

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30303

Report Nos.: 50-413/84-79 and 50-414/84-34

Licensee: Duke Power Company 422 South Church Street Charlotte, NC 28242

Docket Nos.: 50-413 and 50-414

License Nos.: NPF-24 and CPPR-117

Facility Name: Catawba 1 and 2

Inspection Dates: June 26 - July 25, 1984

Inspection at Catawba site near Rock Hill, South Carolina

Inspectors: spector McGuire tor.

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Approved by:

war M V. Browhlee, Section Chief Division of Reactor Projects

SUMMARY

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Areas Inspected

This routine, unannounced inspection involved 250 (resident) inspector-hours on site in the areas of followup of NRC and licensee identified items (Units 1 and 2); site tours (Units 1 and 2); maintenance observations (Unit 1); fuel loading (Unit 1); review of operating license issuance (Unit 1); TMI action items (Unit 1): and followup of IE Bulletins (Units 1 and 2).

Results

Of the seven areas inspected, no violations or deviations were identified.

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REPORT DETAILS

1. Person Contacted

Licensee Employees

- *J. W. Hampton, Station Manager
- *G. T. Smith, Superintendent of Maintenance
- *J. W. Cox, Superintendent, Technical Services
- C. W. Graves, Operations Superintendent
- *C. L. Hartzell, Licensing and Projects
- T. E. Crawford, Operations Engineer
- P. C. McAnulty, Training and Safety Coordinator
- *P. G. Leroy, Licensing Engineer
- D. M. Robinson, Reactor Engineer
- *G. G. Barrett, Training Supervisor
- *R. A. Jones, Test Engineer
- *A. S. Bhatnagar, Test Engineer

Other licensee employees contacted included technical, operators, mechanic, security force members, and office personnel.

Other Organization

F. Jape, USNRC, Test Programs Section Chief, RII

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on July 25, 1984, with those persons indicated in Paragraph 1 above. The licensee acknowledged the findings identified by the inspector.

3. Licensee Action on Previous Enforcement Items

Not inspected.

4. Independent Inspection Effort (71302, 92706) (Units 1 and 2)

The inspectors conducted tours of various plant areas. During these tours, various plant conditions and activities were observed to determine that they were being performed in accordance with applicable requirements and procedures. No significant problems were identified during these tours and the various evolutions observed were being performed in accordance with applicable procedures.

5. Maintenance Observation (Unit 1)(71302)

Station maintenance activities of selected systems and components were observed/reviewed to ascertain that they were conducted in accordance with the requirements. The inspector verified licensee conformance to the requirements in the following areas of inspection: (1) that the activities were accomplished using approved procedures, and functional testing and/or calibrations were performed prior to returning components or systems to service; (2) quality control records were maintained; (3) that the activities were accomplished by qualified personnel; and, (4) parts and materials used were properly certified. Work requests were reviewed to determine status of outstanding jobs and to assure that priority is assigned to safety-related equipment maintenance which may affect system performance.

No violations or deviations were identified.

6. Observation of Fuel Loading (Unit 1)(72524C)

The inspector witnessed portions of the initial fuel loading of the Unit 1 fuel. This inspection was conducted to verify conformance to license requirements and various conditions of the license, conformance to administrative and operational procedural requirements, and conformance to the controlling procedure for fuel loading. In addition, conformance to all Mode 6 Technical Specifications was verified.

No violations or deviations were identified.

7. Review of Operating License Issuance (Unit 1)(94300)

During this reporting period the inspectors reviewed various areas of Unit 1 for operating license issuance. These areas include, but were not limited to, a review of the construction and preoperational inspection program, a review of all violations and unresolved items and the status of these items, a review of the preoperational test program, with emphasis on the commitments identified in the Final Safety Analysis Report, and a review of construction status. The results of these reviews were transmitted to Region II NRC management for consideration during regional assessment of overall licensee readiness for operation.

No violations or deviations were identified.

8. TMI Action Item Verification and Followup (92706)

This inspection was conducted to verify the adequacy of implementation of licensee commitments made to the NRC. The commitments were made in response to the requirements of NUREG-0660, NRC Action Plan Developed as a Result of the TMI-2 Accident, published May 1980, Revised August 1980; NUREG-0737 Clarification of TMI Action Plan Requirements, published November, 1980; and NUREG-0694, TMI-Related Requirements for New Operating Licenses, published June 1980.

