

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION

REGION IV

NRC Inspection Report: 50-285/85-01

License: DPR-40

Docket: 50-285

Licensee: Omaha Public Power District
1623 Harney Street
Omaha, Nebraska 68102

Facility Name: Fort Calhoun Station

Inspection At: Fort Calhoun Station, Blair, Nebraska

Inspection Conducted: January 1-31, 1985

Inspector: *B M Hennicutt*
for L. A. Yandell, Senior Resident Reactor Inspector,
Fort Calhoun Nuclear Power Station

2/25/85
Date

Approved: *B M Hennicutt*
for L. E. Martin, Section Chief, Project Section A,
Reactor Project Branch 2

2/25/85
Date

Inspection Summary

Inspection Conducted January 1-31, 1985 (50-285/85-01)

Areas Inspected: Routine, unannounced inspection of licensee's actions on previous inspection findings, operational safety verification, surveillance testing, maintenance activities, temporary CQE storage, EEQ program, and followup of LERs. The inspection involved 129 inspector-hours onsite by one NRC inspector, of which 25 were offshift hours.

Results: Within the seven areas inspected, one violation was identified (failure to follow procedures - paragraph 6).

DETAILS

1. Persons Contacted

- *R. L. Andrews, Division Manager, Nuclear Production
- *K. J. Morris, Manager, Administrative Services
- *R. L. Jaworski, Section Manager, Technical Services
- *W. G. Gates, Manager, Fort Calhoun Station
- *M. R. Core, Supervisor, Maintenance
- *A. W. Richard, Supervisor, Technical
- L. T. Kusek, Supervisor, Operations
- R. J. Mueller, Supervisor, I&C and Electrical Field Maintenance
- C. J. Brunnert, Supervisor, Quality Assurance Operations
- D. W. Dale, Senior Quality Control Inspector
- R. Wentworth, Quality Control Inspector
- J. L. Dyer, Quality Control Inspector
- D. Haas, Mechanical Engineer, GSE
- R. F. Mehaffey, Supervisor, I&C and Electrical Technical Services
- M. K. Prawl, Senior Engineer, I&C and Electrical Technical Services
- L. W. Jackson, Lead Electrical Design Engineer
- J. J. Foley, Electrical Engineer

*Denotes attendance at the exit interview.

The NRC inspector also talked with and interviewed other licensee employees during the inspection. These employees included licensed and unlicensed operators, craftsmen, engineers, and office personnel.

2. Licensee Action on Previous Inspection Findings

(Closed) Violation 285/8107-03, "Failure to Follow Procedures." This violation contained three examples of the licensee's failure to follow procedures in the Quality Assurance area.

- (1) It was determined by the NRC inspector that the licensee had failed to provide a response to a Deficiency Report within the required 30 days. This program was examined again in April 1983 (see NRC Inspection Report 285/83-08, paragraph 4), and December 1984, (see NRC Inspection Report 50-285/84-29) and the licensee was cited for failure to take prompt corrective action. On the basis that this matter will be addressed by the licensee in their response to Violation 8429-01, the NRC inspector considers this item closed.
- (2) The NRC inspector observed that a QA auditor performing miniaudits of Fort Calhoun surveillance testing was not qualified by examination. This item was reviewed in April 1983, and the NRC inspector verified that "an examination has been administered to the individual in

question in compliance with QAP-18," (see NRC Inspection Report 285/83-08, paragraph 2). This item is considered closed.

- (3) With regard to auditor examination being delegated to an independent certifying agency, the NRC inspector identified that Licensee Procedure QAP-18 required that the licensee's Manager-Quality Assurance retain "responsibility for conformance of the examination and its administration to their standard." Contrary to the above, the NRC inspector determined that for a particular independent agency the licensee had failed to perform a "verification of conformance standards of examination and their administration." The particular instance cited above was reviewed in April 1983, and the NRC inspector verified that this action was documented by licensee

Memo SER 81-ERA/QA-158a of June 1, 1981, (see NRC Inspection Report 285/83-08, paragraph 2). In addition, the licensee has expanded on this requirement in Quality Assurance Department Procedure, QADP-3, "Training and Certification of Audit Personnel," Section 3.2.4, which discusses the licensee's responsibility for final certification of auditors tested by an independent certifying agency. This item is considered closed.

