

an effective testing program to verify the heat transfer capability of various other heat exchangers. The procedure developed to evaluate the heat transfer capability of Service Water (SW) cooled heat exchangers, ES-560.211, has been utilized on the "B" train RBCU's in an effort to determine if this testing method is preferable to periodic inspections. The testing conducted on the RBCU's involved measuring various parameters (i.e. SW inlet and outlet temperature, RB pressure, temperature and humidity, etc.) and inputting these parameter values into a computer program which calculates a fouling factor for the heat exchanger. The computer program then utilizes this fouling factor to determine the heat transfer coefficient that would exist under accident conditions.

The minimum heat transfer coefficient required under accident conditions for the RBCU's is 48.29. The inspector noted that the last three of the four tests conducted on RBCU cooler 2B indicated that the accident heat transfer coefficient was below the acceptance criteria, and 4 of the 4 tests conducted on cooler 1B also indicated unacceptable heat transfer coefficients. The licensee felt that this test data was unreliable due to measurement uncertainties and the large distribution of the test data. The inspector notes that changes in input data, which were within the measurement uncertainties for the instruments used for data collection, could result in satisfactory test results. Based on this, and the fact that SW flows and differential pressure across the heat exchangers are consistent with values measured following tube cleaning conducted in 1988, the inspector felt that there was not an immediate operability concern. The licensee has scheduled RBCU inspections for the upcoming outage. The inspectors will observe the condition of these heat exchangers during these inspections. This item is identified as IFI 395/92-16-03, Adequacy of RBCU Heat Transfer Capability.

6. Verification of Plant Records (Temporary Instruction 2515/115)

On April 23, 1992, the NRC staff issued Information Notice (IN) 92-30, Falsification of Plant Records, to alert licensees to the NRC's concern that plant mechanics, technicians and operators may have falsified plant logs at several nuclear power plants. Specifically, the IN discussed events where both licensed and non-licensed operators falsified their inspection round logs, including some which involved violation of technical specifications. Also, an event was discussed where I&C technicians failed to properly follow a surveillance procedure and subsequently created data that was entered on the calibration data sheet.

To allow licensees sufficient time to implement their own review program in this area, the II inspection effort did not begin before June 30, 1992. As part of the licensee's response, the IN was placed into the required reading for all plant personnel who could be required to take log readings or record plant data. For these same individuals

the issue of falsification of records and the responsibilities associated with record taking was discussed during staff meetings. The licensee's assessment of the IN concluded that the current amount of operator logs are not excessive and that management has been sensitive to personnel demands associated with operator logs. The licensee did not perform a self-monitoring program to compare operator logs versus room entry security records. When questioned by the inspector on why this type of comparison was not performed, the licensee stated that previous reviews of plant problems had included comparisons of logs and security records and no falsification problems were identified. However, the inspector noted that these comparisons were only completed for a few isolated events and the comparison times were relatively short.

To complete the inspection required by the TI, the inspector requested copies of various operator logs and a security record printout for room entries corresponding to the logs. These records were for nine rooms/areas, each requiring separate entries, and fifteen separate days which covered a five month time period (March 8 through July 25, 1992). With both day and evening logs being reviewed, the total number of individual entries was 270. For all the logs associated with an individual room/area, the inspector verified that a security access record existed for that particular entry and the log signoff times matched the access times. One exception involved an operator under instruction who made a room entry and verified the actual log parameters, while the operator providing the instructions completed the log signoff. The licensee informed the inspector that this example complied with SAP 200, "Conduct of Operations", for a qualified individual to review the trainee's log keeping. However, the licensee's expectation is for both the qualified operator and the trainee to complete the log signoff. The need to meet these expectations for operator logs and trainees was discussed with operation personnel.

While reviewing the "Thermo-Lag" fire barrier material issue, the inspectors reviewed the security access records for the areas which required a hourly fire watch patrol. This review verified that room/area entries were made for the documented roving fire watch patrols.

Based on review of the licensee's actions associated with IN 92-30 and the inspectors successful verification of required room entries against security access records, the inspection requirements of TI 2515/115 are completed and the TI is closed.

7. Action on Previous Inspection Findings (92701, 92702)

(Closed) Unresolved Item 395/92-13-01, Failure to take required technical specification explosive gas sample. A personnel error and the failure to update a procedure used to track TS action items (GTP 702), resulted in missed grab sample. The importance of complying with TS related to sampling was emphasized to Operations and Chemistry