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# 10 CFR 2.790 INFORMATION

## U. S. NUCLEAR REGULATORY COMMISSION

## OFFICE OF INSPECTION AND ENFORCEMENT

#### REGION I

Inspection Report No: 50-219/75-21	Docket No:	50-219	-
Jorsey Central Power and Light Company	License No:	DPR-16	_
Madison Avenue at Punch Bowl Road	Priority:	ana kana kana kana kana kana kana kana	-
Morristown, New Jersey 07960	Category:	С	-
	Safeguards Group:	and marking in an and a second	_
cation: Forked River, New Jersey			
pe of Licensee:BWR (GE) 1930 MW(t)			
Routine. Unannounced			
tes of Inspection:August 26-29, 1975			<b>Kunsultu</b>
August 4-5, 1975 August 4-5, 1975 August 4-5, 1975 E. G./Greenman, Reactor Inspector E. G./Greenman, Reactor Inspector L. Norrholm, Reactor Inspector D. L. Caphton, Senior Reactor Inspect 9604230289 960213 PDR FOIA	or	DATE 9/30/25 DATE 0/2/75 DATE DATE	75-2 8/2
Other Accompanying Personnel: NONE		DATE	
2 Mitting herd for		10/3/75 DATE	
Reviewed By: D. L. Caphton, Senior Reactor Inspector Reactor Operations Branch 10 CFR 2.790 INFORM	ATION	B	44
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#### SUMMARY OF FINDINGS

#### Enforcement Action

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#### A. Items of Noncompliance

#### 1. Infractions

- a. Contrary to 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings", the Oyster Creek Operational Quality Assurance Plan, Section V and Technical Specifications Section 6, the following examples of failure to follow procedures were identified:
  - (1) Differential pressure measurements required by "Secondary Containment Leak Rate Test Procedure" 602.6, Revision 6 dated July 11, 1974, to determine and subsequently record air flow through the Standby Gas Treatment System were not recorded for testing conducted October 7, 1974, to verify Secondary Containment integrity. (Details, Paragraph 2.d)
  - (2) Pressure testing of Spent Fuel Cask cap double "0" ring seals was conducted on August 27, 1975, with an applied test pressure as observed, in excess of the indicated 0-100 psig range of the pressure gauge, whereas Station Procedure 219.0, Revision 4 dated June 19, 1975, "Spent Fuel Handling with NFS-4 Cask" stipulates pressurization with air, of the annulus between the double "0" ring seals to between 80-100 psig. (Details, Paragraph 8.a)
- b. Contrary to 10 CFR 50, Appendix B, Criterion II, "Quality Assurance Program", the implementing provisions of the Oyster Creek Operational Quality Assurance Plan, Section II, (Reference JCP&L letter to Division of Reactor Licensing dated May 2, 1974) and ANSI N45.2.3 - 1973, Section 3.2.1 "Cleanliness" during an in plant inspection of areas and components; items of trash, litter and excess materials were observed in the Cable Spreading Room and Battery Room at the Station, and such materials had not been removed. (Details, Paragraph 10.a)

- c. Contrary to the Orster Creek Industrial Security Plan dated January 7, 1974, Section 4.2, one physical access control was found inadequate on August 26, 1975. (Recurrent item). (Details, Faragraph 10.c.1)
- d. Contrary to the Oyster Creek Industrial Security Plan dated January 7, 1974, Section 4.2 which establishes procedural requirements and Procedure No. 1.0 "Security Guide Lines" dated April 11, 1974, area logging requirements were not followed on August 28, 1975. (Details, Paragraph 10.c.2)
- 2. Deficiencies

None

B. Deviations

None Identified

Licensee Action or Previously Identified Enforcement Items

Not Inspected

Design Changes

None Identified

Unusual Occurrences

The following Abnormal Occurrences were reported by the licensee since the last inspection and were reviewed by the inspector. Comments concerning specific areas are noted within this report.

