

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-458/88-11

Operating License: NPF-47

Docket: 50-458

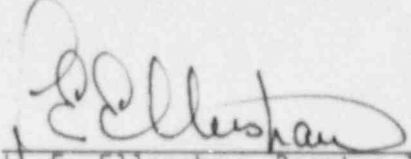
Licensee: Gulf States Utilities (GSU)
P.O. Box 220
St. Francisville, Louisiana 70775

Facility Name: River Bend Station (RBS)

Inspection At: RBS, St. Francisville, Louisiana

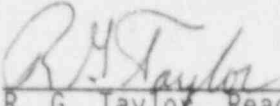
Inspection Conducted: April 4-8, 1988

Inspectors:



L. E. Ellershaw, Reactor Inspector, Materials
and Quality Programs Section, Division of
Reactor Safety

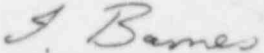
4/26/88
Date



R. G. Taylor, Reactor Inspector, Materials
and Quality Programs Section, Division of
Reactor Safety

4/26/88
Date

Approved:



I. Barnes, Chief, Materials and Quality
Programs Section, Division of Reactor
Safety

4/27/88
Date

Inspection SummaryInspection Conducted April 4-8, 1988 (Report 50-458/88-11)

Areas Inspected: Routine, unannounced inspection of the annual quality assurance program review including the record program; test and experiments program; procurement program, and the receipt, storage, and handling of equipment and materials program.

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

DETAILS1. Persons ContactedGSU

- *J. C. Deddens, Senior Vice President
- *T. C. Crouse, Manager, Quality Assurance
- *P. D. Graham, Assistant Plant Manager, Operations
- *M. F. Sankovich, Manager, Engineering Department
- *J. R. Hamilton, Director, Design Engineering
- *G. K. Henry, Director, Quality Operations
- *T. L. Weir, Director, Materials
- *R. J. Backen, Supervisor, Operations Quality Assurance
- *R. E. Bailey, Supervisor, Quality Engineering
- *R. J. Vachon, Supervisor, Plant Staff Compliance
- *D. B. Reynolds, Supervisor, Administrative Support
- *I. M. Malik, Supervisor, Quality Systems
- *K. E. Suhrke, Manager, Project Management
- *J. H. McQuirter, Licensing Engineer
- *J. Lee, Senior Electrical Engineer
- H. Northrop, Supervisor, Material Control
- D. R. Derbonne, Assistant Plant Manager, Maintenance
- R. G. West, Supervisor, General Maintenance
- K. C. Hodges, Supervisor, Chemistry
- W. C. Hardy, Supervisor, Radiation Protection
- G. Kimmel, Director, Quality Services

The NRC inspectors also interviewed other licensee personnel during the course of the inspection.

*Denotes those persons attending the exit interview.

2. Annual Quality Assurance Program Review (35701)

Based on discussions with the licensee's manager-quality assurance (QA) and several of his subordinate personnel coupled with discussions with the NRC senior resident inspector, it did not appear that there had been any substantive changes in the licensee's QA program since the last inspection in this area as documented in NRC Inspection Report 50-458/86-33. Through discussions with the NRC resident inspectors, it was learned that there had been personnel changes in both the licensee's plant operations organization and in the QA organization. In addition, there had been two functional realignments in the plant organization. The first of the realignments involved the abolishment of the position of assistant plant manager-technical services. The three groups that had reported to this position now report directly to the plant manager. An interview with the supervisor of one of the groups indicated that the change had little impact on his authority or duties and did not affect his span of control

in the area of his responsibilities. The other realignment was the removal of responsibilities for material procurement and warehousing from the assistant plant manager-maintenance. An interview with the present assistant plant manager-maintenance, indicated that the change had been beneficial since it allowed him to increase his attention to maintenance which he considered to be his primary responsibility. He also indicated that he believed that the procurement and warehousing function had benefited from the change since the licensee had brought in an experienced individual from the home office to supervise the activity.

The NRC inspector interviewed the incumbents of four supervisory plant staff positions that had been appointed within the last 18 months in order to determine if they were qualified in accordance with ANS 3.1-1978 as required by the technical specifications (TSs).