3. Operational Safety Verification

The NRC inspector performed activities as described below to ascertain that the facility is being maintained in conformance with regulatory requirements and that the licensee's management control system is effectively discharging its responsibilities during power operation.

- a. The NRC inspector made several control room observations to verify proper shift manning, operator adherence to approved procedures, adherence to selected Technical Specifications, and operability of the reactor protective system and engineered safeguards equipment. Selected logs, records, recorder traces, annunciators, panel indications, and switch positions were reviewed to verify compliance with regulatory requirements. The licensee's equipment control was reviewed for proper implementation by reviewing the maintenance order and tag-out logs, and by verifying selected safety-related tag-outs. The NRC inspector observed several shift turnovers.
- b. The NRC inspector toured the plant at various times to assess plant and equipment conditions. The following items were observed during these tours:
- . general plant conditions
 - . vital area barriers not degraded or appropriately manned by security personnel

- . adherence to requirements of radiation work permits (RWPs)
 - . proper use of protective clothing and respirators
 - . plant housekeeping and cleanliness practices, including fire hazards and the control of combustible material
 - . work activities being performed in accordance with approved activities
 - . physical security
 - . HP instrumentation is operable and calibrated
- c. The NRC inspector verified operability of the following safety-related systems by performing a walkdown and switch verification of the accessible portions of the system:
- . Containment Spray System per Checklist CS-1-CL-A
 - . High Pressure Safety Injection System per Checklist SI-1-CL-A
 - . Low Pressure Safety Injection System per Checklist SI-1-CL-B
 - . Plant Electrical Distribution per Checklists EE-1-CL-A, EE-1-CL-B, and EE-2-CL-A
- d. The NRC inspector observed portions of Containment Purges 85003 and 85005, reviewed the discharge permits and noted the following for each:
- . the X/Q log was maintained, the readings were within limits, and the shift supervisor review was performed
 - . the limiting X/Q was established
 - . VIAS was tested using RM 061 or RM 060
 - . the stack dewpoint and annubar readings were taken
 - . the tritium sampler was in place and the sample was taken
 - . the recommended release rate was established, and the actual flow was lower than that authorized
 - . radioactivity analyses were performed
 - . the required effluent monitors and recorders were operational

- . the required auxiliary building exhaust fans were operating
- . OI-VA-1, Section IV.G was attached to the permit
- . the initial reading of the stack flow integrator was noted on the recorders
- . the operations checklist to CMP 4.5 was complete and signed off by the shift supervisor
- . the permit was reviewed and signed off properly, and the termination time was established

The NRC inspector accompanied the auxiliary building operator on his tour and observed the readings being taken for Containment Purge 85003. For Containment Purge 85005, the NRC inspector observed VIAS testing and initiation of the purge from the control room.

- e. The NRC inspector observed portions of Discharge Permit 85004 for "C" Waste Gas Decay Tank. The NRC inspector reviewed the permit and noted that the operations checklist was completed and signed off, that VIAS and the closing of FCV-532A, FCV-532B, and FCV-532C were tested, that the maximum release rate and the limiting X/Q were established, and that the start time and stack flow integrator readings were recorded.
- f. The NRC regional office informed the licensee on January 11, 1985, that the two RO license holders and two of the five SRO license holders passed the requalification examinations administered on November 6, 1984. Of the three SRO license holders that failed, only one was a member of the operations department and the NRC inspector verified that he was removed from the shift rotation immediately. He and one of the other SRO license holders have been placed in an accelerated training program to prepare for reexamination in about six weeks. The third SRO candidate, due to the nature of his current job assignment, has elected to allow his license to lapse and OPPD is preparing a letter to Region IV informing the NRC of this decision.

