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MAY 2 3 1988

Docket No. 50-425 License No. CPPR-109

Georgia Power Company MTTN: Mr. R. P. McDonald, Executive Vice President-Nuclear Operations P. O. Box 4545 Atlanta, GA 30302

Gentlemen:

SUBJECT: NRC EVALUATION OF VOGTLE UNIT 2 READINESS REVIEW OF MECHANICAL EQUIPMENT MODULE NO. 04

The NRC has performed a review of the Mechanical Equipment for Vogtle Unit 2 covered by Readiness Review Module 04 submitted on January 18, 1988. This review has been performed as part of our routine inspection program. (Reference NRC Inspection Report 50-425/88-12 enclosed). Based upon the NRC review and inspection of those activities identified in the module, we have determined that the Mechanical Equipment at Vogtle Unit No. 2 is acceptable and complies with applicable regulatory requirements with the exception of those items in Enclosure 1. This decision is based on information currently available to the inspectors and reviewers. Should information subsequently become available which was not considered during this review or which conflicts with earlier information, it will be evaluated to determine what effect it may have on the above conclusion.

Please contact us should you have any questions concerning this letter.

Sinc rely,

ORIGINAL SIGNED BY:

J. Nelson Grace Regional Administrator

Enclosures: 1. List of Open Items 2. NRC Inspection Report 50-425/88-12 (See C. Patterson)

cc w/encls: (See page 2)

## Georgia Power Company

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cc w/encls: P. D. Rice, Vice President, Project Director Le. W. Hayes, Vogtle Quality Assurance Hanager . Bockhold, Jr., General Manager, Nuclear Operations L. Gucwa, Manager, Nuclear Safety and Licensing J. A. Bailey, Project Licensing Manager B. W. Churchill, Esq., Shaw, Bittman, Potts and Trowbridge D. Kirkland, III, Counsel, Office of the Consumer's Utility Council Ø. Feig, Georgians Against Nuclear Energy bcc w/encls: E. Reis, OGC V. Hopkins, NRR F. Hawkins, NRR M. Sinkule, RII DRS, Technical Assistant **UNRC** Resident Inspector

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### ENCLOSURE 1

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# LIST OF OPEN ITEMS

Violation, 50-425/88-12-01, "Failure to Provide Adequate Instructions to Ensure the Proper Installation of Flow Elements And Orifices".

Inspection Followup Item, 50-424/88-12-02, "Followup Licensee's Corrective Action Relative to The Identification of Unit Applicability for Calculations".

Inspector Followup Item, 50-425/88-12-03, "Review and Revised Calculation X4C1202V43 Regarding Design Objectives and Conclusions".

Inspector Followup Item, 50-425/88-12-04, "Review Revised Calculation X4C1202V18 Regarding Case 3C Description".

Inspector Followup Item, 50-425/88-12-05, "Review Revised Calculation X4C1202S00F1 Regarding the Evaluation of Flow Failure Detection & Effect on System Safety Function for Item Nos. 85b, 86b, 87b, 88b, 89b, & 90b".



ENCLOSURE 2 UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30323

APR 26 1988

Docket No. 50-425 License No. CPPR-109

Georgia Power Company ATTN: Mr. George F. Head Senior Vice President P. O. Box 4545 Atlanta, GA 30302

Gentlemen:

SUBJECT: NOTICE OF VIOLATION (INSPECTION REPORT NO. 50-425/88-12)

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by Messrs. R. J. Schepens, C. A. Patterson, and C. W. Burger on February 17 --March 31, 1988. The inspection included a review of activities authorized for your Vogtle facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed inspection report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

The inspection findings indicate that certain activities violated NRC requirements. The violation, references to pertinent requirements, and elements to be included in your response are presented in the enclosed Notice of Violation.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

The response directed by this letter and the enclosures are not subject to the clearance procedures of the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, PL 96-511.

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Georgia Power Company

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Should you have any questions concerning this letter, please contact us.

Sincerely,

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Virgil/L. Brownlee, Chief

Reactor Projects Branch 3 Division of Reactor Projects

Enclosures:

- 1. Notice of Violation
- 2. Inspection Report
- cc w/encls:
- P. D. Rice, Vice President, Project Director
- C. W. Hayes, Vogtle Quality Assurance Manager
- G. Bockhold, Jr., General Manager, Nuclear Operations
- L. Gucwa, Manager, Nuclear Safety and Licensing
- J. A. Bailey, Project Licensing Manager
- B. W. Churchill, Esq., Shaw, Pittman, Potts and Trowbridge
- D. Mirkland, III, Counsel, Office of the Consumer's Utility Council
- D. Feig, Georgians Against Nuclear Energy

#### ENCLOSURE 1

### NOTICE OF VIOLATION

Georgia Power Company Vogtle 2

Docket No. 50-425 License No. CPPR-109

During the Nuclear Regulatory Commission (NRC) inspection conducted on February 17 - March 31, 1988, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below.

10 CFR 50, Appendix B, Criterion V, and the accepted Quality Assurance (QA) Program (FSAR 17.1.5) collectively require that activities affecting quality be prescribed by drawings and be accomplished in accordance with these drawings.

P & ID 2X4DB119 details the high head safety injection flow path to be from the Safety Injection (SI) discharge valves through Flow Elements (FEs) - 924, 925, 926, and 927 into the reactor coolant system (RCS cold legs for loops 1, 2, 3, and 4 respectfully.

Contrary to the above, activities affecting quality were not adequately implemented in that an NRC walkdown conducted on March 3, 1988, of portions of the High Head Safety Injection System revealed that FEs - 924, 926, 927 were installed backwards.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Georgia Power Company is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Vogtle, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the

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Georgia Power Company Vogtle 1 Docket No. 50-425 License No. CPPR-109

cime specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

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FOR THE NUCLEAP REGULATORY COMMISSION

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Virgil/L. Brownlee, Chief Reactor Projects Branch 3 Division of Reactor Projects

Dated at Atlanta, Georgia this 262 day of April 1988



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o STATE.	UNITED STATES NUCLEAR REGULATORY CON REGION II 101 MARIETTA STREET, N ATLANTA, GEORGIA 3032	w.
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	Report No.: 50-425/88-12	
	Licensee: Georgia Power Company P.O. Box 4545 Atlanta, GA 30302	
	Docket Nos.: 50-425 Cons	struction Permit No.: CPPR-109
	Facility Name: Vogtle Unit 2	
	Inspection Conducted: February 17, 1988 - Man	rch 31, 1988
	Inspectors: Ca Pattern for R. J. Schepens, Senior Resident Ins for C. W. Burger, Resident Inspector	4122185
_	C. W. Burger, Resident Inspector <u>C. 4. Outleur</u> C. A. Patterson, Project Engineer	Date Signed 4122188 Date Signed
•	Accompanying Personnel: P. A. Balmain Approved By: MV Sinkule. M. V. Sinkule, Section Chief Division of Reactor Projects	4/22/88 Date Signed

SUMMARY

Scope: This inspection entailed a routine, unannounced resident inspection effort in the area of the preoperational testing and a special announced resident and region inspection effort in the area of Readiness Review Module 4, Mechanical Equipment and Piping.

