# U.S. NUCLEAR REGULATORY COMMISSION REGION I

Report No. 50-334/84-28

Docket No. 50-334

License No. DPR-66

Licensee: Duquesne Light Company

435 Sixth Street

Pittsburgh, Pennsylvania 15219

Facility Name: Beaver Valley Power Station, Unit No. 1

Inspection At: Shippingport, Pennsylvania 15077

Inspection Conducted: December 3-6, 1984

Inspectors:

Bissett, Reactor Engineer

W. Gliveira, Reactor Engineer

Approved by:

P. K. Eapen, Acting Chief

Management Programs Section

Inspection Summary:

Routine unannounced inspection conducted on December 3-6, 1984 (Report No. 50-334/84-28

Areas Inspected: Licensee action on previous inspection findings; procurement; and receipt, storage and handling programs.

The inspection involved 62 hours of onsite inspection by two region based inspectors.

Results: No violations were identified.

#### DETAILS

#### 1. Persons Contacted

\*D. Beron, Material Control Supervisor

\*J. Bost, Compliance Engineer

\*R. Druga, Manager of Technical Services \*S. Fenner, Director, Quality Control (QC)

\*J. Gazdacko, Maintenance Engineer \*K. Grada, Manager, Nuclear Safety

\*D. Hunkele, Director, Quality Assurance (QA) - Operations

\*F. Lipchick, Senior Compliance Engineer \*K. Lowrie, Material Procurement Engineer M. Merchick, Station Electrical Engineer W. Neolean, Purchasing Coordinator (NECU)

M. Pergar, Quality Control, Engineer C. Sabol, QA Engineer

B. Sepelak, Nuclear Services Engineer

\*C. Shannon, Senior QC Inspector

\*J. Sieber, General Manager - Nuclear Services

#### USNRC

\*W. Troskoski, Senior Resident Inspector

\*Denotes those present at the exit meeting on December 6, 1984.

#### 2. Action on Previous Inspection Findings

(Closed) Open Item (334/83-28-01): Clarify the intent, use, and responsibility of the maintenance qualification checklist and its update. The licensee is replacing the maintenance qualification checklist with a more structured On-the-Job Training (OJT) program. Maintenance and Instrument and Controls OJT procedures, which will replace the old maintenance checklist, have been developed and approved. The Beaver Valley Power Station (BVPS) training manual is being revised to reflect these changes with the OJT program scheduled for implementation by January 1985.

The inspector reviewed applicable material relating to the above changes and based on this review, this item is closed.

#### 3. Receipt, Storage and Handling for Equipment and Materials Program

# 3.1 References/Requirements

- Beaver Valley Power Station (BVPS) Unit No. 1 Updated Final Safety Analysis Report, Appendix A
- 10 CFR 50 Appendix B

- -- Regulatory Guide 1.38, Quality Assurance (QA) Requirements for Packaging, Shipping, Receiving, Storage and Handling...
- -- NRC IE Bulletin 79-01B, Equipment Qualification
- -- Operations QA Procedure OP-6 Material Control
- -- Plant Modification Manual G-1, Packaging, Shipping, Receiving, Storage and Handling of Materials and Equipment
- -- Operations Quality Control Procedure (600) 7.2, Receipt Inspection (RI) of Materials Procured through Duquesne Light Company (DLC) Purchasing Department of BVPS
- -- OQC 8.1, Storeroom QC
- -- BVPS Chemistry Manual, Chapter 2, Part 1 Reactor Plant Chemicals
- -- General Stores (GS) Procedure 203.0, Receiving Inspection Function of Stock and Non-Stock Material (BVPS)
- -- GS 204.0, Storage Function (BVPS)
- -- Design Change Package 351
- -- DLC Nuclear Group, Nuclear Engineering and Construction Unit Memorandum of October 22, 1984 re: Safety Evaluations

#### 3.2 Program Review/Implementation

The program as described in the preceding references was reviewed and determined that the licensee's established administrative controls for safety-related materials were adequate for:

- -- documenting the receipt inspection, storage and handling requirements, i.e., procedures, instructions, directives, guidelines, etc.
- -- disposition of the material as it is received, inspected, stored, handled and issued, especially when dealing with nonconformances and conditional releases
- -- preventive maintenance (PM) actions and shelf life requirements during storage
- -- periodic inspections, surveillances and audits of the program effectiveness

