APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-458/85-10 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, Louisiana

Inspection Conducted: February 4-8, 1985

Inspectors: W. M. McNeill, Reactor Inspector, Project Section A, Reactor Project Branch 1 (pars. 1, 2.a - 2.l, & 3) — 3/18/85 Date

W. M. McNeill for I. Barnes, Reactor Inspector, Project Section A, Reactor Project Branch 1 (pars. 2.m - 2.v) — 3/18/85 Date

Approved: J. P. Jaudon, Chief, Project Section A Reactor Project Branch 1 — 3/18/85 Date

Inspection Summary

Inspection Conducted February 4-8, 1985 (Report 50-485/85-10)

Areas Inspected: This was the third Region IV followup on the Construction Appraisal Team (CAT) Report 50-458/84-23. The inspection involved 72 inspector-hours onsite by two NRC inspectors.

Results: Within the scope of this inspection, one new violation was identified beyond those identified in the CAT report (compliance with welding material control procedure requirements, paragraph 2.q).

DETAILS

1. Persons Contacted

Gulf States Utilities (GSU)

*C. J. Banks, Security Compliance Supervisor
*W. J. Cahill, Senior Vice President
*T. C. Crouse, QA Manager
*P. J. Dantel, Licensing Staff Assistant
*D. L. Davenport, Plant Security Supervisor
*J. Deddens, Vice President
*O. DeMiranda, QA Engineer
*I. M. Malik, Quality Engineering Supervisor
*T. P. Plunkett, Plant Manager
*R. B. Stafford, Quality Services Director
*D. Suggs, I&C Foreman
*K. E. Suhrke, Project Planning & Schedule Manager
*P. F. Tomlinson, Operations QA Director
R. E. Turner, QA Engineer

Stone & Webster (S&W)

V. Barton, Chief Inspection Supervisor
R. Beaudet, Chief Inspection Supervisor
V. Carver, E&DCR Coordinator
D. Coward, Chief Inspection Supervisor
D. Cowart, Chief Inspection Supervisor
W. Edasi, Test Engineer
R. Ferguson, QC Engineer
J. Green, Inspection Supervisor
*B. R. Hall, Assistant Superintendent of Field Quality Control
*J. M. Lord, Engineering Assurance Manager
J. Lozes, Inspector
H. Oates, Field Engineer
F. Qualter, Procurement QA Assistant Division Manager (phone)
L. Reagles, Inspection Supervisor
S. Slater, Inspection Supervisor
*R. L. Spence, Resident QC Manager
D. Stitt, Engineering Assurance Engineer
*W. T. Tucker, Assistant Engineering Superintendent
C. D. Whitlock, QC Inspection Supervisor

The NRC inspectors also contacted other site personnel including administrative, clerical, operations, and inspection personnel.

*Denotes those attending the exit interview conducted on February 8, 1985. Both NRC senior resident inspectors for operations and for construction also attended this meeting.

2. CAT Inspection Followup on Other Observations

This inspection was the NRC Region IV followup on other observations sometimes identified as irregularities, discrepancies, deficiencies, problems, etc., which are documented in the CAT report. The scope of inspection was to review and evaluate the other observations and any related actions taken by the licensee or his contractors.

a. Heat Exchanger End Connections (page III-10)

The CAT team questioned the adequacy of the design requirements for the end connections of the Reactor Water Cleanup System Regenerative Heat Exchanger supports. Slotted holes, apparently for thermal expansion, were found not to have washers under the bolt head and also snug tight fit was specified.

S&W identified, in addition to the one connection identified by the CAT inspection, three additional connections with the same condition on the heat exchangers in question. Rework control forms were issued to establish the torque of the bolt in the end connections. The maximum torque valves thus established were then used in a calculation 12210-228.320-HB-1884 which established that the snug tight connection and absence of washers had an ineligible effect. The NRC inspector reviewed the rework control forms and the calculation and verified the above. The actions taken are satisfactory and this item is closed.

b. Cross Reference to Drawing 1-DSED-N-7000 (page III-12)

The CAT team noted that a drawing 1DSED-N7000, general notes, was not cross referenced on the basic design drawings used for duct supports.

