U.S. NUCLEAR REGULATORY COMMISSION
Region I

Report No. 50-271/85-11

Docket No. 50-271

License No. DPR-28

Licensee: Vermont Yankee Nuclear Power Corporation
RD5 Box 169 Ferry Road
Brattleboro, Vermont 05301

Facility Name: Vermont Yankee Nuclear Power Station

Inspection At: Vernon, Vermont

Inspection Conducted: March 11-15, 1985

Inspectors: J. Prell — 3-29-85
J. Prell, Reactor Engineer — date

J. Prell for — 3-29-85
W. Oliveira, Reactor Engineer — date

Approved By: Lee H. Bettenhausen for — 4/2/85
Dr. P. K. Eapen, Acting Chief, QA Section — date
Division of Reactor Safety

Inspection Summary: Routine Unannounced Inspection Conducted March 11-15, 1985 (Report Number 50-271/85-11)
Areas Inspected: Quality records storage program, procurement program, and receipt, storage and handling program for safety-related items. The inspection involved 75 hours onsite by two region based inspectors.

Results: Violations (inadequate receipt inspection and potential falsification of receipt inspection records - paragraph 2.5) were identified in the receipt, storage and handling program for safety-related material.

DETAILS

1. Persons Contacted

J. Babbitt, Security Supervisor
D. Bauer, Assessment Engineer
L. Bozek, Senior Engineer, Operations Quality Group (OQG), Yankee Atomic Electric Company (YAEC)
F. Burger, Quality Assurance (QA) Coordinator
R. Butterfield, Operations Technical Assistant
* J. Desilets, Operations Department Supervisor
* P. Donnelly, Technical Services Superintendent (Acting)
D. Dyer, OQG Engineer, YAEC
* C. Falkner, Document Control Coordinator
J. Granfrancesco, Maintenance Supervisor
* G. Gilmore, Storekeeper
W. Limberger, Senior Engineer, Operations
* R. Martin, Quality Design and Procurement Supervisor, YAEC
D. McElwee, Equipment Qualification (EQ) Coordinator
* R. Milligan, Administrative Supervisor
C. Perrevecchio, QA Technician
W. Peterson, OQA and Engineering Group (EG) Supervisor, YAEC
J. Pelletier, Plant Manager
* D. Pike, OQG Supervisor, YAEC
* D. Reid, Operations Superintendent

2.0 Receipt, Storage and Handling

2.1 References/Requirements

1. 10 CFR 50, Appendix B.

2. ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants.

3. ANS 3.2/ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants.

4. Vermont Yankee Final Safety Analysis Report, Appendix D.

5. Yankee Operational Quality Assurance Program, YOQAP-1-A, Operational Quality Assurance Manual.

6. Administrative Procedure (AP)-0801, Revision 12, Receipt, Inspection and Shipment of Material and Equipment.

7. AP-0802, Revision 7, Identification and Control of Materials, Parts and Components.

8. AP-0803, Revision 8, Storage of Materials and Equipment.

9. AP-0806, Revision 1, Issuing and Returning of Material, Parts and Components.

10. AP-6021, Revision 8, Nonconformance Reports.

11. ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel.

2.2 Program Review

The inspector reviewed the documents listed in Section 2.1 and determined that the licensee had established a receipt, storage, and handling program for safety-related material which:

-- Provided for receipt inspection of all incoming safety-related materials and supplies. Reference 6 of Section 2.1 establishes the licensee's practices for receipt and inspection of material.

-- Identified qualified vendors who may supply safety-related items which are supported solely by a certification of conformance.

-- Required that received materials be examined for conformance with requirements specified in the purchase order.

-- Provided for documentation of receipt inspection and storage of receipt inspection records.

-- Provided controls for tagging and marking of acceptable and nonconforming items.

-- Established controls for the disposition and documentation of nonconforming items.

-- Established controls for the conditional release of nonconforming items.

-- Established responsibilities for each aspect of the program.

-- Established controls for shelf-life components.

-- Provided for periodic inspections of the storage areas.

2.3 Program Implementation

Implementation review of the program included the following:

-- Tours of the warehouse. Tags were used to segregate safety-related items from nonsafety-related items. All items but one (P.O. 13068) were properly stored, identified, and segregated. Upon identification by the inspector, the licensee removed the P.O. 13068 item from the shelf for proper tagging. The inspector found no indication of water leakage or rodent damage.

