

May 24, 1988

Docket No. 50-285

MEMORANDUM FOR: L. J. Callan, Director
Division of Reactor Projects
Region IV

THRU: Jose A. Calvo, Project Director
Project Directorate IV
Division of Reactor Projects - III,
IV, V and Special Projects

FROM: Patrick D. Milano, Project Manager
Project Directorate IV
Division of Reactor Projects - III,
IV, V and Special Projects

SUBJECT: DRAFT NRR INPUT FOR FORT CALHOUN STATION SALP
FOR THE PERIOD OCTOBER 1, 1986 TO APRIL 30, 1988

Enclosed is the draft input for the Fort Calhoun Station SALP dealing with the category of Licensing Activities. The proposed overall performance rating in this functional area is Category 2.

This document and enclosure contain predecisional information and have not been distributed to the PDR/LPDR.

/s/

Patrick D. Milano, Project Manager
Project Directorate IV
Division of Reactor Projects - III,
IV, V and Special Projects

Enclosure:
Draft SALP Report Input

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PNoonan	PMilano	JCalvo	LRubenstein	DCrutchfield
5/19/88	5/19/88	5/19/88	5/19/88	5/24/88



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
May 24, 1988

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A handwritten signature in cursive script, appearing to read "Patrick D. Milano".

Patrick D. Milano, Project Manager
Project Directorate IV
Division of Reactor Projects - III,
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J. Licensing Activities

1. Analysis

The assessment of the licensing activities for the Fort Calhoun Station represents the integration of inputs from the Operating Reactor Project Manager and the technical reviewers who provided significant effort on the licensing actions during the rating period. Using the guidelines in NRC Manual Chapter 0516, specific evaluation criteria were applied to the relevant licensee performance attributes and an overall rating category was assigned for each attribute. This information was provided to the Project Manager as an enclosure with the Safety Evaluation Reports completed for each licensing activity. The Project Manager utilized this information by combining it with his assessment of licensee performance and by using appropriate weighting factors based on the complexity of the submittal. From this combination a rating for the licensee's performance in the functional areas was attained.

As stated, the basis for this assessment is the licensee's performance in support of significant licensing actions that were either completed or had a substantial level of activity during the rating period. These licensing actions are presented in the supporting data.

The attributes specified in NRC Manual Chapter 0516 as applicable to the functional area of licensing are:

- a. Management Involvement and Control in Assuring Quality
- b. Approach to Resolution of Technical Issues from a Safety Standpoint
- c. Responsiveness to NRC Initiatives
- d. Reporting and Analysis of Reportable Events
- e. Staffing

2. Evaluation of Each Assessment Attribute

- a. Management involvement and control in assuring quality

The management attention of the licensee toward the assurance of quality in the resolution of issues of major significance remained at an acceptable level. During this period, the licensee management was specifically required to be actively involved in the resolution of concerns arising from reportable events. In addition to having to direct this activity, licensee management was required to make detailed presentations on the impact of the events and corrective actions. These presentations were not initially successful in answering the basic information necessary for the NRC to make a determination of the significance and impact on plant operations. This was an indication that the licensee management had not taken an aggressive approach

toward an understanding of the implications of the event and its outcome, and that the evaluation of the basic data was not fully controlled. Subsequent meetings were then required to obtain the necessary information.

In the area of more routine preparation of licensing actions, the basic documentation appears to be promptly developed and controlled. The quality of the documentation prepared to support licensing amendments and actions have been technically adequate in addressing the issues involved. While the amendment for the Cycle 11 Reload was well developed, others such as for the extension of the operating license duration and for the emergency diesel generator surveillance testing and reliability did lack some essential considerations which the licensee made available later. Also, the amendment requesting technical specification changes involving radioactive effluents was partially denied due to the potential concerns with exceeding concentrations on an instantaneous basis. Additional management attention or oversight may have prevented the concerns or the reiterative process for answering questions.

After the events surrounding the instrument air problem and the NRC inspection into the design modification processes, the licensee has implemented several key programs which may aid in the improvement in these areas. An evaluation of the licensee management organizational relationships is being conducted by an independent agent to determine actions which can increase the efficiency and function of the organization. Also, a design basis reconstitution program is in process. This multi-year program will regain the necessary control over the design control process and reverify the design basis and margins as changed by the plant modifications. In the interim until completion, the licensee is taking a conservation approach toward future changes that may further affect these margins. Finally, of note, is the decision by the licensee to improve the reliability of the auxiliary feedwater system with the addition of a third AFW pump.

b. Approach to resolution of technical issues from a safety standpoint

As a result of the findings raised by the Safety System Outage Management Inspection (SSOMI), a comprehensive review of the design basis of safety-related air operated control valves was implemented. From this review a number of safety issues were raised about the sustained operability of various valves after a design basis event. These issues required the licensee to evaluate the impact on continued operation of the facility. The documentation to support this operation was generally not

well detailed to allow an independent determination that the decision were appropriately reached and valid. While the NRC staff reviews of selected decisions did not disagree with the finding, further information was needed from the technical preparer to come to the same conclusion.

During the instrument air event and the subsequent problems associated with the operation of the emergency diesel generators, the licensee approach toward resolution of the problems and understanding the significance of the safe operation of the facility was not adequate. The licensee made nonconservative decisions which allowed continued operation during a period when the status of many air operated components required for safe operation were of a questionable operability. This item was the focus of an escalated enforcement action by the NRC.

c. Responsiveness to NRC initiatives

The licensee continues to make progress on several significant safety issues. As previously stated, the AFW reliability will be enhanced by the completion of the commitment to install a third pump. Also, progress has been made toward the resolution of generic issues on the control room design and safety parameter display system. Further the design basis reconstitution program taken based on the SSOMI findings was a significant endeavor toward upgrading the control of the design of the facility.