Engineering and Design Change Request (E&DCR) No. C 31,709 had been issued and the specification 216.150 (Revision 4) changed to cross reference to the general notes drawing 1-DSED-N7000. This was verified by the NRC inspector. S&W has concluded that this was an isolated case and no other generic drawings were similarly not cross referenced. The NRC inspector reviewed a sample of support drawings for electrical, mechanical and instrument disciplines and found no further problems. The actions taken are satisfactory and this item is closed.

c. Dimensional Discrepancy and Flex Coupling Assembly (page III-12)

The CAT team observed one case of a dimensional discrepancy and one case of an improper flexible coupling assembly in heating, ventilating and air conditioning duct work in the auxiliary building and reactor building, respectively.

The dimensional discrepancy was documented on "Notice of Nonconformance and Disposition" (N&D) No. 7199. This N&D is now closed and the condition "accepted as-is." The dimensional discrepancy from the design drawing resulted in a vent being located not above certain radiation monitoring equipment. However, this equipment has been deleted by E&DCR No. P-12,915. Dimensional verification is overchecked by "Field Quality Control" (FQC) on a random sampling basis.

S&W has concluded this to be a one time violation. The NRC inspector reviewed "FQC Monthly Reports" for the last 3 months and verified that few dimensional problems were being identified in this overcheck.

In regard to the flexible coupling, an unsatisfactory "Inspection Report" (IR) No. M4400677 was issued. The rework has been accomplished. As in the above S&W has concluded this to be an isolated use. As above "FQC Monthly Reports" support that conclusion. The actions taken are satisfactory and this item is closed.

d. Clearance Violations (page III-12)

The CAT inspection team observed several instances where interdisciplinary seismic and thermal growth clearance criteria were violated.

S&W has established a program for inspection of this problem on an area by area basis with an interdisciplinary team of engineers and FQC. Procedure CSI 8.1.1 and Inspection Plan No. R1777777F0526 have been implemented only recently and limitedly. It was verified by the NRC inspector that two elevations of the Fuel Building have been inspected to date. Twenty-eight additional areas are yet to be inspected. The draft report of this inspection was reviewed. An unsatisfactory type C IR X5600005 has been issued to document implementation problems and the procedure is under revision as this program is debugged. The actions taken are satisfactory and this item is closed.

e. Welding on Bergen Paterson Supports (page IV-4)

Six Bergen Paterson support welds were identified in the CAT report to be found deficient. The supports in question were 1-BZ-71CS, 1-BZ-71EU, 1-BZ-74CL (2 welds), 1-BZ-71DQ, and 1-BZ-31RH.

The undersized welds on 1-BZ-71CS and 1-BZ-71DQ were documented on N&D 6982 and "accepted as-is" based on calculations 12210-NP(C)-Z-2113. Two type C IRs P4660210 and P4660211 each document a reinspection of a sample 25 welds on 13 supports originally inspected by the same inspectors who accepted these welds. No additional undersize welds were noted. The undersized weld on 1-BZ-71EU was like the above documentation N&D 6974 and accepted based on calculations. A type C IR 4660206 documented a reinspection of a sample of welds like the above with no additional problems. The vendor weld on 1-BZ-74CL that was cracked was documented and repaired on N&D 7029. This weld appears to have been cracked as a result of welding by S&W on the back side of the support beam. S&W identified that 19 additional supports had vendor gusset welds of a similar configuration. There have been reinspected, type C IR P4660225, and found acceptable. Also on 1-BZ-74CL, an unsatisfactory weld profile (undercut) and arc strikes were repaired on IR P4200596. IR P4660217 documented the reinspection of a sample 15 welds on 11 supports originally inspected by the same inspector and no additional problems were identified. The insufficient weld wrap on support 1-BZ-31RH was repaired on IR W4000555. The "Field Fabrication/Erection of Pipe Supports 'As-Builts'," Inspection Plan No. R1228312F501 addresses inspection of weld wrap (item 18) as part of the as-built inspection. The above documents were reviewed by the NRC inspector and the repairs were field inspected. The FQC Monthly Reports were reviewed to verify if welding inspection errors were significant. The actions taken to scope the problem, correct the problem and prevent the problem are satisfactory and this item is closed.

