provided to, or logged in, by the system engineer. This information clearly established that the vast majority of workers did not initiate condition reports when they either dropped items into the suppression pool, or lost accountability of items which had the potential for entering the suppression pool.

The failure of site personnel to initiate condition reports in accordance with Procedure ADM 0081 constituted the third example of a violation of Technical Specification 5.4.1 (458/9601-01).

During the Operational Safety Team Inspection (NRC Inspection Report 50-458/93-25), conducted October 25-29 and November 8-12, 1993, the inspectors identified excessive amounts of loose and unattended material inside containment. The licensee removed approximately 10 gallons of material from the suppression pool swell area. The inspectors were concerned that the loose material could potentially enter the suppression pool during an accident and clog the emergency core cooling system strainers. The licensee had initiated Condition Report 93-0753 to review operability.

Condition Report 93-0753 determined that operability had not been affected. However, the licensee did identify that housekeeping problems in containment was programmatic in nature. Numerous efforts were undertaken by the licensee to ensure all plant personnel, including contractors, were aware of requirements and restrictions of each housekeeping zone. In addition, emphasis was placed on personnel responsibilities for maintaining, correcting, and identifying housekeeping deficiencies. The condition report also identified the need for high level management attention to ensure requirements and responsibilities for housekeeping were properly implemented and enforced.

As identified during this outage, the number of unexpected items found in the suppression pool, as well as, the inadequate control of items brought into foreign material exclusion areas, demonstrated that previous corrective actions were ineffective and oversight was not sufficient to prevent recurrence of the violation.

Subsequent to the onsite inspection effort, numerous telephone conversations took place between the Office of Nuclear Reactor Regulation, NRC Region IV personnel, and the licensee representatives regarding operability of the suppression pool. In view of the fact that the licensee[1] cleaned the suppression pool during this refueling outage, it was concluded that there was not an operability issue for the current cycle of operation.

2.11 Observation of Refueling Activities

The inspectors observed numerous fuel bundle moves during this outage, including the removal of the first bundle of irradiated fuel which occurred on January 13, 1996. New fuel movement was being conducted in accordance with Fuel Movement Plan FMP-STO-07-02 and irradiated fuel movement was conducted using Fuel Movement Plan FMP-STO-07-03. Procedure FHP-0001, "Control of Fuel Handling and Refueling Operations," Revision 14, was the governing procedure

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[1]CHANGE: Original stated, "In view of the fact that the licensee drained down . . . ."