-- Verification that access controls exist which limit entrance to the warehouse.

-- Verification that hazardous materials were stored away from safety-related items. Flammables and other hazardous chemicals were stored in enclosed metal cabinets.

-- Verification that safety-related items were stored at their proper storage level or better. The warehouse is a Level B storage area. All items inspected were classified as Level B or lower.

-- A tour of the QC Hold area and verification that the licensee's program for nonconforming items was being properly implemented.

-- Review of the following completed safety-related purchase order packages and verification that receipt inspections had been recorded and documented.

P.O. Number	Description
14409	Solenoid Valves
9706	Diesel Air Start Components
22396	Ninety Degree Angles
22711	Spring Nuts and Ninety Degree Angles
22554	Bolts
12259	Collets and Pistons
16480	Collets and Pistons
19358	IRM
22041	D.G. Fuel Element Cartridge
21945	Agastat Relays
22474	120 Vac Relay
10269	Time Delay Relays
18047	Agastat Relays
22706	Bolts
13068	125 Vdc Coil Control

In addition, the inspector held discussions with the Instrumentation and Control (I&C) and Maintenance Department Heads, the Plant Manager and his staff and stores personnel regarding the effectiveness of the receipt, storage and handling program.

2.4 QA/QC Interface

The annual QA audit of this area, VY-84-08, "Procurement and Material Control," conducted by Yankee Atomic Electric Company (YAEC) was reviewed. One facet of this audit covered the training/qualification of plant personnel performing receipt inspections on safety-related material. Results of this audit are discussed in Section 2.5 below.

2.5 Findings

During the tours of the warehouse, the inspector viewed the as-stored conditions for those items received under purchase orders identified in paragraph 2.3. A majority of the items received under eleven of these purchase orders were not opened by the receipt inspectors. These items were still packaged in their non-transparent sealed shipping boxes or envelopes.

Table 1 is a summary of the inspector's observations for the items received under the eleven purchase orders.

Table 1

P.O. No. Date of Inspection	No. and Kind of Items Received	No. of Items on Shelf*	No. of Items Still Sealed	No. of Items Possibly Inspected	Items Indicated as being Receipt Inspected
14409/ 5/30/81	3-Solenoid Valves	3	2	1	Valves #1, 2, 3 Solenoid Valve and Kits
	2-Repair Kits	2	0	2	
9706/ 7/15/78	4-3-way Solenoid Valves	4	3	1	Valves, elbows, filters (all items on P.O.)
	4-Norgram Air Filters	3	3	1	
	12-Air Filter Elements	4	4	8	
16480/ 8/31/81	6-Collets and Pistons	6	6**	0	Spares (all items on shipping receipt 218-108035)

P.O. No. Date of Inspection	No. and Kind of Items Received	No. of Items on Shelf*	No. of Items Still Sealed	No. of Items Possibly Inspected	Items Indicated as being Receipt Inspected
12259/ 12/31/79	5-Collets and Pistons	3	3	2	Collet and Piston (all items on shipping receipt)
10269/ 6/20/78	17-Different Time Delay Relays	7	7	10	All relays on PO
18047/ 7/16/82	51-Different Relays	47	47	4	All relays indicated on packing list
22041/ 7/24/84	18-Fuel Filter Cartridges 2/box	17	16	2	All items indicated on package list
22396/ 4/5/84	100-Ninety degree Angles 25/box	2 boxes	2 boxes	2 boxes	All items indicated in shipping order
22554/ 4/20/84	10 boxes-3/8" x 2 3/4" bolts	5 boxes	4 boxes	6 boxes	All items on PO
22706/ 6/12/84	20 boxes-3/8" x 2 3/4" bolts	20 boxes	17 boxes	3 boxes	All items indicated on shipping order
22711/ 6/7/84	8 boxes-Ninety degree angles 25/box	5 boxes	3 boxes	5 boxes	All items indicated on shipping order
	15 boxes-3/8" Spring Nuts 100/box	11 boxes	10 boxes	5 boxes	All items indicated on shipping order

* Missing items presumably were issued for use into the plant.
** One item stored in an hermetically sealed aluminum envelope appeared to have been torn while in storage.

