

U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Report No. 84-26

Docket No. 50-271

License No. DPR-28

Licensee: Vermont Yankee Nuclear Power Corporation
RD 5, Box 169, Ferry Road
Brattleboro, Vermont 05301

Facility Name: Vermont Yankee Nuclear Power Station

Inspection at: Vernon, Vermont

Inspection Conducted: December 4-31, 1984

Inspectors: William J. Raymond 1/16/85
W. J. Raymond, Senior Resident Inspector date

Approved by: L. E. Tripp 1/19/85
L. E. Tripp, Chief, Reactor Projects date
Section 3A, Projects Branch 3

Inspection Summary: Inspection on December 4-31, 1984 (Report No. 50-271/84-26)

Areas Inspected: Routine, unannounced inspection on day time and backshifts by the resident inspector of: action on previous inspection findings; physical security; routine power operations, including logs, records and operational status of safety systems; maintenance activities; surveillance activity; LER 84-11 and 84-23; status of modifications to meet Appendix R requirements; and, Appendix R, Item III.G procedures for Alternate Shutdown Systems. The inspection involved 41 hours onsite.

Results: Operational status reviews identified no conditions adverse to safe operation of the facility. Actions to install modifications to meet Appendix R requirements were not completed by the end of 1984 as committed to in letter FVY 84-53 dated May 21, 1984. The modifications should be completed early in 1985. No violations of license conditions were identified.

DETAILS

1.0 Persons Contacted

Interviews and discussions were conducted with members of the licensee staff and management during the report period to obtain information pertinent to the areas inspected. Inspection findings were discussed periodically with the management and supervisory personnel listed below.

Mr. D. Reid, Operations Superintendent
Mr. J. Pelletier, Plant Manager

2.0 Status of Previous Inspection Findings

2.1 (Open) Unresolved Item 83-26-04: Emergency Lighting for Alternate Shutdown. The inspector reviewed this area in detail and the results are documented in paragraph 10.0 of NRC Inspection Report 84-22. This item will remain open pending resolution of the concerns identified in the referenced report.

2.2 (Open) Follow Item 83-17-10: Service Water System Performance. The licensee reviewed the design, operating history, and operational parameters of the service water system, and documented his conclusions in the Operating Experience Review Form VYAPF 0028.01 dated December 16, 1983. The evaluation determined that the existing service water system will supply sufficient flow for all normal and emergency needs. Although the power generation design basis is not met, a review of the operating parameters showed that the system has sufficient capacity. However, the system will not operate at maximum efficiency during summer conditions with only three pumps available, and a fire water pump operated on the service water header will correct the condition.

The licensee identified all component cooling requirements that must be satisfied for emergency shutdown heat loads, including those heat loads added since the plant was built. The maximum flow required under accident conditions was 7480 gallons per minute (gpm), which can be supplied by any two of the three service water pumps operating at 240 feet of head and 85% efficiency. The safety design basis is thus satisfied with 2 pumps operating at about maximum efficiency, and at a flow that is about 12% in excess of the design specification of 3350 per pump.

For the range of anticipated flow of 2700 to 4500 gpm, the pumps will operate within the efficiency range of 79% to 84%. The maximum efficiency for the pumps is 86%. The licensee showed that for the expected range of operation, there are no long term adverse effects on the pumps by operating away from the point of maximum efficiency. The pump motor winding temperatures will remain approximately constant over the anticipated load ranges.

The licensee determined that the failure of the 'C' pump motor winding in July, 1983 was the first failure in 12 years. The temperature of the cooling air in the pump room was found to have the most affect on pump motor winding temperatures. Although measurements showed that the pump winding temperatures were high, they

were below the limit of 266 degrees F for NEMA class B insulation and therefore acceptable. The licensee found that dust buildup on the windings will increase winding temperatures, and a recommendation was made to increase the frequency for cleaning the pump motors and to study the feasibility of installing a filtration system for the air intake.

The licensee further concluded that the safety basis of the service water system will not be compromised by the practice of cross tying it with the non-safety class fire water system, due to the presence of safety class (seismically qualified) manual isolation valves and the excess flow capacity available in both systems. This item remains open pending NRC review of this conclusion.

