



U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Systematic Assessment of Licensee Performance  
Northeast Nuclear Energy Company  
Millstone Nuclear Power Station, Unit 3

October 31, 1983

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## 1. INTRODUCTION

### 1.1 Purpose and Overview

The Systematic Assessment of Licensee Performance (SALP) is an NRC staff effort to collect observations annually and evaluate licensee facilities in order to improve the NRC Regulatory Program and licensee performance.

This assessment period is September 1, 1982, through August 31, 1983. The prior SALP assessment period was September 1, 1981, through August 31, 1982.

The facility covered in this assessment is Millstone Nuclear Power Plant, Unit 3. The licensee is the Northeast Nuclear Energy Company.

### 1.2 SALP Review Board

R. W. Starostecki, Director, Division of Project and Resident Programs (DPRP)  
T. C. Elsasser, Chief, Reactor Projects Section, No. 1B, (DPRP)  
S. D. Ebner, Chief, Engineering Programs Branch, (DETP)  
E. L. Doolittle, Licensing Project Manager, NRR  
T. A. Rebelowski, Senior Resident Inspector, Millstone 3

#### Other Attendees

B. J. Youngblood, Licensing Project Manager, NRR  
J. A. Robertson, Reactor Engineer, DPRP

### 1.3 BACKGROUND INFORMATION

#### 1.3.1 Licensee Activities

Construction activity on Unit 3 increased steadily. The manual work force was approximately 3000 at the end of the previous SALP period; and as of August 31, 1983, it was 4000. Unit 3 is currently 78% complete.

The major construction activities included the removal of the intake structure cofferdam, the completion of the additional fish barrier, the placement and erection of support system tanks, the placement of the majority of the structural concrete, the installation of containment siding, and the completion of the underground facilities. In addition, present emphasis on startup operations has been projected based on the completion of the powering of the Reserve Station Service Transformer. The major effort in electrical installation in areas of power and instrumentation termination is underway.

#### 1.3.2 Inspection Activities

One NRC Resident inspector was assigned to the site during the assessment period. Due to personnel turnovers and regional inspection priorities, the resident inspector was onsite only part-time during the periods July through September 1983. The total NRC inspection effort during this period was 1657 hours (resident and region-based), with a distribution in the appraisal Functional Areas as shown in Table 4. This effort included 620 hours associated with the Nondestructive Examination Program using the NRC Mobile Laboratory.

NRC inspection activities and violations issued during the period are tabulated in Tables 2 and 3, respectively.

2. SUMMARY OF RESULTS

MILLSTONE NUCLEAR POWER STATION, UNIT 3

Functional Areas	Category 1	Category 2	Category 3
1. Soils and Foundations	No Basis		
2. Containment and Other Safety- Related Structures	X		
3. Piping System and Supports	X		
4. Safety-Related Components		X	
5. Support Systems	X		
6. Electrical Power Supply		X	
7. Instrumentation and Control	No Basis		
8. Document Control	X		
9. Licensing		X	

Overall Summary:

The Systematic Assessment of Licensee Performance (SALP) found that the licensee's performance was generally acceptable and reflected aggressive management attention and involvement oriented toward nuclear safety. Some isolated problems have been noted and need to be pursued. Licensee performance was acceptable in the Soils and Foundations and Instrumentation and Control functional areas; however, category ratings were not assigned because of insufficient activities in these areas. Electrical cable installation and splicing were identified as problem areas during the evaluation period. Additional licensee management involvement will be necessary to resolve identified NRC concerns and ensure high standards of construction are met in the installation of electrical power supply components. Specifically, an objective and safety-oriented examination of this issue is needed due to the uniqueness of the licensee's approach. The category rating for the Licensing functional area for this assessment period declined from the rating for the previous period. Inadequate licensee attention to the technical aspects of some technical issues necessitated additional time consuming NRC staff effort in obtaining acceptable resolutions of these issues.

Overall, vigorous licensee management attention and involvement oriented toward nuclear safety, as evidenced by the relatively high category ratings in this and previous periods, has contributed to a good quality of construction of the Millstone Unit 3 facility.