No violations or deviations were identified.

4. Surveillance Testing

The NRC inspector witnessed portions of the following surveillance tests:

- a. ST-CEA-1, F.6 (Monthly) Secondary CEA Position, Indication System POIL, Deviation, Out of Sequence and Overlap Monitoring System Test

- b. ST-ISI-RW-3, F.1 (Monthly) Raw Water Valves Inservice Testing
- c. ST-ISI-RW-3, F.1 (Monthly) Raw Water Pump Inservice Inspection
- d. ST-RPS-1, F.3 (Monthly) Power Range Safety Channels Test
- e. ST-SI/CS-1, F.1 (Quarterly) Engineering Safeguards Mechanical Checks
- f. ST-SMM-1, F.1 (Monthly) Subcooled Margin Meter Check
- g. ST-RPS-5, F.2 (Monthly) High Pressurizer Pressure Channels Test
- h. ST-RPS-7, F.2 (Monthly) Steam Generator Pressure Channels Test
- i. ST-RPS-4, F.2 (Monthly) Thermal Margin/Low Pressure Channels Test
- j. ST-ESF-6, F.2 (Monthly) Diesel Generator Check, Appendix A for D-2
- k. ST-ESF-6, F.5 (Annual) Diesel Generator Inspection performed on Diesel Generator D-2. Related to this inspection, were the following I&C surveillance tests:
 - . ST-DG-2, F.4 (Annual) Level and Pressure Instrumentation Calibration-Diesel Generator D-2
 - . ST-DG-2, F.5 (Annual) Temperature Instrumentation Calibration-Diesel Generator D-2
 - . ST-DG-2, F.6 (Annual) Speed Sensing Instrumentation Calibration-Diesel Generator D-2
- l. ST-CONT-2, F.1 (After Each Opening) Personnel Access Lock (PAL) O-Ring Seal Test.

In the above surveillance tests, the NRC inspector verified, where applicable that:

- . testing was scheduled in accordance with Technical Specification requirements
- . procedures were being followed
- . calibrated test equipment was being used
- . qualified personnel were performing the tests
- . limiting conditions for operation were being met

- . test data were being accurately recorded
- No violations or deviations were identified.

5. Maintenance Activities

The NRC inspector witnessed portions of the work performed on the following maintenance items:

- a. FW-8A Vacuum Pump breaker maintenance. The NRC inspector observed the performance of Calibration Procedure CP-FW-8A, "FW-8A Breaker," and verified that the latest procedure was used, QC signoff was present prior to starting the work, as-found and as-left data were recorded, Tag-Out 85-05 was used, and temporary clearance tags were hung to allow testing of the breaker.
- b. SRDCO 83-55/MR-FC-80-139, "Replace Waste Gas Header-Room 7." This work was being performed to replace a portion of the vent header off the waste holdup tanks with stainless steel material. The NRC inspector reviewed the installation package and noted the following items:
 - . A PRC approved procedure had been prepared and was available for use.
 - . Form F, "Safety-Related Design Change Order," was signed off by QA and QC, RWP's 23 and 24 were assigned to the job, and the planner was identified.
 - . The installation procedure contained QA signoffs verifying that the materials being used met quality requirements and QC verification of welder certification. A pre-job meeting was held with the field supervisor, HP, QC, and craft personnel participating. Procedure Change 13748 was incorporated properly to take into account operational limitations during installation.
 - . Safety Evaluation FC-154 was filled out and signed off properly

The NRC inspector observed that work was delayed about a week while purging of the vent header was being done to allow opening the system without significant radiological impact. The temporary CQE storage areas for the replacement pipe assemblies was inspected and found to be in order, and pipe ends were wrapped and taped for protection.