A tour of the storeroom was made and the following 14 items were selected for review:

- -- Pressure transmitters (PT) Stock No. 834559 and 834564
- -- Valve operator PO C 022563, Stock No. 801798
- -- Motor Stock No. 801755F
- -- Limitorque valve PO 13054
- -- Safety relief valve PO C 020607, Stock No. 853482
- -- Relief valve PO C 016143, Item No. 2
- -- Oil pump PO C 022759
- -- Snubber 8" bore x 5" stroke with ethylene propylene seal Stock No. 859399
- -- Float ring Stock No. 852123
- -- Unions PO C 026481
- -- Gasket material PO C 025796
- -- Air filters PO C 500168, Stock No. 953516 and 953517
- -- Buffer solution PO C 27013, Stock No. 872030
- -- Anion hydroxide PO C 022563, Stock No. 872041F

# 3.3 Findings

- During the tour of General Stores (GS) warehouse area, the inspector noted the following:
  - In verifying removal of items from storage, in accordance with ANSI N45.2.2 paragraph 6.5, a "CD" item, Category 1 limitorque valve (PO 13054) was found to have missing components. Charge Direct (CD) items are specifically requested and maintained in the warehouse by the originator of the purchase order. The general store supervisor informed the inspector that the originators scavenged their own stored CD items for spare parts. No time limits were established for the disposition of previous stored CD items. A procedure is being developed to require prompt disposition of the CD items in the warehouse and eliminate the above problem. The inspector observed that for newly received CD items, the originators are complying with the intent of the procedure. The inspector also reviewed a number of General Inspection Reports (GIRs) which require that Quality Control (QC) verify the identity of all installed Category I material spares/parts to prevent the introduction of spares/parts that would degrade the item.

- 2. In verifying the cleanliness and housekeeping practices in accordance with ANSI N45.2.2 paragraph 6.2.2, it was observed that there was an excessive accumulation of dust throughout the warehouse. The impending move of the warehouse in early 1985 and the remodeling activities now occurring in the warehouse were given as the causes for relaxed dust control. In the interim, general stores has placed, where practical, items in plastic bags. Future plans for the new warehouse include enclosed storage cabinets to alleviate the problem of dust.
- 3. The status indicating system for the release of stored items, required by ANSI N45.2.2 paragraph 5.4, was verified by the implementation of NRC IE Bulletin 79-01B. BVPS Unit No. 1 listed the electrical equipment and components that are required to be replaced in Design Change Package (DCP) No. 351. A sample of the items to be replaced were reviewed with General Stores. The following unqualified components are still maintained in the storeroom as qualified awaiting disposition by Engineering.
  - -- Pressure Transmitter (PT) 50 EP1041 (Fischer Porter)
  - -- Pressure Transmitter (PT) 50 EN1071 (Fisher Porter)

These items will be reviewed in a subsequent NRC inspection (334/84-28-01)

- 4. The inspector reviewed the preventive maintenance program for items in storage. There is very little activity regarding preventive maintenance (PM) and shelf life program for in-storage items at this time. Purchase orders are requesting PM and shelf life information as well as in-storage packaging requirements. When notified by the originator, General Stores (GS) performs the appropriate PM, with the assistance of maintenance. However, problems have been encountered, e.g., long term PM requirements were required for a limitorque valve, PO C 014308. Since no information was received from the originator, GS assumed that no long term requirements were needed. Of the items identified in paragraph 3.2, the following failed to note the vendors recommended shelf life requirements.
  - -- snubber with a ethylene propylene seal (five year shelf life)
  - Anion Hydroxide Form "Gravex" (shelf life of one year for precoat material). In the case of chemicals, where the shelf life varies from chemical to chemical, the Chemistry department determines the shelf life and notifies GS. GS then notes the shelf life information on the item.

