



APPL. Ex. 131

REF: 88

2. Licensee's Actions on Previous Inspection Findings

(Closed) Violation (353/78-07-01)

(Closed) Violation (352/78-11-01) The licensee was discharging water from construction activities with turbidity levels in excess of Construction Permit allowed levels. The licensee analyzed the rate of discharge and the turbidity level relative to the Schuylkill River flow and determined that there was no adverse environmental impact. In addition, he eliminated the direct discharge of water to the Schuylkill River and instructed the responsible superintendent in the proper disposal of dewatering operations.

The subcontractor responsible for this violation has completed his work at the site and no further dewatering operations will be performed by him. The inspector toured the site on February 17, 1982, and verified that settling basins are functional and dewatering appears to be controlled. He also verified that the licensee had performed a follow-up audit, N-142, and surveillance, C-172, and corrected all violations. This item is closed.

(Closed) Violation (352/79-11-08)

(Closed) Violation (352/81-06-02) Inspection finding (352/79-11-08) identified improper welding of heating, ventilating, and air conditioning (HVAC) dampers. An attempt to close this finding disclosed that inadequate corrective actions were taken. The limited access to the welds in question precluded meaningful inspections from being performed. The design remedy was to provide an alternate weld inside the damper. A verification inspection by the NRC revealed that where welds were inaccessible for inspection, the alternate weld had not been deposited. This resulted in the finding (352/81-06-02).

To preclude recurrence of incomplete corrective actions, the licensee has changed his system so that findings will no longer be closed out before committed actions are completed. This will be verified by the NRC as future violations are resolved.

In addition, the licensee took the following actions to correct the damper weld problem:

- (1) Reinspected all dampers for weld accessibility.
- (2) Welds which were determined to be inaccessible were modified in accordance with the alternate design.
- (3) Retrained the HVAC quality control inspectors regarding procedures for inaccessible equipment.

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- (4) Revised the site inspection procedure, PPM-5.3, to include a requirement in the in-process inspection procedure to check for accessibility.

The NRC inspector verified that the above corrective actions were completed. These items are closed.

(Closed) Unresolved Item (352/80-02-03) The practice of welding galvanized coated shapes to the containment liner was questioned. A review of the February 14, 1980 letter disclosed that the licensee performed welding tests of electro-galvanized and hot-dipped galvanized shapes. No adverse reactions were noted because of the coating. The AWS Welding Handbook, 72.13-72.21, and the AWS Structural Welding Code, 3.2, discuss welding through galvanized coatings without detrimental effects on the weld deposit. This item is closed.

(Closed) Unresolved Item (352/80-02-04) The inspector was concerned that licensee Audit Finding Reports, Form QAF-8, were not routinely reviewed for reportability under 10 CFR 50.55(e). A review of the licensee's Quality Assurance Plan, Appendix Z and Exhibit XXXIII, verified that procedures have been implemented which assure the review of audit findings for reportability. The Finding Report is required to be reviewed for reportability and this review documented in block 21 of the report. This item is closed.

(Closed) Violation (353/80-08-01)

(Closed) Violation (352/80-09-01) The licensee failed to prevent the discharge of raw sewage to the Schuylkill River. The licensee determined that the spillage was caused by an open vent associated with the main tank inlet pipe. An abnormally large flow of sewage escaped from this vent. The licensee capped this vent to preclude recurrence. The inspector verified that the vent was capped and discussed the sewage system operation with the pollution control engineer and plant operators. This item is closed.

(Closed) Violation (352/80-17-01)

(Closed) Violation (352/81-04-01) Violation (352/80-17-01) identified uncontrolled cutting of reinforcing bars (rebar) in a concrete block wall. Violation (352/81-04-01) identified uncontrolled issue of rebar cutting drills and improper documentation of cut rebar. The licensee recalled all rebar cutting drills, and implemented new procedures to control the cutting of rebar, and performed an analysis of "worst case" walls to assure structural soundness.

The inspector reviewed the revised Job Rule, JR-G-23, for the committed program changes and controls. He verified that the procedure for control was implemented by examining selected attributes from the Job Rule. He