### 3. CRITERIA FOR ASSESSMENT

The following evaluation criteria were applied to each functional area:

1. Management involvement in assuring quality.
2. Approach to resolution of technical issues from a safety standpoint
3. Responsiveness to NRC initiatives
4. Enforcement history
5. Reporting and analysis of events and construction deficiencies.
6. Staffing
7. Training effectiveness and qualifications

To provide consistent evaluation of licensee performance, attributes describing the characteristics applicable to Categories 1, 2, and 3 performance were applied as discussed in NRC Manual Chapter 0516, Part II, and Table I.

The SALP Board's conclusions were categorized as follows:

#### Category 1

Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used to achieve a high level of performance with respect to operational safety and construction.

#### Category 2

Normal NRC attention should be maintained. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effectively used to achieve satisfactory performance with respect to operational safety and construction.

#### Category 3

Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appeared strained or not effectively used such that minimally satisfactory performance with respect to operational safety and construction is being achieved.

#### 4. PERFORMANCE ANALYSIS

##### 4.1 Soils and Foundation (.8%)

The major soils and foundation activities were completed during the previous assessment period. Routine NRC inspections during this assessment period monitored the removal of a 100,000 cubic yard cofferdam, which protected the service water intake structure during construction; and inspectors observed the preparation of base mats for several site storage tanks. Based on these inspections, the NRC confirmed the continued application of sound engineering, construction and quality assurance resources. Inspectors observed the involvement of construction quality control personnel and verified conformance to design details. No unsatisfactory performance was observed in these areas.

##### Conclusion:

No Basis, due to insufficient activity in this functional area.

##### Board Recommendation:

No further routine NRC inspection activities will be conducted. The advanced state of completion and low level of activity in this functional area warrant no further SALP consideration.

#### 4.2 Containment and Other Safety Related Structures (4.7%)

Strong licensee performance had been exhibited in this area during previous assessments. NRC review of construction activities during this assessment period included observation of activities and review of records for concrete placement of a Liquid Waste Building and for repairs to the containment liner and its concrete placement in the containment construction opening.

Repair activities for the containment liner were well planned, properly implemented and satisfactorily inspected. The licensee demonstrated a generally conservative and technically competent approach to these fire damage repairs and is continuing to resolve a self-identified problem with containment liner stud spacing in the same manner. This effort has been complicated by the identification of additional areas of missing studs.

In process and quality control records were generally found to be complete, properly documented and readily retrievable.

##### Conclusion:

Category 1

##### Board Recommendation:

Monitor licensee resolution to the containment liner stud location problem. Depending on nature of resolution, NRC should anticipate inspection of documents and basic method used in the decision making process used to resolve this issue.



#### 4.3 Piping Systems and Supports (34.5%)

During this assessment period two inspections were conducted in this area by NRC regional inspectors as well as routine observations performed by the resident inspector. In addition, the NRC NDE laboratory conducted an extensive review of the licensee's nondestructive testing program.

The licensee has an effective program for welding activities on pipes and pipe hangers. Adequate staffing in the construction welding, NDE and quality assurance areas was available, and an adequate training and qualification program was implemented.

An in-depth review of licensee NDE programs revealed only two minor problems related to the use of radiographic procedures and the need for film density audits. NDE by NRC personnel of previously documented areas found no significant deviations from the licensee's results. The licensee's program was found to include necessary audits, onsite reviews and observations by qualified NDE personnel.

The licensee has continued to maintain a consistently high level of quality in the area of small bore pipe installation and welding.

#### Conclusion:

Category 1

#### Board Recommendations:

Maintain present level of inspection by the Resident Inspector supported by Region based and team inspections.

#### 4.4 Safety Related Components (13.7%)

During this evaluation period, the licensee's activities have decreased in the area of component installation and increased in the areas of attachments and system piping. Observations were made of the installation of reactor vessel internals, steam generator supports, installation of control rod drive mechanisms and reactor coolant pump internals.

Two violations were identified in the maintenance of equipment. One violation addressed the failure to prevent deterioration of material during field storage of limitorque motors; the second violation addressed the failure to insure cleanliness of the limit switch compartment of installed safety related motor operators.