f. Reactor Controls Inc. (RCI) Tack Welds (page IV-7)

Tack welds were found by the CAT team on RCI supports which were not removed or consumed in the finished weld and the required length of a weld was not identified on drawings.

RCI support welds were reinspected on IR M4650365 and one additional example of this problem was identified. RCI "Nonconformance Report" No. RB-171 was issued to document and repair these problems. RCI also retrained its inspection personnel on this subject. The same IR also scoped the drawing error problem. RB-172 was issued to document this problem and correct the drawings in question. Again RCI retrained its engineering personnel on this subject. The NRC inspector verified the repair in the field, the drawing changes and

reviewed the above documents. The scope, corrective action and preventive actions are satisfactory and this item is closed.

g. Surface Examination of Repair Cavity (page IV-9)

As a result of review of repair welding on the fuel pool cooling heat exchanger 1-SFC-033A, it was found that no documentation existed to demonstrate that the repair cavity had been given a surface examination prior to final welding.

S&W documented this problem on N&D 6973 and subsequently on N&D 6974. The N&D 6974 is dispositioned "accept as-is" based on the following. For one of the two welds in question the welding foreman has attested that the weld rod issued was not used. The sequence of events is that records show the cavity was checked (minimum wall thickness) at one date, then weld material issued at a later date and lastly the cavity surface examination was performed at yet a later date. If the weld rods were not indeed used there would appear to be no problem. For the second of the welds the same sequence appears in the records however the N&D documents that there was an inprocess type repair which was permissible by the welding procedure (e.g. remove only one layer of a weld bead). The NRC inspector questioned the legitimacy of such an operation in light of ASME Code Section ND 4453.1. Subsequently, after the inspection, the NRC inspector found that this concern is the subject of ASME interpretation III-1-79-143 which accepts such a practice.

In the review of N&D 6974 it was noted that the repairs in question were performed to an ASME stamped vessel under Section 25 of the S&W ASME QA Manual (ASME Section XI). It was further noted that an internal S&W audit (EA-1478) and its reply had identified that these repairs and some 75 additional did not fully comply with the requirement of Section 25 of the S&W ASME QA Manual (see finding EA-1220-184). Review of the audit finding reply and associated correspondence found that the ASME Section XI repair activities are not fully established between GSU and S&W. Additional review of ASME Section XI repair activities to assure compliance to Code and procedures will be conducted to verify that these activities are being correctly conducted. This is an open item. (458/8510-01).

h. Subvendor Welding and NDE (page IV-11/12)

The CAT team found the tanks supplied by RECO had welds that were undersized and that radiographs supplied by Metal Bellows Corporation did not have station markers.

S&W issued N&Ds (7241 superseded by 7542) to document the RECO tank problem. All welds were inspected, and all except three were

reviewed the above documents. The scope, corrective action and preventive actions are satisfactory and this item is closed.

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"accepted as-is" based on calculations 237.500-IA-1705/2, 1522/5, 1704/3, 1521/3, 1827/1, and 1872/2. The remaining three, skirt to support base flange, were repaired by welding. The NRC inspector reviewed the above documentation and verified the repairs in the field.