The verification adequacy was based upon personal observations in the plant and review of licensee drawings, procedures and documents. The specifics are contained in each paragraph.

- a. 1.C.1 Reanalysis of Transients and Accidents, Development of Emergency Operating Procedures
 - References: Catawba SER, Section 13.5.3 NUREG-0737, Supplement 1 Catawba SER, Supplement 2, Section 13.5.2

Guidance for upgrading emergency operating procedures (EOPs) was provided in the SER. The schedule and review requirements for TMI Task Action Plan Item I.C.1 have been modified by Supplement 1 to NUREG-0737, "Requirements for Emergency Response Capability."

Supplement 1 to NUREG-0737 requires that technical guidelines be submitted to NRC for review. For Catawba, this requirement was satisfied by (1) the applicant's commitment in the FSAR to implement a program of emergency operating procedures based on the Westinghouse Emergency Response Guidelines when approved by the staff, and (2) NRC approval of Revision 0 of the Westinghouse Owners Group Emergency Response Guidelines (Generic Letter 83-22, dated June 3, 1983).

NUREG-0737, Supplement 1, also requires that each licensee/applicant submit to NRC a procedures generation package (PGP) at least three months before the date formal operator training on the upgraded EOPs is scheduled to begin.

The Catawba PGP was submitted by a letter from H. B. Tucker (Duke) to H. R. Denton (NRC), dated February 28, 1983. Subsequently, this PGP was superseded by a revised PGP submitted by a letter from H. B. Tucker to H. R. Denton, dated June 1, 1983. In a letter from H. B. Tucker to H. R. Denton, dated February 22, 1984, the applicant clarified the June 1, 1983, PGP by stating that the NRC-approved version of the Westinghouse Owners Group ERGs; namely, Revision O to the ERGs, served as the starting point for the development of the Catawba plant-specific technical guidelines.

Based on NRC review of the Catawba PGP, as reported in Supplement 2 to the SER, certain items must be resolved prior to acceptance of actions taken in response to the action item. Of these items, NRR has identified the first as requiring resolution prior to criticality. The second item, consisting of several small issues, has been identified for resolution prior to issuance of an operating licensee.

(1) In the February 22, 1984 letter from H. B. Tucker to H. R. Denton, the applicant stated that Revision O of the ERGs served as the starting point for the Catawba plant-specific technical guidelines. The applicant also stated that some changes had been made to the Catawba plant-specific technical guidelines to conform with Revision 1 of the ERGs. These changes are briefly summarized in the February 22, 1984 letter from the applicant. In addition, Section 6.2.2.1 of the PGP states that major differences between the Catawba design and the reference plant are being considered in additional analyses performed by Westinghouse. Examples of these differences are the ice condenser containment and upper head injection system used in the Catawba design.

NRR staff has required the applicant to identify the safetysignificant differences in the Catawba plant-specific technical guidelines from the NRC-approved generic technical guidelines and to provide justification for these deviations. This information shall be reviewed and approved by the staff before initial criticality.

- (2) NRR identified in SER, Supplement 2, the following items as requiring additional information and/or clarification:
 - (a) The PGP should contain a more complete description of how adequate operator and plant staff familiarization with EOPs will be ensured before EOP implementation. This description should (i) include a commitment that all EOPs will be exercised by all control room operators during simulator training, (ii) identify the method for ensuring adequate operator training of areas not covered by simulator exercises, and (iii) describe the method of documenting the simulator program, including provisions for evaluation and documentation of operator performance.
 - (b) The PGP should contain a description of the criteria used for selecting the scenarios used in the validation/verification program to provide a high level of assurance that the procedures will properly guide the operators in mitigating the consequences of transients and accidents. The program description should indicate that the full complement of EOPs will be exercised (including multiple failures, both simultaneous and sequential).
 - (c) Section 2.5 of the Catawba Writer's Guide correctly states that action steps should not be included in cautions or notes. However, in the Emergency Procedures Example in Appendix I to the Writer's Guide, the cautions on pages three and four do include action steps. Either the action steps should be removed from cautions or the Writer's Guide should be revised to describe when it is permissible to include action steps in cautions.