To rectify this problem the Stores Supervisor has started a computerized listing of items requiring PM or having shelf life

- considerations. The PM and shelf life program will be reviewed in a subsequent NRC inspection (334/84-28-02).
- 5. Procedure 8.1 paragraph 4.5 and 4.6 requires QC to perform reveillances of "as shipped conditions" and long periodic maintenance for items in storage. Also required are annual inspections as well as inspections when General Stores requirements are not being maintained. The inspector found that only the annual inspections were being documented. QC is reviewing this matter in light of the fact that an OQA audit of Material Control in July 1984 had cited General Stores for lack of inspections, storage and records. The finding and observation of this audit (BV-1-84-23) has not been completely resolved. This item will be reviewed in a subsequent NRC inspection (334/84-28-03).

#### 4. Procurement

### 4.1 References/Requirements

- -- Regulatory Guide 1.28, Quality Assurance Program Requirements for Nuclear Power Plants, which endorses ANSI N45.2 1971
- -- Regulatory Guide 1.123, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants, which endorses ANSI N45.2.13 1976
- -- Updated Final Safety Analysis Report, Appendix A.2.2.4, Procurement Document Control
- -- BVPS Station Administrative Procedures (SAP) Chapter 3A, Technical Services
- -- Technical Services Procedures (TSP) for Procurement Activities -TSP No. 4.0 through 4.8
- -- BVPS Quality Assurance Manual, QA Operations Procedure (OP) 5, Procurement Control
- -- Operations Quality Control (OQC) procedures for Procurement Activities OQC 4.1 through 4.5

## 4.2 Review and Implementation

The inspector reviewed various completed procurement packages dealing with the purchase of safety-related equipment, parts and services to verify that the program is being conducted in accordance with applicable standards and procedures detailed in paragraph 4.1. Also, discussions were held with those individuals responsible for coordinating and reviewing procurement activities to further assess the adequacy of the programs in place.

The following purchase orders were reviewed for technical content, receipt inspection, QA requirements (including safety classification) and documentation as required by established procedures. The purchase orders selected for review included procurement of spare parts (stock items), new parts and materials to support modifications and services.

P.O. C014308 P.O. C024197 P.O. C008874 P.O. C024469 P.O. C021823 P.O. C021281 SIR-012063-047-072 SIR-012001-011-000

As a result of the inspector's discussions and reviews, it was determined that procurement activities for safety-related items adequately identified the items purchased and any special tests, instructions, technical requirements and/or documentation required; reviews and approvals of procurements, changes thereto; specifications differing from the original design documents had been performed and documented; and storage and handling, preventive maintenance and shelf life requirements had been addressed.

The inspectors also discussed the handling, status and tracking of the Environmental Qualification (EQ) program with the Technical Services and Nuclear Engineering and Construction Unit (NECU) representatives. Stock item repeat cards for all electrical items are being routinely forwarded via an Engineering Memorandum to NECU by Technical Services for an evaluation of EQ requirements.

The Master Equipment List (MEL) and Qualified Suppliers List(QSL) routinely used during the procurement of an item, were reviewed to ensure that they were maintained and updated on a regular basis. The inspector also discussed with the QA Director the methods and frequency of which the QSL is updated.

# Findings

No violations were identified.

# 5. Quality Assurance/Quality Control Interface

# 5.1 Quality Assurance

Discussions with the QA Director and audit personnel and reviews of QA audits BV-1-84-02, 05, 17, 18 and 23 indicated that QA routinely audits procurement, receipt, storage, and handling activities. Various findings from the above mentioned audits were discussed with QA personnel. All findings were resolved and subsequently followed up by QA with the exception of BV-1-84-23 which presently remains open (refer to section 3.3.5).

QA foresees considerable improvement in the stores area once the transition to the new warehouse has been completed.

The inspectors also reviewed BV-1-84-12 and three QA surveys that evaluated the quality assurance programs of vendors, suppliers, contractors, etc., utilized by DLC.

### 5.2 Quality Control

QC routinely reviews all Category I procurement packages to ensure that proper classification, documentation and reviews have been performed. The inspectors discussed with QC Engineers, the manner in which they performed these reviews and how discrepancies, if any, are resolved. The inspectors also reviewed QC inspections OQC-145 and 160, which dealt with reviews of non-category I procurements to ensure that the items had been properly classified.

QC involvement of receipt, storage and handling of safety-related items is detailed in section 3.0.

### 6. Exit Meeting

The inspector met with the licensee representative (denoted in paragraph 1) on December 6, 1984 to summarize the scope and findings of the inspection.

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