

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 88-21

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Category A/B

Licensee: Philadelphia Electric Company
2301 Market Street
Philadelphia, PA 19101

Facility Name: Limerick Generating Station, Unit 2

Inspection Conducted: August 8, 1988 to September 11, 1988

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9/28/88
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Inspection Summary: Report for Inspection Conducted August 8, 1988 to September 11, 1988 (Report No. 50-353/88-18)

Areas Inspected: Routine inspection by the resident inspector of work activities, procedures, and records relative to preoperational and technical tests, Independent Design and Construction Assessment (IDCA), and welding. The inspectors reviewed licensee action on previously identified items and performed plant inspection tours. The inspection involved 138 hours by the inspectors.

Results: No violations were identified.

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DETAILS

1.0 Summary

Eighteen NRC open items were reviewed and 15 were closed (Section 3, 4 and 5). Several component tests were witnessed, including anchor bolt load tests for the IDCA (section 2). Records of flushing activities were reviewed, preoperational tests were witnessed, and diesel generator testing was monitored (section 6). Bechtel Quality Assurance activities were reviewed (section 7) and Bechtel Engineering work related to the seismic and environmental qualification walkdown programs was observed (section 8). Stone and Webster activities for the IDCA (section 9) and welding being performed on reactor plant systems (section 10) were monitored.

2.0 Plant inspection Tours (371301, 252053, 337301, 370370)

The inspector observed in-progress work activities, completed work, and plant status in several areas during inspection tours. Work was examined for defects and compliance with regulatory and licensee requirements. Particular note was taken of the presence of quality control inspectors and quality control evidence such as inspection records, material identification, nonconforming material identification, housekeeping and equipment preservation. The inspector interviewed craft supervision, craft and quality control personnel in the work areas. Observations are noted below:

- The inspector observed Bechtel Quality Control verification of the generator air gap for diesel D23. The associated startup work order 2-24A-617 and modification rework package 2CG501-33 were reviewed.
- The performance of calibration activities for level switch LSH-47-2-29HE was witnessed. The associated calibration sheet was reviewed.
- The installation of hydraulic control unit valve identification tags was observed. The tags were highly visible and quality control verified proper installation.

The initial hardness test verification for flange material supplied by Piping Supplies Inc. was witnessed. The hardness equipment appears sensitive to parameters such as surface preparation and technician placement of the probe. Retesting of flange material supplied by Piping Supplies Inc. was witnessed. This testing was conducted after flat surfaces were ground on the material, and the test probe was verified to be perpendicular to the surface for each test. This test data will be converted to Brinnell Hardness Numbers for analysis to determine code acceptability.

- The inspector attended a meeting between PECO and the NRC to discuss the draft Unit 2 Technical Specifications. The licensee responded

to the questions and concerns regarding the proposed Technical Specifications. The shared system portions were discussed in detail.

- Preparations for, and conduct of the initial coupled run of the 'B' core spray pump were witnessed. The test personnel were knowledgeable of operating parameters and limits. Appropriate data sheets were properly filled out. Parameters observed were within the expected ranges.
- The inspector witnessed load tests on several pipe support anchor bolts. Bolts were tested to their design loads. QC personnel were on-hand to verify that the bolts did not slip, and that they were properly retorqued.

No violations were identified.

3.0 Licensee Action on Previously Identified Items (292700, 292701, 392701, 392716)

- a. (Closed) Construction Deficiency Report (84-00-10): Water infiltration into diesel fuel oil storage tanks. The fuel oil tanks and pits were cleaned out. The inspector reviewed the following documents regarding long term corrective actions:
- PECO Significant Deficiency Report 146
 - Bechtel Drawing C-1064
 - Balance of Plant Condition Report M-2944
 - Field Change Notice PA-897
 - Project Change Notice 6966-N
 - PECO Procedures ST-6-020-231-1
 - Startup Punchlist

Check valves were installed in the drainage inlet ports to the valve pit drains to minimize the backflow leakage. The fuel oil storage tank vacuum relief valve was raised to a higher elevation. The licensee instituted procedures that require operations personnel to check the valve pits for water accumulation when a high flow alarm is received for the oily waste interceptor. The operability of the installed check valves will be verified by a special startup back flow test. This item is closed based upon the design and procedural changes that should preclude a recurrence of this problem.