- (d) Section 5.5.3 of NUREG-0899 states that "WARNINGS and CAUTIONS should be written so that they can be read completely without interruption by intervening steps or page turning." Section 2.5 or other appropriate location in the Catawba Writer's Guide should include a statement to this effect.
- (e) Section 5.5.8 of NUREG-0899 contains guidance for the preparation of figures and tables. Section 2.9 of another appropriate location in the Catawba Writer's Guide should include such guidance to ensure accuracy of information presentation to facilitate access and usability.
- (f) Describe the method for handling differences between Catawba Units 1 and 2 in the validation/verification and training process, e.g., to the extent that the units differ in terms of instrumentation, controls, equipment (including availability, design, labeling, or location) or any other aspect that may impact safety of plant operation or maintenance.

Pending resolution of the above issues, Item I.C.1 remains open.

b. 1.C.7 Nuclear Steam Supply System (NSSS) Vendor Review of Emergency and Power Ascension Procedures

References: Catawba SER, Section 13.5.4 Catawba SER, Supplement 2, Section 13.5.3

In accordance with NUREG-0737, Item I.C.7, NSSS vendor review of low power testing, power ascension, and emergency operating procedures is necessary to further verify adequacy of the procedures. Sections 13.5.1.2 and 14.2.3.2 of the FSAR state that all preoperational and startup test procedures and the Catawba Station Emergency Operating Procedures developed from the technical guidelines are subject to appropriate review by the NSSS vendor, Westinghouse Electric Corporation; this review will provide further verification of the adequacy of the procedures. These reviews must be completed before fuel load.

NRR has concluded that the requirement for vendor review of EOPs has been satisfied by the involvement of Westinghouse in the development of the ERGs, as reported under TMI Task Action Plan Item I.C.1 of Supplement 2 of the SER. The applicant's EOPs will be based on the ERGs. Westinghouse is performing analyses of differences between Catawba and the reference design used in developing the ERGs to be used in developing the plant-specific technical guidelines. Therefore, NRR staff found that the applicant adequately responded to TMI Task Action Plan Item I.C.7 for EOPs. Further, recent inspection activities have verified Westinghouse involvement in the above referenced activities. In a June 27, 1984, letter from Hal Tucker to Harold Denton, the applicant reported the completion of vendor review of certain fuel loading, precritical, low power physics, and power escalation test procedures. In consideration of this report and onsite inspection the intent of the requirement has been satisfied. This item is closed.

c. 1.C.8 Pilot Monitoring of Selected Emergency Procedures

References: Catawba SER Catawba SER, Supplement 2

The Westinghouse Owners Group indicated in a meeting with the staff on June 18, 1981, that generic emergency operating procedures and supporting analysis needed to comply with the TMI Task Action Plan, Item I.C.1, as clarified in NUREG-0737, would be submitted in two parts.

The first part, containing event-based Optimal Recovery Guidelines, was submitted as an attachment to a letter dated November 30, 1981, from R. W. Jurgensen to D. G. Eisenhut. The second part, containing symptom-based Critical Safety Functional Restoration Guidelines, was submitted August 2, 1982. The r.vised guidelines incorporate the short-term reanalysis of small-break LOCAs and inadequate core cooling that was performed for Task Action Plan Items I.C.1(1) and I.C.1(2), and previously approved by the staff. Pending staff approval of the revised analysis and guidelines, the staff continued the pilot monitoring of interim emergency operating procedures described in Task Action Plan Item I.C.8 (NUREG-0660). Revision 0 of the Westinghouse Owners Group Emergency Response Guidelines were approved June 3, 1983, (Generic Letter 83-22). These guidelines were employed in the preparation of the Catawba EOPs.

In as much as the approved guidelines were employed in the preparation of those procedures, the intent of Item I.C.8 has been satisfied, therefore in Supplement 2 of the SER, Item I.C.8 was deleted. Reference Section 13.5.2.

d. Item I.G.1 Training During Low Power Testing

References: Catawba FSAR, Section 1.9, I.G.1 Catawba FSAR, Table 14.2.12.2 Catawba SER, Section 14

The original objective of Item I.G.1 as detailed in NUREG-0660 was to increase the capability of the shift crews to operate facilities in a safe and competent manner by assuring that training for plant changes and off-normal events is conducted. Near-term operating license facilities were required to develop and implement intensified training exercises during the low-power testing programs.