Results: One violation was identified in the area of system walkdown (Failure to provide adequate instructions to ensure the proper installation of flow elements and orifices).

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# REPORT DETAILS

# 1. Persons Contacted

Licensee Employees

\*P. D. Rice, Vice President, Vogtle Project Director \*R. H. Pinson, Vice President, Project Construction G. Bockhold, General Manager T. V. Greene, Plant Support Manager \*C. W. Hayes, Vogtle Quality Assurance Manager \*E. D. Groover, Quality Assurance Site Manager - Construction \*S. T. Haltom, Quality Assurance Support Supervisor D. M. Fiquett, Project Construction Manager \*G. A. McCarley, Project Compliance Coordinator \*C. L. Coursey, Maintenance Superintendent (Startup) \*H. M. Handfinger, Startup Manager
\*A. W. Harrelson, Electrical Construction Manager
\*R. E. Hollands, Electrical Compliance Supervisor \*C. W. Rau, Mechanical Construction Manager \*J. J. Gilmartin, Mechanical Engineer L. N. Brooks, Civil Construction Manager \*L. B. Glenn, QC Manager \*R. W. McManus, Readiness Review Manager Lead Mechanical Engineer \*R. C. Sommerfield, Readiness Review \*J. E. Sanders, Assistant. Project Manager \*W. C. Ramsey, Project Engineering Manager L. D. Harless, Manager, Quality Concerns \*P. T. Ciccanessi, Senior Regulatory Specialist
\*M. L. Hobbs, I & C Superintendent
\*M. D. Duncan, I & C Supervisor Other licensee employees contacted included craftsmen, technicians,

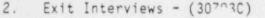
Other licensee employees contacted included craftsmen, technicians supervision, engineers, inspectors, and office personnel.

Other Organizations

C. Marcum, Westinghouse Project Manager
D. L. Kinnsch, Project Engineering - Bechtel
\*T. E. Richardson, Project Engineering Manager - Bechtel
\*D. W. Strohman, Project Quality Assurance Engineer - Bechtel
\*A. J. Ayob, VSAMU, Westinghouse, Supervisor
B. Edwards, Site Manager, PPP
J. Miller, Quality Assurance Manager
\*D. D. Smith, Construction Engineer - Oglethorpe Power Company

\*Attended Exit Interview





The inspection scope and findings were summarized on March 31, 1988, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection results. No dissenting comments were received from the licensee. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection. Region based NRC exit interviews were attended during the inspection period by a resident inspector. The following items were identified during this inspection:

(Open) Violation, 50-425/88-12-01 "Failure to Provide Adequate Instructions to Ensure the Proper Installation of Flow Elements And Orifices" - Paragraph 5.d.(1)(c).

(Open) Inspector Followup Item, 50-424/88-12-02 "Followup Licensee's Corrective Action Relative To The Identification Of Unit Applicability For Calculations" - Paragraph 5.b.(1).

(Open) Inspector Followup Item, 50-425/88-12-03 "Review Revised Calculation X4C1202V43 Regarding Design Objectives and Conclusions" - Paragraph 5.b.(1).

(Open) Inspector Followup Item, 50-425/88-12-04 "Review Revised Calculation X4C1202V18 Regarding Case 3C Description" -Paragraph 5.b.(1).

(Open) Inspector Followup Item, 50-425/88-12-05 "Review Revised Calculation X4C1202S00F1 Regarding The Evaluation Of Flow Failure Detection & Effect On System Safety Function For Item No's. 85b, 86b, 87b, 88b, 89b, & 90b" - Paragraph 5.c.(1).

Licensee Action on Previous Enforcement Matters - (92702)

Not inspected.

# 4. Preoperational Test Program Implementation/Verification - (70302)(71302)

The inspector reviewed the present implementation of the preoperational test program. Test program attributes inspected included review of administrative requirements, document control, documentation of major test events and deviations to procedures, operating practices, instrumentation calibrations, and correction of problems revealed by testing.

Periodic inspections were conducted of Control Room Operations to assess plant condition and conduct of shift personnel. The inspector observed that Control Room operations were being conducted in an orderly and professional manner. Shift personnel were knowledgeable of plant conditions, i.e., ongoing testing, systems/equipment in or out of service, and alarm/annunciator status. In addition, the inspector observed shift turnovers on various occasions to verify the continuity of plant testing,



operational problems and other pertinent plant information during the turnovers. Control Room logs were reviewed and various entries were discussed with operations personnel.

Periodic facility tours were made to assess equipment and plant conditions, maintenance and preoperational activities in progress. Schedules for program completion and progress reports were routinely monitored. Discussions were held with responsible personnel, as they were available, to determine their knowledge of the preoperational program. The Inspector reviewed numerous operation deviation reports to determine if requirements were met in the areas of documentation, action to resolve, justification, corrective action and approvals. Specific inspections conducted are listed below:

a. Preoperational Tests

(1) Test Witnessing (70312)

The inspector witnessed selected portions of the following preoperational test procedures as they were conducted. The inspection included attendance at briefings held by the test supervisor to observe the coordination and general knowledge of the procedure with the test participants. Overall crew performance was evaluated during testing. A preliminary review of the test results was compared to the inspector's own observations. Problems encountered during performance of the test were verified to be adequately documented, evaluated and dispositioned on a selected basis.

Procedure No.	NRC Insp. No.	Test Title	Activity Observed
2-38G-01,R-0	70433	CVCS Preop	Preop Of Charging Isolation Valve 2HV-8105
2-3BJ-01,R-0	70434	SI Preop	Intermediate Head SI Cold Leg Flow Balance And Pump Run Out Verifica- tior
2-3BJ-03,R-0	70434	SI Preop	Accumulator No. 2 Dump L/D



# 5. Readiness Review Module 4 Inspection

The following topics are discussed

Introduction Review of Commitments Engineering and Design Review Safety-Related System Piping Insulation Review Safety-Related Equipment Installation Review Safety-Related Valve Installation Review Conclusions

a. Introduction

This inspection report documents Region II inspection activities relative to the evaluation of Georgia Power Company's (GPC's) Readiness Review Module 4, Mechanical Equipment and Piping. The scope of GPC's Module 4 encompassed the design, procurement, and construction activities regarding safety-related mechanical equipment and piping systems classified as American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section III, Class 1, 2, and 3, which are included in Unit 2 piping systems and are not a part of the nuclear steam supply system.

