

APPENDIX C

OPERATIONS INSPECTION REPORT

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/85-13

Permit: CPPR-126:

Docket: 50-445

Category: A2

Applicant: Texas Utilities Electric Company (TUEC)
Skyway Tower
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES), Unit 1

Inspection At: Glen Rose, Texas

Inspection Conducted: September 1-30, 1985

Inspectors:

Dennis L. Kelly
D. L. Kelley, Senior Resident Reactor Inspector
(SRRI), Region IV CPSES Group

12/16/85
Date

W. F. Smith
W. F. Smith, Resident Reactor Inspector (RRI),
Region IV CPSES Group

12/16/85
Date

Reviewed By:

I. Barnes
I. Barnes, Group Leader, Region IV CPSES Group

12/17/85
Date

Approved:

T. F. Westerman
T. F. Westerman, Chief, Region IV CPSES Group

12/23/85
Date

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Inspection Summary

Inspection Conducted: September 1-30, 1985 (Report 50-445/85-13)

Areas Inspected: Routine, unannounced inspection of: (1) applicant actions on previous inspection findings, (2) maintenance procedures, (3) plant tours, and (4) plant status. The inspection involved 47 inspector-hours onsite by 2 NRC inspectors.

Results: Within the four areas inspected, no violations or deviations were identified.

DETAILS1. Persons ContactedApplicant Personnel

- *J. C. Kuykendall, Manager, Nuclear Operations
- *C. H. Welch, Quality Control Services Supervisor
- *R. B. Seidel, Operations Superintendent
- R. E. Camp, Assistant Project Manager, Unit 1
- S. N. Franks, Special Project and Technical Support Lead
- *M. R. Blevins, Maintenance Superintendent
- D. E. Deviney, Operations QA Supervisor
- *R. A. Jones, Manager, Plant Operations
- M. Bozeman, Results Engineering Supervisor
- R. Scanlan, Surveillance Test Coordinator
- N. Harris, Quality Assurance
- E. Alarcon, Results Engineering
- D. M. Jones, Maintenance Engineering Technician
- W. I. Fenley, Senior Relay Technician
- D. B. Wallace, Relay Technician
- *G. M. McGrath, Licensing/Compliance Supervisor (Startup)
- *D. W. Braswell, Engineering Superintendent
- *R. R. Wistrand, Administrative Superintendent
- *C. E. Scott, Startup Manager
- *J. C. Smith, Operations Quality Assurance
- *R. T. Jenkins, Operations Support Superintendent

*Denotes applicant representatives present during exit interview of paragraph 6.

The NRC inspectors also interviewed other applicant employees during this inspection period.

2. Applicant Actions on Previous Inspection Findings

- a. (Closed) Open Item 8431-10: Surveillance test and calibration control deficiencies. In August 1984, an NRC inspection was conducted to ascertain whether the applicant had developed programs for the control and evaluation of surveillance testing, calibration, and inspection as required by the Technical Specifications (TS). Nine administrative procedures were reviewed. The NRC inspector identified several deficiencies which the applicant indicated were in the process of being corrected as the surveillance program became

more completely developed. The RRI conducted a followup inspection during the period of this report and found that development of the surveillance program had progressed to the point where it appears that adequate controls are in place. For example, in August 1984 there was no master surveillance schedule reflecting the status of all planned in-plant surveillance testing as required by the FSAR, Section 13.5.2.2.5. Currently there is a computerized matrix showing when, by date, each surveillance test is to be accomplished, by whom, and by what procedure. There is another computerized data matrix showing all TS surveillances, when they were last done, and when they are due again. In addition, there is a program in the latter stages of development where the shift supervisor will receive a daily report showing which surveillances are due for that day, which are overdue, and what TS Limiting Conditions for Operation (LCO) must be in effect. In general, the applicant has demonstrated that computer assisted controls will be in effect to assure the surveillances required by TS are completed in a timely manner and that results are properly documented, cataloged, and retained. Furthermore, Quality Assurance has developed the "Quality Assurance Technical Specification Verification Program," the objectives of which include providing assurance that TS surveillances are being properly administered.

During a review of the calibration program in August 1984, the NRC inspector identified deficiencies in the calibration program for the Meter and Relay Group. Meter and Relay process instrumentation comprising about 1462 line items were being loaded into the computerized Maintenance and Operations Data System (MODS). A manual system was being maintained to provide this information but was not described by plant procedures. As of this inspection, a computer printout was in the hands of the Meter and Relay group identifying maintenance and calibration to be performed.

The programmatic and specific deficiencies identified by this item have been resolved and as such this item is closed. During this inspection period, the RRI began reviewing the maintenance and surveillance processes and procedures to much greater depth as reported in paragraph 3 below. The inspection will continue into the next reporting period.