- A. Two electromatic relief valve pressure switches tripped in excess of limits during surveillance.1
- B. A core spray parallel isolation valve failed to demonstrate operability during surveillance due to a broken valve motor breaker.<sup>2</sup>
- C. Two hand hole covers in the 1-1 SBGTS filter train were not in place with the reactor at steady state power conditions.<sup>3</sup> (Details, Paragraph 7)

JCP&L letter to Region I dated June 16, 1975, Subject AO 75-16
 JCP&L letter to Region I dated June 19, 1975, Subject AO 75-17

3. JCP&L letter to Region I dated June 24, 1975, Subject AO 75-18

- D. Three reactor high pressure sensors tripped in excess of required values during surveillance.<sup>4</sup>
- E. One high drywell switch tripped in excess of required values during surveillance.<sup>5</sup>
- F. One isolation condenser system sceam line value failed to close during surveillance and simulation of a high steam line flow signal.<sup>6</sup>

#### Other Significant Findings

A. Current Findings

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1. Plant Status

On August 27, 1975, a reactor scram occurred due to loss of condenser vacuum apparently attributed to restoration of a valved out condenser to service. The licensee has experienced significant condenser tube leakage problems. Radwaste system processing capability and necessity to obtain new resins for the cleanup system delayed startup. Licensee plans to install inserts to eliminate condenser tube leakage problems. (Details, Paragraph 4.a)

2. Mechanical Seismic Shock and Sway Arrestors

Licensee plans to purchase and install 110 mechanical snubbers (Pacific Scientific Company) during the next refueling outage scheduled for April 1976.

3. Contaminated Spent Fuel Shipment

Spent Fuel Shipment No. 48 arrived at West Valley, New York with contamination levels in excess of DOT limits. (Details, Paragraph 8.b)

#### 4. Acceptable Areas

- a. Organization and Administration PORC. (Details, Paragraph 2.b)
- b. Logs and Records. (Details, Paragraph 3)
- c. Operations. (Details, Paragraphs 4a and b)
- d. Containment. (Details, Paragraph 7)
- e. Radiation Protection. (Details, Paragraph 9)

<sup>4.</sup> JCP&L letter to Region I dated July 9, 1975, Subject AO 75-19

<sup>5.</sup> JCP&L letter to Region I dated July 18, 1975, Subject AO 75-20

<sup>6.</sup> JCP&L letter to Region I dated August 4, 1975, Subject AO 75-21

#### 5. Unresolved Items

These are items for which more information is required to determine whether the items are acceptable or Items of Noncompliance.

- a. Current Items
  - Quorum requirements for conduct of GORB meeting 55-A pursuant to Technical Specifications and GORB Administrative Procedures. (Details, Paragraph 2.c)
  - (2) GORB Audits, Administrative Procedures and corporate involvement. (Details, Paragraph 2.c)
  - (3) Electrical Systems and Openings (Design Evaluation). (Details, Paragraph 6)

## b. Status of Previously Reported Items

Valve Wall Thickness Verification Program. Item remains unresolved. (Details, Paragraph 4.c)

#### 6. Followup Items

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These are items of inspector's concern which require additional evaluation and will be reviewed during a subsequent inspection.

75-21-1 Condenser Tube Leakage Problems. (Details, Paragraph 4.a)
75-21-2 Isolation Condenser Steam Leaks. (Details, Paragraph 4.b)
75-21-3 Control Rod Statistical Data. (Details, Paragraph 5)
75-21-4 SBGTS Procedure Changes. (Details, Paragraph 7)
75-21-5 Planning, coordination and procedures for handling Station Emergencies. (Details, Paragraph 10.b)

- 7. Infractions and Deficiencies Identified by Licensee
  - a. Contrary to Technical Specifications 2.3.4, relief valve pressure switches 1A83B and 1A83E tripped in excess of 1070 psig during surveillance. (JCP&L letter to Division of Reactor Licensing dated June 24, 1975, Subject A0 75-16)

- b. Contrary to Technical Specification 3.5.B.2, two (2) hand hole covers in the 1-1 SBGTS were not in place and the 1-1 filter train was selected for operation. (JCP&L letter to Division of Reactor Licensing dated July 1, 1975, Subject AO 75-18). (Details, Paragraph 7)
- c. Contrary to Technical Specification 2.3.3 REO3A, B and D reactor high pressure sensors tripped in excess of 1060 psig during surveillance (JCP&L letter to Division of Reactor Licensing dated July 17, 1975, Subject AO 75-19).
- d. Contrary to Technical Specifications, Table 3.1.1 high drywell pressure switch RV46B associated with core spray actuation tripped in excess of 2 psig during surveillance (JCP&L letter to Division of Reactor Licensing dated July 25, 1975, Subject AO 75-20).