The assistant plant manager-maintenance informed the NRC inspector that he possessed a Bachelor's degree in mechanical engineering and that he had been a startup engineer in a shipyard, building and overhauling nuclear submarines for approximately 8 years prior to coming to RBS where he had occupied various positions in the plant startup staff for approximately 5 years. At the conclusion of preoperational testing in late 1985, he was appointed supervisor-general maintenance and had held that position for approximately 2 years until the appointment to his current job approximately 9 months ago. It became apparent during the interview that the person had familiarity with nuclear codes and standards. The NRC inspector concluded that the qualifications of the incumbent assistant plant manager-maintenance equaled or exceeded the requirements of ANS 3.1-1978, paragraph 4.2.3 relative to the position of "maintenance manager."

The supervisor-general maintenance informed the NRC inspector that he possessed a Bachelor's degree in electrical engineering. He stated that he had been employed at the Grand Gulf nuclear power facility as an electrical engineer from 1980 to 1984. He joined the RBS staff as an instrument and controls engineer in 1984, and became the supervisor of control room testing, holding that position for approximately 2 years. After approximately 1½ years in project engineering, he was appointed to his present position in July 1987. The NRC inspector noted that while the position has second tier supervisory responsibility for mechanical maintenance as well as for electrical maintenance and instrument and control maintenance, there was no indicated experience in the mechanical discipline area. Paragraph 4.3.2 of ANS 3.1 indicates a requirement that he have experience in this area. However, since the position is a second level supervisory position with subordinate supervisors over each of the three principal groups, and is subordinate to the assistant plant manager-maintenance who is a mechanical engineer, the NRC inspector concluded that there was sufficient compensating experience both above and below to provide reasonable assurance that his actions would not jeopardize the operations of mechanical equipment at the RBS facility.

The radiation protection supervisor informed the NRC inspector that he possessed a Bachelor's degree in nondestructive testing. He stated that he also has an associate level degree in nuclear engineering and had served in the nuclear navy where he had completed the nuclear power school training course. He indicated that prior to coming to RBS, he had worked for 7 years at the Browns Ferry Nuclear Power Station, 3 of which were as the radiation protection foreman. From April 1985, when he became employed at RBS, until July 1986, he was a radiation protection specialist. In July 1986, he was appointed radiation protection supervisor in an acting capacity with full appointment following in early 1987. While the position of radiation protection supervisor reports to a senior position of director of radiological programs, the NRC inspector compared his qualifications to those of paragraph 4.4.4 of ANS 3.1-1978 and found the requirements fully satisfied.

The final plant staff position selected for review was that of the chemistry supervisor. During the interview with the incumbent, the person stated that he possessed a doctorate level degree in chemistry. He stated that he had experience as a chemist in a concrete materials test laboratory for approximately 2 years in the late 1970s. He became employed by RBS in 1979 in the QA group and had become the supervisor of quality engineering before becoming the supervisor of chemistry in February 1987. Based on the Ph.D. in chemistry, which is directly relatable to the present position and the experience gained as a chemist in the concrete materials test laboratory, it is considered that the incumbent of this position is qualified in accordance with paragraph 4.4.3 of ANS 3.1-1978.

In addition to the above evaluations concerning the plant staff, the NRC inspector selected two positions in the licensee's QA organization for evaluation since they are key positions with new personnel assigned within the past year. These two positions were the directors of operations quality assurance and quality services, respectively, both of which report to the manager of quality assurance. The two positions are not considered by the NRC staff to come within the purview of ANS 3.1-1978 but rather are covered by commitments contained in the Updated Safety Analysis Report (USAR) Chapter 17.2. The NRC staff position is that only the position of manager of quality assurance is governed by ANS 3.1-1978.