In the area of licensing actions, the response of the licensee to questions raised which required direct contact with the technical preparer has been generally well coordinated and timely.

d. Reporting and analysis of reportable events

The single factor most affecting the determination of the licensee's degree of attainment for this attribute was the event surrounding the water ingress into the instrument air system. The NRC review of the analysis found that the licensee took a less than conservative approach toward determining operability for components and systems. Additionally, the licensee did not make a determination for the precursor event that the NRC should be notified. No further discussion of this is necessary since it has been previously addressed and has been the subject of escalated enforcement action.

The design basis reconstitution program also has generated findings that are determined to be reportable. The analysis of the condition and the decision to report has been adequate. Since this could create conditions which could affect operability of equipment, the licensee has had to analyze the impact on continued operation. These have been prepared and received the required reviews by the Plant Review Committee and Safety and Reliability Committee. However, the documentation of the basis for the determination has been found in several cases to not be fully detailed in the report. Otherwise, the licensee's event reports appear to be comprehensive and well documented.

e. Staffing

The results of significant events and the findings of NRC inspections have created an intensive workload for periods of time. The licensing staff and technical support appear to be adequately staffed to handle the normal workload. During the periods of increased unplanned activity, the technical support for the analysis effort has appeared to be overtaxed. The temporary assignment of technical assets to areas working on resolutions of concerns and problems may be a means of alleviating shortfalls in staffing during these periods. The outcome of the independent management review will be watched to see if changes are recommended in the staffing and management of this area.

3. Conclusion

The licensee's performance in the area of licensing activities during this rating period has been average. The circumstances surrounding the events noted above were a major criticism of the activity that led to the lowering of the previous grade in this area. Historically, the licensee has maintained a responsive licensing interface with the NRC and management control over the various licensing inputs. This has resulted in no need to request emergency relief for requirements and allows the routine review and amendment processing. The licensee must, however, ensure that closer reviews are conducted prior to submittal to the NRC to preclude the need for further requests for information. While not significant for the final determination, the review processing time could thus be improved.

The overall rating of the licensee in the category of Licensing Activities is a grade of 2.

4. Board Recommendations

a. Recommended NRC Actions

The staff should increase its efforts toward review of licensee decisions on plant operability as related to questionable seismic qualifications of certain equipment.

b. Recommended Licensee Actions

The licensee should continue with established programs for reconstitution of the design and evaluation of the staffing and management. Technical reviews must be conducted in more detailed manner and documented such that an independent review can be successfully accomplished.

SUPPORTING DATA AND SUMMARIES

J. Licensing Actions

1. NRR/Licensee Meetings

- November 5, 1987 Meeting in Bethesda, MD regarding the water ingress into the instrument air system.
- November 13, 1988 Meeting in Bethesda, MD regarding further information on the above event.

2. Commission Meetings

None

3. NRC Site Visits

- August 17-21, 1987 Vendor Inspection Branch to review the inservice testing of check valves.
- September 14-17, 1987 Combined Detailed Control Room Design Review and Safety Parameter Display System.
- October 14-15, 1987 Resolve outstanding questions on second 10-year inservice testing period for pumps and valves.
- February 1-5, 1988 Inspection of the Health Physics Program
- April 4-8, 1988 Followup inspection to review status of findings from the 1986 Safety System Outage Management Inspection (SSOMI).

4. Schedular Exemptions Granted

Extension of time to complete the Thermal Shield Support Inspections under OPPD letter dated April 4, 1984, on January 12, 1987

Extension on date of implementation of USNRC Regulatory Guide 1.97 on February 20, 1987

One-time extension of the surveillance inspection interval for Diesel Generator No. 2 on April 18, 1988

5. Relief Granted

Relief from ASME Code Section XI requirements for inspection of inaccessible welds in the main steam and feedwater systems. Staff letter dated on November 10, 1986.

Relief from the ASME requirements for visual inspection of the reactor pressure vessel interior, except when the core support vessel is removed. Staff letter dated April 1, 1987.

6. Exemptions Granted

Schedular exemption for the relief from property insurance requirements of 10 CFR 50.54(w)(1). Staff letter dated December 2, 1987.

See other exemptions in section 4 above.

7. Emergency Action Granted

None

8. Licensee Amendments Issued

<u>Amendment No.</u>	<u>Date</u>	<u>Description</u>
101	November 24, 1986	Organizational Changes
102	January 20, 1987	Reporting requirements for primary coolant iodine spike
103	March 9, 1987	Modifies boron concentration from 1700 to 1800 ppm
104	March 26, 1987	Revision to surveillance criteria for steam generator tubes
105	March 26, 1987	Deletion of snubber tables from the Technical Specifications
106	March 26, 1987	Revision of surveillance for the H ₂ and O ₂ monitoring
107	March 30, 1987	Delete hydrogen fluoride detectors
108	April 28, 1987	LCO and surveillance change for steam generator isolation
109	May 4, 1987	Cycle 11 Reload

<u>Amendment No.</u>	<u>Date</u>	<u>Description</u>
110	August 31, 1987	Inadequate core cooling instrumentation
111	September 24, 1987	Diesel generator reliability
112	April 19, 1988	One-time extension of surveillance interval for diesel generator no. 2

9. Orders Issued

None

10. Multiplant Actions and Generic Safety and Security Issues Having Significant Activity During This Rating Period

NRC Performance of Auxiliary Feedwater Reliability Analysis

Response to NRC on Safety Parameter Display System and Control Room Design Review

11. Plant Specific Issues Having Significant Activity During Rating Period

Response on revised thermal shock analysis for incorporation into the Technical specifications

Amendment for extended fuel burnup fo Batches K and L

Request for relief on ASME XI inspection requirements on welds in the main steam and feedwater systems