NRR required new operating licensees to conduct a set of low-power tests to accomplish the objective. The set of tests were determined on a case-by-case basis for the first few plants. Then developed acceptance criteria for low-power test programs to provide "hands on" training for plant evaluation and off-normal events for each operating shift.

An evaluation of the resources available on-site proved to be futile in that they (FSAR, SER) do not adequately address the program as described in NUREG 0660 nor could the applicant provide expanded resource information. The inspection was inconclusive, the item remains open.

e. Item II.B.1 Reactor Coolant System High Point Vents

References: Catawba FSAR, Section 1.9, II.B.1 Catawba SER, Section 5.4.5

As reported in the Catawba SER, Section 1.9 of the Catawba FSAR has been reviewed in accordance with the July 1981 edition of "Standard Review Plan (SRP) for the Review of Safety Analysis Reports for Nuclear Power Plants," NUREG-0800.

The Catawba reactor vessel head vent system consists of a 1-in. line that forks into two lines. Each line has two water-operated valves in series (250A, 251B, and 252B, 253A). These valves are Kerotest Y-body globe valves. The two lines of valves are cross connected.

These valves have their controls and position indications in the control room. They receive power from redundant diesel-backed emergency power sources and are environmentally qualified for post-accident conditions. The vent design provides for a flow-restricting orifice that will limit the flow during venting to less than the lower limit of a LOCA.

These valves have design provisions to be individually stroke tested during normal power operation. The piping, valves, components and supports are classified seismic Category I and safety Class 1 up to and including the second normally closed valve; safety Class 2 up to and including the flow-restricting orifice.

The applicant identified the pressurizer PORVs as RCS vents according to NUREG-0737, II.B.1.

The staff has asked the applicant to show that

 The pressurizer vents are appropriately qualified in accordance with SRP Section 5.4.12.

- (2) RCS vent paths to the containment discharge into areas that provide good mixing with containment air and are able to withstand steam, water, noncondensible products, and mixtures of the above.
- (3) Displays and controls added to the control room as a result of this requirement do not increase the potential for operator error.

Pending staff review and approval of the above requested information this item remains open.

f. II.B.4 Training for Mitigating Core Damage

References: Catawba FSAR, Section 1.9 Catawba SER 13.2.2, 13.2.3

The Catawba SER Section 13.2.2, states a training program in mitigating core damage for operations personnel has been developed as well as a program for health physics, chemistry, and instrumentation and control technicians and supervisors that is commensurate with their responsibilities. The inspector reviewed the administrative controls for this area. The administrative procedures do not contain well defined guidance for this required training. Areas, such as, who is required to be trained, what subjects are required to be given, duration of training and retraining to be implemented, are examples of areas that are not addressed in the Catawba programmatic procedures. The subject matter being taught exceeds that which is specified by NUREG 0737, however, it has been incorporated into two separate levels of instructions consisting of 40 hours and 88 hours of management technical training conducted over an extended period of time. This training is primarily focused on system training. As a result of this method there is no mechanism that all required training will be conducted as needed to support operation of the facility.

As a result of this review, two inspector followup items have been identified.

- (1) Modify the administrative procedures that define the training required for multigating core damage training to specify what training is required, who is required to receive the training and what retraining is needed to maintain the proficiency of the operating organization. This item will be tracked as inspector followup item 413/84-79-01.
- (2) Enclosure 2 of NUREG 0737, requires that training for Item II.B.4 be completed by full power. The inspector considers full power for this application to mean the plant is either classified as in commercial operation or 100% thermal power generation has been obtained. Since the training for mitigating core damage for all managers and technicians in the IAE, Health Physics and Chemistry Departments, commensurate with their responsibility has not been

completed at this time, this item will be tracked as Inspector Followup Item 413/84-79-02.

g. II.E.1.1 Auxiliary Feedwater System Reliability

References: Catawba FSAR, Section, 1.9 Catawba SER, Section 10.4.9 Catawba SER, Supplement 2, Section 10.4.9

On the basis of its review, NRR staff concluded that the auxiliary feedwater system meets the requirements of GDC 2, 4, 5, 19, 34, 44, 45, and 46 with respect to protection against natural phenomena, missiles, and environmental effects, shared systems and operational capability from the control room, decay heat removal, cooling water capability, inservice inspection functional testing; and the guidelines of RG 1.29 and BTPs ASB 10-1 and RSB 5-1 concerning seismic classification, power diversity, and the recommendations of NUREG-0611 concerning generic improvements to the AFWS design, procedures, and Technical Specifications and AFWS reliability, except with regard to loss of the primary source of condensate storage water. The staff required that a condition be placed in the license requiring that before fuel loading, design modifications be made by the applicant which are satisfactory to the staff. The AFWS met the acceptance criteria of SRP Section 10.4.9 except as noted above.