The NRC inspector interviewed the director of operations quality assurance. It was learned that he had been the supervisor of electrical engineering in the licensee's engineering department prior to his appointment to his current position. He stated that he has a Bachelor's degree in electrical engineering and that he had worked over a period of approximately 13 years for two well known firms in the nuclear architect/engineering field. He indicated that during 10 years with Gilbert/Commonwealth, he had occupied various supervisory and management positions which included a level of responsibility for review, approval, and implementation of QA controls regarding engineering activities. Later, while employed with Wyle Laboratories for 3 years, he indicated that he had a heavy involvement in the qualification testing of nuclear

components which entailed implementation of a QA program for the testing activities. Since having been employed at RBS in 1984, he had been the supervisor of electrical engineering which entailed some responsibility for implementation of the construction and operations QA programs as they pertained to engineering activities. Paragraph 17.2.1.2.5 of the USAR requires that the director of operations quality assurance possess a degree in engineering or science, or have equivalent capabilities; have 4 years of QA-related experience, 2 which must be in nuclear supervision; have experience in development and implementation of QA programs and procedures; have familiarity with Appendix B to 10 CFR Part 50 and industry QA standards; and have knowledge of inspection and testing. The NRC inspector concluded that the incumbent director of operations quality assurance had the background to satisfy these commitments even though he had no apparent experience with a specific QA organizational component such as an audit or inspection group.

The NRC inspector also interviewed the recently appointed director of quality services. This person stated that he had a Bachelor of Science degree in agriculture and had been in the nuclear navy and had gone through the nuclear power schools. After leaving the navy, he had been employed as a QA auditor by the Public Service Company of Oklahoma, the former applicant for a construction permit to build the Black Fox Station. Following withdrawal of the application for construction of Black Fox, this individual entered into employment at RBS in approximately June 1980. He stated that he had served in various capacities with the QA organization since that time. The last two positions prior to his appointment as director had been as supervisor-operations quality control and as supervisor-operations quality assurance. Paragraph 17.2.1.2.6 of the USAR contains commitments specific to the position involved but which are identical to those of the director-operations quality assurance as discussed above. The interviewed person did not consider his BS degree in agriculture to be applicable to his current position and the term "equivalent capabilities" is not defined in the USAR. The person does have nearly 14 years of direct involvement in QA which well exceeds the experience requirement of 4 years, and substantial amounts of that time have been in supervision. The NRC inspector concluded that the incumbent director of quality services is qualified for the position based on his experience and his familiarity with QA requirements.

No violations or deviations were identified in this area of the inspection.

3. Records Program (39701)

The NRC inspector reviewed the following procedures in relation to the implementation of paragraph 17.2.17, "Quality Assurance Records," of the current USAR.

- Quality Assurance Directive (QAD)-17, Revision 4, "Quality Assurance Records," which requires that department managers establish records control measures in their respective areas and establishes broad categories of records to be included.
- RBNP-008, Revision 2, "Document Control & Records Management," which establishes records control sections in the Records Management organization and prescribes the use of a records transmittal and a form to provide data input for the computerized locator system for microfilmed records. This procedure also establishes the requirement for a separate "Records Type List." The NRC inspector reviewed the most recent edition of the Records Type List and found that it essentially takes the line items of the attachment to ANSI N45.2.9-1974, connects identified site-generated records to the line item, and then specifies a retention period. As new records are identified, the list is updated accordingly.
- ADM-0006, Revision 4, implements RBNP-008 for the plant staff.
- TAP-5-007, Revision 3, implements the requirements of RBNP-008 in the training department.
- SSP-1-003, Revision 3, implements the requirements of RBNP-008 within the administrative section responsible for the retention of records.
- ENG-3-006, Revision 3, implements the requirements of RBNP-008 in the engineering department.

The NRC inspector selected various categories of records from the above procedures to verify implementation of the overall system. It was found that the licensee's intention is to microfilm essentially all of the records which must be retained for the operational life of the facility. The effort is somewhat behind schedule because of the volume of records that had accumulated prior to the implementation of that decision. Some amount of relatively current records must be stored in hard copy form until such time as they can be microfilmed. With this understanding, the NRC inspector selected a minimum of two records in each group, one of very current origin and a second approximately a year older. In some cases, such very recent records as the training records for reactor operators had been microfilmed. In the case of the minutes of the Facility Review Committee (FRC), records as old as 2 years were still in hard copy. The personnel of the records management group were able to quickly locate the requested record from either the records vault or from the computerized locator system and hence the microfilm files. The examined microfilm records were found to be of excellent quality although, in the instance of handwritten records such as control room logs, it was necessary to take several copies from the film before the record could be read. The fault here seemed to lay with the microfilm viewing machines. A total of 14 records in 6 different categories were selected, located, and reviewed for clarity and legibility and retention identification compliance to the "Records Type List." All were found to be acceptable in each attribute.