The inspector reviewed the receipt inspection records for the above purchase orders. The inspection records indicated that without exception all received items were inspected. In Sections III and IV of the Receipt Inspection Checklist, the receipt inspectors recorded that the attributes such as, physical damage, dimensions, workmanship and electrical insulation were inspected. As described in Table 1, a majority of those items remaining on the shelf were in sealed packages. Inspection for such attributes through the sealed packages is impossible. The eleven identified Receipt Inspection Checklists covered a span of six years (1978-1984) and were signed by eight different individuals: four Department Heads, one Department Head designee, two QA Technicians and one Storekeeper. All Receipt Inspection Checklists since 1982 were signed off by the QA Technician or the Storekeeper.

Further inquiry resulted in these additional findings and conclusions:

(1) Inadequate Receipt Inspection Procedures

The inspector's review of the above purchase orders indicated that the inspection efforts varied significantly from person to person. For example, all of the inspection activities required on the receipt inspection checklist (RIC) for PO 14409 were not performed because the receipt inspector knew that the components received under this PO would never be used at the facility. However, the licensee failed to tag these components to identify this fact. Additionally, these components were not segregated from other stored safety-related items.

For P.O. 22041 and P.O. 18047 a sampling inspection was thought by the licensee to be adequate to accept all the components received under a given P.O. However, the licensee procedures and specific procurement documents neither endorsed acceptance of received goods by sampling inspections nor provided specific guidance for determining the appropriate sampling plan.

These observations indicate that the licensee program failed to establish acceptable procedures for receipt inspection.

(2) Inadequate Personnel Training, Guidance and Tools

Prior to February 1, 1982, all receipt inspections were conducted and signed off by the cognizant Department Head. After February 1, 1982, a new position, QA Technician, was created to be responsible for all receipt inspections. The licensee's full time QA Technician stated to the inspector that he did not receive any formal training in receipt inspections. As stated in YOQAP-1-A, the licensee has taken exception to the qualification

requirements of ANSI N45.2.6 for this position. Licensee administrative procedures related to receipt inspection provide little or no inspection guidance. Procedures governing inspections of items for physical damage, physical properties, dimensions, weld preparations, workmanship, lubricants and oils, and electrical insulation do not exist. The licensee has established some guidance for such receipt inspection attributes as identification and marking, documentation, protective covers and seals, coatings and preservatives, inert gas blankets, desiccants, and cleanliness. However, in most cases, the established guidance was inadequate since it only addressed packaging, transportation and classification level requirements. The inspectors also determined through questioning of the QA Technician that the only tools available for dimensional inspections were a tape measure and a steel ruler.

Because of this apparent lack of tools, training and written guidance, the receiving inspector did not perform the required inspections although he documented on the Receipt Inspection Checklist that he did.

Given below are five examples where the receipt inspector documented that he had inspected those attributes on the RIC but in fact he had not performed the inspections. These five records appear to be false.

P. O. Number	Attributes Which Were Indicated as Being Inspected But Were Not
16480	Electrical Insulation
14409	Dimensions
18047	Dimensions, Electrical Insulation
22396	Dimensions
22711	Dimensions

Notes: P.O. 16480 did not have any electrical parts. In P.O. 14409 the receipt inspector stated that a dimensional check was probably not performed. In P.O. numbers 18047, 22396 and 22711, the receipt inspector stated he did not know what dimensional or electrical attributes to measure or inspect.

(3) Ineffective QA Audits

In YAEC audit VY-84-08, the training and qualifications of plant personnel were audited. Under the "Assessment of the Effectiveness of the Activities Audited", the conclusion was made that these personnel were "highly knowledgeable of the procedural requirements". This appears to contradict the NRC findings and raises questions as to the effectiveness of the audit.

In addition, the audit report did not reflect a review of stored items and storage conditions.

(4) Inadequate Preventive Maintenance Program for Items in Storage

The licensee has not established a preventive maintenance (PM) program for safety-related items stored in the warehouse as required by 10 CFR 50, Appendix B and ANSI N45.2.2. Purchase orders did not require PM information from the vendor. Although the licensee has implemented a good PM program for stored rotating electrical equipment, there is no evidence that PM is being performed for items stored in inert gas or with desiccants. As an example, PO 10269, received on March 16, 1978, had the following notation stamped on the nontransparent hermetically sealed envelopes "Storage Inspection: check container upon receipt for damage/loss of vacuum. Examine contents in 3 year intervals of packaging." The contents were still sealed in the manufacturers sealed envelope six years after receipt.