SER, Supplement 2, Section 10.4.9 states that by letter dated September 28, 1983, the applicant stated that valve CA103 had been removed. Removing this valve will not block the water from the primary water source to the auxiliary feedwater (AFW) pumps. The staff found this acceptable.

An onsite review confirms that the valve was removed. This item is closed.

h. II.E.3.1 Emergency Power for Pressurizer Heaters

References: Catawba FSAR, Section 1.9 Catawba SER, Section 8.4.11

Position II.E.3.1 of NUREG-0737 lists various requirements for the power supply to the pressurizer heaters. Table 1.9-1 of the Catawba FSAR describes the specifics of how Catawba meets the NUREG requirements.

There are two groups of pressurizer heaters (each rated at 416 kW) for each Catawba unit, which can be supplied from offsite power or from the onsite emergency power system. The applicant has verified that one heater group has the capability to maintain natural circulation under hot standby conditions. Each group of heaters has access to only one Class 1E division power supply. If the pressurizer heaters are being supplied from the emergency onsite system, they will be automatically load shed upon the occurrence of an SI. The SI and the diesel generator load sequencer must both be reset before the operator can manually reload the pressurizer heaters onto the emergency power sources. These resets and the manual controls for the pressurizer heater feeder breaker are located in the control room. Procedures for manually loading the pressurizer heaters onto the emergency power sources following an SI are available to the operator.

NRR reports in Catawba SER, Section 8.4.11 that the above provisions meet the requirements of TMI Item II.E.3.1 and are, therefore, acceptable.

This item is closed.

i. II.E.4.2 Containment Isolation Dependability

References: Catawba FSAR, Section 1.9,6.2.4,7.3 Catawba SER, Section 6.2.4 Catawba SER, Supplement 2, Section 6.24

A review performed by NRR, the results of which were reported in the Catawba SER, Section 6.2.4 revealed that except for two confirmatory items concerning containment purging and design provisions for isolation barriers, the containment isolation system design is acceptable and meets the requirements of GDC 1, 2, 4, 16, 54, 55, 56, and 57 and Appendix K to 10 CFR 50.

In Section 6.2.4 of SER, Supplement 2, it was reported that the additional documentation required to confirm the applicant's statement that the design provisions for containment isolation barriers (e.g., Quality Group B, seismic Category I, protection from pipe whip and jets) had been received, and it had been confirmed that the appropriate design provisions for containment isolation barriers have been provided in the Catawba design.

In that the issue of containment purging is as yet unresolved, the item remains open.

j. . Item II.K.3.1 Auto PORC Isolation

References: Catawba FSAR, Section 1.9, Subsection II.K.3.1 Catawba SER, Sections, 7.6.2.6 and 15.5.3 Catawba SER, Supplement 2, Section 7.6.2.6

In the SER, the staff indicated that an automatic closure system for the PORV block valve would not be required if studies provided in response to Item II.K.32 show that the probability for the PORV sticking open is sufficiently small. The applicant's response to Item II.K.3.2 referred to a Westinghouse generic report (WCAP-9804) and stated agreement with the conclusions in that report as applicable to Catawba. The staff has now reviewed the applicant's response and WCAP-9804 and finds that an automatic PORV isolation system is not required for Catawba.

k. Item II.K.3.5.b Automatic Trip of Reactor Coolant Pumps

References: Catawba FSAR, Section 1.9 Catawba SER, Section 15.5.4

NUREG-0737, Item II.K.3.5 requires that the reactor coolant pumps be tripped automatically in case of a small-break LOCA. The applicant was asked to consider other solutions to the small-break LOCA problem.

In FSAR, Section 1.9, Revision 4, the applicant referenced the Westinghouse Owners Group generic resolution of this issue. Based on the resolution of this issue and the applicant's reference, the staff found this item status acceptable and will require modifications if indicated by the review and resolution of this issue.