The NRC inspector also inspected the licensee's records vault for compliance to the licensee's commitment. The vault was found to be of concrete block construction resting on a concrete slab. The interior walls and floor were well sealed to prevent concrete dusting. A halon fire protection system has been installed with several zoned fire detectors attached to the ceiling. No other piping was identified coming into the room. The only anomaly identified was the installation of a large air conditioning unit within the room rather than having the unit outside with the air supplied to the room via ductwork. The unit was provided with a deep and adequately large drip pan underneath to collect any moisture that might collect from dehumidification. The halon fire suppression system in conjunction with a fire detector located near the air conditioning unit should preclude any damage to the stored records occasioned by a fire in the unit.

No violations or deviations were identified in the area of records control.

4. Test and Experiments Program (37703)

This NRC inspection area relates to those tests and experiments which the licensee may perform causing plant systems or components to be operated other than as described in the USAR or other licensing documents. Such tests or experiments may also constitute an unreviewed safety issue within the meaning of 10 CFR 50.59. The purpose of this inspection was to examine how the licensee controls any such tests or experiments. The NRC inspector reviewed the licensee's Operation QA manual which implements the commitments of Chapter 17 of the USAR. It was found that QAD-11, Revision 5, "Test Control," requires that all tests must be performed in accordance with procedures and that the procedures for any special tests be reviewed and approved by the licensee's Facility Review Committee. If the FRC determines that the potential for an unreviewed safety issue is involved, the licensee's Nuclear Review Board must also review and approve the procedure. Procedure ADM-003, Revision 14, "Development, Control, and Use of Procedures," implements the requirements of QAD-11 within the operations staff. This procedure specifically defines special tests and experiments in a similar manner to that used in the NRC procedure and provides that any procedures meeting the definition must be reviewed by the FRC and approved by the plant manager prior to any utilization of the special procedure. Based on discussions with the NRC resident inspectors and on interviews with the licensee's acting plant manager and the licensee's reactor engineer, the NRC inspector concluded that no special test or experiment procedures exist and that no such tests or experiments have been accomplished since RBS was authorized to load fuel in late August 1985.

No violations or deviations were identified in this area of the inspection.

5. Procurement Program (38701)

The NRC inspector reviewed the following documents to verify that administrative controls exist and that they provide measures to assure that necessary technical and quality requirements are included in procurement documents for safety-related items or services. The documents were also reviewed to verify that controls exist for the selection, approval, and use of vendors. These documents were further reviewed to assure that responsibilities for implementing the established measures were delineated in writing.

<u>Document No.</u>	<u>Revision</u>	<u>Date</u>	<u>Title</u>
Chapter 17	-	08/87	Updated Safety Analysis Report
RBNP-003	3	02/05/87	Procurement of Materials and Services
EDP-EQ-01	0	12/11/87	Technical, Quality, and Documentation Requirements for Procurement Documents
EDP-AA-46	1	03/26/87	Development of Purchase Standards
QAI-2.02	7	08/05/87	QA Review of Procurement Documents and Identification of Receipt Inspection Requirements
QAI-2.4	4	02/23/88	Quality Assurance Evaluation of Supplier/Contractor QA Programs
QAI-2.7	4	01/12/88	Quality Surveillance of Suppliers
QAI-2.11	6	01/06/88	Qualified Supplier List
NuPE-AA-42	3	07/28/86	Evaluation and Justification of Commercial Grade Items

To assess the implementation of these documents, the NRC inspector selected the following safety-related components from the identified systems and verified that documentary evidence was available to support the conformance of the items to the requirements of the procurement documents:

	<u>Component</u>	<u>Quantity</u>	<u>System</u>
a.	3-inch Stainless Steel (SS) Elbows	4	Reactor Coolant System
	2- X 3/4-inch SS Reducers	3	Reactor Coolant System
	4-inch, 1500-lb. SS Flange	1	Reactor Coolant System
b.	Air Lock Door O-Rings	20	Containment System
c.	3/4-inch, 1500-lb. Bottomless Globe Valves	6	Reactivity Control System
d.	Fuseblocks, 30 Amps, 600 Volts	2	Instrumentation System
	Limiterque Motor, 125 VDC	1	Instrumentation System
e.	3-inch, 300-lb. SA-105 Gate Valve Piston Disc and Spring Assembly Kit for 1 1/2-inch 600-lb. Valve	4 1	Emergency Core Cooling System Emergency Core Cooling System
f.	100 Amp Circuit Breakers	2	Plant and Electrical Power Systems
	480 VAC Standby Motor Control Center Spare Parts Kit	1	Plant and Electrical Power Systems

The procurement dates for the above items occurred between July 19, 1985, and December 13, 1987. While some of the controlling procedures were revised subsequent to the procurement dates, this had no impact in terms of performance relative to these purchases.

For the above items, the NRC inspector reviewed all purchase requisitions, purchase orders (POs) and any applicable revisions for QA review and approval, and verified that technical requirements were either contained in the text of the document or referenced. It was also verified that these documents did impose 10 CFR Part 21 and 10 CFR Part 50, Appendix B.

The NRC inspector verified that all required supplier documentation had been received and that, as a minimum, it complied with the requirements of the PO. In addition, a review of all material manufacturers' certified material test reports was performed for those components identified in a., c., and e. above. In addition, for the valves identified in e. above, the Seismic Analysis Report, Form NPV-1 Certificate Holders' Data Report for Valves, Liquid Penetrant Examination Reports, and the Valve Body Wall Thickness Reports were reviewed.

The NRC inspector verified that the vendors from whom these procurements had been made were on either GSU's Qualified Supplier List (QSL) or Stone and Webster Engineering Corporation's (SWEC) Qualified Rating List (QRL). A contractual agreement exists between GSU and SWEC such that SWEC

performs vendor evaluations and audits, and maintains a QRL which can be used by GSU for procurement purposes. SWEC's activities in this area are performed in accordance with the applicable GSU procedures.

Included within the scope of this inspection and as a result of an inspection performed by the NRC's Vendor Inspection Branch (VIB), a review of GSU's activities applicable to Nutherm International Incorporated (NI) was performed. The VIB performed an inspection at NI on November 16-20, 1987, the purpose of which was to followup allegations received pertaining to the methods by which NI conducted work activities that affected the quality of commercial nuclear power plant safety-related systems. The allegor, documented the allegations in a notification which was titled "10 CFR 21 'Safety Related Defects Reporting.'" The VIB identified the scope of NI's nuclear industry activity as including fabrication, designing, testing, and qualification of electrical devices and control systems. RBS was identified as a site which had received equipment from NI. The VIB, in addition to identifying six nonconformances, concluded with respect to the allegations that the concerns about the way NI controlled its nuclear quality-related activities were valid, and the basis for NI's safety-related component Certificates of Conformance for previously supplied equipment was questionable.

GSU placed NI on the QSL on July 26, 1984. This was based on the following SWEC surveys and audits. A presurvey evaluation of NI was performed on January 18, 1983, followed by a facility survey. Subsequent to the evaluation and survey, SWEC conducted an audit on August 30 through September 2, 1983, which identified nonconforming conditions requiring corrective actions. SWEC performed an audit on December 8, 1983, to verify that the committed corrective actions had been implemented. GSU performed an audit of NI on January 28-29, 1986, which is documented as Survey No. 86-01-S-0132, and identified eight nonconforming conditions. GSU performed a corrective action audit on October 31, 1986, and verified that the committed corrective actions had been implemented. On April 22, 1987, GSU removed NI from the QSL and placed them on an inactive status. This was done to avoid duplication of effort in that SWEC was maintaining NI on their QRL.

It appears that the allegor's 10 CFR Part 21 notification dated September 2, 1987, was distributed to NI's customers, including GSU. The allegor provided a customer listing in his notification. GSU contacted several of the identified customers to determine if any actions had been taken based on the notification, and the results. General Public Utilities (GPU) responded by letter dated November 17, 1987, which included a copy of their investigation performed at NI on September 16-18, 1987. GPU concluded that, based on a records review, they could not substantiate the allegations with respect to equipment ordered by them.