(5) Apparent Falsification of Inspection Records

It appears that the present licensee program is conducive to falsification of receipt inspection records. The receipt inspector or his alternate is the only individual who presently signs the receipt inspection; there is no management review. Prior to 1982, management personnel signed receipt records as noted in paragraph 2.5(2). Examples of PO's which contained false information are:

PO No.	Apparent Falsification
14409	RIC indicates solenoid valve Serial Numbers 1, 2, and 3 were inspected. Inspector found Serial Numbers 2 and 3 still packaged inside solid foam containers.
16480	RIC indicates that the 6 collets and pistons had been inspected. The inspector found all 6 in their hermetically sealed bags. In addition, the RIC indicates they had been inspected for electrical insulation which does not pertain to collets and pistons.
18047	RIC indicates relays were dimensionally checked. The QA Technician stated he did not know what dimensional attributes to measure.
22041 22396 22554 22706 22711	RIC indicates these items received a dimensional check. The QA Technician indicated he had no criteria to measure against and that a dimensional check was probably not performed.

Items (1) through (4) above indicate a programmatic breakdown of receipt inspections. They collectively appear to be a violation.

Item (5) also appears to be a violation resulting from the falsification of receipt inspection records.

2.6 Management Meetings

The inspectors met with the Plant Manager and his staff to discuss these findings on March 14, 1985.

At that time, the inspector asked the licensee five questions NRC Region I management sought answers to. They were:

1. "What was the basis for apparently not inspecting all items?"

2. "Why doesn't the documentation accurately reflect what the inspection covered?"

3. "Where are the missing items?"

4. "What guarantees can the licensee provide to the NRC that these missing items are performing their intended function?"

5. "Why wasn't this programmatic breakdown identified by supervision or QA?"

That evening, licensee management informed the NRC that the following immediate actions had been taken.

1. Stores had removed all the identified items from the warehouse and placed them into the QC Hold area.

2. Until further notice, all safety related materials were to be receipt inspected against the RIC and documented prior to being released to the plant.

3. Engineering would be requested to review the receipt inspections conducted for the identified items along with their known or likely installations and make an engineering safety evaluation of placing these items into service without an adequate receipt inspection.

2.7 Summary of the Licensee's Findings in Receipt Inspections

On March 15, 1985, after the NRC inspector made known his findings, the licensee provided a copy of an internal memorandum dated February 22, 1985, entitled "Meeting to Develop Recommendations for Enhancement of Receipt Inspection" VYB85/74. This memorandum was addressed to the Vice President and Manager of Operations and summarized a January 11, 1985, meeting between Yankee Nuclear Services Division (YNSD) QA, VY Corporate, and VY Plant personnel regarding the adequacy of the current VY receipt inspection function. The following weaknesses were identified in the memorandum:

"1. Receipt inspectors sign for acceptance of dimensional characteristics and conformance to drawings and specifications, but do not actually measure dimensions nor, in most cases, compare received items to applicable documentation other than the purchase order and the vendor's C of C. Supporting documentation is not readily available.

2. Receipt inspectors have received no hands-on technical training in the techniques of mechanical and visual inspection of materials, parts, and components.

3. Receipt inspectors do not have the equipment necessary to perform even minimum dimensional inspection of received items.

4. Too much faith is placed upon the vendor's C of C as ensuring the adequacy of purchased items.

5. Resolution of problems identified at receipt inspection (other than those documented in non-conformance reports) may be subject to the "pressures of production", since the only source resolution is the Ordering Department.

6. Receipt inspection has been treated as a "part-time" duty of the stores QA technician, which promotes superficiality of inspection due to the pressure of other priorities."

This memorandum proposed several corrective actions to resolve the above weaknesses. These actions were undergoing VY management review at the time of this inspection.

3.0 Procurement Program

3.1 References/Requirements

1. 10 CFR 50, Appendix B, Criteria IV and VII.