The turnover of plant systems from the construction to the operations group has commenced. This necessitates increased licensee attention to preventive maintenance and surveillance programs in order to maintain cleanliness control.

The licensee has identified potential problems through Field Quality control in a timely manner. However, resolution of certain significant construction problems remains on an extended time frame. Examples of problems which have not been dispositioned for over six months are the missing containment liner studs anomaly and the incore thermocouple tubing deformities.

The construction deficiencies have generally been carefully analyzed and solutions are based on sound engineering practices. One problem with the placement of the component coolant tank foundation was reanalyzed at the request of the inspector to accomodate additional shear forces.

#### Conclusion:

Category 2

#### Board Recommendation:

Monitor licensee surveillance and preventive maintenance programs utilized during plant system turnovers.

#### 4.5 Support Systems (4.7%)

Construction efforts have increased in the area of heating and ventilation (HVAC) systems. During this assessment period, NRC inspections in this area included observation of the installation of HVAC, air, and nitrogen systems and examination of selected support plates and foundation bolting for support equipment. In addition, the connection of purge gas piping to the Unit 1 stack and the placement of auxiliary equipment in the turbine building were monitored. During these inspections, the use of approved and current design drawings was verified. Field quality control personnel and construction supervisors were frequently observed at the work site. Licensee performance appeared to be oriented toward the quality construction of all support systems.

Conclusion:

Category 1

Board Recommendation:

None

#### 4.6 Electrical Power Supply (14.5%)

During this assessment period, a major licensee effort was implemented to increase the number of cable installations and terminations. An increase in electrical craftsmen from approximately 400 to 800 occurred. The completed construction of plant systems and system turnovers are dependent on the success of this effort.

During this assessment period, installation of cable has become a major site activity. At the commencement of cable installation, side wall pressure was not being considered in determining a maximum pull tension. The licensee placed an engineering hold on all Category I machine assisted cable pulling until new guidance was issued by engineering. The licensee's initial actions to resolve this concern were considered adequate. The licensee has since instituted a procedure by which the tension required to perform selected cable pulls is mathematically determined and the need to directly measure the actual tension eliminated. The failure to monitor actual exposed cable pull tension results in the possibility of unknown cable degradation or damage and is not consistent with construction practices currently in use in the industry. A recent cable pulled under this criteria was damaged and discarded without an engineering evaluation of the possible cause of the damage. The adequacy of this method of pulling cable has been the subject of ongoing discussion between the regional staff and the licensee. The adequacy of this procedure had not been resolved at the conclusion of the assessment period. Principal concerns include: 1) the lack of experimental verification of the mathematical method and 2) the potential for the occurrence of conditions outside of the mathematical method (i.e. cable jamming and improperly lubricated cables).

Recently, the licensee has performed cable splices on safety related, Category I cabling. This practice deviates from the provisions of Regulatory Guide 1.75 which is currently incorporated into the Final Safety Analysis Report (FSAR). Although this practice was identified outside the evaluation period, acceptability of this practice requires resolution since a number of severed cables in the service water system controls are currently scheduled to be spliced instead of rerun. The licensee has indicated that a number of power cables are also scheduled to be repaired by splicing. Apparently, the licensee's intention is to submit a change to the FSAR for review by the NRC which would permit the splicing of safety related cables.

Problems related to inadequate control and periodic maintenance of electrical equipment in storage were detailed in Section 5.4.

At this point in construction, with major critical path items related to the completion electrical activities, the identification of significant unresolved technical issues based on a small sample of these activities indicates that more quality assurance and management attention to this area is appropriate.

Conclusion:

Category 2

Board Recommendations:

Regional management should closely follow licensee resolution of the cable pulling and splicing issues. Once resolved, appropriate inspection to verify the licensee's course of action should be conducted by the Senior Resident and region based inspectors.

Due to the large increase of electrical craftsmen presently onsite, a review of the Stone & Webster training programs for electrical craftsmen should be performed.