2.3 (Open) Violation 84-05-02: Valve Lineup Controls. The licensee submitted a supplemental response to this item in letter FVY 84-142 dated December 4, 1984. The licensee stated that AP 0155 would be revised to require that two senior licensed operators review changes made to system valve lineups in accordance with criteria to be incorporated in the procedure. Review criteria will be added to AP 0155 to assure that no conditions adverse to safety will be created. The reviews will be completed prior to making the changes to equipment status. The Plant Operations Review Committee will review system lineup changes made per AP 0155 semi-annually prior to submitting the changes to the Plant Manager for approval. The PORC review of the items will assure that the changes do not constitute an unreviewed safety question.

The licensee's response and plans regarding AP 0155 were discussed with the Operations Superintendent in a meeting on December 19, 1984. The inspector stated that, if AP 0155 is revised in accordance with the criteria stated in FVY 84-142, the resulting procedure for making changes to system valve lineups would be acceptable. The licensee stated that AP 0155 will be revised and issued by February, 1985. This item will remain open pending revision of AP 0155 and subsequent review by the NRC.

2.4 (Open) Violation 84-18-01: Failure to Maintain System Valves Positioned Correctly. The licensee's response was provided in letter FVY 84-136 dated November 21, 1984. The status of the corrective actions were discussed with the Operations Supervisor on December 18, 1984. System valve lineup controls were discussed with shift personnel during department meetings, as discussed in the response letter. Valve position verifications will be performed as new revisions to certain safety related valve lineups are issued. Additionally, quarterly valve lineups will be performed to verify the effectiveness of the controls established per the tagging and valve control procedures.

The low pressure cooling pressurization system descriptions used during initial operator training will be enhanced by June 1, 1985. Tagging procedure AP 0140 will be revised by March 1, 1985 to strengthen caution tag controls when in an interim operating position, and to ensure that equipment restoration positions are consistent with plant status conditions when the caution tags are cleared. The Operations Supervisor stated that further review of item #3 discussed under AP 0140 (page 3 of the response) concluded that it would be inappropriate to

to revise the tagging form (VYAPF 0140.03) to document the "normal" position of the component being tagged. Rather, the instructions of procedure step 24 on page 5 will be clarified to ensure that the control authority refers to the configuration specified in the normal operating procedure for the existing plant conditions when restoring equipment to service.

The inspector had no further comment on this item at the present time. This item will remain open pending completion of the procedure changes described in the response letter and subsequent review by the NRC.

2.5 (Open) Violation 84-20-01 and 84-20-02: Failure to Maintain Secondary Containment During Fuel Movement. The licensee's response to these items was provided in letter FVY 84-134 dated November 9, 1984. The status of the licensee's corrective actions were discussed with the Operations Superintendent on December 6, 1984. Existing and planned training programs for contractor personnel were discussed with Construction Supervisor - Mechanical on December 7, 1984. Corrective actions, taken or planned, were as described in the response letter.

Changes will be made to the contractor training program to better document the training in plant administrative requirements already covered by existing training. The inspector reviewed the list of plant procedures that will be covered by the training program and identified no discrepancies. The improved training program will be fully implemented by June 1, 1985 concurrent with the implementation of the training program for the Construction Department.

The licensee took exception to the staff position regarding mechanical bypasses that could have a safety impact if established controls are not followed during implementation of the bypass. No caution statements will be added to the bypass requests. The inspector reviewed the licensee's comments and accepted the licensee's position based on the information provided in the response letter.

The inspector noted that the licensee's response did not address a commitment made during the enforcement conference for these violations on September 12, 1984. Based on the discussion with the Operations Superintendent on December 6, 1984, the inspector determined that the administrative controls in AP 0020 will be revised as necessary by March 1, 1985 to ensure that any activity that has the potential to jeopardize secondary containment will have a second level review (beyond that already prescribed by procedure) prior to implementation of the bypass (or activity).

The inspector had no further comments on this item at the present time. This item will remain open pending completion of the actions described above and subsequent review by the NRC.

3.0 Observations of Physical Security

Selected aspects of plant physical security were reviewed during regular and back-shift hours to verify that controls were in accordance with the security plan and approved procedures. This review included the following security measures:

guard staffing; random observations of the secondary alarm station; verification of physical barrier integrity in the protected and vital areas; verification that isolation zones were maintained; and implementation of access controls, including identification, authorization, badging, escorting, personnel and vehicle searches. No inadequacies were identified.

4.0 Shift Logs and Operating Records

Shift logs and operating records were reviewed to determine the status of the plant and changes in operational conditions since the last log review, and to verify that: (1) selected Technical Specification limits were met; (2) log entries involving abnormal conditions provided sufficient detail to communicate equipment status, correction, and restoration; (3) operating logs and surveillance sheets were properly completed and log book reviews were conducted by the staff; (4) Operating and Special Orders did not conflict with Technical Specification requirements; and, (5) Jumpers (Bypasses) did not create discrepancies with Technical Specification requirements and were properly approved prior to installation.

