

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos. 50-440/84-15(DRP); 50-441/84-14(DRP)

Dockets No. 50-440; 50-441

Licenses No. CPPR-148; CPPR-149

Licensee: Cleveland Electric Illuminating Company
Post Office Box 5000
Cleveland, OH 44101

Facility Name: Perry Nuclear Power Plant, Units 1 and 2

Inspection At: Perry Site, Perry, Ohio

Inspection Conducted: July 1 through September 10, 1984

Inspectors: J. A. Grobe

J. W. McCormick-Barger

Approved By: *RC Knop*
R. C. Knop, Chief
Reactor Projects Section 1C

10-9-84
Date

Inspection Summary

Inspection on July 1 through September 10, 1984 (Report Nos. 50-440/84-15(DRP); 50-441/84-14(DRP))

Areas Inspected: Routine unannounced inspection by resident and regional inspectors of applicant action on previously identified inspection findings applicant action on 10 CFR 50.55(e) reportable items, applicant action on 10 CFR Part 21 reportable items, applicant action on IE Bulletins, preoperational testing program implementation verification, instrument air system cleanliness, safety committee activity, standby liquid control system design and installation, emergency exercise, and applicant meeting with Region III representatives. The inspection involved a total of 120 inspector-hours onsite by two NRC inspectors including 22 inspector-hours onsite during off-shifts. The inspection also involved a total of 118 inspector-hours onsite and in the regional office by seven inspectors and three managers preparing for and participating in a regional meeting with the applicant.

Results: Of the ten areas inspected, no items of noncompliance or deviations were identified in nine areas; one item of noncompliance was identified in the remaining area (failure to properly implement the test program - Paragraph 7).

DETAILS

1. Persons Contacted

- ³ C. M. Shuster, Nuclear Quality Assurance Department (NQAD) Manager
- ³ F. R. Stead, Nuclear Engineering Department Manager
- ¹³ B. D. Walrath, Operational Quality Section (OQS) General Supervising Engineer
- ² G. R. Hicks, OQS, Turnover/Systems Supervisor
- ²³ E. Riley, Construction Quality Section General Supervisor
- ² T. A. Boss, Quality Audit Unit Supervisor
- ² R. O. Neuendorf, Quality Audit Coordinator
- ² P. P. Martin, Procurement and Administrative Quality Section (PAQS), General Supervising Engineer
- ¹²³ K. C. Kaplan, PAQS, Senior Engineering Technician
- ² D. R. Green, Nuclear Design and Analysis Section (NDAS), Systems and Equipment Senior Project Engineer
- E. C. Willman NDAS, Senior Electrical Systems Engineer
- E. M. Buzzelli, Nuclear Licensing and Fuel Management Section (NLFMS), Licensing Engineer
- B. S. Ferrell, NLFMS, Licensing Engineer
- ¹³ M. E. Milkovich, NLFMS, Licensing Engineer
- R. L. Vondrasek, Reliability and Design Assurance Section General Supervising Engineer
- ¹³ J. J. Waldron, Perry Plant Department (PPD) Manager
- R. J. Tadych, PPD, Operations Section General Supervisor
- R. A. Stratman, PPD, Nuclear Services Section General Supervisor
- R. Bowman, PPD, Maintenance Section
- ¹³ M. D. Lyster, PPD, Plant Operations Superintendent
- ¹³ B. L. Barkley, Nuclear Test Section (NTS), General Supervising Engineer
- G. H. Gerber, NTS, Mechanical Test Support Element Senior Project Engineer
- R. E. Jaquin, NTS, Document Processing Supervisor
- M. B. McLeod, NTS, Senior Test Engineer, Instrumentation and Controls

The inspectors also contacted other licensee and contractor personnel during this inspection.

¹ Denotes those attending the exit interview on August 2, 1984.

² Denotes those attending the exit interview on August 3, 1984.

³ Denotes those attending the exit interview on September 7, 1984.