S&W issued N&Ds (7242 and 7559 superseded by 8354) to document the Metal Bellows problem. Forty-nine butt welds of bellows were reradiographed by S&W to procedure QAD 9.41. The NRC inspector reviewed a sample of 10 bellows radiographs and no problems were noted. In addition, S&W did train its procurement quality assurance personnel in light of both of the above problems. These records were reviewed. The corrective actions and preventive actions are satisfactory and this item is closed.

i. Segregation of Calibration Equipment (page IX-15)

The CAT team identified that improvement was needed in S&W and GSU calibration laboratories on segregation of equipment of different status (e.g. calibrated, rejected, awaiting inspection).

S&W has established a locked cabinet for segregation of rejected equipment. GSU has labeled and identified shelves with red tape for rejected equipment. The NRC inspector verified these corrective actions and inspected both laboratories. It was also noted that controls were in place such as calibration labels and equipment number labels which also assure the same objective. The corrective action is satisfactory and this item is closed.

j. Change to the Calibration Procedure (page IX-16)

The CAT team identified that there was a change to the S&W calibration laboratories practices which was not incorporated into the implementing procedure in regard to sealing zero adjustment screws.

S&W has revised its procedure MS-1.2 to document this practice on sealing the zero adjustment with a wax in lieu of a sticker. This was verified by the NRC inspector. A brief review of the other implementing procedures and the laboratory did not reveal any further problems. The corrective action is satisfactory, and this item is closed.

k. GSU Audit Program (page IX-17)

The CAT team identified that GSU needed to improve its audit program to assure all criteria are included, all organizations were audited,

training would be programmed, and findings would be closed in a timely manner.

GSU has addressed the criteria that were identified as missing in subsequent audits of S&W Cherry Hill and General Electric San Jose. The organizations that were missed were addressed in subsequent audits of 1984 (S&W Toronto and General Electric Site). In addition the audit schedules and matrixes (which determine what organizations and what criteria are to be addressed) were changed to assure future audits would not have the same problem. In regard to training, a program of continuing education of auditors was found in place. A biennial program addressing training on such subjects as regulatory guides and ANSI standards, was verified as being in place by the NRC inspector. The NRC inspector also found that there was a timely close out of findings. The QA Department Status Reports for the last 2 months showed only 50 percent have been open more than 60 days. It was also noted that these open findings represent only a small part of the total findings issued. The actions taken, both corrective and preventive, are satisfactory and this item is closed.

l. Quality Concerns (page IX-19)

A recommendation of the CAT team was that GSU formalized its practices into a procedure on quality concerns to assure all organizations are addressed, specific responses are made to individuals and that activity is centralized.

GSU has, since early 1984, established some activity in this area and its program was issued as a procedure, QAP 1.14, in August 1984. It addresses use of posters, drop box, phone "hot line," exit interviews, walk in interviews, and regularly scheduled interviews of continuously employed personnel. A review of this program to date by the NRC inspector found about 900 interviews have been performed and these have resulted in about 90 concerns being expressed. With the other sources added, there have been to date about 100 concerns addressed. About one-half have been researched and resolved. Of the remaining half, half of these are very recent (e.g. within the last month). All organizations appear to be addressed; specific responses to all individuals are accomplished, and the activity is centralized. The actions taken are satisfactory, and this item is closed.

m. Unidentified Fasteners in Battery Racks and Motor Control Centers (page VI-1)

The CAT team noted that some fasteners used in battery racks (i.e., IENB* Standby 1A and IENB* Standby 1B) and motor control centers (i.e., IENB* MCC-1, IEHS* MCC-2F and IEHS* MCC-15A) were made of indeterminate material.