#### Management Interview

An exit interview was conducted on August 29, 1975, with Mr. D. A. Ross, Manager Nuclear Georating Stations,\* Mr. D. Reeves, Chief Engineer,\*\* Mr. J. L. Sulliva , Operations Engineer and Mr. K. O. E. Fickeissen, Technical Supervisor. Items discussed are summarized below:

A. General

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The inspectors described the scope of the routine unannounced inspection as related to Abnormal Occurrence review, plant operations, organization and administration, review and audits related to onsite and off-site committees, determination of status of certain battery room cable runs and separation, observations of spent fuel shipments in progress and security access controls.

## B. Valve Wall Thickness Verification Program

The inspector as a followup item concerning Region I Inspection 50-219/75-15, stated the Region I position that Jersey Central Power and Light Company complete inspection of all valves as designated in the Region I letter of June 22, 1972, concerning the referenced subject.

\* Participation via intercom at Corporate Offices. \*\* Acting Plant Superintendent, August 29, 1975 A licensee representative acknowledged the inspector's remarks and stated that the licensee would take exception to the Region I position, based upon prior correspondence describing the scope of the program based on a sampling number of valves.

The inspector further stated that this matter would be forwarded to OIE Headquarters for resolution. (Details, Paragraph 4.c)

#### C. Housekeeping Hazards

The inspector stated that during conduct of facility tours, visual observations in the Battery Room and Cable Spreading Room resulted in findings which included disclosure of storage of wooden crates and boxes in the cable spreading room, a newspaper located within a cable tray and trash and litter on the floors of both referenced areas. The inspector expressed concern regarding the potential fire hazard such materials represented. The inspector expressed his additional concern that Station management had permitted such hazards to exist.

A licensee representative acknowledged the inspector's remarks. (Details, Paragraph 10.a)

### D. <u>Planning Coordination and Procedures for Handling Postulated</u> Station Fires

The inspector expressed his concern regarding what he observed following a sampling review of planning and existing procedures for handling a station fire. Licensee representatives were apprised that this matter would be addressed during a subsequent inspection. (Details, Paragraph 10.b)

## E. Cable Spreading Room and Battery Room Openings

The inspector stated that his visual observations of unsealed openings leading from the Cable Spreading Room and Battery Room appeared to require design evaluation regarding potential for contributing to a potential hazard. (Details, Paragraph 6)

#### F. Enforcement Action

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Items as listed under Enforcement Action were identified as apparent Items of Noncompliance.

#### DETAILS

#### 1. Persons Contacted

Mr. D. A. Ross, Manager, Nuclear Generating Stations Mr. D. L. Reeves, Chief Engineer Mr. J. Sullivan, Operations Engineer Mr. K. O. E. Fickeissen, Technical Supervisor Mr. R. Swift, Maintenance Engineer Mr. E. Skalsky, Radiation and Protection Supervisor Mr. J. Maloney, Operations Supervisor Mr. J. Edelhauser, Associate Engineer Mr. R. Lang, Associate Engineer Mr. R. A. Parshall, Engineering Assistant Mr. E. Roessler, Instrument and Electrical Foreman Mr. T. Johnson, Instrument and Electrical Foreman Mr. B. Cooper, Shift Foreman Mr. R. Wenz, Control Room Operator A Mr. H. Callahan, Control Room Operator A Mr. N. Boulwarc, Control Room Operator B Mr. C. Silvers, Control Room Operator B

Mr. J. Beh, Radiation Technician

#### 2. Organization and Administration

a. Personnel Changes

None

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## b. Plant Operations Review Committee (PORC) Meetings

The inspector verified that all on-site review committee meetings for the prior year had been held within frequency requirements as established by Technical Specifications and that quorum requirements had been satisfied. (Region I Inspection Reports 50-219/75-04 and 50-219/75-18). No inadequacies were identified for the one year interval as examined. The inspector also verified on a sampling basis that proposed Technical Specification changes had been reviewed as required by facility Technical Specifications. PORC review of violations of Technical Specifications, and rules and regulations will be examined in a subsequent inspection.