2. Applicant Action on Previously Identified Inspection Findings.

- a. (Open) Open Inspection Item (440/84-09-01(DRP); 441/84-09-01(DRP)): Concerns regarding the Plant Operations Review Committee (PORC) procedure, PAP-0103, Revision 1. To resolve the inspector concerns the applicant committed to incorporate the following into the next revision of PAP-0103.
- . Conducting PORC business by polling members will not be permitted. All regular business will occur at a committee meeting.
 - . Emergency PORC business, when required, will be conducted by telephone conference call.
 - . The reasons for any dissenting votes will be recorded in the minutes.
 - . Major, non-grammatical, procedure changes made during the PORC meeting will be recorded in the minutes.
 - . PORC members will be qualified for conducting PORC business through completion of a required reading list.
 - . Agendas and meeting minutes should be distributed to all alternate PORC members.
 - . The review process will be more accurately described in the procedure.
 - . PORC members will be responsible for timely completion of their review activities.

Additionally the applicant committed to ensure that PAP-0103 will conform to Section 6 of the Technical Specifications, when issued. The inspector will review the procedure revision and Technical Specification conformance during a future inspection.

- b. (Open) Open Inspection Item (440/84-11-01(DRS); 441/84-11-01(DRS)): Applicant will provide the documentation detailing the test organization in their description of the test program. The applicant has included a description of the test organization in the recently issued Test Program Manual (TPM). This item will remain open until an evaluation of the test organization as described in the TPM has been completed.
- c. (Closed) Open Inspection Item (440/84-11-02(DRS); 441/84-11-02(DRS)): The applicant committed to the creation of a "Startup Manual". The applicant developed the TPM to consolidate all of the controlling preoperational test program procedures in a single volume. The inspectors reviewed the TPM and found it satisfactory with the exception of any remaining items from reports 50-440/84-11 and 50-441/84-11. These items will continue to be tracked under their respective item numbers. This item is considered closed.
- d. (Closed) Open Inspection Item (440/84-11-03(DRS); 441/84-11-03(DRS)): Controls over jurisdictional tagging are not adequate to ensure that the status of systems and components are known. The applicant has taken action to resolve the inspectors comments by the development of Test Program Instruction (TPI) -9, "Turnover to the Nuclear Test Section", and inclusion of that instruction in the TPM. The inspector reviewed TPI-9, Section 4.1.7, and found that it provided adequate guidance. The inspector has no further concerns in this area. This item is considered closed.

- e. (Closed) Open Inspection Item (440/84-11-04(DRS); 441/84-11-04(DRS)): Pretest checklist does not require a review of all possible mechanisms available for making system design changes. The applicant has taken action to resolve the inspector's comments by the development of TPI-27, "Release for Test: Preoperational and Acceptance Tests". Section 4.3 of TPI-27 requires a copy of the Master Deficiency List (MDL) be included in the Release for Test Package along with an evaluation of the effect of each open item upon the test. TPI-8, "Master Deficiency List/Tracking", requires that items generated by the various mechanisms available for making system design changes be included on the MDL. The inspector has no further concerns in this area. This item is considered closed.
- f. (Closed) Open Inspection Item (440/84-11-05(DRS); 441/84-11-05(DRS)): No formal administrative procedures existed to control the scheduling of test activities. The applicant has taken action to resolve the inspector's comments by the development of TPI-5, "Test Program Planning", which provides the necessary administrative controls. The inspector reviewed TPI-5 and has no further concerns in this area. This item is considered closed.
- g. (Open) Open Inspection Item (440/84-11-06(DRS); 441/84-11-06(DRS)): Inspector comments on administrative procedures developed to control processes for review, approval, and issuance of preoperational tests. The applicant has taken action to resolve seven of the original nine comments by the development of the TPM. The inspector reviewed TPI-6, "IC&R Test Procedure Preparation, Review & Approval", TPI-7, "Preoperational and Acceptance Test Preparation, Review and Approval", and TPI-28, "Conduct of Preoperational Tests", and considers that comments 1, 2, 3, 5, 6, 7 and 8 have been satisfactorily resolved. During the review of the applicant's action taken to resolve comments 4 and 9, the following subsequent concerns were identified:
- . The specific examples cited for the definition of major changes to Initial Checkout and Run-In (IC&R) Tests in TPI-6 and Preoperational Tests in TPI-7 are dissimilar. The applicant stated these sections will be revised to provide similar guidance.
 - . The inspector determined that IC&R tests may be used to satisfy preoperational acceptance criteria and that these tests will be reviewed and approved to the same level as the preoperational tests. However, the inspector also determined that TPI-29, "Preparation and Review of Preoperational and Acceptance Test Results", requires only that the IC&R data sheets be provided in the preoperational test package and that a chronological test log is not required during the performance of the IC&R test. This situation has the potential for allowing a deviation in the IC&R test performance, which may affect the acceptability of the data for preoperational acceptance criteria, to be undocumented and therefore not reviewed for acceptability during the preoperational test results review. The applicant stated that further evaluation will be required to resolve this concern.