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Readiness review Module 4 is one in a series of modules being conducted by GPC that provide an evaluation of the design, construction and preoperation testing of the Vogtle Electric Generating Plant Unit 2 to assure its operational readiness in accordance with scheduled plans for obtaining an operating license. Module 4 is intended to describe the method GPC complied with the project commitments found in the Final Safety Analysis Report (FSAR) and is not intended to make further commitments or revise in any way, prior commitments.

The inspection was conducted to aid in determining whether Module 4 provided an acceptable basis for it's reported conclusion - that adequate controls exist to ensure the quality of work and the implementation of FSAR commitments within the scope of mechanical equipment and piping for Vogtle Electric Generating Plant (VEGP) Unit 2. The inspection report contains a description of the inspector's activities and findings.

b. Review of Commitments

This section of the module defines commitments as project obligations to regulatory guides, industry standards, branch technical positions, and other licensing requirements, to the extent defined in the FSAR. This section also identifies the source of the commitments to be



restricted to the FSAR and responses to NRC questions associated with the FSAR. As defined, commitments which were considered by the licensee to be most appropriately categorized in this module were tabulated in a commitment matrix identified in section 3.2 of the module. The licensee identified 248 commitments as being most appropriately categorized in this module.

This section of the module also defines an implementing document as a working level document, either program control or test procedure, that fulfills a construction commitment applicable to a specific activity. Implementing documents were identified for each of the 248 commitments and this information was tabulated in an implementation matrix identified in section 3.2 of the module.

The evaluation of this section consisted of reviewing the commitment and implementation matrices delineated in section 3.2 as discussed below.

(1) Evaluation of The Commitment and Implementation Matrix

Commitments applicable to the Nuclear Service Cooling Water (NSCW) system were selected and reviewed to determine that: 1) All project commitments detailed in licensing documents for the NSCW system had been properly identified, 2) Licensing commitments had been recognized and were addressed in primary design/construction documents and whether responses to those commitments have been included in the appropriate working level documents, and 3) Whether the commitment and implementation matrices are accurate and demonstrate proper implementation of licensing commitments. The following commitments were reviewed for the above noted attributes:

Ref. <u>No</u>	FSAR Source	Subject	Document/ Feature	Design/Const. Implementation
683.00	1.9.2.7.2	Ultimate Heat Sink	RG 1.27	DC 1202-A-1.0
1743.00	3.1.5	PIP'G Sys. Penetrating Cnmt.	10 CFR 50, App.j	DC 2415-2.0
4916.00	3.2.2-1	NSCW Sys. Design	NSCW PIP'G & VLU's Outside Crmt. ASME III CL3	DC 1202-3.1E
4917.00	3.2.2-1	NSCW Sys. Design	NSCW PIP's & VLU'S Inside Cnmt. ASME III CL2	DC 1202-3.1E





	Ref. <u>No</u> (cont'd)	FSAR Source	Subject	Dusument ( Feature	Gesign/Const. Inpiementation
	1778.00	3.8.2.1	Pipe Attached To Cnmt. Wall Sleeves	ASME 11 CL2	X4AC10-4.14
	1782.00	3.8.2.7	Testing Of CL2 Pipe Assemblies	ASME III, 10-6000	X4AQ10-8.2
	5026.00	3.9.B.1.5.1	Weld Inspt.	ASME III	X4AZ01-
			P3.3.0.A Accept Criteria	'77 Edition Thru Winter Addenda '77	PPP 1X-3-7.0 PPP 1X-18
	5349.00	3.9.8.5	ASME III CL 1,2 & 3 Components	CL2 & 3 PIPG NC & ND '74 dition Thru Simmer '75 Addena	DC 10 7-2.1
	Raf. <u>No</u>	FSAR Source	Subject	Orgument/	Design/Const. Implementation
1	4913.00	9.2.1-1	NSCW Sys Design	Max Heat Load Diring Accident Conditions 349.8 Million BTU/Hour	X4C1202V18
	4914.00	9.2.1-1	NSCW Sys. Design	Min. NSCW From Per Train During Accident Conditions 15,733 GPM	x4Ċ1262M93
	384.00	9.2.1-3	NSCW Equip. Design	NSCW Pumps ASME III, CL3	DC 1010-T1







\*

Ref. <u>No</u> (cont'd)	FSAR Source	Subject	Document/ Feature	Design/Const. Implementation
3525.00	9.2.1.1.1-C	NSCW Sys.	Seismic	DC 1202-3.1E
		Safety Design Basis	Cat. 1	
3749.00	9.2.1.1.1-G	NSCW Sys. Safety Basis	Designed To Perform Function Following L.O.C.A. Automatically, Assuming Single Failure Coincident With a L.O.O.P	DC 1202-3.1A
4912.00	9.2.1.1.1-Н	NSCW Sys. Safety Design Basis	NSCW Designed To Prevent Boiling Cnmt. Coolers During L.O.C.A	DC 1202-3.1P
3750.00	9.2.1.1.1-I	NSCW Sys. Safety Design Basis	Sys. Pressure Greater Than Cnmt. Bldg. Max. Design Pressure	DC 1202-3.1H
4915.00	9.2.1.2.B	NSCW Sys. Oper.	NSCW Press. Higher Than Fluid In Cooled Safety- Related Component	DC 1202-3.1H X4C1202V15
400.00	9.2.5	UHS Design	RG 1.27	DC 1202-A-1.0
401.00	9.2.5.1	UHS Towers & Basin Design	Seismic Cat. 1	DC 1202-A-3.1A



Ref. <u>No</u> (cont'd)	FSAR Source	<u>Subject</u>	Document/ Feature	Design/Const. Implementation
3755.00 3542.00	9.2.5.1.1.A	UHS Safety Design Basis	Single Failure With L.O.O.P	DC 1202-A-3.1C
418.00	9.2.5.1.1.B	UHS Safety Design Basis	RG 1.27	DC 1202-A-1.0A
3541.00	9.2.5.2.2	UHS Component Description	Fan Motors Powered by Class 1E	DC 1202-A-3.18
402.00	9.2.5.2.4	UHS Performance	BTP ASB 9-2	DC 1202-A-1.0
403.00	9.2.5.2.4	UHS Performance	RG 1.27	DC 1202-A-1.0
4777.00	9.2.5.2.4	UHS Performance	BTP RSB 5-1	DC 1202-A-3.1C
4221.00	NRC QUES. Q210.11	NSCW Sys. Cooling Water Supply & Return Piping For Pump Motor Coolers	ASME III, CL3	DC 1010-T1

During the review of the implementation of the above noted commitments, the inspectors had the following comments:

COMMITMENT NO. 3750.00 & 4912.00

Commitment No. 3750.00 states that "the NSCW system is to be designed such that system pressure is greater than containment building maximum design pressure." The design implementation for this commitment is referenced as being contained in DC 1202-3.H. However, the inspector could not verify this to be the case. Therefore, the following question was raised to the licensee: What are the first and second order implementation documents for the subject commitment?