2. ANSI N45.2.13-1976, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants.

3. ANS 3.2/ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants.

4. Yankee Operational Quality Assurance Program YOQAP-1-A, Operational Quality Assurance Manual.

5. Vermont Yankee Final Safety Analysis Report, Appendix D.

6. AP-0800, Revision 10, Material and Service Procurement.

7. AP-6020, Revision 10, Material and Service Purchase Approval.

8. Yankee Atomic Electric Company Approved Vendor List, Revision 16.

3.2 Program Review

The inspector reviewed the documents listed in Section 3.1 and determined that the licensee had established a procurement program for safety-related replacement items which included the following:

-- Only approved and qualified suppliers were used for supplying safety-related items.

-- Procurement procedures were developed in accordance with ANSI N45.2.13-1976.

-- Responsibilities were identified for initiation, review, and approval of procurement documents.

-- Purchase and receipt records for safety-related items were retained and maintained in accordance with established requirements.

-- The engineering organization performed technical and quality evaluations of all purchase requisitions.

-- Quality Assurance (QA) performed overview of the above activities.

-- Controls were established for making changes to procurement documents.

3.3 Program Implementation

The inspector selected the following purchase orders for safety-related items to ascertain whether procurement activities were conducted in accordance with programmatic and QA requirements.

Purchase Order Number	Description
22124	UV Sensor Tube Module
22146	RCIC Trip Throttle Valve
22173	Containment Monitors
22271	EQ ASCO Solenoids
22179	3/4" Swing Check Valves for Diesel Air Start
22395	Reactor Feedwater Nozzle Mockup
22378	ASCO Pressure Switch
22474	Agastat Relays
22592	Diesel Generator ASCO Valves and Repair Kit
22673	710 DU Spare Parts Kit for Analog Trip System
22684	SNB Motor and Operator for V23-15
22738	Gaskets and Disc for RCIC Valve
23021	O-Ring Kits
23261	125 Hp. Motor for Cooling Tower
23263	Gasket Material for QA MOV's
23616	Limit Switches and Gaskets

The inspector verified that the vendors for the above purchase orders were on the Approved Vendors List; that QA and Engineering had reviewed the purchase requisitions; and that the requisitions referenced the appropriate codes, standards, Part 21, shelf-life, and Certificate of Conformance requirements.

3.4 Findings

No violations were identified.

4.0 Records Program

4.1 Requirements/References

1. 10 CFR 50, Appendix B.
2. Technical Specification Section 6.6.
3. FSAR Section 1.9, Quality Assurance Program.
4. ANSI N45.2.9-1974.
5. ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants.
6. YOQAP-1-A, Revision 15, Operational Quality Assurance Manual.
7. Administrative Procedure (AP) 0834, Revision 11, Plant Record Retention.
8. AP 6802, Revision 11, Drawings and Aperture Cards.
9. AP 6805, Revision 8, Document Control.
10. AP 6806, Revision 5, Transfer of Quality Assurance Records to Document Control Center.
11. AP 6808, Revision 3, Record Disposition.

4.2 Program Review

The inspector reviewed the licensee's Quality Assurance records storage program. This program was established to meet the requirements of the documents referenced in paragraph 2.1. The licensee's procedures adequately identified the records required to be maintained. All records required to be maintained by the Technical Specifications are identified and tracked in the licensee's Departmental Record Type List. Responsibilities and controls for storage and filing, transfer, retention, maintenance and disposition of records are also identified and assigned in the licensee's procedures.

4.3 Program Implementation

The inspector verified the implementation of the record storage programs in AP 0834 and AP 6806 by tours of several departmental storage areas and the storage vault. The designated record clerks/custodians:

(1) readily retrieved any records requested, including microfilm records located in specific areas throughout the plant.

(2) controlled the receipt and verification of records including changes and supplemental information. The inspector reviewed the Records Receiving Checklist for the Health Physics Department and the Stores and Purchasing Department. These records had been submitted for microfilming.

(3) controlled the access to files and the accountability of records.

(4) were knowledgeable of the retention requirements and the disposition of records.

When the records personnel were not sure of the record retention periods, especially for the records not covered by regulatory requirements or ANSI N45.2.9, they consulted the applicable department heads for answers. Furthermore, AP 6808 requires the signature of a department head for the destruction of any records regardless of the retention period. For example, the inspector noted that the Reactor Engineering Department Head signed the Records Disposition Form to have the Nuclear Engineering Conference Reports for 1976-1981 destroyed. Likewise, the Training Department Head requested that certain outdated records be returned to him after they were microfilmed.

