

*R. Gardner*

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

SEP 17 1984

MEMORANDUM FOR: James G. Keppler, Regional Administrator  
FROM: C. E. Norelius, Director, Division of Reactor Projects  
SUBJECT: PROGRESS REPORT - NRC ONGOING INSPECTION OF BRAIDWOOD  
CONSTRUCTION ASSESSMENT PROGRAM (BCAP)

The following information was provided by the NRC inspector assigned to follow the BCAP. It covers the period of September 4 through September 14, 1984. Similar type progress reports will be issued between the normal monthly inspection reports to inform NRC management of ongoing BCAP activities and issues.

BCAP Status

The Construction Sample Reinspection (CSR) and Reverification of Procedures to Specification Requirements (RPSR) BCAP elements are approximately four weeks behind schedule. The stop work was lifted in the Review of Significant Corrective Action Programs (RSCAP) BCAP element. RSCAP personnel are presently reviewing five corrective action programs. Delays in initiating CSR and RPSR activities are primarily due to difficulties encountered in the areas of CSR and RPSR procedure approvals, personnel training, and inspector certifications. The BCAP inspector certification process has been halted due to NRC concerns with the qualifications of BCAP inspectors. BCAP QA has placed a formal Hold Point on the initiation of CSR and RPSR BCAP elements. This will provide QA with the opportunity to review the BCAP program for compliance to programmatic requirements prior to initiating CSR and RPSR activities. ERC personnel have been onsite performing BCAP reviews. The first ERC audit of BCAP was completed. Total BCAP manpower is presently 78 personnel.

Review of BCAP Program

During this review period the inspector performed the following reviews of BCAP activities:

- 1) reviewed revised BCAP procedures
- 2) reviewed the training program for BCAP QA personnel
- 3) observed an ERC audit team exit meeting

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- 4) reviewed BCAP QC inspector resumes
- 5) reviewed CSR preliminary inspection checklists
- 6) reviewed CSR conduit support population documents
- 7) reviewed BCAP engineering personnel resumes
- 8) - met with RPSR personnel to discuss the status of the RPSR element

#### Problem Areas Identified

Two significant problems were identified during this review period. The first dealt with the training provided to BCAP QA inspectors prior to their participation in the formal review and approval of BCAP task force procedures. The inspector determined that the licensee had failed to provide required training for two BCAP QA inspectors who had reviewed and approved BCAP procedures. BCAP QA initiated a Corrective Action Request (CAR) to document this deficiency. Open Item #5.

The second problem dealt with the qualifications of BCAP inspectors who were in the process of being certified. The inspector determined that certain BCAP personnel did not meet the Braidwood site QA requirements for inspector qualifications. Open Item #6.

#### Status of Open Items

To ensure the proper tracking and closure of open items identified in the NRC BCAP progress reports, all open items will be uniquely identified and tracked to closure.

Open items identified in the initial progress report and their current status are as follows:

1. (Closed) ERC manpower estimates may be inadequate. ERC has increased their BCAP manpower estimates from five to nine. In addition, ERC has committed to providing additional personnel, as needed, to adequately monitor the BCAP program.
2. (Closed) Stop Work issued for the RSCAP area of the BCAP program. ERC concurred in the lifting of the stop work on August 31, 1984, based on their review of the BCAP response to the ERC comment on BCAP procedure, BCAP-60.
3. (Closed) BCAP procedure BCAP-06 to be revised prior to initiation of CSR BCAP element. The inspector reviewed revision 2 to BCAP-06 and concluded that the revised procedure was acceptable.

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4. (Open) Inspector concerns with the training of BCAP personnel who are performing functions other than QC inspections. The BCAP QA department had previously initiated a CAR on this matter and is in the process of reviewing the corrective actions taken as a result of the CAR.

*RF Warrick for*

C. E. Norelius, Director  
Division of Reactor Projects

cc: R. C. DeYoung, OIE  
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