The licenses's response was a follows: It has been assumed that the "Interfacing Heat Transfer Systems" referred to in DC 1202-3.1H included the containment building air coolers, and that the NSCW system serving them would be designed with a higher pressure than the containment atmosphere. Upon further investigation, it has been discovered that the "Interfacing Heat Transfer Systems actually refer to the Component Cooling Water (CCW) and Auxiliary Component Cooling Water (ACCW) Systems. Currently, there is no first order implementation of commitment 3750 in DC 1202. To correct this, design engineering will issue Design Manual Change Notice No. 1202-6 which will add paragraph 3.18 to address a commitment requirement that the NSCW system pressure be greater that the maximum calculated containment atmosphere pressure following a LOCA. FSAR Change Notice No. 559, filed on February 27, 1987, makes the change in paragraph 9.2.1.1.1-I from "Maximum Design Pressure" to maximum calculated pressure. This change notice will be reflected in FSAR Amendment 35. The licensee issued DMCN 1202-6 on March 8. 1988, therefore, this item is considered to be closed.

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Regarding the second order implementation, the licenses informed the inspector that it was contained in two design calculations: X4C1202V21, Rev. 2 Verification Of No Boiling In Containment Coolers and X4C1202V43, Rev. 0 NSCW Flow Balance. After further discussions with the licensee on this matter, the licensee informed the inspector that calculations X4C1202V21, X4C1202S19, and X4C1202V09 were originally applicable to both Units 1 and 2. Due to later developments, it was decided to recalculate the pressure drops across the restricting orifices to balance the flows in the Unit 2 NSCW system. Therefore, calculation X4C12C2V43 was prepared to apply to Unit 2 only. Revision 1 to thi. calculation was issued on March 2, 1988, and covers train "B" of the NSCW system. Revision 2 is currently in preparation and will cover train "A".

The inspector questioned the method utilized by the licensee for determining which unit a calculation was applicable to? The licensee stated that the Calculation Control Log (CCL) was the document for determining unit applicability of a calculation. The inspector noted that the current Calculation Control Log (CCL) reflected that calculations X4C12C2V21, X4C1202S19, and X4C1202V09 as being applicable to both units. The inspector raised the concern relative to correctness of the Calculation Control Log. Also, the inspector questioned the appropriateness of using this method of documenting unit applicability versus specifying the unit applicability in the calculation so as to provide a positive means for documenting engineering review and sign off of the calculation for Unit II applicability.



The licensee confirmed that when calculation X41202V43 was issued for Unit II, the common calculations (X4C1202V21, X41202S19, and X4C1202V09) were not changed to Unit 1 on the CCL and remained as common. Furthermore, the licensee conducted a review of all mechanical calculations to determine the extent of the problem. This inspection revealed 4 additional calculations with incorrect designators. Therefore, a total of seven out of eleven-hundred-forty six mechanical calculations had the incorrect unit designator on the CCL. Based on the above finding, the licensee has committed to re-review all calculations and insert a cover sheet which will specify the applicable unit designator and will be initialed and dated by the responsible engineer and engineering group supervisor. The inspector informed the licensee that, pending the completion of the above noted corrective action this matter will be identified as Inspector Follow Item 50-425/88-12-02 "Followup Licensee's Corrective Action Relative To The Identification Of Unit Applicability For Calculations."

Calculation X4C1202V43 was identified by the licensee as the working level document for implementing commitment numbers 3750.00, "NSCW system shall be designed such that system pressure is greater that containment building maximum calculated pressure" and 4912.00 "NSCW system shall be designed to prevent boiling in containment coolers during LOCA conditions". The inspector reviewed the calculation and determined that the design did incorporate the subject commitments. However, the objective section of the calculation did not reflect these commitments as objectives therefore the calculation did not contain any conclusions relative to these design objectives. The licensee committed to include these commitments as objectives and state conclusions relative to these design objectives when Revision 2 of the subject calculation is issued. The inspector informed the licensee that, pending the issuance of the revised calculation, this matter will be identified as Inspector Followup Item 50-425/88-12-03 "Review Revised Calculation X4C1202V43 Regarding Design Objectives And Conclusions."

During the review of FSAR sections 2.4.11, 9.2.1, and 9.2.5 the inspector questioned why was the following sentence in FSAR 9.2.1.1.1-J not considered a licensing commitment? "The NSCW System Is Designed To Minimize The Effects Of Water Hammer Forces".

The licensee's response was as follows: This sentence was apparently taken in context with the seventh paragraph of FSAR 9.2.1.2.3 on page 9.2.1-4 in which the features of the NSCW system that minimize the effects of water hammer are described.



In as much as these features appeared to implement the apparent commitment in paragraph 9.2.1.1.1-J, it was interpreted as a descriptive statement when taken together with paragraph 9.2.1.2.3, and thus was not considered a licensing commitment. The inspector considers the licensee's response to be acceptable and thus has no further questions on this matter.

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#### COMMITMENT NO. 4913.00

Calculation X4C1202V18 NSCW/COPATTA 11 Input Data/LOCA 1-Train" was reviewed to determine the adequacy of the implementation of FSAR commitment for a maximum total NSCW heat load of 349.8 million BTU/HR during accident conditions given in FSAR table 9.2.1-1. This commitment was tracked by GPC as readiness review commitment Reference no. 4913.00. Results of all cases studied in this calculation to determine total NSCW heat load were higher than the values given in FSAR Table 9.2.1-1. GPC has initiated FSAR Change Notice 559 to update the table and will include the revised heat load values in FSAR Amendment 35. The inspector also noted that the description of one of the cases (case 3C) dealing with fouling factors in heat exchanger tubes was misleading. The licensee committed to correct this discrepancy in the next revision of the calculation. The inspector informed the licensee that, pending the issuance of the revised calculation, this matter will be identified as Inspector Followup Item 50-425/88-12-04 "Review Revised Calculation X4C1202V18 Regarding Case 3c Description."