S&W documented the unidentified battery rack fasteners in N&D No. 7021 with an "accept-as-is" disposition. The N&D also identified that ASTM A 325, ASTM A 193 Class 2 and ASTM A 307 bolts had been substituted during rack assembly for some of the vendor furnished fasteners. The basis for the disposition was that (1) all fasteners used in rack assembly were equal to or greater in tensile strength than the ASTM A 307 bolts used in rack seismic analysis, and (2) operating basis earthquake (O.B.E.) and safe shutdown earthquake (S.S.E) stresses were very low. Correspondence with the vendor identified that SAE J 429 grade 2 bolting had been furnished for rack erection. The NRC inspector examined the battery racks to confirm the S&W reported condition and then verified by review of SAE J429 that the specification did not require identification markings for Grade 2 fasteners. S&W Specification No. 244.521, "Standby Control Storage Batteries," through Addendum No. 7 (issue date April 26, 1984) was ascertained by review to contain no requirements in regard to selection of rack fasteners. Examination of the applicable fastener material specifications confirmed that ASTM A 307 reflected the lowest minimum strength properties. Review of the battery rack seismic analysis contained in GNB Batteries Inc. report. "Environmental Qualification for Class 1E Lead-Acid Storage Batteries," showed allowable bolting stresses of 20,000 psi and 27,270 psi, respectively, for O.B.E. and S.S.E conditions. The maximum computed fastener stresses were identified to occur in rack upright connection bolts and were reported as 3,263 psi and 5,706 psi, respectively, for O.B.E and S.S.E conditions.

S&W had not documented unidentified fasteners in motor control centers in a N&D report. The NRC inspector examined accessible structural fasteners in the IENB* MCC-1 motor control center and confirmed that the fasteners were not identified. Review of Gould Inc. Distribution & Control Division Drawing No. 03-36418-00, Revision 10, showed that commercial grade hex head capscrews were specified for the 5/16" size observed by the NRC inspector.

The fastener identity status of this equipment is considered satisfactory, and this item is closed.

n. <u>Different Installed Flange Fasteners to Identities Shown in Control Drawings (page VI-1)</u>

The CAT team noted that the identity of installed flange fasteners for 1" lines off regenerative heat exchangers 1G33* EB001B and 1G33* EB001C did not agree with QC accepted and verified fasteners as shown on control drawings.

Review of IR P4000349 dated August 9, 1984, showed that four nuts had been found with identified batch numbers H3, 1AN-2, CC6 and U-2. The

control drawing indicated that batch number B-1 should have been the applicable fastener identity. As a result of this finding, S&W instituted a 100% reinspection of nonspecial bolted joint connections utilizing QA Inspection Plan R1777777 F0529, Revision 00, Change 01, "Reinspection of Piping and Supports." The reinspection effort was approximately 95 percent complete as of this inspection.

The corrective actions being taken are satisfactory and this item is closed.

o. ASME Code Class 3 Orifices Installed in Class 2 Systems (page VI-1)

The CAT team noted that orifices which had been certified to comply only with ASME Code Class 3 requirements had been installed in approximately 30 flange joints in ASME Code Class 2 systems.

Flow elements/restriction orifices were field procured by S&W in Purchase Order No. 12210-19594 dated January 14, 1983, with a requirement that the vendor furnish a certified material test report or certificate of conformance in accordance with ND-2130 (i.e., Section III Class 3) of the ASME Code. A check of intended application, by system code classification, was apparently not performed by the responsible engineer prior to finalization of procurement requirements. S&W revised the purchase order, after the NRC finding, to require the vendor to issue a certificate of compliance to NC (i.e., Class 2) requirements. The NRC inspector verified that the vendor had complied with this purchase order revision and had no questions since the technical requirements for these items were the same for both Class 2 and Class 3 application E&DCR No. C-14,275 was written, after review to assure that no Class 1 applications existed, to change S&W Specification No. 211.80, "Procurement of ASME Section III Raw Materials," to require all flow elements/restriction orifices to be procured in accordance with Class 2 requirements. An Engineering Assurance evaluation was performed in November 1984 of all field purchase requisitions initiated by the engineer responsible for the orifice procurement. No additional problems were identified by this evaluation.

