



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report No.: 50-424/85-62

Licensee: Georgia Power Company
P. O. Box 4545
Atlanta, GA 30302

Docket No.: 50-424

License No.: CPPR-108

Facility Name: Vogtle Unit 1

Inspection Conducted: January 6-10, 1986

Inspectors: G. A. Belisle Jr. 3/7/86
L. H. Jackson Date Signed

G. A. Belisle Jr. 3/7/86
J. H. Moorman, III Date Signed

Approved by: G. A. Belisle 3/7/86
G. A. Belisle, Acting Section Chief Date Signed
Division of Reactor Safety

SUMMARY

Scope: This special, unannounced inspection involved 70 inspector-hours on site in the areas of Readiness Review Appendix E, Material Control.

Results: One violation was identified - Failure to provide end caps to protect weld end preparations for valves, fittings, pipes, and tubing, and failure to store piping subassemblies in accordance with procedures.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

D. Adams, Warehouse Supervisor
*E. Groover, Quality Assurance Site Manager (Construction)
D. McAfee, Quality Control Supervisor, Receiving Inspection
R. McManus, Assistant Project Construction Manager II

Other licensee employees contacted included engineers, technicians, and office personnel.

Other Organizations

A. Nakashima, Bechtel Power Corporation, Readiness Review, Discipline Manager (Appendices)
*W. Ramsey, Southern Company Services (SCS), Readiness Review Project Manager

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on January 10, 1986, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee.

Violation, Failure to provide end caps to protect weld end preparations for valves, fittings, piping, and tubing, paragraph 5.a. and failure to store piping subassemblies in accordance with procedures, paragraph 5.b.

Inspector Followup Item, The scope of Appendix E is inconsistent with the contents, paragraph 6.a.

Inspector Followup Item, Audit matrix and finding matrix of Appendix E fail to include all violations and findings germane to materials control, paragraph 6.b.

Inspector Followup Item, W. C. Ramsey letter to D. O. Foster addresses Structural Steel, paragraph 6.c.

Inspector Followup Item, Readiness Review Finding E1 is classified as Level III which is inappropriate, paragraph 6.d.

Inspector Followup Item, Storage requirements for electrical equipment conflicts with ANSI standards, paragraph 6.e.

Inspector Followup Item, Weatherproof and outside storage are specified for like materials, paragraph 6.f.

Inspector Followup Item, Conflict in number of audits, paragraph 6.g.

Inspector Followup Item, INPO findings are inconsistent, paragraph 6.h.

Inspector Followup Item, Summary of Section E5, Audits, states that 120 findings were identified, paragraph 6.i.

Inspector Followup Item, Equipment Maintenance Storage List (EMSL) of Safety Injection Pumps and Motors contain errors, paragraph 6.j.

Inspector Followup Item, Improper classification of violations for records, paragraph 6.k.

Inspector Followup Item, Regulatory Guide 1.28 not included, paragraph 6.l.

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved Items were not identified during this inspection.

5. Readiness Review Implementation

- a. The inspectors toured warehouses, laydown yards, shop areas, and the powerhouse to verify material control adequacy as an approach to the evaluation of this appendix. Attention was given to the adequacy of housekeeping, materials identification, rodent control, levels of storage, access control, environmental control, sources of contamination, electrical heater connections for motors, and fire protection.

During this tour of the warehouses, laydown areas and the powerhouse, it was noted that piping subassemblies and valves, piping, fittings, and tubing were not being stored in accordance with ANSI standards in that ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants, paragraph 6.4.2 requires that caps and plugs be used to seal openings in items having sensitive

internal surfaces and to protect threads and weld end preparations. The inspectors observed that many end caps on valves had fallen off while in storage and had not been replaced, that stainless steel pipe and tubing stored in the warehouse yard were not capped in accordance with the accepted Quality Assurance (QA) Program, and that weld end preparations on flanges and fittings stored inside warehouses were not consistently protected to prevent damage. This failure to protect valves, fittings, flanges, pipe, and tubing is identified as the first example of Violation 50-424/85-62-01. Similar violations were brought to your attention in our letters dated 5/13/81, 7/12/82, and an unresolved item by letter dated 10/17/84.

- b. The inspectors conducted a general inspection of the piping subassembly yard and noted that many of these assemblies were not stored on cribbing. This failure to store subassemblies in accordance with ANSI N45.2.2-1972, paragraph 6.1.2(4) is identified as the second example of Violation 50-424/85-62-01. A similar violation was brought to your attention in our letter dated 5/13/81.

6. Evaluation

- a. The scope of Appendix E states, "The scope addresses permanent plant materials, parts and equipment at VEGP (Vogtle Electric Generating Plant) from receipt through issue to contractors for installation and storage/maintenance to transfer to Georgia Power Company (GPC) Nuclear Operations."

This scoping statement appears inconsistent with the text of Appendix E in that many areas of material control are not discussed. A specific example is that welding filler material does not appear in this appendix. Also, it appears that Appendix E does not address all material control requirements after issue from warehouse storage. These areas appear to be evaluated in individual modules. Until this scoping statement is clarified, this is identified as Inspector Followup Item 424/85-62-02.

- b. The audit matrix and finding matrix of Appendix E fails to include all violations and audit findings germane to materials control which have been identified at VEGP. The following are examples of perceived problems:

- Violation 424/79-07-02, Electrical preventive maintenance and rotation of Spray Pump Motors and Safety Injection Pump Motors.
- Violation 424/81-07-02, No record of EMSL inspections of Reactor Pressure Vessel and Boric Acid Transfer Pump for 9/80 and 3/79.
- Violation 424/82-16-01, Failure to perform periodic maintenance of equipment within specified maintenance period (this is listed under inspection).