COMMITMENT NO. 4914.00

NSCW calculation X4C1202V03 "Verification Of NSCW Constant Heat Loads And Flows" was reviewed to determine the adequacy of the implementation of FSAR commitment for a minimum NSCW flow of 15,733 GPM per train during accident conditions given in Table 9.2.1-1. This commitment was tracked by readiness review commitment reference no. 4914.00.

This calculation was performed to compile the latest available constant heat load and maximum required cooling water flow rate for all equipment cooled by the NSCW system, as well as the component pressure drops.

The inspector reviewed the calculation and noted that the data used was based upon the latest vendor data as of February 27, 1985, In particular, the number for the heat load per train of the standby diesel generator coolers was different than the number in the FSAR Table 9.2.1-1. The vendor number was 17.1 x 10 to the 6 BTU/HR. Since the FSAR had not been updated, the inspector questioned what was being used as the design basis of the plant.

The licensee provided a copy of a FSAR Change Notice No. 631, which identified in January 1988, that the FSAR update was needed. A meeting was conducted on March 9, 1988 with the cognizant personnel concerning calculation reviews, FSAR changes, and licensing personnel to discuss this item. The licensee provided project instructions which required calculations be reviewed for possible FSAR changes. This resolved the programmatic concern of updating the FSAR. The licensee provided a copy of a temporary exemption request from 10 CFR 50.71(e), FSAR annual update, dated January 15, 1988, to the inspector. The licensee is required to update the original FSAR within 24 months of the date of the issuance of the operating licensee. Unit 1 received its low power operating licensee on January 16, 1987, and the updated FSAR is due January 16, 1989. The exemption would defer the submittal of the updated FSAR for units one and two until 12 months after the licensee for unit two expected in February 1989. The particular concern of the standby diesel generator coolers heat load would be incorporated in the update as requested by the exemption.

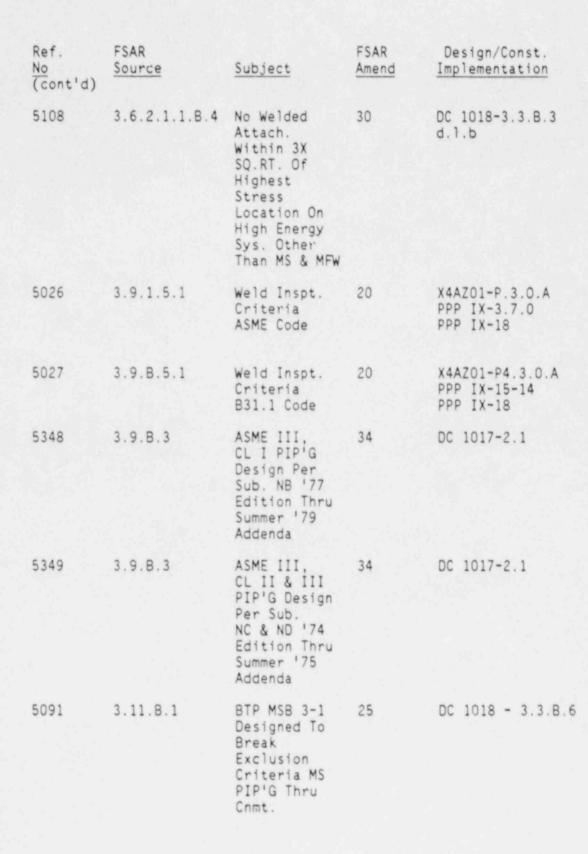
(2) Evaluation of Commitment Additions/Changes From Unit 1 To Unit 2

The Commitment matrix identified 13 commitments as charges from those presented in the Unit 1 Module. Of these, seven were not included in the Unit report, but were subsequently added by an FSAR amendment and the remaining six were subsequently changed by various FSAR amendments. The inspectors conducted a review of the added commitments to verify proper implementation by a working level document and the commitments which were revised were reviewed to evaluate the significance of the change.

The inspectors reviewed the following commitments which were not included in the Unit 1 report, but were subsequently added by FSAR amendments as noted below:

Ref. <u>No</u>	FSAR Source	Subject	FSAR Amend	Design/Const. Implementation
5107	3.6.2.1.1.B.4	No Welded Attach. Within 5 Pipe Dias. Of Highest Stress Location On MS & MFW Systems	30	DC 1018-3.3.8.3 d.1.a.





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The inspectors reviewed the following commitments which were included in the Unit 1 report, but were subsequently changed by various FSAR amendments as noted below:

Ref. <u>No</u>	FSAR Source	Subject	FSAR Amend	Design/Const. Implementation
711	1.9.82.2	Sumps. For Emerg. Core Cooling & CS Systems	19	Adequacy Of CS Pump Available NPSH Recalculated To To Address Additional Factors
2295	3.F.4.4	Propagation Of Flood Waters From Break In 96" CW PIP'G Into Safety-Related Structures Precluded By Design	16	Design Basis Pipe Failure Mode Change From A Critical Crack To A Full Circumference Break In The 96" CW PIP'G
2816	6.3.2.2.9	RWST Designed To Seismic Category 1 & Htr. Provided To Maintain Min. Wtr Temp. Of 50%	17	Stipulated A Recir Htr. Is Provided To Maintain Min. Wtr. Temp.
4923	9.2.2.3.A	Peak Load On CCW Sys. 1-Train Oper. Is 189 x 10 To The 6 BTU/Hour Cold Shutdown Achieved In 34 Hours	20	Peak Load On CCW Sys. And Time For Achieving Cold Shu down Was Revised Upward
3535	9.3.3.4.A	Testing Of Pressurized Portions Of Waste Collection Systems Hydroed To 1 1/2 Times DP	19	Pressurized Portions Defined As Pump Suction And Discharge PIP'G

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Ref. <u>No</u> (cont'd)	FSAR Source	Subject	FSAR Amend	Design/Const. Implementation
3834	9.3.3.4.A	Non Pressured Portions Of Waste Collection Hydroed At Atm. Press.	19	Non-Pressurized Portions Chg'd To Equip. & Floor Drn's In Aux. Bldg., Control F.H, Radwaste Solidification, ARB, RW Transfer And RW Tunnel Transfer

# c. Engineering and Design Review

(1) Calculation Review

A representative sample of NSCW system calculations were reviewed to determine that objectives, assumptions, numbers and conclusions in the calculation were valid. The following calculations were reviewed:

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Calc. No./Rev	Subject
X4C1202S00F1, Rev. 1	Failure Modes and Effect Analysis - NSCW
X4C1202V03, Rev. 1	Verification Of NSCW Constant Heat Loads and Flows
X4C1202V14, Rev. 1	Ultimate Heat Sink Weather Screening
X4C1202V15, Rev. 1	NSCW - ACCW - CCW Pressure Differential Verification
X4C1202V18, Rev. 3	NSCW/COPATTA - II Input Data/LOCA - 1 Train
	and the second

X4C1202V43, Rev. 1 NSCW Train "B" Flow Balance

During the review of calculation No. X4C1202S00F1 (Failure Modes And Effect Analysis For The NSCW System) the inspector questioned the correctness of the conclusion reached in the calculation for the method of failure detection and failure effect on system safety function capability evaluation for failure mode item 85b. (NSCW pump P4-001 discharge bypass line check valve). Item Nos. 86b, 87b, 88b, 89b, and 90b are also effected. The calculation presently states that if the train "A" bypass line check valve failed open with train "B" in service that this would be indicated by flow indicators and a low header pressure alarm in the control room. This would result in the starting of the train B standby pump.

The licensee reviewed the inspector's comment and concurred that the lower flow conditions would not be detected by the flow indicators in the control room since the indicators are in 500 GPM increments and the amount of flow bypassed would be approximately 200 GPM. In addition, this reduction of flow would not be sufficient to cause the starting of the train "B" standby pump. however, this condition would be detectable in the control room by the high flow alarm annunciator off of FSH 11776 on the train "A" inter tie line. The licensee committed to revise the calculation to reflect the correct method of failure detection and failure effect on system safety function capability for items 85b, 86b, 87b, 88b, 89b, 90b. The inspector informed the licensee that, pending issuance of the revised calculation, this matter will be identified as Inspector Followup Item 50-425/88-12-05 "Review Revised Calculation X4C1202S00F1 Regarding The Evaluation Of Flow Failure Detection & Effect On System Safety Function For Items No's. 85b, 86b, 87b, 88b, 89b, & 90b."

#### (2) Review Of Code/Seismic Interfaces

A representative sample of Nuclear Safety-Related Systems were selected and reviewed for ASME code and seismic category interfaces. The purpose of this inspection was to verify that the systems were designed to meet seismic category 1 requirements to ensure no loss of function during a safe shutdown earthquake. The inspector reviewed the following system design bases and P and IDs to determine that appropriate ASME code and seismic interfaces were invoked.

Document No.	Title
DC-1203-6	CCW System Design Bases
2X4DB136,R-13 2X4DB137,R-14	CCW System P & ID Trains A & B
DC-1202-5	NSCW System Design Bases
2X4DB133-1,R-21 2X4DB134,R-18 2X4DB135,1,R-18	NSCW System P & ID Train A





Document No. (cont'd)

## Title

DC-1302-5

# AFW System Design Basis

2X4DB161-1,R-19	AFW System P &	ID
2X4DB161-2,R-18	Trains A & B	

As a result of the above inspection, the inspectors raised the following comments:

## NSCW SYSTEM REVIEW

NSCW drain valve 2-1202-U4-129 off of the RHR pump motor cooler shown on P and ID 2X4DB134 reflects incorrect code/seismic break. The inspector confirmed that isometric drawing 2K3-1202-155-01 which reflects the as-installed condition was correct. The licensee informed the inspector that this item was a result of a drafting error during incorporation of a DCN on to the P and ID. Isometric/P and ID reconciliation discovered this drain missing from the P and ID and a DCN was issued against 2X4DB134 on December 22, 1986. When it was incorporated in April 1987 a drafting error was made switching the code/seismic break exactly opposite of the isometric drawing. The licensee considers this to be an isolated case, and to ensure that this is the case, the licensee conducted a review of ten safety related P and IDs relative to the incorporation of 200 DCNs/ FERs. No additional incorporation errors were identified during this review. The licensee issued DCN No. 57 to P and ID 2X4DB134 to correct the identified discrepancy on March 28, 1988. The inspector finds the licensee's response to be acceptable, therefore this item is considered to be closed.

Also, during the above inspection, the inspector noted that P and IDs in general don't reflect code/seismic breaks location for all vent, drain, and test connection piping. The licensee acknowledged this and issued DCN No. 12 to P and ID 2X4DB101 which added a note to specify code/seismic locations for the type of corrections noted above. The inspector finds this action taken by the licensee to be acceptable, therefore, this item is considered to be closed.

- d. Safety Related System Piping Installation Review
  - (1) System Walkdown Inspection

Selected portions of the Nuclear Service Cooling Water (NSCW) System Containment Spray (CS) System and High Head Safety



Injection System, were walked down. The constructed piping systems were compared to the piping and instrumentation diagrams and the fabrication isometric drawings. Examples of items checked were piping configuration, pipe class, weld location, valve location and appearance, orientation, labeling, piping support location, and engagement of threaded fasteners.

## (a) NSCW System Walkdown

Train "A" of the NSCW piping system was walked down in the NSCW tower and pump house, connecting tunnel to the auxiliary building, auxiliary building, connecting tunnel to the diesel generating building, diesel generator building, and east of the U-II construction barrier on level 3 of the control building. The inspectors conducted the walkdown inspection with the piping and instrumentation diagram and fabrication isometric drawings to verify that the system was constructed as shown on the current approved revision and in accordance with the piping and instrumentation construction specification X4AZO1. The piping runs inspected were designed and constructed to ASME boiler and pressure vessel code (B and PVC), Section III Class III and seismic Category 1 requirements. The following drawings were used in the walkdown.

# P&ID/ISO/Rev.

Title

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In general for the items reviewed, the piping was found installed in accordance with the drawings. One question was raised for a support location on drawing 2K5-1202-033-01. The drawing showed a support at NODE NO. 241 location between the discharge of the NSCW pump and the pump house wall. However, the support was actually located outside the pump house on the other side of the pump house wall. The licensee stated that the node points on the isometric drawing do not reflect the support location but rather the pipe support drawings which are referenced show the as-installed location. The licensee confirmed that pipe support drawing (V2-1202-023-HOO4) which was referenced for node point 241 reflected the as-installed condition of the hanger. Therefore, this question was resolved.

(b) Containment Spray System Walkdown

Train "B" of the Containment Spray System was walked down in the auxiliary building, fuel handling building, and containment building. The inspectors conducted the walkdown inspection with the piping and instrumentation diagram and the fabrication isometric drawings to verify that the system was constructed as shown on the current approved revision and in accordance with the piping and instrumentation construction specification X4AZ01. The piping runs inspected were designed and constructed to ASME B and PVC, Section III Class II requirements. The following drawings were used in the walkdown.