The NRC inspector observed work at the jobsite and noted that craftsmen were conforming to the requirements of the RWP. It was noted that the planner/field supervisor spent extensive time at the

jobsite, kept the documentation current, and was available for consultation and resolution of problems. The NRC inspector reviewed the work package and verified that signoffs were current, that the QA hold point had been signed off, and that HP precautions were observed. A review of 14 Welding and Test Control Records (FC-145) showed that each record contained weld rod information, I.D. number and class, non-destructive (NDE) test requirements and results, and the signature of the NDE inspector.

This work was still in progress at the close of this report period.

- c. Maintenance Order (MO) 842796, "RM 050 Stack Monitor." Shortly after startup in July 1984, the licensee was required to adjust the discriminator level to keep the instrument reading on scale. This work was performed to return the discriminator back to the level that had been established by Calibration Procedure CP-050, "Electronic, Secondary, and Primary Calibration Procedure for Stack/Containment Gas Monitor," on July 30, 1984. The NRC inspector observed portions of the work and noted that the MO was properly signed off, QA/QC signoffs were present, and QC witnessed operability.
- d. MO 844225, "VA-12A, Nuclear Detector Well Cooling Fan." It was observed by the operators that when starting VA-12A, a 480V ground was received and the breaker appeared to seal in. The fan was tripped but the ground alarm did not clear until the 480V breaker tripped. An operator observed locally that the breaker had tripped and that the smell of charred wiring was present. The NRC inspector accompanied the electricians as they inspected the breaker. He noted their work practices and that the safety precautions were observed. The switch was found to be burnt and damaged beyond repair. The breaker was removed to the electrical shop for maintenance. The NRC inspector reviewed the MO for completeness, noted that Tag-Out 85-32 was assigned to this job, QA/QC signoffs were present, CQE parts were used and the redundant fan VA-12B was operable. The NRC inspector observed the electricians establish the temporary CQE storage area for the breaker and verified that the blue "CQE Equipment Removed for Rebuild/Repair" tag was correctly hung on the device.
- e. MO 844228, "Pressurizer Level Recorder LRC-101X." The control room operators observed that the output from LRC-101X was erratic and caused the output on HIC-101 to oscillate and start the backup charging pumps. The NRC inspector reviewed the MO and observed troubleshooting being performed by qualified technicians. Repairs were completed that day and the system returned to normal.
- f. SRDCO 84-72/MR-FC-83-160, "Waste Concentrate Tank Level Transmitter Installation." The NRC inspector observed this job in progress and reviewed the following:

- . PRC approved procedure
- . Form F, "Safety-Related Design Change Order." This document was signed off properly and QC had established hold points to review the calibration procedures and witness operability.
- . Form 154, "Safety Evaluation"
- . Installation Procedure, "Waste Concentrate Tanks WD-38A and WD-38B Level Transmitters." It was noted that all prerequisites had been established and signed off, that steps were signed off as they were performed, and that Procedure Changes 13767 and 13818 were incorporated properly.
- . Form H, "Pre-Installation Modification Control." This document was completed and signed off properly, the work order number (No. 1115) and planner assignments were identified, and purchase order/parts information was recorded.
- . FC-379, "Alara Review Checklist"
- . Attachment "A" to the work package, "Requirements for Installation of Electrical Cable at the Fort Calhoun Station Unit No. 1." This included Table A, "Cable Installation Verification Signoff Sheet," and the NRC inspector verified that the six cables installed at that time had been checked and signed off by QC and craft personnel.
- . Attachment "B" to the work package, "Material List." All items were identified by number, quantity, description, and purchase order number.
- . Attachment "C" to the work package; copies of purchase orders
- . Attachment "D" to the work package; a copy of the OPPD work order
- . Attachment "E" to the work package, "Drawing List." The NRC inspector verified the following drawings at the jobsite to be the ones required by the drawing list:
 - 161F576, Sheet 1, Revision A
 - 161F556, Sheet 7, Revision A
 - 161F556, Sheet 10, Revision A
 - 161F550, Sheet 1, Revision A
 - 161F550, Sheet 2, Revision A
 - 161F550, Sheet 3, Revision A

