

U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT  
REGION I

IE Inspection Report No: 50-219/75-10 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 07960 Category: C  
Safeguards Group: \_\_\_\_\_  
Location: Oyster Creek, Forked River, New Jersey  
Type of Licensee: 1930 Mwt, BWR  
Type of Inspection: Routine, Unannounced  
Dates of Inspection: March 25-28-31, 1975  
Dates of Previous Inspection: March 25-27, 1975  
Reporting Inspector: *D.F. Johnson* 4/7/75  
D. F. Johnson, Reactor Inspector DATE  
Accompanying Inspectors: None \_\_\_\_\_ DATE  
\_\_\_\_\_ DATE  
\_\_\_\_\_ DATE  
Other Accompanying Personnel: None \_\_\_\_\_ DATE  
Reviewed By: *E.C. McCabe, Jr* 4/8/75  
E. C. McCabe, Senior Reactor Inspector DATE  
Nuclear Support Section  
Reactor Operations Branch

B1 859

## SUMMARY OF FINDINGS

### Enforcement Action

#### A. Items of Noncompliance

##### 1. Infraction

Contrary to the requirements of 10 CFR 50 Appendix B, Criterion VI, the Oyster Creek Operational Quality Assurance Plan Section V, and Technical Specifications Section 6.2.F, temporary changes to eight (8) operating procedures were not reviewed and approved. (Detail 2)

### Licensee Action on Previously Identified Enforcement Items

Not inspected

#### Design Changes

Non identified

#### Unusual Occurrences

None identified

### Other Significant Findings

#### A. Current Findings

##### 1. Acceptable Areas

No noncompliance, deviations or unresolved items were identified in the following areas.

- a. Procedural requirements for revising, changing and upgrading procedures. (Detail 5)
- b. Format and content of facility procedures. (Detail 8)
- c. Authorities, responsibilities, and performance of the Plant Operating Review Committee. (Detail 6)

2. Unresolved Items

- a. Scope of procedural coverage. (Detail 7)
- b. Administrative Controls of authorized management review and approval of facility procedures. (Detail 4)
- c. Standing Orders. (Detail 9)
- d. Facility procedure revision program. (Detail 8)

3. Status of Previously Reported Unresolved Items

- a. The following data represents the status of the licensee's program for the revision and upgrading of facility procedures. (Detail 8)

<u>% Revised/Written</u>	<u>% Reviewed</u>	<u>% Approved</u>
100	59	5

- b. 37.5% of the administrative procedures previously identified as lacking in scope of coverage with respect to Regulatory Guide 1.33 Appendix A, remain to be completed. (Detail 7)
- c. Staffing requirements for refueling has been resolved. (Detail 3)

Management Interview

A management meeting was held at the Oyster Creek Nuclear Power Station on March 31, 1975 at the conclusion of the inspection.

Personnel in attendance

Mr. J. T. Carroll, Jr., Station Superintendent  
Mr. J. Menning, Staff Engineer  
Mr. D. L. Reeves, Chief Engineer  
Mr. D. A. Ross, Manager Nuclear Generating Stations

Summary of Items Discussed

- 1. Item of Noncompliance. (Detail 2)
- 2. Staffing requirements for Refueling. (Detail 3)
- 3. Procedure review and approval. (Detail 4)

2. Unresolved Items

- a. Scope of procedural coverage. (Detail 7)
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- b. 37.5% of the administrative procedures previously identified as lacking in scope of coverage with respect to Regulatory Guide 1.33 Appendix A, remain to be completed. (Detail 7)
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- 1. Item of Noncompliance. (Detail 2)
- 2. Staffing requirements for Refueling. (Detail 3)
- 3. Procedure review and approval. (Detail 4)

4. Procedure revision and change methods. (Detail 5)
5. Plant Operating Review Committee. (Detail (6)
6. Facility procedure coverage. (Detail (7)
7. Facility procedure format and content. (Detail 8)
8. Standing orders. (Detail 9)

