

U.S. ATOMIC ENERGY COMMISSION

DIRECTORATE OF REGULATORY OPERATIONS

REGION I

RO Inspection Report No.: 50-219/73-22

Docket No.: 50-219

Licensee: Jersey Central Power and Light Company

License No.: DPR-16

Madison Avenue at Punch Bowl Road

- Priority: -

Morristown, New Jersey

- Category: C

Location: Oyster Creek, Forked River, New Jersey

Type of Licensee: 1930 Mwt. BWR (GE)

Type of Inspection: Special, Announced

Dates of Inspection: December 12, 1973

Dates of Previous Inspection: December 10-12 and 18, 1973

Reporting Inspector: *D.F. Johnson*
D. F. Johnson

1/11/74
Date

Accompanying Inspectors: *for D.F. Johnson*
A. D. Toth, Reactor Inspector

1/11/74
Date

E.G. Greenman
E. G. Greenman, Reactor Inspector

1/11/74
Date

_____ Date

_____ Date

Other Accompanying Personnel: None

_____ Date

Reviewed by: *E.J. Brunner*
E. J. Brunner, Chief, Reactor Operations Branch

1-11-74
Date

_____ Date

SUMMARY OF FINDINGS

Enforcement Action

None

Licensee Action on Previously Identified Enforcement Items

Not inspected

Unusual Occurrences

None

Other Significant Findings

A. Current Findings

1. The licensee agreed to update their current facility procedures to comply with the latest industry standard ANSI N.18.7 and Regulatory Guide 1.33.
2. The licensee has established a standard format consistent with the requirements of ANSI N.18.7 for all facility procedures and efforts are in progress for revision of current facility procedures.
3. The licensee stated a QA plan and implementing procedures would be completed by March 1, 1973.

Management Interview

A management interview was conducted December 12, 1973 with Mr. D. A. Ross, Manager, Nuclear Generating Stations and Mr. J. T. Carroll, Station Superintendent. Items discussed are summarized below.

A. General

The inspectors described the scope of the inspection related to an overview of the licensee's procedural status. The requirements for procedure development, review and revision to assure compliance with ANSI 18.7 and Regulatory Guide 1.33, were discussed.

B. Independent Review for Procedures

The inspector stated that PORC approval did not constitute an offsite or independent review, and further referenced the necessity for review by some organization separated from daily plant operation.

A licensee representative asked if a corporate management representative and engineering staff would fulfill these requirements.

The inspector stated that such a review could be considered as independent.

C. Procedure Development

The inspector stated that a comparison of the licensee's procedures with Regulatory Guide 1.33 indicated additional procedural coverage was required. (Details, Paragraph 2)

D. Housekeeping

The inspector stated that a tour of the facility indicated substantial improvements. Specifically, the repainting of the 51' elevation level. The inspector noted color coding of system piping and painting of mechanical equipment.

A licensee representative acknowledged the inspector's remarks and noted that similar work was to be done throughout the plant.

E. QA Program for Operations

The inspector requested a status report for the QA Program for Operations. Staffing and manpower requirements were discussed in detail.

A licensee representative stated that the plan is in draft form and the staff is currently writing implementing procedures.

F. The inspector stated that Oyster Creek's facility procedures are generally not consistent with content requirements of ANSI N.18.7 in the following areas:

- Statements of Applicability
- References and Cross References
- Prerequisites
- Limitations and Corrective Actions
- Check-offs and Check-lists
- Identification of Technical Specifications where applicable

(Details, Paragraph 3)

DETAILS

1. Persons Contacted

D. Ross, Manager, Nuclear Generation
J. Carroll, Station Superintendent
D. Reeves, Chief Engineer
J. Sullivan, Operations Engineer
R. Swift, Maintenance Engineer
J. Maloney, Operations Supervisor
E. Growney, Technical Engineer
E. D. Scalsky, Radiation Protection Supervisor

2. Oyster Creek's facility procedures are adequate and in compliance with their license requirements, however, additional procedural coverage and revision of existing procedures in the following areas would be necessary to be in complete compliance with the current industry standard ANSI N 18.7 and Regulatory Guide 1.33.

a. Administrative controls for:

- (1) Authorities and responsibilities of the plant staff for safe operation and shutdown of the facility.
- (2) Adherence to procedures, checklists and prerequisite approvals for determining a procedural step as "not applicable."
- (3) Shift and relief turnover.
- (4) Record retention and retrievability.
- (5) Surveillance test and calibration schedules.
- (6) Bypassing of safety functions and jumper control.
- (7) Implementing the corrective and preventive maintenance program.
- (8) Preparation of procedures, which adopts ANSI N.18.7 and Regulatory Guide 1.33 requirements and which also describes the mechanics of review and approval.
- (9) Actions relative to check offs of non-applicable items and system operational requirements when portions of the system are permitted to be out of service.

- b. Operating procedures for:
 - (1) Communication systems.
- c. Emergency procedures for:
 - (1) Loss-of-coolant inside and outside the drywell.
 - (2) Abnormal releases of radioactivity.
 - (3) High stack releases when shutdown.
- d. Maintenance procedures for:
 - (1) Safety related systems and components.

Licensee's Response

A licensee representative concurred with the inspector's comments and agreed to review facility procedures to ensure coverage in the above areas.

- 3. Review of selected operating and emergency procedures identified the following areas which require upgrading to meet ANSI N 18.7 and Regulatory Guide 1.33.
 - a. Clarification of whether or not complete establishment of "Initial Conditions" is required before beginning the procedures' steps.
 - b. Assuring conformance of checklists with steps in the body of the procedure.
 - c. Assuring that precise procedural steps cover imprecise terms which do not have quantitative control guides. Examples include:
 - (1) Appropriate instrumentation.
 - (2) Proper Valving.
 - (3) Specified withdrawal sequence.
 - (4) Ready.
 - (5) Available.

- (6) Normal level.
 - (7) In-operation.
 - (8) In-service.
- d. Assuring, as key systems are brought on the line, that process parameters are, in each case, checked against quantitative limits to confirm acceptable operational status before attempting the next step.
 - e. Assuring that procedures instructing the operator to operate a system or component reference the specific procedure containing precautions, limitations, and step by step operating instructions for the operation involved.
 - f. Assuring that required review of plant status prior to startup is sufficiently detailed.
 - g. Assuring that emergency procedures highlight primary symptoms without requiring discrimination between multiple, separate, and long lists of conditions.
 - h. Assuring that emergency procedures properly delineate investigative steps taken subsequent to the immediate response to an alarm.
 - i. Assuring that alarm clearing procedures generally refer to the Technical Specifications and the other alarms and procedures which must be consulted.
 - j. Assuring that actions to be taken for alarm conditions are compiled in a single location.
 - k. Assuring that emergency procedures require specific notification of plant personnel about the nature of the emergency and confirmation of the status of the plant.
 - l. Assuring that the purpose or intent of each procedure is clearly defined.
 - m. Assuring that procedures provide specific acceptance criteria and cover restoration to normal operation after evolutions.
 - n. Assuring that procedures contain appropriate references to engineering flow diagrams, technical manuals, and other pertinent procedures.

- o. Assuring that step by step procedures provide specific guidance for the operator.

Inspector's Comment

The inspector emphasized that this was a sampling inspection which indicated that all facility procedures should be reviewed for similar conditions and for other requirements of ANSI N 18.7 and Regulatory Guide 1.33.

The licensee stated that he concurred with the inspector's comments.