The applicant indicated that further action would be taken to resolve these comments. This item will remain open pending further applicant action.

- h. (Closed) Open Inspection Item (440/84-11-07(DRS); 441/84-11-07(DRS)): Inspector comments on administrative procedures developed to control engineering drawings and vendors manuals. The applicant has taken action to resolve the inspector's comments by the development of TPI-15, "Document, Test Procedure and Drawing Control", and TPI-19, "Design Changes: ECNs, FDIs, FDDRs." The inspectors reviewed TPI-15 and TPI-19 and have no further concerns in this area. This item is considered closed.
- i. (Closed) Open Inspection Item (440/84-11-08(DRS); 441/84-11-08(DRS)): Inspector comments on administrative procedures developed to control design changes and modifications. The applicant has taken action to resolve the inspectors comments by the development of TPI-17, "NTS/Engineering Interface (FQs & EDCRs)", TPI-19, "Design Changes: ECNs, FDIs, FDDRs", and TPI-14, "NRs and Deficiencies during Test Program". The inspectors reviewed TPI-17 and TPI-19 and have no further concerns in this area. This item is considered closed.
- j. (Closed) Open Inspection Item (440/84-11-09(DRS); 441/84-11-09(DRS)): Inspector comments on administrative procedures developed to control temporary modifications, jumpers and bypasses. The applicant has taken action to resolve these comments by the development of TPI-18, "Temporary Alterations". The inspectors reviewed TPI-18 and have no further concerns in this area. This item is considered closed.
- k. (Closed) Open Inspection Item (440/84-11-10(DRS); 441/84-11-10(DRS)): Inspector comments on administrative controls and procedures governing the conduct of plant maintenance during preoperational testing. The applicant has taken action to resolve these comments by the development of TPI-12, "Work Authorization", and TPI-13, "Test Work Procedure Preparation, Review and Approval"; and by revision of Project Administration Manual Section 1107, "Work Authorization". The inspectors reviewed TPI-12, TPI-13 and Project Administration Manual Section 1107 and have no further concerns in this area. This item is considered closed.
- l. (Closed) Open Inspection Item (440/84-11-12(DRS); 441/84-11-12(DRS)): Inspector comments on administrative procedures developed to control equipment protection and cleanliness. The applicant has taken action to resolve these comments by the development of TPI-10, "Housekeeping and Equipment Protection", and TPI-11, "Cleanliness Verification, Control and Layup." The inspectors reviewed TPI-10 and TPI-11 and have no further concerns in this area. This item is considered closed.
- m. (Open) Open Inspection Item (440/84-11-13(DRS); 441/84-11-13(DRS)): Inspector comments on administrative procedures developed to control Measurement and Test Equipment (M&TE). The inspector reviewed TPI-16, "Use of Measuring & Test Equipment", and found that it adequately

addressed comments 2, 3, 4, and 5. However, with regard to comment 1, TPI-16, paragraph 1.1, states that the purpose of the TPI is to provide instructions for the use of M&TE on structures, systems, and components that fall within the scope of the Corporate Nuclear Quality Assurance Program (CNQAP). As noted in comment 1, the CNQAP only requires the use of M&TE on safety-related systems and components instead of requiring its use for all preoperational testing that generates data for comparison to acceptance criteria. The applicant indicated at the time of this inspection that the CNQAP had not yet been changed to reflect this. This item is considered open pending further applicant action and evaluation by the inspector.