In any event, GSU reviewed their procurement documents to NI and compiled a listing of equipment. Approximately 15 POs were placed with NI by both SWEC and GSU for safety-related HVAC equipment and spare parts. This

equipment consisted of the No. 1 Standby Cooling Tower Chillers, identified by Mark Nos. HVY-CH6A and -CH6B, and related spare parts. In addition, GSU identified the Maintenance Work Orders (MWOs) applicable to both chillers, to determine if excessive repairs or replacements due to faulty equipment had been performed. This review revealed that three MWOs had been issued:

- MWO R008693 dated October 8, 1985
- MWO R035182 dated May 14, 1986
- MWO R057106 dated October 15, 1986

The NRC inspector reviewed the MWOs and determined that they had been issued for routine testing and inspection activities, and not for any need to repair or replace faulty items.

It would appear that GSU has taken appropriate actions to address any concerns which may have resulted from the allegations.

During the NRC inspector's review of procurement document packages, it was noted that a minimum of seven POs, which were designated as safety-related, contained the following notes: Safety-Related, No QA Program Applicability, Commercial Grade, and Q Class-1. In an attempt to gain an understanding of what might be construed as conflicting terminology, the NRC inspector discussed this with engineering and QA personnel. In addition, review of the "Definitions" section of the applicable procedures identified above provided the following information:

Quality Class 1 (Q Class-1) is defined as a safety-related item. Q Class-1 is subdivided into Q Class-1Q, which identifies items requiring qualification or imposition of 10 CFR Part 21 on the supplier, and Q Class-1C, which identifies items for use in safety-related applications, but are purchased as commercial grade and are dedicated after receipt. Dedication of a commercial grade item is defined by 10 CFR Part 21 as occurring after receipt of the item and at the time the item is designated for use as a basic component (safety-related). Q Class-2N describes items for nonsafety-related systems which have no regulatory requirements for QA. It is also referred to as "QA Program not applicable."

The discussions with the engineering and QA personnel did not result in a clear understanding regarding the intent of the notes on the POs. In fact, the definitions indicate that the notes are conflicting.

Procedure RBNP-003 defines a commercial grade item as being a class of components or parts meeting the definition of 10 CFR Part 21 which may be purchased off the shelf without incurring defect reporting responsibility to the seller. Such parts are not considered safety-related until dedicated to use in a safety-related application.

The procedure also provides the three criteria established by 10 CFR Part 21 which are to be used in determining if a part is commercial grade:

- a. Not subject to design or specification requirements that are unique to the nuclear power industry,
- b. Used in applications other than the nuclear power industry, and
- c. May be purchased from the manufacturer/supplier solely on the bases of information set forth in the manufacturer's published product description.

Procedure NuPE-AA-42 states that its purpose is to provide instructions for evaluating replacement items for safety-related equipment to determine whether the item can be procured as commercial grade. It also states that it applies only to safety-related items which are like-for-like replacements for the originally supplied equipment.

It would appear that Procedure RBNP-003 describes the procurement of commercial grade items, for which it is not known that the items might be used in a safety-related application. However, Procedure NuPE-AA-42 appears to indicate that it is indeed known at the time of procurement that the items will be used in a safety-related application. The procedure also contains a form titled "Justification for Commercial Grade Items," which is used to establish whether an item is considered commercial grade. This is accomplished by assessing the item against the three 10 CFR Part 21 criteria mentioned above. However, the first criterion above has been changed somewhat to read as follows:

"The item(s) requires no special tests, documentation or controls other than those intended by the manufacturer to maintain a quality product."

Because of time constraints, the NRC inspector could not fully evaluate what appears to be inconsistencies. As a result, this area of the inspection regarding the procurement and dedication of commercial grade items is considered to be an unresolved item (458/8811-01).

No violations or deviations were identified in this area of the inspection.