The storage vault was inspected. This vault met the requirements of a single storage facility discussed in ANSI N45.2.9, Paragraph 5.6. The temperature and humidity (72°F and 50%) was within the range indicated in AP 0834 (68°F-75°F and 30-55%). Temperature/humidity information was recorded monthly on Form 0834.02. Access to the vault is controlled by the Administrative Supervisor, the Document Control Coordinator or her assistant. The permanent records in the vault include the Health Physics logs, Chemistry logs, radiographs, and strip charts. The strip charts, after a year, are sent to a vault in Iron Mountain, New York.

The inspector randomly selected the following records for review:

- Health Physics Log Book (8/12/79 through 12/10/79)
- Chemistry Log Book (8/10/72 through 10/26/72)
- Radiographs RHR 3BF6 (2/17/71)
  MS ID F5 (1/11/71)
  Core Spray (12/30/69 and 4/11/71)
  Reactor Recirc (6/17/76)

The inspector also verified that the drawings received by Document Control Center (DCC) from YAEC were in agreement with the transmittal documents; that the drawings were properly distributed; and that the microfilm for these drawings was properly filed. Specifically, the inspector verified that the drawing revisions of an Engineering Design Change Request (EDCR 84-13) and a Plant Design Change Request (PDCR 84-01) from Engineering Support were in agreement with the Master Point Index.

The following records were reviewed to verify proper implementation of the program:

-- Reportable Occurrences related to Information Notices (IN), Generic Letters, Inspection Reports (IR), and Licensee Event Reports (LERs).

  - IN 85-09, IN 85-10, IN 85-11 IN 85-04, IN 84-81, IN 84-79 and IN 84-78
  - Generic Letter 84-24 and LERs 84-12, 84-13, 84-14, 84-15 and 85-01
  - IR 84-23, Licensee is preparing reply to open items 84-23-02 and 84-23-04

-- I&C calibration records for a Decade Box, Voltmeter, and Potentiometer.

-- Surveillance test record of a Standby Gas Treatment System.

-- Operational logs and records such as: Operator Round Sheet; Auxiliary Operator Round Sheet; Sump Timer Data Sheet; and Meter Data Sheet.

-- Reactor Engineering records such as: Fuel Receiving Supervisor's Checklist; Fuel Container Checklist; and Special/Spent Nuclear Material (SNM) Transfer Form.

-- Maintenance Inspection Reports for MR 84-2260, 2247, and 2169.

-- Inservice Inspection (ISI) for 1983: ISI Insulation Removal and Replacement package; and 1983 Vermont Yankee Work Plan.

-- DCC records such as Drawing Status Revision Report and Master Print Index. The inspector and DCC assistant randomly selected twenty drawings from the print index of 17,900 drawings and verified that these drawings were microfilmed.

-- Equipment Qualifications (EQ) records for Level Transmitter LT 2-3-72A (MR 85-0411), and Pressure Transmitter PT 2-3-52D.

-- MR 84-0263, Reactor Building Closed Cooling Water Pump and MR 84-1757, Emergency Core Cooling System Battery Charger.

4.4 QA/QC Interface Involving Records

The annual YAEC audit (VY 84-13) of Document Control, which included records, was conducted in October 1984. The audit report was issued on November 21, 1984. The plant's response, which was adequate and timely was sent to the Manager of Operations on January 3, 1985 for his review and approval. Operational QA (OQA) only retains the latest YAEC QA Audit. Plant Audit reports are maintained at YAEC, Framingham, Massachusetts. The inspector also reviewed OQA Inspection Checklists 84-12, 84-16, 84-32, 83-35, 83-50, and 85-16. These checklists conformed to ANSI N45.2.9 requirements.

4.5 Findings

No violations were identified.

5.0 Exit Meeting

The inspectors met with the Plant Manager's designee and other staff members denoted in Paragraph 1 on March 15, 1985, to summarize the scope and findings of the inspection. These representatives acknowledged the inspector's findings. See paragraph 2.6 for details of other management meetings.

At no time during the inspection was written material provided to the licensee by the inspectors.