- n. (Closed) Open Inspection Item (440/84-11-14(DRS); 441/84-11-14(DRS)): Inspector comments on need for clarification of training and certification requirements for Nuclear Test Section (NTS) personnel. TPI-3 "NTS Training and Certification", has been issued and adequately addresses the inspectors concerns and provides the requested clarification. The inspector has no further concerns in this area. This item is considered closed.
- o. (Closed) Noncompliance (440/84-09-03(DRP)): Failure to properly control mechanical foreign items (MFI). The applicant responded to this violation in a letter dated August 17, 1984. The inspector reviewed NQAD Operational Surveillance Report No. 84-87 which examined the implementation and effectiveness of the MFI control program through reinspection of 541 MFIs on 51 systems. The surveillance resulted in the identification of 100 deficiencies in the control of MFIs. Those deficiencies were documented in Action Request (AR) P0142-61 and Corrective Action Request (CAR) 84-60. The inspector reviewed the closeout of the CAR and the actions taken on the AR. The inspector also examined nine MFIs in four systems on August 29, 1984, and found no discrepancies. The inspector has no further concerns at this time. This item is considered closed.

3. Applicant Action on 10 CFR 50.55(e) Reportable Items

- a. (Closed) 10 CFR 50.55(e) Reportable Item (440/83-06-EE; 441/83-06-EE) (DAR-122): Missing Weld on Brown Boveri Electric (BBE) supplied Class 1E Low Voltage Switchgear Enclosures. On December 22, 1982, BBE notified the NRC under 10 CFR Part 21, of the deficiency. A BBE Quality Assurance representative and Perry Nuclear Power Plant (PNPP) site personnel conducted an on-site inspection of the low voltage switchgear and found one defective (missing weld) enclosure.

The inspector reviewed; (1) Nonconformance Report (NCR) CQC 2666, Revisions 1, 2, 3, 4, 5, and 6, which documented the deficiency and provided BBE recommended instructions for repair; (2) Surveillance/Inspection Report SE-2504, Sheets 1 through 5 which documented the Quality Control (QC) acceptance of the work performed under NCR CQC 2666; and (3) the affected low voltage switchgear, frame EF2C07 of substation 2R23S011. The inspector found the above documentation and affected hardware to be complete and acceptable. This item is considered closed.

- b. (Open) 10 CFR 50.55(e) Reportable Item (440/84-06-EE; 441/84-06-EE) (DAR-159): Potential for premature failure of Pacific Air Products Co. (PAPCO) supplied linear converters on multi-blade dampers and louvers utilized in safety-related heating, ventilation, and air conditioning (HVAC) systems. On February 1, 1984, PAPCO notified the applicant that they had filed a 10 CFR Part 21 notification with the NRC relative to the above problem. The applicant reported that PAPCO had furnished the site with 52 of the linear converters in question.

Investigation by PAPCO concluded that abnormal wear on the linear converters was caused by actuator oscillation and recommended a maintenance and lubrication program to preclude premature failure.

The applicant concluded that, since premature failure would occur over an extended period of time, allowing operator action prior to ventilation system failure, PAPCO's 10 CFR Part 21 report did not constitute a reportable incident pursuant to 10 CFR 50.55(e).

The inspector reviewed NCR P049-2711 (Unit 1) and NCR P049-2712 (Unit 2) which addressed PAPCO's 10 CFR Part 21 report. The disposition proposed by the applicant was found to be acceptable. This item will remain open pending NRC verification of the following actions required by the NCR's mentioned above.

- (1) Verify that M32 and M43 linear converters were properly lubricated and adjusted to reduce oscillations to 20 per hour.
 - (2) Verify that the M15 linear converters were rebuilt.
 - (3) Verify that an acceptable maintenance program was established for the linear converters in the maintenance manual.
- c. (Open) 10 CFR 50.55(e) Reportable Item (440/84-19-EE; 441/84-19-EE) (DAR-179): Missing relay contact that would prevent a Reactor Core Isolation Cooling system (RCIC) low suction pump trip for 15 seconds after a main steam valve opens. The applicant withdrew the preliminary report on May 24, 1984, because General Electric Company (GE) informed them that sufficient suction pressure is provided by elevation differences between the pump and source of water.

The inspector reviewed the letter from GE dated 5/17/84 which stated that the relay was not needed. Preoperational testing of the pump should substantiate GE's conclusion. This item will remain open pending NRC review and approval of the revision to the applicant's Final Safety Analysis Report (FSAR), section 5.4.6.2, which currently requires the time delay relay.