- b. (Closed) Unresolved Item (87-02-01): Procurement of components from General Electric switchgear division. A review of procurement records was performed by both Bechtel and General Electric. The review determined that no safety related spare or replacement parts had been procured from the subject facility.
- c. (Closed) Information Notice (88-58): Potential problems with ASEA Brown Boveri IIE-51L time overcurrent relays. This Information

Notice reported a condition which occurred at Beaver Valley nuclear power station. The condition involved excessive leakage currents through silicon control rectifiers (SCR's) in the solid state trip units of Brown Boveri circuit breakers, which caused nuisance trips of the circuit breakers and unnecessary interruptions of electrical power to safety related equipment. PECO reported similar malfunctions in 1983 under 10 CFR 50.55(e) which were discovered during breaker testing prior to installation. Suspect units were returned to the manufacturer for correction. PECO testing procedures were revised in early 1984 to include testing of these SCR's for leakage current, in accordance with a procedure specified by the manufacturer. Due to this pre-installation testing, there have been no nuisance trips of these circuit breakers at the Limerick Generating Station. This item is closed.

- d. (Closed) Construction Deficiency (88-00-02) Handshake splices used in 480 V load Center Breakers: This item was first reported on March 17, 1988 pursuant to 10 CFR 50.55 (e). The inspector reviewed the following records related to this issue:

- Telecon Record, March 17, 1988, Helwig to Linville
- ASEA Brown Boveri Letter, April 13, 1988, Garvey to Kar
- Rework Notices 2-5A-7, -33, -21, -23, -41, -43, -20, -5 and -19
- Quality Record, April 15, 1988, Helwig to Linville

This condition was subsequently determined to not be reportable as the handshake splices constitute the standard Brown-Boveri design, and are qualified for Class IE service. These connectors were, however, replaced with butt splices to conform to Specification E-10 and Drawing E-1412. This item is closed.

4.0 Licensee Action on Bulletins and Circulars (392703)

The inspector reviewed licensee records related to the Bulletins and Circulars identified below to verify that: the Bulletin or Circular was received and reviewed for applicability; a written response was provided if required; and the corrective action taken was adequate. The following Bulletins and Circulars were reviewed:

- a. (Closed) Circular (80-22): Confirmation of Employee Qualifications. The inspector reviewed the following documents:

- PECO Finding Report C-281 and G-194

The licensee reviewed the employment verification practices of several contractors that provide engineering services. PECO further reviewed the procedures utilized by Bechtel and General Electric (GE) to verify employment history and educational background. Several audits were performed by Bechtel and PECO on the implementation of the verification procedures. An instance of falsified QC inspector credentials was detected in 1981 and resolved

at Limerick. Based upon the verification procedures utilized at Limerick, this item is closed.

- b. (Closed) Circular (RO-07): Problems with High Pressure Coolant Injection (HPCI) turbine oil system. This circular reported several failures of HPCI turbines to start on demand. One failure was due to water contamination of the combined lubrication/control oil system. The other failure was due to deterioration of the seal rings in the hydraulic cylinder for the turbine stop valve. The circular suggests that licensees assure that preventive maintenance programs include a means of detecting water or other deterioration in the oil system, and replacement of the hydraulic cylinder seals every five years. The Limerick preventive maintenance scheduling system (CHAMPS) requires HPCI turbine oil to be sampled semi-annually and analyzed in accordance with procedure CH-501, "Determination of Free Water and Sediment in Fuel or Lubricating Oil." The hydraulic cylinder is covered by procedure PMQ-056-016, "Preventive Maintenance Procedure for HPCI Turbine Stop Valve Hydraulic Cylinder Examination and Overhaul" which requires replacement of the seals if there is evidence of nicks, excessive wear, or if the last replacement was five or more years ago. The procedure further advises that the seals be replaced whenever the cylinder is disassembled, if the parts are available. This item is closed.