## c. General Office Review Board (GORB) Meetings

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The inspector verified that all off-site review committee meetings for the prior year had been held within frequency requirements as established by Technical Specifications. Quorum requirements were satisfied for the one year interval examined exclusive of GORB meeting 55A held November 27, 1974. (Special) Acceptability of quorum requirements, adherence to administrative procedures, conduct of audits and corporate management involvement is considered unresolved based on information available on-site as of the date of this inspection. The inspector also verified that GORB had investigated reported instances of Technical Specification noncompliance with respect to A.O.s 74-5 and 74-20. No inadequacies were identified.

#### d. 10 CFR 50.59 Reviews

The inspector reviewed Semi-Annual Reports No. 10 dated August 29, 1974 and No. 11 dated February 28, 1975, Sections VIII, Tests and Experiments. Items reviewed included eddy current testing of control rod blades, shutdown margin testing, and secondary leak rate testing. No inadequacies were identified with respect to reviews of shutdown margin testing and eddy current tests of rod blades. Differential pressure measurements as required by Secondary Containment Leak Rate Test Procedure 602.6, Revision 6, dated July 11, 1974, were not recorded for testing conducted on October 7, 1974, when testing was performed to verify Secondary Containment Integrity. This item as listed as an example of failure to follow procedure under Enforcement Action constitutes an apparent Infraction level Item of Noncompliance.

#### 3. Logs and Records

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The following logs and records were reviewed for the periods indicated. Comments concerning specific areas were as noted.

- a. Station Log Book June 16 August 28, 1975
- b. Shift Foreman's Log July 1 August 28, 1975
- c. Jumper Log all active items
- d. Job Order Index June 1 August 27, 1975
- e. PORC Minutes August 1974 August 1975
- f. GORB Minutes March 1974 May 1975

The inspector noted that some logkeeping activities conducted by the licensee had not been administratively defined. As a result, inconsistencies were observed in logkeeping. The Control Room Operator's Data Log contained entries such as "BUSY" instead of operating data, resulting in a loss of information for periods up to 4 hours. No licensee requirements covering the use of such entries was found by the inspector. Additionally, a daily source check of the stack gas radiation monitor, normally entered in the Station Control Room Operator's Log daily, was not conducted on August 14 and 15, 1975. No requirement was found for performing this check daily although it had been a continuing practice.

The inspector informed licensee representatives that if the above were desired activities, administrative definition should be provided to the operators.

#### 4. Operations

#### a. Condenser Leaks

The licensee was continuing to experience difficulty with condenser tube leakage which resulted in equilibrium chloride concentrations of 100 ppb in primary coolant water. This concentration is a factor of 10 below Technical Specification 3.3.E limits for steaming rates in excess of 100,000 pounds per hour, but was equal to limits for operation below 100,000 pounds per hour. On August 27, 1975, a reactor scram occurred due to loss of condenser vacuum upon restoration of a valved out condenser half to service. Startup was delayed until new resins could be obtained.

The licensee was apprised by a cognizant licensee representative that the licensee was purchasing copper-nickle inserts approximately three (3) feet in length with a fiber seal at one end which will be rolled into tube sheets. Condenser tube leakage problems have been pronounced and metal loss apparently due to hydraulics and cavitation has been identified in the condensers. According to the licensee, the problem is localized to within the first 2.5 to 3 feet of the inlet of the tube sheet. Tube leakage is evidenced in 10-25% of the tubes in all condenser halves. This item will be reviewed further during a subsequent inspection.

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#### b. Facility Tour

During conduct of a facility tour, the inspector noted a steam leak in the area between the two (2) Isolation Condensers. The floor area had been appropriately roped off as a contaminated area. The inspector was apprised that the leak would be repaired during the current shutdown.

#### c. Valve Wall Thickness Verification Program\*

Status of completion remains unchanged. Discussions with licensee representatives indicated that the licensee has concluded that a representative sample which has been completed and as was described in a JCP&L letter to Region I dated July 21, 1972, completes licensee action. This item was discussed at the exit interview and remains unresolved.

#### 5. Reactivity Control and Core Physics

#### Control Rod Blade Inspections

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The inspector reviewed the licensee's data and supporting documentation related to inspection and evaluation of Control Rod Blade inspection. No inadequacies were identified with respect to scope of required 10 CFR 50.59 reviews completed and/or in progress. Data further indicated a total reduction in shutdown margin capability of less than 0.09%  $\Delta k$ .