## DETAILS

### 1. Persons Contacted

Mr. J. T. Carroll, Station Superintendent  
Mr. N. Cole, Shift Foreman  
Mr. C. C. Dekker, Control Room Operator  
Mr. E. J. Gowney, Technical Engineer  
Mr. D. MacFarlane, Control Room Operator  
Mr. J. P. Maloney, Operations Supervisor  
Mr. J. Menning, Staff Engineer  
Mr. D. L. Reeves, Chief Engineer  
Mr. E. Riggle, Maintenance Supervisor  
Mr. E. Rosenfeld, Assistant Staff Engineer  
Mr. D. A. Ross, Manager Nuclear Generating Stations  
Mr. J. P. Sullivan, Jr., Operations Engineer  
Mr. R. Swift, Maintenance Engineer

### 2. Item of Noncompliance

10 CFR 50, Appendix B, Criterion VI requires that measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality.

These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel.

The Oyster Creek's Operational Quality Assurance Plan, Section V, states that the "Oyster Creek Superintendent is responsible for ensuring that instructions and procedures associated with the operation of components and systems are prepared, reviewed, approved and implemented. This also includes the issuance of appropriate changes to such documents."

Technical Specifications Section 6.2.F. states "Temporary changes to procedures shall be documented and subsequently reviewed by the Plant Operations Review Committee and approved by the Station Superintendent."

Contrary to the above, the inspector, through selective examination of procedures, representative records and interviews with personnel determined that temporary changes to the following operating procedures are in effect and the changed procedures have not been revised, documented, and reviewed by the Plant Operations Review Committee or approved by the Station Superintendent in accordance with the Technical Specifications.

<u>Procedure</u>	<u>Temporary Change</u>	<u>Temporary Change Dates</u>
203 "Approach to Critical"	Step 22g. deleted	12/11/73
	Step 23 instructions to increase reactor power by rod movement or recirculation flow	12/11/73
	Step 12.b, 5, 6, 7, 8, major change	3/9/74
203.1 Startup and Synchronization of Unit	Step 6 permits operation above rod block setting	11/27/73
201.2.1 "Preperation for startup and shutdown"	Adherence to switching and tagging procedures temporary change not removed-revision was made	3/29/74 6/28/74
211.3.2.1b.2 "Power Operation"	Allows operation with a continuous rod block in effect	11/19/73
212.2 Refueling Procedures	Precautions Step 4 TS change 3.2.C.1 standby liquid control system no longer required	5/18/74
212.6 Refueling Procedure	Step 11 pen and ink change to reference as per TS section 3.1.1J	5/3/74
301.3.1 Placing Recirculation Pump in Operation	Steps 6 and 7 deleted	
301.3.2 Removing Recirculation Pumps from Service	pen and ink change	2/18/74

This repetitive failure to perform required review of temporary changes is considered an Infraction level item of Noncompliance.

3. Staffing Requirements for Refueling

The licensee stated his intention is to utilize non-licensed individuals for the manipulation of fuel handling apparatus and mechanisms for the movement of fuel assemblies in and out of the core during forthcoming refueling operations.

In addition, the licensee's stated intention is to provide a licensed operator in the control room for supervision of fuel handling activities by maintaining direct communication between the control room and the fuel handling area, without providing a licensed individual for the direct supervision at the fuel handling area.

In subsequent telephone conversations between the Office of Inspection and Enforcement Region I, the Division of Reactor Licensing, and representatives of the Jersey Central Power and Light Company resulted in a commitment from the licensee to provide a senior licensed operator on the refueling floor to directly supervise fuel handling activities.

In addition, the Division of Reactor Licensing on April 11, 1975 issued a letter to Jersey Central Power and Light Company stating their current position on staffing requirements for fuel handling activities as delineated in the Standard Technical Specification, and requested that the licensee provide within 15 days their actions for compliance with these requirements.