In conversations held with NRR on June 28, 1984, it was determined that NRR's review is not complete; therefore this item remains open.

1. Item III.D.1.1 Primary Coolant Sources Outside Containment

References: Catawba FSAR, Section 1.9, III.D.1.1 Catawba SER, Section 11.6

In SER, Section 11.6, NRR reported that the applicant had committed to writing a periodic leak rate test for systems carrying radioactive fluids outside containment. The following systems are included: safety injection, residual heat removal, containment spray, containment hydrogen sample and purge, nuclear sampling, boron recycle, chemical and volume control, refueling water, liquid waste, and waste gas. This test is to be performed before startup and during each refueling outage.

A separate periodic test procedure will be written to ensure that excessive leakage is detected on a timely basis. This test will be run at least weekly and will require that systems carrying radioactive fluids outside containment be visually inspected for excessive leakage. Appropriate corrective action will be taken if excessive leakage is detected.

The staff has reviewed these provisions according to the guidelines in NUREG-0737 (III.D.1.1) and found them acceptable.

A review was performed of the following applicable procedures. The procedures appeared to be technically adequate, addressing the intent of the requirement. In view of this analysis this item is closed. 9. IE Bulletins (Units 1 and 2) (92703)

(Closed - Units 1 and 2) IE Bulletin 84-02: Failure of GE Type HFA Relays in Use in Class IE Safety Systems. Licensee review and response dated July 13, 1984, indicated that the subject components are not utilized by Catawba. Based on this information, the licensee actions are considered satisfactory.

- 10. Licensee Identified Items 50.55(e) (Units 1 and 2) (99020)
 - a. (Closed) CDR 413/84-07: Incorrect Modifications to End Blocks for ITT Grinnal Mechanical Snubbers. Responses for this item were submitted on May 4 and May 11, 1984. The inspector reviewed and verified implementation of the corrective actions described in the responses for this item and considers these actions to be satisfactory.
 - b. (Closed) CDR 413, 414/84-09: Incorrect Tubing Clamps Used in Erection of Tubing Supports. Responses for this item were submitted on May 11 and June 11, 1984. The inspector reviewed and verified implementation of corrective actions described in the responses for this item and considers these actions to be satisfactory.
 - c. (Closed) CDR 413/84-12: Bergen-Paterson Clamps Installed Without Appropriate Construction Procedures. The response for this item was submitted on May 29, 1984. The inspector reviewed and verified implementation of corrective actions described in the response and considers these actions to be satisfactory.

No violations or deviations were identified.

- Licensee Action on Previously Identified Inspection Findings (Units 1 and 2) (92701)
 - a. (Closed) Inspector Followup Item (413/83-42-12, 414/83-35-12). Complete Installation of the Communications Equipment for the Control Room. This item had previously been reviewed and found to be acceptable with the exception of the Emergency Notification System (ENS) phones. See Report Numbers 50-413/84-54 and 50-414/84-24. The ENS phones have now been installed in the control room, Senior Resident Inspectors' office and Technical Support Center and check out is completed.
 - b. (Closed) Inspector Followup Item (413/83-23-01, 414/83-20-01). Provision of Segmented Maps of the Emergency Planning Zones (EPZ) at appropriate locations. Segmented maps of the EPZ depicting preselected monitoring points have been provided throughout the Crisis Monitoring Center.

12. Followup On Board Findings

On July 24, 1984, the inspector discussed with Mr. G. E. "Beau" Ross, the corrective actions that Duke Power Conpany (DPC) has taken to address the Board findings that the 1981-1982 evaluation, the November 1982 interim evaluation, and the 1982-83 evaluations of Mr. Ross were unfair and in retaliation for Mr. Ross and his crew's strict adherence to QA procedures and expression of safety concerns. Concerning the actions taken by DPC as a result of the Board's finding Mr. Ross stated in general the following:

- a. DPC has removed the evaluation for the period stated above from his personal file. They have also written a memo that states his work was satisfactory during that period of time. He is satisfied with this action although the material removed from his file is being maintained in a sealed envelop in a separate DPC file. DPC also included in that separate file a letter which in general states that they do not concur with the board findings.
- b. Mr. Ross expressed a concern that future unfair treatment may be exhibited as a result of his actions as he is transferred to other DPC facilities. His general concern was for future treatment and did not state any present examples evidencing discriminatory treatment.