The following plant logs and operating records were reviewed periodically during the period of December 4-31, 1984:

- Shift Supervisor's Log
- Night Order Book Entries
- Auxiliary Operator Log
- Control Point Log
- Valve Lineup File
- Jumper/Lifted Lead Log
- Maintenance Request Log
- Switching Order Log
- Shift Turnover Checklists
- Radiochemistry Analysis Log
- RE Log Typer-Core Performance Log
- Potential Report Form 51/84 dated December 14, 1984

PRO 51/84 concerned the degraded condition of the 'B' uninterruptible power supply (UPS) when a control power supply failed and a 'Control Battery Discharge Alarm' occurred in the main control room. Redundant power supplies provide DC control power for the UPS unit and normally operate at 20 volts output. The power supplies float on the DC control battery, which operates at about 18 volts. The power supplies operate in parallel and only one is required to operate the UPS. Upon investigation of the 'B' unit, the licensee found that PS-1 had failed to zero volts output and supply PS-2 was operating at 17.6 volts. The voltage on PS-2 was adjusted up to 20 volts and the battery discharge alarm cleared. Maintenance Request 84-2218 was issued to complete repairs on the failed UPS power supply.

The licensee determined that the event was not reportable since all UPS functions remained operable and the unit would not have been affected by the condition of the power supplies.

No unacceptable conditions were identified.

5.0 Inspection Tours

Plant tours were conducted routinely during the inspection period to observe activities in progress and verify compliance with regulatory and administrative requirements. Tours of accessible plant areas included the Control Room Building, Reactor Building, Diesel Rooms, Radwaste Building, Control Point Areas, the Intake Structure and the grounds within the Protected Area. Control room staffing was reviewed for conformance with the requirements of the Technical Specifications and AP 0036, Shift Staffing. Inspection reviews and findings completed during the tours were as described below.

5.1 Systems and equipment in all areas toured were observed for the existence of fluid leaks and abnormal piping vibrations. Pipe hangers and restraints installed on various piping systems were observed for proper installation and condition. Minor stem packing leaks (less than two drops per minute) were noted on 1 inch diameter valves RV-304A and 304B. This leakage was reported to Operations personnel and a maintenance request was written to address the item. No inadequacies were identified.

5.2 Plant housekeeping conditions, including general cleanliness and storage of materials to prevent fire hazards were observed in all areas toured for conformance with AP 0042, Plant Fire Prevention, and AP 6024, Plant Housekeeping. Work controls were reviewed for conformance with the fire permits established for welding, cutting and grinding operations on the North and South banks of hydraulic control units. No inadequacies were identified. The inspector had no further comment in this area, except as noted below.

5.2.1 Plant alterations to meet the requirements of Appendix R to 10 CFR 50 were in progress during the inspection period (see section 8 below) and included work to modify the sprinkler system in the Northwest corner of the Reactor Building on the 232 foot and 252 foot elevations. The modifications were completed per Plant Design Change Request (PDCR) 84-03. The existing sprinkler system in the Northwest corner, along with fire hose stations on the North side of the Reactor Building, were isolated to complete the modifications. The sprinkler system was isolated under Tagging Order 84-1369. Compensatory measures to meet the requirements of Technical Specifications 3.13.C.2 and 3.13.F.2 were implemented under Fire Control Permit (FCP) 84-661 starting on December 5, 1984. The compensatory measures included the routing of an alternate water supply using equivalent diameter hoses to the North Reactor Building hose stations, and establishing an hourly fire watch of the areas no longer protected by the sprinkler system.

The inspector toured the work areas and verified that compensatory measures were established and maintained in accordance with FCP 84-661 and succeeding permits. No inadequacies were identified. The licensee stated that the sprinkler modifications were expected to be completed in January, 1985 and that the system would be returned to an operable status at that time. The inspector noted that the sprinkler system was still inoperable at the end of the inspection period, and a report to the NRC in accordance with Technical Specifications 3.13.F.2 and 6.7.C.2 was required by January 18, 1985. This item will be followed on a subsequent inspection (IFI 84-26-01).

5.3 Tagging and controls of equipment released from service were reviewed during the inspection tours to verify equipment was controlled in accordance with AP 0140, VY Local Control Switching Rule. Controls implemented per Switching and Tagging Orders 84-1362, 84-1369 and 84-1410 were reviewed and no discrepancies were noted.