5.0 Three Mile Island Action Plan Items (525401, 525559)

- (Open) I.A.1.2: Shift supervisor responsibilities. The inspector reviewed a PECO response to an FSAR question regarding management and problem solving training that shift supervision receives. The inspector questioned whether the current operating staff has received the management training. This item remains open pending licensee response.
- (Open) I.C.2: Shift and relief turnover procedures. The inspector reviewed the FSAR and station administrative procedure A-7. The documents were not consistent regarding the use of turnover checklists for auxiliary operators. This item remains open pending further licensee review of this question.
- (Closed) I.C.3: Shift supervisor responsibilities. The inspector reviewed:
 - NUREGS 0694 and 0737
 - SER section 13.5
 - SSER 1 section 13.5
 - FSAR section 1.13
 - A-7, "Shift Operations"

The inspector ascertained that administrative procedure A-7 adequately address the operating shift personnel duties, responsibilities and authority. This item is closed.

- (Closed) I.C.4 Control Room Access. This item required plant procedure revisions to limit access to the control room to necessary personnel, and to define clear lines of authority, responsibility, and succession in the control room. These requirements are implemented by administrative procedure A-7, "Shift Operations". Revision D of the draft procedure was reviewed by the NRC staff, and it was determined to provide adequate measures (Section 13.5.1 of Supplement 1 to the SER). The inspector reviewed Revision 4 of procedure A-7 and verified that these requirements have been maintained. This item is closed.
- (Closed) I.C.6: Verify correct performance of operating activities. The inspector reviewed:
 - NUREG 0737
 - FSAR section 1.13
 - SER section 13.5
 - SSER 1 section 13
 - A-41, "Procedure for Control of Plant Equipment"

The inspector ascertained that administrative procedure A-41 addresses adequately independent verification activities of blocking permit application and removal. This item is closed.

- (Closed) I.C.7 NSSS Vendor Review of Procedures. This item requires NSSS vendor review of low power testing procedures, power ascension test procedures, and emergency operating procedures to verify their adequacy. Administrative procedure A-201, Rev. 2 requires GE Operations Manager to review and recommend approval for all startup test procedures. Administrative procedure A-204, Rev. 1 requires GE Operations Manager to review and recommend approval of all hot functional test procedures and test results of NSSS procedures. The emergency operating procedures for Limerick are based on the boiling water reactor owner's group guidelines, revision 3, which was found acceptable by the NRC staff without further review by the NSSS vendor (SER, Section 13.5.2.3). This item is closed.
- (Open) II.K.3.13: Separation of high pressure coolant injection (HPCI) and reactor core isolation cooling (RCIC) system initiation levels--analyses and implementation. The inspector reviewed the following documents:
 - NUREG 0737
 - Limerick FSAR section 1.13
 - Limerick SER section 15.9.4 and SSER 2 section 15.9.4
 - PECO letter to NRC dated May 22, 1985
 - General Electric Elementary diagrams for HPCI and RCIC

Limerick has complied with the BWR owners group recommendation that no change was necessary for the HPCI and RCIC initiation setpoints and that the RCIC should perform an automatic restart on low level after a high level trip. The inspector confirmed that the RCIC steam admission valve (FO45) will reopen upon the receipt of a low level signal. The remainder of the system valves remain positioned for injection to the reactor vessel. The inspector questioned whether the automatic restart feature was tested within the RCIC preoperational test 2P-50.1. Pending licensee response, this item remains open.