11405-E-61, Revision A
11405-E-62, Revision A

. Attachment "F" to the work package, "Wire List"

- g. M0850176, "RM054B." The NRC inspector observed an alarm being received in the control room on high activity in the "B" Steam Generator blowdown and verified that the automatic control feature actuated to secure steam generator blowdown flow. It was determined that the detector needed cleaning and the NRC inspector observed the preparation and signoff of the MO, the tag-out of the equipment, and the work performed by the technician at the detector. It was noted that proper radiological and safety precautions were observed by the technician. Following cleaning, the detector was reinstalled, the alarm condition cleared, and blowdown flow reestablished.

No violations or deviations were identified.

6. Temporary CQE Storage

As a followup to the maintenance items discussed in paragraphs 5.b and 5.d, the NRC inspector reviewed the Temporary CQE Storage Program established in Standing Order G-22, "Storage of Critical Element and Radioactive Material Packaging, Fire Protection Material, and Calibrating Equipment," Section 4.0. On January 18, 1985, the NRC inspector reviewed the Temporary CQE Storage Area Log kept and maintained by the QC department. This record review showed that 13 Temporary CQE Storage Areas were in effect throughout the plant. During the next few days the NRC inspector attempted to inspect the areas identified in the log and determined that Area Nos. 2, 3, 4, and 8 no longer existed. This failure to properly closeout these areas is a violation of paragraph 4.9, Section 4.0 which requires that "after (an) area is no longer required, the group responsible for establishing the area will remove all ropes, signs, etc., turn in the signs to QC who will perform a closeout inspection and forward the Fort Calhoun Temporary CQE Approval Form to the Supervisor Maintenance"

During the inspection of Temporary CQE Storage Areas, the NRC inspector observed that Area No. 5 was not properly roped off and the identifying sign was detached from the rope and laying face down among pieces of structural steel. The failure to properly establish the area is a violation of paragraphs 4.1 and 4.2, Section 4.0 which state that "for large items such as panels or cable, the area must be roped off" and that "a sign must be on the rope specifying Temporary CQE Storage."

The NRC inspector also noted in the inspection of Area No. 5 that the majority of the structural steel was not marked as CQE materials. The

storage of non-CQE marked material in this area is a violation of paragraph 4.5, Section 4.0 which states that "only CQE materials shall be stored in any area marked Temporary CQE Storage."

In reviewing the Temporary CQE Storage Area Log, the NRC inspector determined that no periodic inspections had been performed by plant QC personnel on 10 of the 13 Temporary CQE Storage Areas identified as in effect at that time. The failure to perform these inspections is a violation of paragraph 4.7, Section 4.0, which states that "QC will perform a periodic inspection on all Temporary CQE Storage Areas using the Fort Calhoun Temporary CQE Storage Area Approval Form as a guide."

During the plant tours of January 18 and 21, 1985, the NRC inspector noted two locations (a cage in the west switchgear room, and a part of Room 71) that were marked as Temporary CQE Storage Areas but were not identified with the 13 Temporary CQE Storage Areas considered in effect at that time. The failure to properly process and establish these areas is a violation of paragraphs 4.2 and 4.8, Section 4.0, which state that signs "must be obtained from plant QC after presenting a properly filled out Fort Calhoun Temporary CQE Storage Area Approval Form" and that "after the Fort Calhoun Temporary CQE Storage Area Approval Form is approved by the Supervisor-Maintenance, QC will file it in an appropriate location in the QC office to be used as a log book to keep track of Temporary CQE Storage Areas."