## P&ID/ISO/Rev.

Title

2X4DB131,R-14	P&ID CS System - Train "B"
2K3-1206-019-01,R-6	FAB. ISO Spray Additive TK Piping
2K3-1206-019-03,R-7	FAB. ISO - Spray Additive TK Piping
2K3-1206-037-01,R-4	FAB. ISO - Spray Additive TK Piping
2K3-1206-048-01,R-8	FAB. ISO - Spray Additive TK Piping
2K3-1206-002-01,R-14	FAB. ISO - CS Suction Piping
2K7-1206-002-01,R-11	FAB. ISO - CS Suction Piping
2K3-1206-002-02,R-5	FAB. ISO - CS Suction Piping
2K3-1206-002-02,R-10	FAB. ISO - CS Suction Piping
2K3-1206-006-02,R-10	FAB. ISO - CS Discharge Piping
2K3-1206-006-03,R-5	FAB. ISO - CS Discharge Piping
2K3-1206-006-04,R-5	FAB. ISO - CS Discharge Piping
2K7-1206-006-01,R-5	FAB. ISO - CS Discharge Piping
2K4-1206-008-10,R-4	FAB. ISO - CS Discharge Piping

The piping system was found installed per the applicable drawings for those items checked.

#### (c) High Head Safety Injection System Walkdown

This inspection consisted of a walkdown on the train "A" centrifugal charging suction piping from the RWST and the discharge piping thru the SI discharge valves and into the four reactor coolant loops. The inspectors conducted the walkdown inspection with the piping and instrumentation diagram to verify that the system was constructed as shown on the current, approved revision and in accordance with the piping and instrumentation construction specification X4AZO1. The piping runs inspected were designed and constructed to ASME B & PVC, Section III Class I and II and seismic category 1 requirements. The following drawings were used in the walkdown.

#### P&ID/ISO/Rev.

#### Title

2X4DB116-2,R-15 Chemical & Volume Control System DCN 35 & FCR MFCRB-8751F

2X4DB119,R-15

Safety Injection System

Safety Injection System

2X4DB121,R-17 DCN 79, FCR's 17,860,MFCRB 17,741

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During the walkdown, the inspector noted that P and ID 2X4DB119 did not reflect the correct installation of the vent valves on the loop 4 cold leg injection line. The P and IDs reflected that the vent valves were installed inside the shield wall. However, the actual installation as shown on isometric drawing 2K4-1204-077-02,R-4, was outside the shield wall. The licensee has reconciled the P and ID to reflect the correct installation in accordance with the isometric drawing by issuing DCN 29 to P and ID 2X4DB111 and DCN 34 to P and ID 2X4DB119. The inspector considers this item to be satisfactory resolved.

In addition to the above noted discrepancy, the inspector identified that flow elements (FE's) = 0924,0926, and 0927 were installed backwards. These flow elements are located downstream of the SI discharge valves in the SI injection lines to the reactor coolant system cold legs for loops 1. 3, and 4 respectfully.

Several meetings were held with the licensee to discuss the above NRC finding as well as an NRC concern about the possibility for the performance of a preoperational flow balance test with FEs/FOs installed backwards since there is no prerequisite in preops for test supervisors to check/verify the proper installation cf FEs and FOs.

As a result of the above finding, the licensee took appropriate corrective action consisting of but not limited to the following: 1) A walkdown of all FEs/FOs was conducted which identified an additional 17 installed backwards out of a total of 248. 2) PCN #7 was issued to Pullman Power Products procedure IX-5 to specify installation instructions and to require QC verification of orifice plate orientation in relation to flow. 3) Training was conducted of craft personnel on how to install FE's/FO's. 4) FE/FO installations will be limited to trained flush/ hydro personnel and 5) Test supervisors are required to verify FE/FO orientation and document it in the test log prior to the performance of a test.

The foregoing in considered to be in violation of 10 CFR Part 50, Appendix B, Criteria V and will be identified as Violation 50-425/88-12-01 "Failure To Provide Adequate Instructions To Ensure The Proper Installation Of Flow Elements And Orifices."

It should be noted that this item was not inspected by the Readiness Review Staff during the performance of Module No. 4 since it was scoped to be inspected in Module No. 20 Instrumentation and Controls.

The reason being that at the time of performance of Module No. 4 flow elements and/or orifices were not installed. Therefore, it would not have been expected for the Readiness Review Staff to have identified this item during the performance of Module No. 4.

- (2) Review Of Documentation For Piping Installation
  - (a) NSCW Supply And Return Header Piping To Diesel Generator (DG-1A)

An inspection was conducted of the train "A" NSCW supply and return header piping to DG-1A piping fabrication sheets to verify the following attributes: Proper material type and certification per piping classification. properly documented code data report for NPP-1 for fabricated nuclear piping subassemblies, proper weld history documentation, and proper non destructive examination (liquid penetrant) Documentation for ASME III, Class 3 piping. Piping fabrication sheets were reviewed for the following spool numbers.



Fab. Sht. No.	Description	
4107	10" Return Header Assembly	Pipe
4201	10" Return Header Assembly	Pipe
4202	10" Return Header Assembly	Pipe
4108	10" Return Header Assembly	Pipe
4109	10" Return Feader Assembly	Pipe
4110	10" Return Header Assembly	Pipe
4114	:0" Supply Header Assembly	Pipe
4115	10" Supply Header Assembly	Pipe
4116	10" Supply Header Assembly	Pipe
4205	10" Supply Header Assembly	Pipe
4117	10" Supply Header Assembly	Pipe
4118	10" Supply Header Assembly	Pipe
4119 01 01 (thib) time	Assembly	Pipe
	4107 4201 4202 4108 4109 4110 4114 4115 4116 4205 4117 4118 4119	410710" Return Header Assembly420110" Return Header Assembly420210" Return Header Assembly410810" Return Header Assembly410910" Return Header Assembly410910" Return Header Assembly411010" Return Header Assembly411110" Supply Header Assembly411510" Supply Header Assembly411610" Supply Header Assembly411710" Supply Header Assembly411810" Supply Header Assembly411910" Supply Header

(b) NSCW Tower Header and Distributing Piping

Documentation relating to selected portions of the NSCW tower distribution piping supplied by the Marley Cooling Tower Company was reviewed to verify that the piping met the requirements outlined in Construction Specification No. X4AD02 "Specification For Nuclear Service Cooling Towers And Associated Equipment". This specification

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states that the design of the cooling tower, equipment, and piping shall be in accordance with ASME Section III, Class 3 and seismic Category 1 requirements. Specific drawings and documents listed below were used to verify that the NSCW Train "A" header (2-1202-007-12) and branch arm assembly (2-1202-007-8) were installed in accordance with these requirements.