The corrective actions taken are satisfactory and this item is closed.

p. Use of NF and not the Required NC Spacer Plate Material (page VI-2)

The CAT team identified that a spacer plate had been installed in Low Pressure Core Spray flange assembly CSL-4-2-011, adjacent to pump 1E21 PC001, which had been made from ASME Section III Code, Subsection NF material rather than the required Subsection NC material.

The NRC inspector ascertained that ASME Material Specification SA 36 plate was originally specified for the spacer. This material specification is precluded by the Appendices to the ASME Section III Code from use as a pressure boundary material in safety-related piping systems. The original spacer plate was replaced by a spacer machined from ASME Material Specification SA 516 Grade 65 plate, which is a permissible NC piping system material. The NRC inspector was informed by S&W personnel that this deficiency was identified by FQC-ASME personnel during assembly of system documentation for the NRC CAT inspector. It was additionally stated that the system documentation review, which is performed by the FQC-ASME group in preparation for issue of ASME N-5 Data Reports, would detect any other material discrepancies, if present.

The NRC inspector reviewed S&W QC Instruction No. FR1-ASME3-02B, "As-Built Verification and Code Certification," and reviewed final documentation (site and vendor) for feedwater system line 1-FWS-020-062-2. No anomalies were noted in the documentation with respect to materials certification, compliance of site fabrication and examination records with ASME Code requirements, and vendor compliance with S&W Specification No. 228.150, Revision 1 through Addendum 5, dated August 12, 1983, "Specification for Shop Fabricated Piping."

This item has been closed based upon correction of the identified problem. FQC-ASME group performance will, however, be further assessed, during future NRC inspections of as-built status and documentation for safety-related piping and supports.

q. <u>Deficiencies in Weld Filler Material Environmental Control (page VI-2)</u>

The CAT team noted that weld rod storage ovens, one at issue station #1 and one at issue station #3, were not controlled within required temperature ranges.

The NRC inspector compared the surveillance criteria contained in QA Inspection Plan R1211300F0501, Revision B through Change Notice No. 4 dated June 13, 1984, "Welding Material Control," against the requirements of S&W Specification No. 211.300, Revision 3, "Specification for Field Storage, Handling, and Issuance of Welding and Brazing Materials." Construction Method Procedure (CMP) 6.4, Revision E, through Change Notice No. 1 dated June 11, 1984, was also reviewed for consistency with the technical requirements of the above specification and for definition of issue station duties with respect to control of temperature in storage ovens. During visits to issue stations #1 and #3, the NRC inspector noted that each weld rod storage oven had an installed dial thermometer. These thermometers were not calibrated instruments. Oven temperature measurements by

station attendants were made using a digital pyrometer. Pyrometers at both issue stations were verified by the NRC inspector to have a current calibration status. Observation of the installed thermometers at issue station #1 showed one oven where the temperature reading was at the minimum of the required range. One oven at issue station #3 was noted to show a reading 10°F below the required minimum. Requested digital pyrometer checks confirmed that both ovens were actually within the specified temperature range.

The NRC inspector reviewed rod oven temperature records at issue stations #1 and #3 prepared by station attendants for January 1985. Daily check records were available at issue station #1. From review of the issue station #1 records, the NRC inspector noted that Oven 1-10 was recorded as being below the required range of 250°F to 350°F on eight different days in January 1985. Specifically, the recorded daily temperatures for January 7 through January 10, 1985, were 177°F, 183°F, 185°F and 181°F. Temperatures of 183°F and 184°F, respectively, were recorded for January 16 and January 17, 1985. The recorded temperatures for January 30 and January 31, 1985, were, respectively, 179°F and 181°F. Filling out of Construction Completion Checklists (CCCs) by the construction supervisor, welding, at intervals not to exceed 1 week, is required by CMP 6.4 for verification of compliance with CMP 6.4 requirements. Included in the CMP 6.4 checklist is an attribute for verifying that storage ovens are being maintained in accordance with the temperature requirements defined in paragraph 4.3.3 of the CMP. CCCs had been filled out on a daily basis by station attendants, and not the construction supervisor, at issue station #1. CCCs for the 8 days in question were completed to show satisfactory temperature maintenance of rod storage ovens. The failure to verify that satisfactory temperature control was being maintained is an apparent violation (458/8510-02).