- (Closed) II.K.3.15: Modify break detection logic to prevent spurious isolation of high pressure coolant injection (HPCI) and reactor core isolation cooling (RCIC). The inspector reviewed the following documents:

- FSAR section 1.13
- SER section 15.9.4
- SSER 2 section 15.9.4
- General Electric HPCI and RCIC elementary diagrams
- PECO agastat relay test sheets

The inspector verified that a three second time delay pickup relay was added to the HPCI and RCIC high flow trip logic. The test sheets were reviewed for the four relays. This item is closed.

- (Closed) II.K.3.21: Restart of core spray and low pressure coolant injection systems. The inspector reviewed:

- FSAR section 1.13
- SER section 7.3.2.2
- SSER 3 section 15.9.3

Limerick is in conformance with the BWR owner's group position that automatic restart of core spray and low pressure coolant injection is not warranted. The NRC has accepted the owner group position. This item is closed since no modifications were necessary.

- (Closed) II.K.3.22: Automatic switchover of RCIC suction. This item recommended that the change of RCIC suction from the condensate storage tank (CST) to the suppression pool occur automatically on low CST level. FSAR paragraph 7.4.1.1.3.6 describes the RCIC suction automatic switchover. Redundant instruments monitor the level of the CST, each of which is individually capable of opening the suppression pool suction valve. When the suppression pool suction valve reaches full open, it causes the CST suction to automatically close. This scheme was reviewed by the NRC staff and confirmed as adequate in section 7.4.2.2 of supplement 3 to the Limerick SER. This item is closed.

- (Closed) II.K.3.25: Effect of loss of A-C power on pump seals. This item is intended to prevent excessive leakage from the reactor coolant system through recirculation pump seals. The normal method of cooling for these seals is by reactor enclosure cooling water (RECW) cooling the reactor water flowing to the seals. The RECW pumps are supplied from the class IE distribution and are provided with an automatic restart. Emergency service water (ESW) can be manually aligned to the RECW system heat exchangers on a loss of the normal service water supply, and can also be manually aligned to the recirc pump seal coolers via RECW piping. Backup cooling is provided by the recirculation pump seal purge system which injects water from the control rod drive (CRD) system into the lower seal cavity. In the event that all seal cooling is lost and the seals fail, the leak rate would be a small fraction of the capacity of the normal or emergency water supply systems. In SER section 15.9.4, the NRC staff concluded that the potential problems associated with loss of recirculation pump seal cooling have been adequately addressed. This item is closed.

- (Closed) II.K.3.27: Provide common reference level for vessel level instrumentation. This item requires referencing all vessel water level instruments to a common point, to avoid operator confusion during stressful situations. FSAR paragraph 7.7.1.1.3.1.3 lists the following reactor pressure vessel (RPV) water level instruments:
 - Shutdown water level range for use during shutdown when the system is flooded for maintenance.
 - Upset water level range for use during transients when the water level goes off-scale on the high end of the narrow range instrument.
 - Narrow water level range used for indication and control during normal operation.
 - Wide water level range used for indication during transients when the water level goes off-scale on the low end of the narrow range instrument.
 - Fuel zone water level range for indication of the water level inside the core shroud during accident conditions.

The zero reference point for all five instrument ranges is the bottom of the steam dryer skirt which satisfies the requirement. This item is closed.

6.0 Startup Test Activities (371302, 335301, 370302, 370341, 370436)

- a. The inspector observed preoperational test activities associated with the spent fuel pool cooling subsystem (2P35.1A). The completion of the test prerequisites was reviewed. The conduct of the shift superintendent pre-test briefing was witnessed. The inspector noted that the system test engineer was cognizant of the system status and intended test methodologies. The shift superintendent asked very probing questions on the intended test

conduct. The questions generally related to mechanical system integrity to preclude potential leak paths and control of Unit 1 and 2 system interfaces. The operational test of cooling pump 2BP211 was witnessed.

b. The inspector reviewed the following documents related to flushing activities:

- Startup administrative procedure AD7.1, "System Cleanness Verification Procedure"
- ANSI N45.2.1, "Cleaning of Fluid Systems and Associated Components"
- 2F49.1, "Residual Heat Removal System Cleanness Verification Procedure"