These failures to follow procedures are an apparent violation against Technical Specification 5.8.1 which requires that "written procedures . . . be established, implemented, and maintained that meet or exceed the minimum requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972, and Appendix A of USNRC Regulatory Guide 1.33 . . .," and Procedure G-7 which states in Section 1.3 that "adherence to the Operating Manual is mandatory." (285/8501-01)

Since the identification of this violation the NRC inspector made additional inspections and observed that: (1) the Temporary CQE Storage Area Log was updated, (2) Area Nos. 2, 3, 4, and 8 were removed from the records, (3) inspections were performed on the remaining areas, (4) Area No. 5 was properly roped off and marked, and (5) activity was initiated to properly identify and tag the unmarked material in Area No. 5. At the exit interview, the licensee stated that the two locations marked as Temporary CQE Storage Areas but not part of the formal system would be reclassified as permanent CQE storage areas. The NRC inspector recommended that the entire Temporary CQE Storage Area Program be reviewed for effectiveness.

No other violations or deviations were identified.

7. Electrical Equipment Qualification (EEQ) Program

In NRC Inspection Report 285/84-18, paragraph 2.g, the NRC inspector described an initial review of the licensee's Qualified Life Program that was instituted as a result of work performed in response to IE Bulletin 79-01B. The licensee recognized the need for a full-time coordinator to be assigned to this effort. Since that inspection, the licensee has acquired the full-time services of a consultant engineer at the Fort Calhoun Station. Tasks performed by this consultant included the following:

- . Review EEQ documentation on all MO's since the implementation of the EEQ program. All MO's were reviewed from April 1983, to the present to ensure that all EEQ related work was performed in accordance with Standing Orders G-17A, "Electrical Equipment in a Harsh Environment," and G-56, "Qualified Life Program (QLP)."
- . Review the QLP entries for accuracy in the Fort Calhoun computer data base used in the maintenance program. This review is complete and the licensee has developed procedures for QLP data retrieval.
- . Provide a complete training program which describes the basics of the EEQ program and defines responsibilities. The NRC inspector observed the final draft of the training package that is presently being prepared for presentation. The licensee intends to initiate training on March 1, 1985, to all applicable station employees.

The NRC inspector reviewed the following MO's with regard to the EEQ program to verify that the item was properly identified as part of the QLP, that the correct procedures were referenced, and that instructions were given to fillout the appropriate documentation forms:

- . M0841561, "PCV-742B-33A, Namco Limit Switch"
- . M0841530, "HCV-2604A-33A, Namco Limit Switch"
- . M0841588, "HCV-311, HPSI Isolation Valve to Loop 1B"
- . M0840386, "B/TT-122H, Replace Inner and Outer Penetration Connections"
- . M0840379, "A/TT-122H, Replace Inner and Outer Penetration Connections"

On January 10, 1985, the NRC inspector met with licensee representatives at the Jones Street office to review an audit performed on the EEQ program and to examine the documentation reference files. The audit was performed by an independent, outside consultant and the report was signed off to OPPD on September 7, 1984. The NRC inspector reviewed the audit findings

with the licensee and discussed what actions they planned to take. One comment identified three maintenance procedures requiring revision, and the NRC inspector will review these documents to ensure that these corrections have been incorporated.

The NRC inspector reviewed a sample of the EEQ documentation reference files being maintained at the Brandeis Building by GSE. This was done by selecting various System Component Evaluation Work (SCEW) Sheets contained in Enclosure 6 of the EEQ manual and verifying for specific parameters that the documentation references were present. The following records were reviewed:

