency escape lock. A material note on the applicable design drawings (EV-41A and EV-60A) indicates that the material requirements either are specifically given on the drawing or are specified in the relevant Specification, P283B. However, no material requirements for the collar bolts were delineated in either document and the only bolting material mentioned at all is SA193, grade B7. Thus the use of the A325 bolts in the questioned application appears to have been unauthorized. Prior to the conclusion of this NRC inspection, SWEC N&D 8323 was issued on the bolting material discrepancy and dispositioned to "accept-as-is" since the installed bolts are acceptable for the intended function. While the inspector concurs with the hardware disposition to N&D 8323, the design change controls which allowed the installation of hardware not specified by the design documents appear to have failed in this particular case.

The inspector informed licensee QA and engineering management personnel that the failure of the design change control process in the three cases cited above represents a violation of 10 CFR 50, Appendix B, Criterion III (84-11-04).

b. The inspector also evaluated the design process by which structural beam stiffener installation is controlled for support loads attached at a later time to the structural members. He chose examples from the field where structural beams had been stiffened and examples where the beams remained unstiffened for support attachments in the electrical, small-bore pipe support, and large-bore pipe support disciplines. While no problems arose for the electrical and small-bore support examples, follow-up of one large-bore hanger identified a question as to how and by whom the pipe support structural attachment loading schedule gets revised and reviewed for stiffener installation. For the specific support (BZ72DS, a QA CAT II nonsafety support), Revision 2 to the design had increased the moment reactions. The licensee provided no evidence, however, that the loading schedule had been revised and rechecked for stiffener calculations. While one response to the NRC question indicated that the pipe support engineers have the latitude to use "engineering judgement" in determining whether stiffener calculations must be revised, another response seemed to indicate that all load revisions are routed to the structural design group for review.

Since the NRC inspector was not able to verify that sufficient procedural controls exist in this design area, this issue remains unresolved pending the conclusion of discussions between the licensee and A/E on the methods of control and presentation to

the NRC of evidence of a defined program which will assure beam stiffener design, review, and installation, where required (84-11-05).

c. The inspector examined a design change (reference: E&DCR F11411) to a structural member in the field which called for coping a portion of the beam flanges to avoid interference with an existing component support. While no clearance directions were specified on the E&DCR, the inspector noted that the coped beam and the support leg were in actual contact. This condition was questioned and found to be unacceptable from the standpoint of seismic movement and design clearances.

Discussion with SWEC structural engineering personnel revealed that certain situations had not been considered in the overall program of controls for seismic clearance specifications. These potential inadequacies could have allowed the above unacceptable condition to go undetected. They include:

-- Since the component disciplines have design clearances relative to structural members, the structural specification itself provides no such clearance dimensions. However, if the structural member is installed after the affected component, this lack of specified clearances could lead to unacceptable conditions.

-- The applicability of seismic clearance requirements to nonsafety-related components is not clearly defined in all cases. Thus seismic clearances for QA CAT I components could be adversely affected by the later installation of QA CAT II or III components in near proximity.

-- Construction tolerances for various component installations could infringe upon the original design such that the seismic clearances are collectively violated, while each individual component remains acceptably located within its tolerances.

Licensee and SWEC structural engineering personnel have begun to review the above cases, and any other adverse hypothetical situations, to determine if they represent a real concern to actual hardware installations from a seismic clearance standpoint. Pending presentation of the evidence of a program which adequately addresses all cases of seismic clearance conflicts or the establishment of new controls to correct existing inadequacies, this issue is unresolved (84-11-06).

7. Main Stack Activities

The inspector reviewed ongoing activities of Pullman Power Products Corp. (Pullman), SWEC and NMPC for the safety related Category I main stack structure. Pullman is responsible for the stack fabrication, SWEC for design and QC, and NMPC for QA. The inspector reviewed Specification S210A, "Main Stack", applicable drawings, construction and QC procedures.

The inspector also examined the following documents to confirm that concrete production and placement, installation of reinforcement, inspections, and material tests were performed as required.