6. Receipt, Storage, and Handling of Equipment and Materials Program (38702)

The NRC inspector reviewed the following documents in order to verify that administrative controls exist and that they provide measures to assure that received materials and suppliers will be examined for conformance with requirements specified on the procurement documents. The documents were reviewed to verify that acceptance criteria were clearly established and that requirements for documenting the performance of receipt inspections were delineated.

<u>Document No.</u>	<u>Revision</u>	<u>Date</u>	<u>Title</u>
EDP-EQ-01	0	12/11/87	Technical, Quality and Documentation Requirements for Procurement Documents
MHP-15-001	0	10/02/87	Materials Receiving and Inspection
	1	03/31/88	
QAI-2.02	7	08/05/87	QA Review of Procurement Documents and Identification of Receipt Inspection Requirements
QCI-3.0	9	09/15/87	Receiving Inspection
MHP-15-006	0	11/16/87	Issuance or Release of Material from Warehouse
ENG-3-019	0	09/14/87	River Bend Station Processing of Unsatisfactory Receiving Inspection Reports

In order to assess the implementation of those documents associated with material acceptance, receipt inspection, storage, and control of QA documents and records, the NRC inspector selected the following safety-related items which were observed in storage, in addition to all of those components identified in paragraph 5 above, and reviewed all applicable documentation:

- a. 1 1/4-inch, 90°, SS, 3000-lb. Elbows
- b. 1 1/4-7 X 4-inch, ASTM A-574 Cap Screws
- c. 2-inch, 1500-lb., SA 105 Globe Valves
- d. Valve bonnet gaskets
- e. 5/8-11 X 2 3/4-inch, SA 307, Heavy Hex Cap Screws
- f. 1 - 8 X 6 1/2-inch, SA 193 Grade B7 A/T Studs
- g. 30 amp, 250 volt, Fuseblocks
- h. 5.3 oz. Tubes of Molykote Lubricant

All of the above items were stored in the warehouse and were protected by cartons, heavy plastic bags, or wooden crates. The items are stored on divided shelves and are all tagged. The tags identify the PO, Heat/Batch numbers if applicable, item description including ASME designation if applicable, vendor, and shelf life, if applicable.

The associated records were filed by PO number and form a documentation package. The NRC inspector reviewed the documentation packages identified by the PO number on the tags. Each package consisted of a copy of the PO,

Receiving Inspection Report (RIR), and applicable vendor supplied documentation; i.e., certified material test report, certificate of conformance, and shelf life data.

There were no instances identified where the information on the tags were different from the data in the documentation packages.

The NRC inspector verified that the identified vendors had been on either the QSL or QRL at the time the PO had been placed.

The program for receiving inspection and storage of materials appears to be effective with respect to meeting the committed objectives, and no violations or deviations were identified during review of this area.

7. 10 CFR Part 21 Inspection (36100)

This inspection was meant to determine whether the licensee had established and implemented procedures and controls which provide for evaluating deviations, assuring that defects or failures to comply are reported to the NRC, and that records applicable to these activities are established and maintained.

The following procedures applicable to 10 CFR Part 21 were reviewed:

<u>Document No.</u>	<u>Revision</u>	<u>Date</u>	<u>Title</u>
RBNP-026	0	04/28/86	Processing 10 CFR 21 Reports
NLP-10-007	0	04/27/87	Processing Evaluations of Reportability Under 10 CFR 21
RBNP-004	2	03/03/87	Reporting Requirements
	3	03/14/88	

The NRC inspector determined that the evaluating, reporting, and record requirements are clearly established in the above referenced procedures. The NRC inspector also verified that the posting requirements of 10 CFR Part 21 were being complied with.

The only example in which implementation of 10 CFR Part 21 requirements could be measured related to the subject of NI addressed in the Procurement Program paragraph. While it was a letter containing allegations by an NI employee, the subject was titled "10 CFR 21, 'Safety Related Defects Reporting.'" Therefore, GSL treated the letter as if it were an actual 10 CFR Part 21 report and performed the required evaluation on the equipment which might have been affected.

No violations or deviations were identified in this area of the inspection.

8. Exit Interview

The NRC inspectors held an exit interview with the licensee on April 8, 1988, to discuss the areas inspected and the findings. The NRC resident inspector, Mr. W. B. Jones, also was in attendance during the interview.