#### 4.7 Instrumentation and Control Systems (1.3%)

During this assessment period, only a small percentage of mechanical instrumentation tubing and control cables were completed for final inspection. NRC inspections by region-based and resident inspectors found the control of in process work, quality control inspection and documentation to be adequate for the level of activity in this area. Quality Assurance audits in this area were adequately detailed and performed in a timely manner.

During this period, the licensee identified several "cut" instrumentation cables. These problems are attributed to vandalism and the licensee has increased the presence of security patrols in safety equipment areas. As the plant is entering the final stages of construction, further management attention to this issue is required to ensure quality and readiness of safety systems for operation.

##### Conclusion:

No Basis, due to lack of a sufficient amount of completed work.

##### Board Recommendation:

The resident inspector should include in his routine inspections a continuing review of the licensee's actions to minimize the potential for vandalism.

Increased inspection effort, in the area of cable pulling for Instrumentation and Control systems, is warranted in light of cable pulling problems described in section 5.6.

#### 4.8 Document Control (25.2%)

During the previous assessment period, a significant programmatic deficiency with the control of design drawings and associated changes was identified. During this assessment period, only one violation was issued with regard to craftsmen review and verification of field drawings. The field prints (yellow and black) are now required to be reviewed by field supervisors each day to verify that no additions or changes have been made which would invalidate the design. Subsequent NRC observations have revealed that accurate prints were being used in the field.

A review of training in the area of document control indicated that new supervisors were not receiving training in an expeditious manner (six months without training). A revised training schedule was implemented for these individuals and additional reviews of new supervisor training have been programmed to insure that appropriate training is provided in a timely manner.

A major NRC inspection effort during this period involved the review of documentation of the nondestructive examination program at Millstone 3. This effort included a review of film retrieval, liquid penetrant test records and radiographic interpretation. Licensee records were found to be reasonably detailed, accurate and readily retrievable.

#### Conclusion:

Category 1

#### Board Recommendation:

Maintain present level of inspection by Resident Inspector supported by Region based and team inspections.

#### 4.9 Licensing Activities

The primary licensing activities which took place for Millstone 3 during this period were tendering and docketing of the Operating License application and subsequent initiation of NRC staff review of the Final Safety Analysis and Environmental Reports.

Northeast Nuclear Energy Company (NNECO) demonstrates a clear understanding of issues and generally exhibits conservatism where the potential for safety significance exists. Resolutions to technical issues are generally timely, although the staff noted that in some cases inadequate attention was given to resolution of an issue. In these cases the staff felt that an easy approach to resolution was chosen instead of a sound and thorough one. Additional NRC effort has been necessary to obtain acceptable resolutions thereby delaying completion of its review. Examples of delayed resolutions are in the area of the Seismology Review and the Geotechnical Review. Discussions with the applicant continue to indicate that its management is well aware of the above licensing activities including details of the staff's specific technical concerns. Northeast Nuclear Energy Company places a high priority on meeting deadlines within the licensing schedule as demonstrated by prompt submittal of its responses to the staff's OL Review questions, and submittal of its Probabilistic Safety Study as scheduled. Additionally, NNECO has requested periodic meetings with the NRC licensing staff to review upcoming licensing priorities.

The licensee's responsiveness to other initiatives not detailed in the licensing schedule is generally timely and thorough. Some delays, for which NNECO has been responsible, has been experienced by the staff in scheduling technical meetings; typically a part of the OL review process used to expedite the review. The staff perceives that these delays are related to the time necessary for NNECO to prepare its technical positions and consult with its architect engineer. Occasionally delays have resulted from other priorities related to construction of Unit 3.

Staffing appears to be ample as indicated by the applicants ability to meet licensing schedule deadlines. Positions within the applicant's organization are well defined. The division of authority and responsibility for technical decisions and commitments has occasionally been unclear as observed during discussions with the NRC staff and NNECO Generic & Nuclear Construction Licensing and Project Management Personnel. Discussions with NRR staff members who have interacted with the NNECO staff have indicated that training and qualification appears to be effective as judged by NNECO's understanding of work and adherence to procedures.