Review of issue station #3 rod oven temperature records showed a total of 9 days in January 1985 for which recorded data was available. CMP 6.4 did not address temperature record requirements or reference the form being used by the attendants for documenting oven temperatures. Oven 3-3 was noted in the available temperature records to have been found on January 7, 1985, to be at 90°F relative to a required range of 150°F to 250°F. The comment "bad" had been entered in the record relative to this measurement. Daily completed CCCs for this station, also filled in by station attendants, all indicated satisfactory maintenance of rod oven temperatures during January 1985, with the CCC for January 7, 1985, being completed during a prior shift to the discovery of an unsatisfactory temperature in Oven 3-3.

The NRC inspector reviewed FQC January 1985 weekly surveillance IRs for the issue stations, each of which showed satisfactory temperatures had been found in the ovens by FQC measurement. One of the IRs was generated on a date corresponding with an unsatisfactory issue station #1 temperature record for Oven 1-10. Information was requested by the NRC inspector from FQC concerning (1) actions taken by the station attendant on discovery of a discrepant temperature in Oven 3-3, (2) the conflict between CCCs and temperature records for Oven 1-10, and (3) the quantities of electrodes issued from these ovens and application for the dates in question. A station attendant memorandum was shown to the NRC inspector which indicated that E309 electrodes in Oven 3-3 were scrapped by the attendant after discovery of the low temperature. The oven was removed from service and repair made by an electrician. The oven was then stated to have been held for 48 hours at temperature to demonstrate satisfactory control prior to return to service. The memorandum did not indicate that any actions had been taken with respect to ascertaining whether electrodes had been issued prior to discovery of the low temperature. A weld material requisition was shown to the NRC inspector which indicated that E 309 electrodes had, in fact, been issued on January 7, 1985, but to a nonsafety-related application. The NRC inspector was informed by FQC personnel that review of weld material requisitions indicated that E 7018 electrodes in Oven 1-10 had not been issued during January 1985. The Oven 1-10 unsatisfactory temperature data was attributed by FQC personnel to have probably resulted form the erroneous entry by the station attendant of data from an oven set at 200± 50±F into the Oven 1-10 record block.

The NRC inspector questioned whether completion of CCCs by personnel responsible for performing CMP 6.4 duties could be considered a meaningful verification of compliance with CMP 6.4 requirements. The response given to this question was that paragraph 4.4 in CMP 1.1, "Preparation and Control of Construction Method Procedures," permits a person to delegate performance of his duties to personnel under his authority.

r. Design Change Control Discrepancies (page VII-3/4)

Seven examples of what were termed isolated discrepancies were noted by the CAT team with respect to design change control. The examples noted were (1) initiation of E&DCRs at both site and Cherry Hill Operations Center to effect the same drawing change, (2) failure to incorporate available E&DCRs into a drawing revision, (3) an incorrect E&DCR status shown in an IS-217 report and a wrong drawing revision listed in an IS-256 report, (4) failure of a E&DCR to show that the FSAR was affected by a system change, (5) signoff of a E&DCR by a project engineer's designated representative before signoff by the applicant, (6) modification of a E&DCR after project engineer

signoff, and (7) specification requirements change by correspondence rather than by use of an E&DCR.