5.4 The inspector monitored the feedwater sparger leakage detection system data and reviewed the monthly summary of feedwater sparger performance provided by the licensee in accordance with his commitment to NRC/NRR made in letter FVY 82-105. The licensee reported that, based on the leakage monitoring data reduced as of November 30, 1984, there were (1) no deviations in excess of 0.10 from the steady state value of normalized thermocouple readings; and (2) no failures in the 16 thermocouples initially installed on the 4 feedwater nozzles. No unacceptable conditions were identified.

5.5 The status of the Residual Heat Removal, Residual Heat Removal Service Water, High Pressure Coolant Injection, Core Spray, Standby Liquid Control, and Reactor Core Isolation Cooling (RCIC) systems was reviewed to verify that the systems were properly aligned and fully operational in the standby mode. The review included the following: (1) verification that each accessible, major flow path valve was correctly positioned; (2) verification that power supplies and electrical breakers were properly aligned for active components and, (3) visual inspection of major components for leakage, proper lubrication, cooling water supply, and general condition. No inadequacies were identified.

5.6 Radiation controls established by the licensee, including radiological surveys, condition of access control barriers, and postings within the radiation controlled area were observed for conformance with the requirements of 10 CFR 20 and AP 0503. Radiation work permits (RWPs) were reviewed to verify conformance with procedure AP 0502. Work activities in progress were reviewed for conformance with the requirements of RWP 84-3000. No inadequacies were identified.

5.6.1 The inspector noted that a radiation monitor for the vehicle gate near Gatehouse 2 was made operable on December 14, 1984. The monitor was installed as part of the licensee's corrective actions from previous events where control of radioactive material was lost. This action satisfied the licensee's commitment to have the monitor operable by December 31, 1984. No inadequacies were identified.

5.6.2 The licensee notified the inspector on December 17, 1984 that the NOAA radio based portion of the Public Notification system would be removed from service for about 6 hours on December 24, 1984 to allow for scheduled maintenance. The outage was required to allow the relocation of a transmitter station by 300 yards to improve signal strength. No interim compensatory measures were planned since the planned outage was of short duration. The licensee stated that the States within the emergency planning zone would be notified of the outage and steps would be taken to make an announcement that the system was down for repairs. The NOAA system was removed from service from 9:21 A.M. until 7:30 P.M. on December 26, 1984. No unacceptable conditions were identified.

5.7 Implementation of the following jumper (J/LL) and mechanical bypass (MBR) requests was reviewed to verify that controls established by AP 0020 were met; no conflicts with the Technical Specifications were created; and, installation and removal was in accordance with the requests: J/LL requests 84-185 through 84-188; MRB requests 84-19, 84-22 and 84-23. No unacceptable conditions were identified.

5.8 Analysis results from samples of process liquids and gases were reviewed periodically during the inspection to verify conformance with regulatory requirements. The results of isotopic analyses of radwaste, reactor coolant, off-gas and stack samples recorded in shift logs and the Plant Daily Status Report were reviewed. Sample results for the standby liquid control tank on December 6, 1984 showed that the boron concentration was maintained within technical specification limits. No inadequacies were identified.

5.9 System valve lineups established to maintain containment integrity and isolation capability were reviewed on a sampling basis during inspection tours to verify conformance with the configuration specified by OP 2115, Revision 13. The review confirmed that manual valves were shut, capped and locked as required by procedure; power was available to motor operated valves and no physical obstructions would block operations; and, no leakage was evident from valves, penetrations and flanges. No inadequacies were identified.

6.0 Operational Status Reviews

The operational status of standby emergency systems and equipment aligned to support routine plant operation was confirmed by direct review of control room instrumentation. Control room panels and operating logs were reviewed for indications of operational problems. Licensed personnel were interviewed regarding existing plant conditions, facility configuration and knowledge of recent changes to the plant and procedures, as applicable. Acknowledged alarms were reviewed with licensed personnel as to cause and corrective actions being taken, where applicable. Anomalous conditions were reviewed further.

Operational status reviews were performed to verify conformance with Technical Specification limiting conditions for operation and approved procedures. The following items were noted during inspector reviews of plant operational status.

6.1 The recirculation weld leakage detection system was operable during the inspection period, with status information available from all six detectors. No indications of recirculation system weld leakage was detected. No inadequacies were identified.