- Violation 424/82-19-01, Protection of valves.
- Violation 424/82-29-01, Failure to control the storage and preservation of electrical equipment.
- Violation 424/84-11-01, Failure to follow procedure for protection of electrical equipment in control room.

Until the audit matrix and finding matrix are reviewed and an evaluation made to include/not include these violations, this is identified as Inspector Followup Item 424/85-62-03.

- c. The transmittal letter to Mr. D. O. Foster from Mr. W. C. Ramsey dated October 30, 1985, states in part that problems experienced by other near term operating license utilities regarding structural steel are considered in this appendix. The inspector's review of this appendix identified that structural steel is not included in this appendix. Until this apparent wording error can be clarified, this is identified as Inspector Followup Item 424/85-62-04.
- d. Readiness Review Finding E1 identified four equipment/material items out of a sample of 34 for which there was no documented evidence to show that GPC Construction Engineering had evaluated them to determine whether the items were to be entered into the EMSL or whether these items were to be exempted from the EMSL. This finding was classified as a Level III finding by the Readiness Review Team. This finding appears to be a Level II finding since Level II is defined as a violation of licensing commitments or engineering requirements with no safety concerns. Until this apparent misclassification can be corrected, this is identified as Inspector Followup Item 424/85-62-05.
- e. ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants, Section 2.7.2, states that instrumentation, electrical equipment, and batteries, shall be stored in Level B storage areas. Appendix E, Section E4.3.1, General Storage Requirements states that instrumentation, electrical equipment, and batteries will be stored in Level C storages. The inspectors verified that the proper level of storage was actually maintained for the equipment onsite. However, until storage procedures are changed to reflect the correct requirements, this will be identified as Inspector Followup Item 424/85-62-06.
- f. Appendix E, Section E4.3.1, General Storage Requirements, states that conduit and cable trays are to be stored in both Level C and Level D Storage. Until conflict in storage requirements is resolved, this is identified as Inspector Followup Item 424/85-62-07.

- g. Appendix E, Section E5.1, states the following:

The Georgia Power Company (GPC) conducts regularly scheduled audits to verify compliance with project commitments. Audit findings and recommended corrective measures are reported to the management of the audited organization. The audit results are also reported to GPC management and the GPC Quality Assurance (QA) organization tracks the acceptability and timeliness of the response.

Georgia Power Company has conducted 55 audits relating to material control. The audits, summary descriptions of the findings, and the categorization of each finding are presented in the audit and finding matrixes at the end of this section. The 38 GPC audits resulted in the identification of 97 findings during the period from 1977 through the first quarter of 1985.

<u>Category</u>	<u>Total Findings</u>
Receiving	4
Storage	78
Maintenance	7
Documentation	11
Total	<u>100</u>

There are apparent conflicts in this section in that one statement says that GPC has conducted 55 audits and another statement says that they have conducted 38 audits. This section also states that there were 97 findings; however, the total findings column sums to 100. Until this apparent discrepancy in number of audits conducted and total findings can be resolved, this is identified as Inspector Followup Item 85-62-08.

- h. Appendix E, Section E5.3, INPO Evaluations, has a conflict similar to the one in (g) above in that the text of the section states that five findings were identified while the Total Findings column sums to only four. Until this apparent conflict in the number of total findings can be resolved, this is identified as Inspector Followup Item 424/85-62-09.
- i. Appendix E, Section E5.6, Summary, states that there were 120 total audit findings. However, when the Total Findings columns from Sections E5.1 to E5.5 are summed, the result is 139. Until this apparent conflict in the number of total findings can be resolved, this is identified as Inspector Followup Item 424/85-62-10.
- j. The inspectors selected the EMSL cards for Safety Injection Pump Motors to evaluate the preventive maintenance performed on this equipment. These logs contain discrepancies which should have been identified and

evaluated by the Readiness Review Team. A specific example is that the EMSL card for the "B" Motor, tag number 1-1204-P6-004-M01, has been listed as train "A" since 10-31-83. Also, there were questions concerning documented records for preventive maintenance from early 1979 until 10-28-81. However, during subsequent inspections, GPC was able to produce records documenting maintenance on these pumps during this period. Until the mislabeling is clarified for the "A" and "B" pumps and the records reviewed to assure preventive maintenance was performed correctly, this is identified as Inspector Followup Item 424/85-62-11.

- k. The inspectors noted that the audit matrix contains listings of violations concerning records which were perceived to be applicable to Appendix D rather than E. A specific example is that violations 424/79-13-03 and 424/83-13-03 appear to be more applicable to Records than to Materials Control. Until this apparent misclassification can be clarified, this is identified as Inspector Followup Item 424/85-62-12.
1. Paragraph E3.1, Commitments, does not list Regulatory Guide (RG) 1.28, Quality Assurance Program Requirements, as being applicable to the VEGP Materials Control Program. It appears that RG 1.28 is applicable to this program. Until an evaluation can be performed by the licensee to determine RG 1.28 applicability, this is identified as Inspector Followup Item 424/85-62-13.

The inspectors are concerned that the violations and audit findings have been listed in modules where they are not applicable. This would distort the evaluation and lead to an inadequate evaluation of the overall program effectiveness. The RRT did not access the overall program effectiveness from 1977 through 1985. Therefore, the inspectors were unable to adequately evaluate the acceptability of Appendix E.