- . SCEW Sheet 6-6, "Pressure Transmitter." Wyle Test Report 45592-4 (Foxboro No. 83-6076) was in the file as supporting documentation for the environmental parameters of operating time, temperature, pressure, relative humidity, chemical spray, radiation, and aging. This report was supplemented by the similarity analysis provided in Foxboro Qualification Test Report Q0AAC11.
- . SCEW Sheet 6-29, "Motor Operator." Philadelphia Gear Corp. Test Report No. 600198, Limitorque Corp. Letter J. B. Drab to R. J. Mueller dated March 26, 1979, and Philadelphia Gear Drawing No. 15-77-2618-3 were in the file as supporting documentation for the environmental parameters of operating time, temperature, pressure, and relative humidity. These documents, plus Enclosure 7 to the EEQ Manual, "Chemical Spray Testing," provide supporting documentation for the chemical spray environmental parameter.
- . SCEW Sheets 6-123 and 6-125, "Limit Switches." NAMCO Test Report Model EA180, QTR-105 was in the file as supporting documentation for the environmental parameters of operating time, temperature, pressure, relative humidity, chemical spray, and radiation.
- . SCEW Sheets 6-122 and 6-124, "Solenoid Valves." ASCO Test Report AQR67368/Rev. 0 and ASCO letter dated July 10, 1980, were in the file as supporting documentation for the environmental parameters of operating time, temperature, pressure, relative humidity, chemical spray, and radiation.

No violations or deviations were identified.

8. Followup of Licensee Event Reports (LERs)

- a. LER 84-002, "Main Steam Safety Valve Test." While performing Surveillance Test ST-MSSV-1, "Main Steam Safety Valve Test," five of the ten main steam safety valves failed to lift within plus or minus one percent of their nameplate values. Three of the five safety valves had lift pressures lower than the set pressure and all valves

were reset to correct values. The licensee reviewed their testing procedure with the valve manufacturer who concurred that the method used by Fort Calhoun Station was correct. However, the vendor commented that the valves should be allowed to cool 10 to 15 minutes after the second lift. This specific comment is not written into the test. The NRC inspector reviewed the latest revision to ST-MSSV-1 and verified that this comment was incorporated. The corrective actions of the licensee appeared to be adequate.

- b. LER 84-009, "Environmental Testing of Electrical Penetrations." While performing environmental qualification testing of electrical penetration assemblies to fulfill the requirements of 10 CFR Part 50.49, the test laboratory informed OPPD that failures had occurred. The licensee modified selected penetration assemblies to preclude the failure from occurring to the installed penetration assemblies during a Large Break Loss of Coolant Accident or a Main Steam Line Break Accident (LBLOCA). The work performed by the licensee is discussed in NRC Inspection Reports 84-14, paragraph 4.e and 84-16, paragraph 4.d. The licensee committed to providing administrative controls to give direction to operating personnel "in the event it becomes necessary to assure proper positioning of pilot-solenoid air-operated valves following a LBLOCA." The NRC inspector reviewed Operations Memo 84-06 and verified that this guidance was provided and that operating personnel were familiar with the information.

The long term resolution of this matter was addressed by the licensee in a letter to the NRC, Office of Nuclear Reactor Regulation and will be reviewed and evaluated as part of work being completed to fulfill the EEQ requirements of 10 CFR Part 50.49. The corrective actions of the licensee with regard to this LER appeared to be adequate.

- c. LER 84-011, "Flexible Sampling Connection to RM-061/062 Found Disconnected." While conducting a tour of the auxiliary building, the operator found the flexible sampling connection to RM-061/062 disconnected. A containment pressure reduction was in progress at the time and RM-050/051 was operational, but Technical Specification 2.9(2)e requires that RM-061/062 be in operation during all gas releases. Sampling of the auxiliary building before, during, and after the event indicated that activity present was well below unrestricted limits.

The connector was reattached immediately and the licensee initiated an investigation into the matter. It was determined that the slip fit connection had loosened over time and had been disconnected due to either maintenance in the areas or vibration from the monitor sample pump. To prevent reoccurrence of such an event, the licensee installed a hose clamp on the flexible suction line. The NRC

inspector reviewed the installation and considered the flexible connection to be securely fastened. No further problems have occurred since this event and the licensee's corrective actions appear to be adequate.

9. Exit Interview

The NRC inspector met with licensee representatives on February 1, 1985, to summarize the scope and findings of the inspection.