As a result of the scope and programmatic nature of the listed deficiencies, the NRC inspector decided that the most appropriate followup to the CAT team findings was to perform an inspection of the compliance of current design change control activities with program requirements. Program requirements were determined by review of both Procedure RBP 12.0-13 dated November 13, 1984, "Engineering & Design Coordination Report (E&DCR) Procedure," and Engineering Assurance Procedure 6.5, Revision 0 through Change Notice No. 1 dated July 27, 1984, "Preparation, Review, Approval, and Control of Engineering and Design Coordination Reports (E&DCRs) - Computerized Logging and Tracking System." Eleven E&DCRs, C-06848 through C-068, from the civil/structural discipline were initially selected for review. Each of the E&DCRs was reviewed with respect to apparent adequacy of dispositions, compliance of processing with program requirements, and reflection of correct status in the computerized tracking system. Dates of current revisions of affected drawings were also compared against approval dates for unincorporated E&DCRs, to assure that all available E&DCRs had been incorporated at the time a drawing revision was made.

Within this area of inspection, no violations or deviations were identified. This item has been closed for tracking purposes as a CAT followup item. Planned additional inspection of this activity will be included in the scope of a future inspection of site design control.

s. Missing Inspection Tags on Small Bore Restraints (page VII-7)

The CAT team identified two small bore restraints, 1-BZ-CCP-61* PSR-13B and -64* PSAR-006A, which were missing applicable as-built inspection tags.

The NRC inspector reviewed Construction Site Inspection Procedure C.S.I. 8.0.3, Revision 7, "Category I, ASME III Piping and Pipe Support As-Built Drawings," and interviewed the FQC supervisor responsible for as-built inspection. A memorandum was also shown to the NRC inspector, wherein the resident project manager informed supervision that work was prohibited on any component exhibiting an as-built acceptance tag without appropriate Engineering authorization. Violation of this requirement, or tampering with tags, was indicated would be responded to with appropriate disciplinary action. In that the memorandum was dated June 1, 1984, which predates the CAT observation, the effectiveness of this action could not be assessed without additional direct inspection being performed.

This item will be an open item pending NRC inspection of as-built compliance of piping and supports with design requirements. (458/8510-03)

t. Incorrect Design of Diesel Generator Silencer Connection (page VII-8)

The CAT team noted that the silencers for Transamerica Delaval diesel generators were installed without any sliding connection for thermal expansion.

The NRC inspector verified that Rework Control Form M50522 had been initiated to provide a sliding connection for thermal expansion of the silencers. One unit had been reworked as of this inspection.

The corrective actions being taken are satisfactory and this item is closed.

u. Use of E&DCRs for Nonconformances (page VII-8)

The CAT team identified seven instances where E&DCRs had been incorrectly used for addressing nonconformances.

In addition to the immediate S&W corrective actions which were taken and documented in the CAT report, an Engineering Assurance surveillance was performed in November 1984 with respect to this subject. A total of 234 multi-discipline E&DCRs were evaluated, of which 138 had been issued since August 30, 1984. No additional instances were found when E&DCRs rather than N&Ds had been used for addressing site nonconforming conditions.

The corrective actions taken are satisfactory and this item is closed for CAT followup tracking purposes. This deficiency will be additionally considered, however, during planned inspection of site design control.

v. E&DCR Approval Without Independent Review of Calculations (page VII-9)

The CAT team identified that E&DCRs associated with Site Engineering Group Calculation No. 12210-S-E107 (340) had been approved by the Project Engineer, although a number of calculations had not been checked and independently reviewed.

An Engineering Assurance surveillance was performed in December 1984 which reviewed 73 inter-discipline change documents that referenced calculations as technical justification. One E&DCR was found in this surveillance which referenced a calculation that had not received final approval prior to E&DCR approval. Documented training actions

and/or other actions to preclude recurrence were not reviewed during this inspection.

This item will be an open item pending such review. This subject will also be further addressed during planned inspection of site design control. (458/8510-04)

3. Exit Interview

An exit interview was conducted on February 8, 1985, with those personnel denoted in paragraph 1 of this report. At this exit interview, the NRC inspectors summarized the scope and findings of this inspection.