- d. (Closed) 10 CFR 50.55(e) Reportable Item (440/84-24-EE; 441/84-24-EE) (DAR-185): Missing rear bracing panels on Eaton Corporation supplied Class 1E motor control centers (MCC's). Eaton Corporation informed the applicant of the potential problem which resulted in the discovery of two MCCs, 1R12S0015 and 2R42S0015, with missing rear bracing panels.

The inspector reviewed; (1) inspection report SIR SE-2558, which reported the inspection of all MCCs addressed in the Eaton Corporation notification; (2) NCR OQC 823, Revision 0, for panel 1R42S015 and the associated inspection report SIR R84-4033; (3) NCR OQC 824, Revision 0, for panel 2R42S015 and the associated inspection report SIR R84-4034; and (4) procedures GEN-E-001, Revision 8, and GEN-E-002, Revision 5, and associated inspection reports SIR R84-4032 and SIR R84-4031 which were used to perform the insulation resistance measurements required after reassembly of the affected MCCs. No irregularities were noted. This item is considered closed.

- e. (Open) 10 CFR 50.55(e) Reportable Item (440/84-26-EE; 441/84-26-EE) (DAR-187): Make up to the suppression pool may not be adequate to maintain the level of water above the 19 safety relief valve discharge line drywell penetration sleeves which are not sealed and could result in exceeding the FSAR allowable drywell leakage. An Engineering review by Gilbert/Commonwealth revealed that uncovering the penetration sleeves would not result in leakage that would exceed FSAR leakage limits and on June 20, 1984, the potential 50.55(e) report was withdrawn.

The inspector reviewed the memorandum dated May 31, 1984, from Gilbert/Commonwealth which stated that the FSAR allowable leakage area would not be exceeded. The inspector also reviewed the Design Input Record 2.5.6.2, which documented the calculation for total leakage area of 1.36 ft.².

Although the FSAR allowable leakage area of 1.68 ft.² would not be exceeded, it was determined that the proposed Technical Specification limit of one-tenth the FSAR limit would be exceeded. A discussion with the applicant's engineering staff revealed that the 19 penetration sleeves in question are undergoing a design change that will result in the sleeves being sealed (possibly with bellow type seals).

This item will remain open pending NRC review of the completed work package for sealing the penetration sleeves.

4. Applicant Action on 10 CFR Part 21 Reportable Items

(Closed) 10 CFR Part 21 Reportable Item (440/80-01-PP; 441/80-01-PP) (DAR-34): Malfunction of Comsip Inc., Reliance IE motor that drives a Dia-Vac diaphragm pump used with a post-accident analyzer. The pump motor drive shaft failed in two places during testing of the motor at Comsip Inc. facilities. The drive shaft was redesigned in accordance with Comsip's 10 CFR Part 21 Report dated July 31, 1980. New motors were sent to the applicant after extensive testing as documented in a letter to the applicant from Comsip dated September 22, 1980. This item is considered closed.

5. Applicant Action on IE Bulletins

- a. (Closed) IE Bulletin 79-05 (440/79-05-BB, 1B and 2B; 441/79-05-BB, 1B and 2B): Nuclear Incident at Three Mile Island. This Bulletin was sent to the applicant for information only to inform the applicant of the nuclear incident. No written response by the applicant was required.

The inspector reviewed the applicant's Document Response form dated August 15, 1980, which concluded "No action required - not applicable to the Perry Nuclear Power Plant." After reviewing the subject Bulletins including updates 79-05A and 79-05B which are specific to Babcock and Wilcox pressurized water reactors, the inspector determined that the applicant's response was adequate. This bulletin is considered closed.

- b. (Closed) I.E. Bulletin 79-06 (440/79-06-BB, 1B, 2B and 3B; 441/79-06-BB 1B, 2B and 3B): Review of Operational Errors and System Misalignments Identified During the Three Mile Island Incident. This Bulletin was sent to the applicant for information only. No written response by the applicant was required.

The inspector reviewed the applicant's Document Response form dated August 15, 1980, which concluded "No action required - not applicable to the Perry Nuclear Power Plant." After reviewing the subject Bulletin including updates 79-06-1B, 79-06-2B, and 79-06-3B which are specific to all pressurized water reactors (PWRs) with an operating license except Babcock and Wilcox PWRs, the inspector has determined that the applicant's response was adequate. This bulletin is considered closed.