Documents reviewed were:

Concrete Pour Packages

3-364-502P (2nd ring of stack)

3-364-509P (9th)

3-364-515P (15th)

Compressive Strength Test Reports (CSTR)

3-364-507P

3-364-508P

3-364-510P

NMPC QA Surveillances (Unscheduled)

C-84-402

C-84-416

C-84-473

Pour packages consisted of preplacement inspection reports, placement inspection reports, pour records, concrete pour card/checklist, and preliminary CSTRs and/or final CSTRs (28-day strengths).

Inspection of the stack work activities and review of the above records confirmed that required inspections were performed, acceptance criteria were identified, concrete test cylinders were properly cured (field and laboratory) for form-removal purposes and 28-day strengths, tests were conducted and adequately documented, and nonconformances were documented and resolved. It was noted that NMPC QA had not yet conducted a scheduled (vs. unscheduled) surveillance of the main stack activities. QA informed the inspector that a scheduled surveillance required an approved checklist of attributes, and that the checklist for the main stack was still under review. QA expected the checklist to be approved within two weeks, at which time scheduled surveillances would begin.

No violations were identified.

8. Battery Installation

The inspector visually examined the condition of station batteries, 2BYS * BAT 2A ("A" Train dc power) and 2BYS * BAT 2C ("High Pressure Core Spray"dc power). He spot-checked rack installation, cable terminations, and inter-cell series connections. SWEC Quality Assurance Inspection Reports for 2A & 2C battery installation processes were sampled, as were the preventive maintenance inspection reports, to verify conformance to the manufacturer's instructions. The inspector also reviewed the Wyle Laboratories Test Report No. 44681-2, documenting the Nuclear Environmental Qualification Program for the NCX-2550 batteries supplied by Gould Industrial Battery Division for station batteries 2A & 2B. The HPCS battery 2C was supplied by the C&D Corporation thru a GE contract.

While the inspector identified no violations with regard to battery installation or inspection, two questions arose regarding seismic qualification, as follows:

1) Batteries 2A & 2B: Each battery set includes eighteen 350 MCM cables comprising the interstep and interrack connectors between the cells. Neither the Wyle Lab Report nor any other documentation available on-site was able to substantiate the environmental and seismic qualification of these jumper cables. Gould has been asked to supply the necessary information to confirm proper qualification.

2) Battery 2C: The seismic analysis for the HPCS battery did not include consideration of the external cable connections. Since 750 MCM, medium voltage power cables are utilized for external connection to the relatively small battery terminal posts, GE has been asked to determine the maximum cable size and unsupported length allowed to maintain seismic qualification.

The two questions relative to battery qualification remain unresolved pending confirmation of the acceptability of the existing cables and configurations (84-11-07).

9. Protection of Permanent Plant Equipment

a. The inspector examined instrumentation and control tubing runs located within the reactor building. He observed a section at azimuth 197° which was severely deformed. The tubing was located in an area exposed to work activities on adjacent items. Upon notification of the problem, JCI initiated Inspection Report (ISR) 6896. This concern is unresolved pending JCI disposition of ISR 6896 and the conduct of future NRC inspection to assure that greater levels of protection are provided for the tubing runs to preclude additional damage (84-11-08).

b. The inspector examined cable and raceway installations within the electrical tunnels between the control and reactor buildings. He observed the application of fire proof coating onto several Class 1E cables. Measures had been inadequately instituted to cover the cables in question. SWEC QC initiated IR E4008135 to document the deficient condition. This item is unresolved pending the closure of QC related documentation and the implementation of greater controls over the fire proofing application contractor to preclude further occurrences of this nature (84-11-09).

No violations were identified; however, greater protective measures appear to be warranted to assure that installed permanent plant equipment are not damaged by ongoing work operations.

10. Unresolved Items

Unresolved items are matters for which more information is required in order to ascertain whether they are acceptable items, items of violations or deviations. Unresolved items disclosed during the inspection are discussed in paragraphs 6b, 6c, 8, 9a and 9b.

11. Management Meetings

At periodic intervals during the course of this inspection, meetings were held with senior plant management to discuss the scope and findings of this inspection. The inspector attended periodic meetings with the NMPC QA manager and the project director to discuss the status of CAT corrective actions. Apparent violations of NRC requirements were discussed with licensee plant management during exit meetings held on June 22 and July 27, 1984.