

pump. Procedure POM 35.000.052(SR), "Emergency Diesel Generator - Engine General Maintenance," Revision 6, included instructions for the removal and installation of fuel injector pumps; however, the procedure was not used by maintenance personnel. Instead, mechanical work and inspection were performed in accordance with verbal instructions from the vendor representative. The fuel injector pump was specifically removed in order to inspect the cam roller for possible damage because of wear indications on the cam shaft. The wear indications were previously identified and documented on Deviation Event Report (DER) 88-0403; however, no disposition instructions or corrective actions were provided on the DER prior to removal and reinstallation of the fuel injector pump. Additionally, removal and installation of the injector pump without use of procedures and results of the cam roller inspection were not documented.

Accomplishing work without use of appropriate instructions and inspecting without acceptance criteria is an example of a violation of 10 CFR 50, Appendix B, Criterion V (341/88007-3B).

- 3.2.1.3 The inspectors observed pressure testing of the EDG-13 jacket water system. Procedure POM 34.000.14(SQ), "Emergency Diesel Generators - Inspection," Revision 8, Step 7.3.4 required a hydrostatic test of the jacket water system to 50 psig, by using a hydrostatic test pump. The procedure contained a "CAUTION" not to exceed 50 PSIG in the jacket water headers. Instead of using a hydrostatic pump a hose was connected from the jacket water system to the RHR demineralized water header drain valve P11F213 along with a pressure gauge and two relief valves connected to the outlet, the high point. In order for the gauge to maintain a 50 psi reading, water was allowed to run out of both relief valves. (The P11 system pressure normally exceeds 70 psig and could exceed 100 psig.) Even though the pressure gauge at the outlet, the high point, read 50 psi, it was not obvious that the jacket water system had not exceeded the 50 psig maximum. The inspectors discussed this apparent problem with the licensee, who then performed a technical evaluation and determined that no damage was caused to the EDG jacket water system, which could withstand 100 psig.

Additionally, after the licensee had temporarily stopped all outage related work to impress upon workers the importance of following procedures, a mechanic installed an additional pressure gauge, not required by the procedure, on the blanked-off flange, downstream of the jacket water heat exchanger on EDG-14. The purpose of this, as explained by the mechanic, was for his "own piece of mind." The mechanic stated that it wasn't in the procedure to install the extra gauge but he decided to install it to refute the engineer's assertion that there would be a 8 psid between the inlet and outlet of the jacket water heat exchanger. Installation of the extra gauge did not materially affect or invalidate the test and results of determining the existence of jacket water cooling leakage in the diesel generator.

Failure to accomplish work in accordance with documented procedures is another example of a violation of 10 CFR 50, Appendix B, Criterion V (341/88007-3C).