- c. (Open) I.E. Bulletin 79-08 (440/79-08BB; 441/79-08BB): Events Relevant to Boiling Water Power Reactors Identified during Three Mile Island Incident. This Bulletin was sent to the applicant for information only. No written response by the applicant was required.

The inspector reviewed the applicant's Document Response form dated August 15, 1980, that concluded "No action was required" and a subsequent Document Response form dated June 23, 1983, which concluded that resolution of NRC requirements would be addressed in the FSAR and that review and approval of that resolution would be through NRC and the applicant's existing programs.

The inspector found the above responses to be inadequate. Although the bulletin did not require formal response from power reactors that did not have a license to operate, the requested actions should be addressed item by item by the applicant to assure adequate attention has been given. The applicant was informed that in order to close this bulletin, documentation must be provided which can show the inspector what specific actions were taken.

6. Preoperational Testing Program Implementation Verification

The inspector observed control room operation and test coordination, reviewed applicable logbooks and conducted discussions with control room operators and test coordinators during the months of July and August to ensure that test activities were being conducted in accordance with regulatory requirements and station procedures. Tours of the Unit 1 reactor building, intermediate building, intermediate building, auxiliary building, fuel handling building and control complex were conducted to observe test

and maintenance work in progress, area housekeeping, equipment condition and system cleanliness. The inspector reviewed the Nuclear Construction to Nuclear Test Section (NTS) turnover for the Unit 1 Plant Ventilation Radiation Monitoring System (1D17K) to ensure that instrument calibrations had been incorporated into a schedule and were accomplished in accordance with that schedule. The inspector reviewed the Nuclear Construction to NTS turnover for part of the Reactor Core Isolation Cooling System (1E51B) to ensure that preventative maintenance had been incorporated into a schedule and was accomplished in accordance with that schedule. During these observations and reviews, no violations of facility procedures or regulations were noted.

The inspector reviewed the complete NTS to Perry Plant (operations) Department (PPD) turnover package for the Non-Safety Related Instrument Air System (1P52) to verify that the turnover process was properly implemented. The inspector walked down major 1P52 components and examined jurisdictional tagging on the system. The inspector observed two blue tags (NTS jurisdiction) that had not been removed from two pressure indicators following turnover. Those tags were subsequently replaced with green tags (PPD jurisdiction). In walking down the system, the inspector noted that, in many areas, sufficient green tags had not been hung to clearly indicate jurisdictional status of the system. Project Administration Procedure (PA) 1103, Revision F, "System Turnover Process", PA 1104, Revision 2, "Project Safety, Jurisdictional and Special Purpose Tagging", and PPD Interface Procedure 7-1101, Revision 1, "System Turnover - NTS to PPD", all contain general wording regarding the removal of blue tags and the placement of green tags during NTS to PPD turnover. The applicant concurred with the inspector that the procedures were not sufficiently detailed and the 1P52 tagging was not adequate to indicate jurisdictional status of the system. The applicant committed to revise the procedural guidance for placement of green tags to ensure adequate tagging. The resolution of this issue will be tracked as an unresolved item (440/84-15-01(DRP)).

No items of noncompliance or deviations were identified in this area.

7. Independent Inspection - Instrument Air System Cleanliness

The inspector reviewed the Instrument Air System (1P52) acceptance test to ensure that air quality was adequately verified during the testing process. The acceptance test, TP 1P52-A-001, Revision 1, required by prerequisite, a test air blow with pillowcase sample to verify Class C cleanliness. Class C cleanliness criteria allow particles up to 1/32 inch maximum dimension and slivers up to 1/16 inch long. The test air blows were completed and documented on flush cleanliness verification data sheets that were included in the NTS to PPD turnover package. The Final Safety Analysis Report, Regulatory Guide 1.80, Revision 0, "Preoperational Testing of Instrument Air Systems", and ANSI MC11.1-1975 (ISA S7.3), "Quality Standard for Instrument Air," require that the product air be tested for cleanliness to verify less than 3 micron particulate and 1 part per million oil/hydrocarbon contamination. The air stream was qualitatively analyzed to ensure particulate contamination was less than 1/32 inch (significantly larger than 3 microns) and was not analyzed for oil/hydrocarbon content. This failure to properly implement the test program to assure that 1P52

would perform satisfactorily in service represents a violation of 10 CFR 50, Appendix B, Criterion XI (440/84-15-02(DRP)).