This item is resolved.

4. Procedure Review and Approval

The inspector performed an audit, on a sampling basis, of the following procedures.

- 101 Organization and Responsibility
- 107 Procedure Control
- 105 Maintenance, Repair and Modification Control
- 113 Calibration of Installed Plant Instruments

- 201 Preparation for Startup and Shutdown
- 523 Condenser Tube Leak
- 602 Containment Leakage Test
- 607 NSSS Leak Test
- 608 Isolation Condenser System Test

The inspector, based on the review of the above procedures and the on-site safety committee meeting minutes, found no discrepancies between the licensee's review/approval methods/procedures, the current Technical Specifications, and the licensee's administrative controls.

The inspector stated that the licensee's present Technical Specifications and administrative controls do not specify any frequency for periodic review of facility procedures.

ANSI N18.7 "Administrative Controls for Nuclear Power Plant" states that, "Each procedure shall be reviewed prior to initial use and periodically thereafter. The frequency of such reviews shall be specified."

The Division of Reactor Licensing Standard Technical Specifications Section 6.B.2 states, "Each procedure and administrative policy and changes thereto, shall be reviewed by the Facility Review Group (FRG) and approved by the Plant Superintendent prior to implementation and periodically as set forth in each document."

In response to the Division of Reactor Licensing's request for the Jersey Central Power and Light Company to submit an application for Amendment to the Oyster Creek operating license to revise the Technical Specifications to conform to the Standard Specification on Administrative Control, the licensee submitted an application for Amendment of Facility Operating License DPR-16 which commits to the above requirements.

The licensee stated that administrative Procedure 103 is currently under revision and will incorporate the requirements for a periodic review of applicable facility procedures with a specified frequency.

This is an Unresolved Item pending Licensing action on the proposed Technical Specifications and licensee action on the requirements involved.

5. Procedure Revision and Change Methods

- a. The inspector reviewed administrative Procedure 101 "Organization and Responsibility," 107 "Procedure Control" and verified that the licensee has procedures for changing, revising and updating facility procedures, including temporary changes.
- b. The inspector reviewed PORC meeting minutes for the years 1974 and 1975, and verified that changes and revisions to procedures resulting from Technical Specification revisions, design changes, system or component modifications and procedure updating have been reviewed and approved in accordance with the requirements of the Technical Specifications and the licensee's administrative Controls.
- c. The inspector examined, on a sampling basis, the control room copies of operating and emergency procedures and verified that these procedures being utilized for the operation of the facility were the latest revision and were properly reviewed and approved by authorized management.

The inspector had no further questions on these items.

6. Plant Operating Review Committee

The inspector performed a sampling audit of the PORC meeting minutes and verified that the following items were in accordance with the requirements of the Technical Specifications, the licensee's administrative controls, and the guidelines set forth in ANSI N18.7 "Administrative Controls for Nuclear Power Plants."

- a. Committee membership.
- b. Meeting frequencies.
- c. Quorums.
- d. Responsibilities.
- e. Authorities.
- f. Records.
- g. Committee evaluations and recommendations.
- h. Organizational membership.

The inspector had no further questions in this area.

7. Facility Procedural Coverage

Based upon review of procedure indices, examination of records, and discussions with the licensee, the inspector questioned the facility procedure coverage scope.

Examples of areas with questionable coverage include, but are not limited to, the following.

a. Administrative Procedures

- (1) Authorities and responsibilities for safe operation and shutdown.
- (2) Record retention.
- (3) Recall of standby personnel to the plant.

b. Emergency Procedures

- (1) Fire in Control Room or forced evacuation of control room.

The licensee stated he would initiate or revise existing procedures to include procedural coverage for the above items. This is an unresolved item pending implementation of licensee action.

8. Facility Procedure Format and Content

- A. The licensee has instituted a program for the review of all facility procedures for the purpose of upgrading and revising to comply with the format and content recommended in ANSI N18.7. The following is a status of completion of this program.