#### Control Rod Statistical Comparative Data

The data reviewed indicated apparent inconsistencies in exam results as reported. Data based on examination of identical blades over a two (2) year cycle indicated the following:

			Inverted Pins			
	Core Location	Wing A	Wing B	Wing C	Wing	
1974	22-23	None	None	None	5, 6, 17	
1975	22-23	3, 5	None	3, 5	None	
1974	38-31	None	None	17	10, 12, 17	
1975	38-31	None	4,6	7,9,15	None	

\* Region I Inspection Report 50-219/75-15, Details, 3.

The anspector also reviewed the licensee's letter to GE dated Augus 25, 1975, requesting resolution of the referenced conflicting reports. Disposition of data related to control rod locations 22-23 and 38-31 and review of data results for all control rods will be reviewed during a subsequent inspection.

#### 6. Electrical Systems

The inspector visually examined electrical cables supplied from the Battery Room Distribution Panels A and B. Findings were as follows:

- a. Redundant 125 volt DC control circuits, serving as backup for the battery and controls occupy a single <u>common</u> tray from the power distribution panels in the battery room to the point where they enter conduits to continue underground to the diesel generator building. (DC-2 cable 86-68 and DC-1 cable 86-19) These cables are in a common tray and terminate into tray 24.
- b. Redundant 125 volt DC control circuits serving the 4160 volt vital busses (1C and 1D) do not occupy the same common tray. The 1C bus feed (Cable 62-88) which is located in Panel A has been placed in separate conduit outside the common tray, and the 1D bus feed from Panel B (Cable 62-100) is located inside the tray. Physical separation provided in this instance is on the order of 2.5 to 3 feet except at the point where cable 62-100 exits the distribution panel adjacent to the common tray.
- c. Circuitry is described on DC line drawing 302-8 Revision 10, reviewed for as-built conditions, June 10, 1970.

This item with respect to adequacy of separation is considered unresolved.

The inspector also observed openings in the battery room and cable  $r_{\rm M}$  adding room.\* No requirements were identified to seal such operings. This item is considered unresolved with respect to design evaluation.

7. Containment

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#### Standby Gas Treatment System

The licensee has committed, following Abnormal Occurrence (AO 75-18) to provide a procedure for HEPA filter testing in the SBGTS, to

\* Region I Inspection Report 50-219/75-13

preclude a subsequent failure to properly reinstall hand hole covers which provide filter access. At the conclusion of this inspection, the referenced procedure had not been approved by PORC. This item will be reviewed further during a subsequent inspection.

#### 8. Fuel Handling

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#### a. Spent Fuel Handling

The inspector observed the loading of two fuel bundles into the NSF-4 shipping cask and the subsequent handling of the cask for spent fuel shipment #54 on August 27, 1975.

Station Operating Procedure 219.0 (Revision 4, dated June 19, 1975), <u>Spent Fuel Handling with NSF-4 Cask</u>, Step 8.40 requires a test of the cask cap double o-ring seals be performed as follows: "Pressurize with air the annulus between the double o-ring seals to between 80 and 100 psig, isolate, held for 10 minutes, and check for zero pressure leak down with NFS supplied pressure test equipment".

It was observed by an inspector on August 27, 1975, at approximately 1330, following cap installation on the cask for spent fuel shipment number 54, that the o-ring pressure test was not conducted in accordance with the approved procedure specified above. Specifically, the test pressure applied exceeded the indicated range of the pressure gauge (0-100 psig range) on the NFS supplied equipment. The indicated pressure corresponded to approximately 110 psig by visual extrapolation of the gauge scale. The gauge indicator did not contact the mechanical stop.

A licensee representative stated that the 80-100 psig pressure was difficult to obtain because the service air supply pressure is 140 psig and is provided via a gate valve.

The inspector stated that this was an apparent failure to follow procedure and that the absence of scale markings on the gauge in the range over 100 psig makes the application of the test acceptance criterion (i.e., no leakge) difficult.

Technical Specification 6.2.c, requires adherence to operating procedures for refueling operations which are required by

Technical Specification 6.2.A. Additionally, Title 10, Code of Federal Regulations, Part 50, Appendix B, Criterion 5 requires procedures be used for activities affecting quality.

This failure to follow procedures when considered collectively with others as listed under Enforcement Action, constitutes a Infraction level Item of Noncompliance.