6.2 The 'A' station service water pump was released to maintenance on December 31, 1984 to repair a shaft packing leak. The loss of 1 of 4 service water pumps placed the plant in the action statement for Technical Specification 3.5.D, which required that the plant be shutdown within 15 days unless the subsystem was sooner made operable. The pump was returned to service within the 15 day period and no further actions were required.

The inspector noted that in accordance with the Technical Specifications and FSAR section 10.6, both service water subsystems remained 'operable' per the safety design basis for the system, since at least one pump in each service water loop remained operable and only two pumps are required to meet safe shutdown cooling load requirements. No unacceptable conditions were identified.

6.3 Plant operators declared offgas radiation monitor RAN-3128 inoperable on December 30, 1984 due to dissimilarities between its reading and the redundant channel, RAN-3127. RAN 3128 was reading downscale. Removing the channel from service placed the plant in the action statement for Technical Specification 3.2.D, which allowed for continued plant operations provided the alternate channel and the stack gas monitors were operable. Instrument and Control personnel replaced the detector, and the channel was subsequently returned to an operable status following testing and an observation period to assure the detector was responding properly. No unacceptable conditions were identified.

6.4 The inspector reviewed portions of the following surveillance tests to verify that testing was performed by qualified personnel; test data demonstrated conformance with Technical Specification requirements; and, system restoration to service was proper.

- + OP 5374, Backfilling Reference Chamber for Torus Level Transmitters LT 16-19-38A&B and LT 16-19-10A&B&C, December 14, 1984

No inadequacies were identified.

6.5 The maintenance request log was reviewed to determine the scope and nature of work done on safety related equipment. The review confirmed: the repair of safety related equipment received priority attention; Technical Specification limiting conditions for operation (LCOs) were met while components were out of service; and, performance of alternate safety related systems was not impaired.

Maintenance activity associated with the following was reviewed to verify (where applicable) procedure compliance and equipment return to service, including operability testing.

- + MR 84-2218, UPS 'B' Power Supply Failure
- + MR 84-2274, Recirculation Flow Transmitter 2-110D Zero Drift

The following items required inspector followup.

During operations at 50% power on December 15, 1984, an APRM flow bias alarm was received in the main control room when recirculation flow was reduced for routine testing and a rod pattern exchange. Instrument and Control personnel determined that recirculation flow channel 2-110D was reading about 10% lower than expected due to a drift in the transmitter zero setting. The instrument zero was adjusted from 8.72 to 9.99 micro-amps to restore a proper output. The inspector had no further comments on this item. No unacceptable conditions were identified.

7.0 Review of Licensee Event Reports (LERs)

Licensee event reports 84-11 and 84-23 were reviewed in the NRC Resident and Regional Offices. Each report was reviewed to verify that the event and its safety significance were clearly described; the cause of the event was identified

and corrective actions taken (or planned) were appropriate; and, the report satisfied the requirements of 10 CFR 50.73. The inspector had no further comment in this area, except as noted below.

- + LER 84-11, Type C Leak Rate Test Failures, July 16, 1984
- + LER 84-23, Inadvertent Group III Isolation, December 17, 1984

LER 84-11 reported the results of the licensee's Type C leak rate tests on valves MSIV 86B, CRD 412A, PCAC 16-19-8, and FDW 96A completed during the 1984 refueling outage. The valves failed the test due to excessive leakage. The valves were subsequently repaired and satisfactorily retested prior to plant startup from the outage. The inspector had no further comments of the licensee actions to investigate, repair and return the components to an operable status.

The inspector noted that LER 84-11 did not provide, for each failed component, an adequate description of the conditions that caused the failure, the actions necessary to effect repairs and pass a leak rate test, and an evaluation of the significance of any failure that was a recurrent problem. The inspector discussed LER 84-11 with the Plant Manager on December 18, 1984 and at the exit meeting, and stated that a supplemental report should be submitted to address the above items. The licensee questioned whether such detail was required in the LER when Type B and C test results were submitted to the NRC under other reporting requirements. The inspector stated that in those cases, it would be sufficient for the LER to reference the leak rate test report. The inspector noted that the licensee did not perform a Type A leak rate test in 1984, and thus, there was no other report that described the test results.

This item is unresolved pending submittal of a supplemental report for LER 84-11 and subsequent review by the NRC (UNR 84-26-02).