- b. (Closed) Open Item 8445-03: In NRC Inspection Report 50-445/85-11, the RRI reported a satisfactory followup inspection which resolved document trail disparities in the LCP-PT-66-01, "Nuclear Instrumentation System" completed preoperational test data package. The item was left open pending incorporation of clarifying information into the permanent test record filed in the Records Center. During this inspection period the RRI verified the

incorporation of this information into the data package as supplemental TDR 4125. This item is closed.

3. Maintenance Procedures

The objective of this inspection is to confirm that plant maintenance procedures are prepared to adequately control maintenance and surveillance testing of safety-related systems within applicable regulatory requirements.

The inspection included verification that:

- o Adequate procedures and processes are in place for control of measuring and test equipment (M&TE),
- o Procedures have been published for performing preventive and selected corrective maintenance,
- o Adequate procedures and programs exist for the implementation of surveillances required by Technical Specifications,
- o All procedures are in the appropriate format as specified in the administrative control manual, and that they are technically adequate to accomplish their stated purpose,
- o Where appropriate, procedures prescribe steps important to the protection of the health and safety of the workers and of the public,
- o An adequate preventive maintenance program has been implemented, scheduled and is being performed.

The maintenance procedure inspection was commenced in September 1985, and is presently in progress. Results of the inspection will be reported in the applicable NRC RRI's periodic inspection reports. The following has been completed as of the end of this reporting period:

Procedures Reviewed

- STA-702, Revision 4, "Surveillance Test Program"
- STA-608, Revision 8, "Control of Measuring and Test Equipment"
- EDA-105, Revision 3, "Engineering Department Surveillance Procedures"
- EDA-109, Revision 0, "Surveillance Tracking Program"

No violations or deviations were identified upon review of the above procedures.

The NRC inspector conducted a walkdown inspection of the M&TE calibration control process. Applicant's representatives responsible for the implementation of the program were interviewed and given the opportunity to demonstrate how their respective responsibilities are implemented. Approximately 100 calibration records (Form 608-1) were sampled from the Records Center and reviewed. The files appeared to be in order. All M&TE are identified by a unique identifier which also indicates the owner organization. Each piece of equipment is represented by the identifier in the computerized MODS. MODS printouts are published by an M&TE calibration coordinator on a monthly cycle to the organizations responsible for M&TE. When the M&TE is calibrated, the MODS is updated, and hard copies of the calibration data are permanently filed in the Records Center. There are provisions for schedule reevaluations for M&TE that may not be frequently used. The M&TE calibration coordinator periodically publishes "overdue" calibration notices, which identify M&TE with expired calibration dates to the responsible supervisors. The notices enable the supervisors to follow up and ensure controls are in effect to prevent use of this equipment on quality-related systems and components, and to take appropriate corrective measures. When asked by the RRI what would happen if the M&TE with expired calibration dates were not flagged by the computerized system, the applicant's representative pointed out that each piece of M&TE has its own calibration sticker containing the expiration date, which must be verified current and recorded on the data sheet being used. In general, the M&TE calibration program appears to be effective and in control.

No violations or deviations were identified as of the end of this inspection period.

4. Plant Tours

During this reporting period, the SRRI and RRI conducted inspection tours of Unit 1. In addition to the general housekeeping activities and general cleanliness of the facility, specific attention was given to areas where safety-related equipment was installed and where activities were in progress involving safety-related equipment. These areas were inspected to ensure that:

- o Work in progress was being accomplished using approved procedures,
- o Special precautions for protection of equipment were implemented, and additional cleanliness requirements were being adhered to for maintenance and welding activities, and

- o Installed safety-related equipment and components were being protected and maintained to prevent damage and deterioration.

Also during these tours, the SRRI and RRI reviewed the control room and shift supervisor's log books. Key items in the log review were:

- o Plant status,
- o Changes in plant status,
- o Tests in progress, and
- o Documentation of problems which arise during operating shifts.

During a previous tour of the control room, the NRC inspector noted some small pieces of dirt and debris had fallen from scaffolding that was installed for ceiling modifications to the top of the control panel. This was apparently caused by inadequate seals around existing structure above the panels. This was discussed with the applicant who acknowledged and subsequently corrected the problem. Protection of the control panels have been routinely and specifically observed during resident inspector tours to ensure control panel protection is properly maintained while the ceiling modification is in progress. No violations or deviations were identified.

5. Plant Status as of September 30, 1985

- a. Unit No. 1 is reported to be 99% complete, however excavation is underway to facilitate replacement of main condenser internals, and a significant amount of rework continues on the control room ceiling.
- b. Unit No. 2 is reported to be 77% complete. The preoperational test program on systems associated with NRC inspections has not yet started; however, preoperational test procedures are being submitted to the Joint Test Group for review and comment.

6. Exit Interview

An exit interview was conducted October 3, 1985, with the applicant representatives identified in paragraph 1 of this appendix. During this interview, the operations RRI summarized the scope and findings of the inspection. The applicant acknowledged the findings.