Conclusion:

Category 2

Board Recommendation:

None

5. SUPPORTING DATA AND SUMMARIES

5.1 Investigations

None

5.2 Escalated Enforcement Action

- a) Civil Penalties - None
- b) Orders - None
- c) IAL/CAL - None

5.3 Management Conferences During Assessment Period

SALP Management meeting at the Northeast Nuclear Energy Company on November 3, 1982, to discuss the Millstone Unit 3 findings for the prior SALP assessment period, September 1, 1981, through August 31, 1982.

TABLE 1

CONSTRUCTION DEFICIENCY REPORTS

<u>CDR Number</u>	<u>Summary Description</u>
82-00-11	Westinghouse Design Thermal Sleeves in Two-Inch CVCS Lines Missing
82-00-12	Slight Cracking in Cable Tray Notches Reducing Section Strength
82-00-13	Reduction in Ultimate Load Capability of Pipe Straps
82-00-14	Cracks Related to Imbedments in the Containment
83-00-01	Brown/Boveri 480V Breakers Supplied with Disconnect Switch that was not ordered. (Report Retracted)
83-00-02	Clogging of Service Water Pump Cooling Water Strainers
83-00-03	Potential Hardware Interference on ITT Grinnel Mechanical Snubbers
83-00-04	Improper Undervoltage Attachment Retaining Ring on Westinghouse Model DS-416 Reactor Trip Breakers
83-00-05	Inadvertent Uncoupling Problem with the Pull-Apart Terminal Blocks in Gould Motor Control Centers
83-00-06	Inadequate Welds on Main Control Board Panels Supplied by Reliance Electric Company
83-00-07	Potential Problems with NTC Card Relays - Westinghouse 7300 Process Protection
83-00-08	Potential Problems with NLP Card Heat Sinks - Westinghouse 7300 Process Protection System
83-00-09	Containment Liner Stud Spaces in Excess (Missing Studs)
83-00-10	Circuit Breakers, HE-4 - Failure to open (Single Phase)

CDR Tabular Report

Type of events:

A.	Personnel Error	0
B.	Design/Manufacturing/Installation/Construction	7
C.	External Cause	0
D.	Defective Procedure	0
E.	Component Failure	<u>7</u>
	Total	14

TABLE 2  
ENFORCEMENT DATA

Violations by Severity Level

Severity Level:	I	0
	II	0
	III	0
	IV	2
	V	4
	Total	<u>6</u>

Violations By Functional Area

1.	Soils and Foundation	0
2.	Containment and Other Safety-Related Structures	0
3.	Piping Systems and Supports	3
4.	Safety-Related Components	2
5.	Support Systems	0
6.	Electrical Power Supply	0
7.	Instrumentation and Control	0
8.	Document Control	<u>1</u>
	Total	6

Description of Violations

<u>Insp. No.</u>	<u>Dates</u>	<u>Subject</u>	<u>Req.</u>	<u>Sev. Level</u>	<u>Funct. Area</u>
82-14	11/18/82	Failure to follow construction procedure requirements for print control.	APP.B-VI	V	8
83-01	01/24/83	Licensee did not correctly translate design information into drawings, procedures and instructions in the area of welding across a stainless steel/inconel interface without procedural instructions qualified in this (ASME IV "P" Group 8-43) type interface.	APP.B-III	IV	3
83-04	02/9/83	A. Failure to maintain measures to prevent deterioration of material during storage of limit torque motors.	APP.B-XIII	IV	4
83-04	02/9/83	B. Failure to maintain measures to insure cleanliness of limit switch compartment of safety related motor operated valves.	APP.B-XIII	V	4
83-14	08/15/83	Failure to follow non-destructive testing procedures in the area of placement of penetrameters in radiography examinations.	APP.B-IX	V	3
83-14	08/15/83	Failure to maintain proper density of film in area of interest of radiographs.	APP.B-IX	V	3