One item of noncompliance and no deviations were identified in this area.

8. Safety Committee Activity

The inspector observed the plant operations review committee (PORC) meeting on September 6, 1984, and reviewed the minutes of the meetings conducted in July and August 1984 to verify conformance with PPD procedures and regulatory requirements. This examination included committee membership and qualifications, committee quorum at meetings and committee activities.

The inspector noted that in Sections 6.5.1.6.a and 6.8.2 of the applicant's draft Technical Specifications, the applicant reduced the Standard Technical Specifications scope of PORC responsibilities for procedure review to only requiring PORC review of the plant administrative procedures and any other procedures and instructions as designated by the PPD manager. The inspector is concerned that this reduction in PORC responsibilities will reduce the broad based experience and qualifications for procedure and instruction reviewers that would have been afforded by PORC. Resolution of this concern will be tracked as an open item (440/84-15-03(DRP)).

No items of noncompliance or deviations were identified in this area.

9. Standby Liquid Control System Design and Installation - Headquarters Request

At the request from the Offices of the Executive Legal Director and Nuclear Reactor Regulation, the inspector examined the current status of the design and installation of the Standby Liquid Control System (SLCS) and the historical development of the SLCS design. The inspector concluded that the Unit 1 SLCS was designed and built as a manually initiated system. Previous revisions to the design of the SLCS had included automatic initiation features. The inspector observed that three cables had been installed under that design which could support automatic initiation. Those cables had not been terminated. Significant other cabling and equipment installation would be necessary to convert the currently installed system to an automatic system. This information was contained in an affidavit transmitted to C. P. Woodhead by memorandum dated August 31, 1984, from J. A. Grobe. That affidavit was filed before the Atomic Safety and Licensing Board on September 7, 1984.

No items of noncompliance or deviations were identified in this area.

10. Emergency Exercise Observation

The inspector observed the emergency exercise conducted on September 12, 1984. The inspector observed the functioning of the control room staff in the Perry Nuclear Power Plant simulator, the Technical Support Center (TSC) staff and the Emergency Operations Facility (EOF) staff. The inspector also observed the integrated operation of and coordination between the control room (simulator), the TSC, the EOF, the Operations Support Center and the

Joint Public Information Center. The exercise scenario required the handling of a contaminated injured man requiring transportation to a local hospital (transportation not simulated), high flow rate unidentified leak in the drywell, fuel failure due to loose parts blockage of coolant flow paths and double ended rupture of a main steam line outside containment with concurrent failure of the effected main steam isolation valves and shutoff valve. This scenario resulted in integrated activation of all of the applicant's emergency response capabilities, but no offsite emergency organizations were activated.

No items of noncompliance or deviations were identified.

11. Applicant Meeting with Region III Representatives

At the request of the applicant, a meeting was held on July 27, 1984, in the Region III offices to discuss the applicant's recently developed Test Program Manual. That manual had been developed in response to NRC concerns expressed in Inspection Report Nos. 50-440/84-11(DRS); 50-441/84-11(DRS). The primary applicant representatives included Messrs. C. M. Shuster, M. D. Lyster, B. L. Barkley and B. D. Walrath, and the primary Region III representatives included Messrs. R. D. Walker, R. C. Knop and L. A. Reyes. The Test Program Manual had been transmitted to Region III prior to the meeting facilitating a productive meeting where many NRC concerns were resolved. Documentation of that resolution is included in Paragraph 2 of this report.

No items of noncompliance or deviations were identified.

12. Open Inspection Items and Unresolved Items

Open inspection items and unresolved items are matters which have been discussed with the applicant, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or the applicant or both. Open inspection items and unresolved items disclosed during the inspection are discussed in Paragraphs 6 and 8.

13. Exit Interview

The inspector met with applicant representatives denoted in Paragraph 1 throughout the inspection and at the conclusion of the inspection period on September 7, 1984. The inspector summarized the scope and results of the inspections.