Isometric Drawings 2V5-1202-007-01 - Header 2V5-1202-007-02 - Branch Arm Assembly

Weld Process Sheets 007-W-101 - Branch Arm Assembly 8" Butt Weld 007-W-102 - Branch Arm Assembly 8" Butt Weld

Pipe Support Installation Process Sheets V2-1202-T07-H045 - Header Support Assembly Bracket V2-1202-T07-H046 - Header Support Assembly V2-1202-T07-H048 - Branch Arm Saddle Assembly

Bolting Verification Field Process Sheet Spool 007-S-04 to Vendor

NPP-1 Code Data Reports AP & E S/N 3692 - Header AP & E S/N 2903 - Branch Arm Assembly AP & E S/N 2932 - Branch Arm Assembly

Supplier Quality Verification Documentation Lists Equipment Tag # 2-1202-W4-001 Distribution Piping And Supports

Equipment Tag # 2-1202-W4-002 Distribution Piping And Supports

Documentation Turnover Package 2-1202-P02

Marley Drawings

78-42913	Plan View Of Spray System
78-4717	Spray System Anchorage And Load Points
78-4718	Load Tables For Spray System
79-41025	Spray System Installation
79-41026	Spray System Installation Details
79-41027	Mechanical Equipment Installation
79-41271	Branch Arm Saddle Fabrication And Assembly
79-41285	Header Assembly
79-41425	Header Support Bracket Assembly
81-4882	Specifications Required For NSCW Towers
83-2450	Standard Torque Recommendation For Fasteners
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#### e. Safety - Related Equipment Installation Review

A representative sample of installed equipment was inspected to verify that the as installed condition was in accordance with the requirements specified in the applicable manufacturer drawing and installation manual, layout drawing, and piping and instrumentation drawing. The following attributes were inspected: proper documentation of installation on field process sheets (i.e. tightening or torquing of anchor bolts as required); proper evidence of equipment maintenance and cleanliness during construction and startup; proper equipment tag number and code plate serial number, proper nozzle location, size and elevation; proper drain, vent, and relief connections; proper handling of equipment; and proper code class. The following equipment was selected on the basis of either being cooled by or part of the Nuclear Service Cooling Water System by the inspector and inspected for the above noted attributes:

	Equip. No.	Description	Specification No.
•	2-1202-P4-001 2-1202-P4-005 2-1203-E4-001 2-1217-E4-001 2-1501-A7-001 2-1501-A7-005 2-1511-E7-002 2-1515-A7-001 2-1592-C7-001	NSCW Pump - Train "A" NSCW Pump - Train "A" CCW Heat Exchanger ACCW Heat Exchanger CTB Cooling Unit Coils CTB Cooling Unit Coils Reactor Cavity Cooling Unit Co Containment Aux. Cooling Unit ESF Chiller	2X4AF02-33 2X4AF02-33 2X4AE01-4 2X4AE01-50 2X4AJ16-2 2X4AJ16-2 11s 2X4AJ16-4 2X4AJ16-3 2X4AJ16-3 2X4AJ04-11

f. Safety - Related Valve Installation Review

A Representative sample of installed valves were inspected to verify that the as installed condition was in accordance with the requirements specified in the applicable piping and instrumentation drawings, isometric drawings, and instrumentation index or valve designation list. The following attributes were inspected: proper valve orientation and flow direction; proper valve sizing and type; proper piping class (i.e. code class, pressure rating, material type, and end connection type); proper tag and serial number; proper piping of instrument air to air operated valves to ensure that valve will fail to the safe position on loss of air pressure; and proper operator sizing to ensure closure against maximum operational differential pressure conditions. The following valves were randomly selected by the inspector and inspected for the above noted attributes:



Valve No.	Description	Drawing No.	Size/Type
2HV-780	Reac Cav & Cnmt Sump HDR ISO	2X4AR01-375	10" Air Oper. Gate
HV-2791A	Hydrogen Monitor ISO	2X5AC07-109	3/4" Solenoid Operated Globe
2HV-8030	PRT Fill ISO	2X6AA06-255	3" Air Operateo Diaphraym
2HV-8149C	LTDN Orifice ISO	2X6AA06-341	3" Air Operated Control
2HV-8160	CVCS LTDN ISO	2X6AA06-428	3" Air Operated Globe
2HV-8986A	RHR Cnmt Sump Pass Sample Train "A"	2X5AC07-153	1" Solenoid Operated
2HV-10466	RHR Train "B" Suct Line Vent	2X5AC07-107	3/4" Solenoid Operated Globe
2HV-15214	CVCS Ltdn ISO	2X5AC01-291	3" Air Operated Control
L-1304-U6-003	SI RWST Purif. Pump Disch o RWST ISO	2X6AA06-250	3" Globe
2-1204-06-128	SI RHR To HL Loop 1	2X6AA06-389	8" Swing Check
2-1204-04-142	SI To Cl Loop 4	2X5AG08-58	2" Needle
2-1205-06-001	RHR Train "A" Suct From RWST	2X6AA06-400	12" Swing Check
2-1205-U4-123	RHR Train "B" Suct From Cnmt Sump	2X6AR01-457	14" Check
2-1206-06-017	CS Train "A" HDR ISO	2X6AA06-391	8" Gate



Valve No. (cont'd)	Description	Drawing No.	<u>Size/Type</u>
2-1206-06-018	CS Train "B" HDR ISO	2X6AA06-391	8" Gate
2-1208-04-417	CVCS Sea' INJ To RCP #4	2X5AC08-50	1" Needle
2-1901-U4-039	WPSL CDT HX Outlet HDR	2X4AR01-355	3" Swing Check

## g. Conclusions

The inspectors have concluded based on a review on a representative sample of the commitments designated in section 3.2 of module 4 that the licensee has accurately defined licensing commitments from the FSAR, responses to inspection and enforcement bulletins, and correspondence to the NRC. In addition, the licensee has accurately defined the working level implementing document utilized by site personnel to ensure that these commitments (within the scope of module 4) are invoked during the design and construction phase.

Furthermore, based on independent NRC inspections of randomly selected mechanical equipment, and piping systems, the inspectors have concluded that the hardware inspected was installed per licensing commitments in accordance with Regulatory requirements. Therefore, it is recommended that this module be accepted by the NRC.