TABLE 3  
INSPECTION REPORT ACTIVITIES

<u>Report No.</u>	<u>Inspector</u>	<u>Areas Inspected</u>
82-12	Resident	Piping installation, electric cable installation, containment liner repairs and installation of reactor vessel internals.
82-13	Specialist	Material receipt inspection of electrical components cable and cable tray installation, quality control inspection of electrical activities, and review of electrical separation criteria.
82-14	Resident	Storage and maintenance of equipment, personnel qualifications, piping activities, reactor pressure vessel internals, installation of steam generator supports, reactor vessel nozzle repairs, heating and ventilation welding activities and document control.
82-15	Resident	Installation of steam generator supports, installation of heating and ventilation filters in Auxiliary Building, installation of control rod drive mechanisms, installation of reactor coolant pump internals, inspection of reinforcing steel cadwelds in crane wall, installation of pipe, installation of seismic conduit supports, and review of concrete records.
83-01	Specialist	Welding, quality assurance, quality control, work planning, nondestructive testing and completed weldments on reactor coolant pressure boundary piping and vessels, other safety-related piping and pipe hangers.
83-02	Resident	Review of NRC issued bulletins, circulars and information notices, installation of pipe, inspection of reinforcing steel caldwelds in Pressurizer Shield Wall, review of activities associated with reporting of 10 CFR 50.55(e) items, and plant tours.
83-03	Specialist	Inspection of environmental protection program for construction phase, observations of the existing environmental conditions at the construction site and the surrounding

Report No.	Inspector	Areas Inspected
		environment, verification of the implementation status of the Construction Permit requirements, and verification of procedures for implementing the environmental protection program during site preparation and construction.
83-04	Specialist	Activities pertaining to the installation, storage and maintenance of electrical safety-related equipment.
83-05	Resident	Installation of piping system, inspection of electrical activities, observation of reactor vessel internals activities, and plant tours.
83-06	Resident	Environmental protection commitments, welds in main control room panels, baseline inservice inspection of reactor vessel head, licensee identified reportable items, material damaged in truck accident, training course, preoperations system turnover program, and tour of site.
83-07	Resident	Review of nonconformance and disposition reports, pipe fabrication shop observations, public inquiry, diesel generator foundation bolts, bulletins, circulars and information notices status, plant tours and licensee reports of potential significant deficiencies.
83-08	Specialist	Activities pertaining to safety-related piping, containment liner repair, service water pump casting, welder qualification and weld inspection including radiography.
83-09	Specialist	Activities pertaining to the installation of electrical safety-related equipment.
83-10	Resident	Engineered safeguards feature as-built comparison, severance of control cables, battery discharge test, containment liner studs spacing requirements, NRC environment review, crane wall embedment cracks, engineering and design coordination report reviews, incore thermocouple fitting anomaly and plant tours.



Report No.	Inspector	Areas Inspected
83-11	Specialist	Activities pertaining to the installation, storage and maintenance of electrical safety-related equipment.
83-12	Specialist	Concrete placement activities for the Liquid Waste Disposal Building, licensee action on significant deficiencies reported under 10 CFR 50.55(e) and record review and verification inspection of installation of the reactor coolant pumps.
83-13	Specialist	Procedures and work activities relating to the installation and inspection of electrical and instrumentation components.
83-14	Specialist	NRC independent measurements inspection was conducted at the utilities construction site using the NRC mobile Non-Destructive Examination (NDE) laboratory. Selected safety-related piping, structural and support weldments fabricated to ASME Code, Section III, Class 1, 2, and 3 and American Welding Society (AWS) Code D 1.1 requirements were inspected.
83-15	Specialist	Activities associated with the installation of electrical cables, raceway, motor control centers, batteries and quality records.

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TABLE 4  
INSPECTION HOURS SUMMARY

<u>Functional Area</u>	<u>Hours</u>	<u>% of Time</u>
1. Soils and Foundation	14	.8
2. Containment and other Safety-Related Structures	78	4.7
3. Piping Systems and Supports	572	34.5
4. Safety-Related Components	227	13.7
5. Support Systems	77	4.7
6. Electrical Power Supply	240	14.5
7. Instrumentation and Control	32	1.3
8. Document Control	417	25.2
9. Licensing Activities	-	-
	<hr/>	<hr/>
	1657	100%