<u>Procedures</u>	<u>% Revised/ Written</u>	<u>% Fully Reviewed</u>	<u>% Fully Approved</u>
1. General Plant Operating Procedures (200 series 8 procedures)	100	0	0
2. System Operating Procedures (300 series 57 procedures)	100	95	7
3. Nuclear Instrumentation Procedures (400 series 8 procedure)	100	100	0
4. Emergency Procedures (500 series 33 procedures)	100	67	0

<u>Procedure</u>	<u>% Revised/ Written</u>	<u>% Fully Reviewed</u>	<u>% Fully Approved</u>
5. Surveillance Pro- cedures (600 series 84 procedures)	100	81	2
6. Maintenance Pro- cedures (700 series 85 procedures)	100	20	4
7. Core Procedures (1000 series 27 procedures)	100	26	26

Total for all Procedures (302 procedures)\*

100% revised and written  
56% final review  
5% final approved

\* This number does not include the Chemistry and Radiation Protection procedures that are being reviewed and revised in house and therefore are not part of the overall program status.

B. The inspector conducted an audit of the facility procedures program by a sampling review of the following revised procedures.

1. Administrative Procedures

- a. 101 Organization and Responsibility.
- b. 105 Maintenance, Repair and Modification Control.
- c. 107 Procedure Control.

2. Operating Procedures

- a. 301 Nuclear Steam Supply System.
- b. 304 Standby Liquid Control System.
- c. 308 Emergency Core Cooling System.
- d. 311 Fuel Pool Cooling System.
- e. 317 Reactor Feedwater System.
- f. 329 Reactor Building Heating Cooling and Ventilation System.
- g. 334 Instrument, Service, Breathing and Bleeder Check Air Systems.
- h. 406 Process Radiation Monitoring System.

3. Emergency Procedures

- a. 503 Instrument Air Failure.
- b. 519 Loss of Containment Integrity.
- c. 504 Service Water Failure.

4. Maintenance Procedures

- a. 704 Reactor Vessel Steam Dryer and Separator Removal and Replacement.
- b. 705 Control Rod Drive Removal and Replacement.
- c. 708 Reactor Recirculation Pump Rotating.
- d. 719 Shutdown cooling Pump Rotating Assembly Removal and Replacement.

4. Alarm Procedures

- a. 515 Steam Leak.
- b. 522 Inadvertent Poison Injection.
- c. 501.4.1 Containment Spray.
- d. 501.4.2 Feedwater low flow.

The inspector stated that the format and overall content of the revised procedures is consistent with the requirements of the Technical Specifications and is in accordance with the guidelines set forth in ANSI N18.7.

The inspector had no further questions in this area.

Until the licensee completes this program and performs final approval and implementation of the procedures this remains as an unresolved item to be followed in subsequent inspections.

9. Standing Orders

The inspector reviewed, on a sampling basis, the control room standing orders that provide supplemental instructions to the operators for operation of systems and components determined by management to be of sufficient significance to warrant highlighting and additional guidance. The inspector identified the following items as a result of his review.

- a. Alarm setpoints and safety related operating limits contained in the standing orders are in conflict with the parameters stated in the operating procedures. In discussions with the licensee's operating personnel they displayed an uncertainty as to which was the correct value.

- b. The inspector identified particular standing orders containing instructions, Technical Specification limits and operational limits related to nuclear safety. Based on item b. this information and guidance contained in standing orders must be reviewed and incorporated as applicable into existing facility procedures and subsequently approved by authorized management in accordance with the Technical Specifications.

The licensee concurred with the inspectors comments and stated that a review of standing orders will be performed and administrative procedures will be revised to delineate review and approval of standing orders. In addition, standing orders will be phased out and incorporated into existing facility procedures as applicable.

Until the licensee completes his proposed actions, this is an unresolved item.