#### b. Spent Fuel Cask Contamination

Shipment No. 48 arrived at NFS on August 22, 1975, with six of eight smears exceeding the 2,200 dpm limit established by DOT. The highest reading was reported to be 56,000 dpm. The inspector reviewed the licensee's Smear Survey 2024-75 dated August 21, 1975, which indicated 54 smears had been taken including decontamination. No unusual results were noted, and smear data indicated measured levels within limits. The licensee's investigation was continuing.

#### 9. Radiation Protection

During observation of spent fuel handling operations, the inspector noted that personnel on the 119' elevation (refueling floor) did not routinely use, nor have easy access to a frisker to verify that no contamination was leaving that level following fuel cask decontamination.

A licensee representative stated that a frisker which was being used to count smears of the cask was available in the stairwell area.

The inspector's statement that this was not convenient and probably, for that reason not used, was acknowledged by the licensee.

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#### a. Housekeeping

During the conduct of facility tours, selected site areas were examined with respect to housekeeping practices, including the reactor building in general, tank farm area, canal area, outside storage, diesel generator area, battery room and cable spreading room. The following inadequacies were identified.

#### (1) Battery Room

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The inspector visually observed the presence of trash on the battery room floor. The referenced materials were removed by the licensee and the area was reverified to be clean by the inspector. The battery room was appropriately identified as a no-smoking area.

#### (2) Cable Spreading Room

The inspector visually observed the presence of trash on the cable spreading room floor. Additionally, the licensee had been storing materials in containers situated inside the cable spreading room. The inspector also located and removed a newspaper from inside a cable tray. The referenced materials were removed by the licensee and the area was reverified to be clean by the inspector. Prior to the conclusion of the inspection, the cable spreading room was appropriately posted as a "No Smoking" area.

10 CFR 50, Appendix B, Criterion II, the implementing provisions of the OQAP, Section II and ANSI Standard N45.2.3 -1973 establish cleanliness requirements (Reference JCP&L letter to Division of Reactor Licensing dated May 2, 1974). Section 3.2.1 of ANSI N45.2.3 - 1973, states in part, that garbage, trash, scrap, litter and other excess material shall be collected, removed from the job site, or disposed of in accordance with specified requirements or standards. This failure to maintain cleanliness as listed under Enforcement Action constitutes an apparent Infraction level Item of Noncompliance.

b. <u>Planning, Coordination and Procedures for Handling Station</u> Emergencies

The inspector audited on a sampling basis the licensee's procedures for fire protection, coordination, and training. This area will be reviewed further during a subsequent inspection.

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#### c. Security Controls

#### (1) Reactor Building Doors and Locks

During the course of a facility tour conducted of areas external to the Reactor Building on August 26, 1975, the inspector observed that the Northeast door (outer airlock door) to the reactor building was ajar. Accompanied by a licensee representative, the inspector verified inner door integrity (Secondary Containment) and observed the outer door as locked but not capable of complete closure without a manual assist. The door was properly closed prior to proceeding with the facility tour. Two licensee representatives were located in the vicinity of the Nitrogen Tank and Station, however, these personnel did not have the subject door under surveillance. Failure of the closure to selflock was attributed by the licensee to door sill problems, which were subsequently resolved.

The Oyster Creek Industrial Security Plan, dated January 7, 1974, Section 3.4.2, "Control" specifies, that access be controlled by locked doors or security/operating personnel. This failure to maintain the referenced door in a locked status as listed under Enforcement Action constitutes an apparent Infraction level Item of Noncompliance. Additionally, this item is recurrent in that the Northeast door to the reactor building was found ajar due to a faulty door closure during a prior inspection.\*

#### (2) Vital Area Access Logs

The inspector during the conduct of a facility tour on August 28, 1975, was accompanied by a licensee representative to the cable spreading room, a designated Vital A area. The Cable Spreading Room door was posted with respect to Vital Area Log requirements for sign-in and sign-out. No entries were required during this tour of the inspector or licensee representative. During a subsequent tour on August 29, 1975, appropriate sign-in and sign-out procedures were in effect.

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The Oyster Creek Industrial Security Plan, dated January 11, 1974, Section 4.2, establishes procedural requirements, and Procedure No. 1.0 "Security Guidelines", dated April 11, 1974, states in part that personnel, "shall be instructed to sign in and out on the Vital "A" Area Log located at the entrance to each Vital Area".

Failure to complete appropriate sign-in and sign-out requirements as listed under Enforcement Action constitute an apparent Infraction level Item of Noncompliance.

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