8.0 Status of Modifications to Meet Appendix R Requirements

The licensee responded to NRC inspection findings documented in Region I Inspection Report 83-26 by letter FVY 85-53 dated May 21, 1984. The licensee's response addressed, among other issues, the plant modifications that will be completed to correct certain deficiencies in meeting the fire protection requirements of 10 CFR 50, Appendix R. The licensee committed to completing the modifications by the end of 1984. The status of the licensee's actions on these were reviewed during the inspection, as summarized below. The 'item numbers' below refer to those used in letter FVY 84-53.

- 8.1 Item 1 - Reactor Building Northwest Corner Room, 232 foot
Install a pre-action water suppression system to cover the corner room using the existing detectors to activate the system.

Status - Incomplete. Work was in progress during the inspection to install the system per PDCR 84-03.

- 8.2 Item 4 - Reactor Building Northwest Corner, 252 foot
Install a pre-action water suppression system to cover the floor area to the steam tunnel wall and add a second level above the overhead cable trays.
- Status - Incomplete. Work was in progress during the inspection to install the system per PDCR 84-03.
- 8.3 Item 5 - Reactor Building Northeast Corner, 252 foot
Separate Control Cables for HPCI and RCIC Containment Isolation Valves.
- Status - Complete. Actions were taken prior to plant startup from the 1984 refueling outage to separate the HPCI and RCIC control cables.
- 8.4 Item 7 - Reactor Building Northeast Corner, 252 foot
Install a radiant heat shield between MCC 89A and MCC 89B and seal conduits running between MCC 89B and MCC 9D.
- Status - Incomplete. Actions were in progress at the end of the inspection period to complete the modifications in accordance with PDCR 84-05.
- 8.5 Item 8 - Turbine Building to Radwaste Building Personnel Corridor
Wrap power cables in the overhead area of the corridor with one-hour rated material.
- Status - Complete.

The Plant Manager notified the inspector on December 14, 1984 that the modifications identified in FVY 84-53 should be finished by January, 1985. The licensee stated that a supplemental letter would be sent to the NRC to address the revised completion schedule. This item is considered open pending receipt of additional correspondence from the licensee regarding the completion schedule (IFI 84-26-03).

Licensee actions to correct the deficiencies and complete other actions identified in FVY 84-53 will be examined further on subsequent NRC inspections.

9.0 Review of Alternate Shutdown Procedures

NRC review of the alternate shutdown procedures began on a previous inspection and is documented in Region I Inspection Report 84-21. NRC review of this item was completed during this inspection. Procedure OP 3126, Shutdown Using Alternate Shutdown Methods, provides the instructions to shut down the plant in the event of the loss of the Control Room or Cable Vault. The procedure describes the actions that must be taken to shut down the plant remote from the control room, assuming a concurrent loss of offsite power, along with instructions to restore onsite

power using diesel generator 'A' and to use the residual heat removal system to control torus and reactor temperatures once power has been restored. The normal surveillance procedures for the 'A' diesel generator, the RCIC system and the RHR system were revised to include instructions to complete monthly valve operability and system performance tests from the alternate shutdown panels. The following is a complete listing of procedures reviewed:

- + OP 3126, Shutdown Using Alternate Shutdown Methods, Revision 0, August 3, 1984
- + OP 4126, Diesel Generator Surveillance, Revision 15, July 10, 1984
- + OP 4124, RHR and RHRSW System Surveillance, Revision 15, August 2, 1984
- + OP 4121, RCIC System Surveillance, Revision 16, August 3, 1984

The inspector had no comments on procedures OP 4121, 4124 and 4126. The following comments on OP 3126 were discussed with a licensee engineer on December 20, 1984:

- + Precaution #1 refers to 'automatic functions and system interlocks' that will be lost when the transfer switches are placed in the emergency positions. The affected functions and interlocks should be described in greater detail than presently exists in the procedure (i.e., not all are covered).
- + Step #C.2 should be revised to suggest the best locations for the shift supervisor to be stationed; the locations should be listed in order of decreasing effectiveness.
- + Section C - The immediate actions section should be revised to require that certain actions be completed prior to abandoning the control room, such as scrambling the reactor, opening HPCI-24, and completing as many actions as is feasible to achieve stable shutdown conditions.
- + Step C.9.b - This step should be expanded to provide greater detail on how to initiate a manual scram from the local control panels using the Rosemont low level trip settings.

This item is considered open pending revision of OP 3126 to address the above items and subsequent review by the NRC (IFI 84-26-04).

10.0 Management Meetings

Preliminary inspection findings were discussed with licensee management periodically during the inspection. A summary of findings for the report period was also discussed at the conclusion of the inspection and prior to report issuance.