The inspector reviewed the documentation for completion of selected portions of the flush activity. The procedure addenda were reviewed for technical details and appropriate startup review of procedure intent changes. The inspector had no concerns.

c. The inspector witnessed portions of the diesel generator logic testing for engine D21. The test procedure (2P24.1) was reviewed and the test exceptions were discussed with the startup engineer. A representative from PECO Quality Assurance was present during the testing. The performance of lifted lead restoration quality control checks was witnessed. The testing was performed in accordance with the procedure instructions. The test engineer was found thoroughly knowledgeable regarding the diesel. The conduct of the diesel testing is well planned in that one engine will be tested to debug the procedure and then the remainder of the engines will be tested.

d. The inspector witnessed portions of the residual heat removal system logic testing. Portions of the test could not be carried out as written due to the inability to access leads for installing jumpers. A test change was issued to use test relay assemblies instead, which use toggle switches to make the connections. This resulted in changing several witness points for QC verification of restoration. QC was contacted, and the witness points were revised before work was resumed. An additional test change was issued prior to commencement of testing, when the test engineer determined that several indicating lights were not included in the test procedure referenced for them. Test instructions for these lights were added to the appropriate sections of the RHR procedure. Test results review would have identified this situation after completion of the unit cooler testing, however, foresight on the part of the RHR test personnel resulted in more timely identification and resolution. Two test exceptions were taken as a result of referenced procedures not being available in final approved form. The inspector also witnessed restoration of the logic circuits and QC verification.

- e. The inspector witnessed portions of the testing performed for resolving vibration testing observations on the D24 engine, and thermostatic cooling valve testing on the D23 engine. Representatives of the Colt-Fairbanks Engine Division assisted in the troubleshooting on the D24 engine. Tests performed included checking gear backlash on the vertical drive and fuel injector spray pattern testing and correction. At the end of the inspection period, efforts had begun to attempt to rebalance the generator. These resulted in some improvement when the engine was run after the end of the inspection period, and more work will be done in this area. This work will be reviewed during the next inspection as it progresses. In addition, the inspector observed adjustments made to tune the governor of the D21 diesel generator. While response was acceptable in the original configuration, the governor was adjusted to make it more closely match the response of the Unit 1 diesel generators to which the operating staff has become accustomed. The thermostatic valves which control jacket water temperature were found to control at too low a temperature. This was found to be the result of the valves stroking to a 20% open position before the temperature setpoint was reached. As nuclear qualified replacement elements were not immediately available, the thermostatic elements were replaced with non-qualified elements in order that testing could continue. When the properly qualified thermostatic elements were received, they were installed and tested satisfactorily.

7.0 Bechtel Quality Assurance (235060)

The inspector received the Bechtel Quality Assurance activity report for July 1988. Quality Action Request (QAR) F-636 was issued for an adverse trend that was detected during termination activities, involving broken arc barriers. The following Bechtel audit reports and associated audit checklists, data collection sheets and finding reports were reviewed:

<u>Audit</u>	<u>Date Performed</u>	<u>Area Audited</u>
PFA 934	7/11 - 7/13	Fire Protection QA Program
PFA 936	7/18 - 7/25	NCR Dispositions
PFA 937	7/14 - 7/22	Electrical Equipment In-process Control

The audits involved hardware and software reviews. No programmatic hardware deficiencies were identified. The audit documentation was found complete.

No violations were identified.

8.0 Bechtel Engineering (237055)

The inspector attended training sessions conducted by Bechtel project engineering personnel for the seismic walkdown program. The presentation addressed the various elements of the walkdown program and sample data sheets for the documentation of walkdown results. The walkdown teams

were initially not supplied a mechanical engineer. This shortcoming was identified by PECO QA and an appropriate individual was detailed from San Francisco for the mechanical scope.

The inspector accompanied walkdown personnel during an examination of an instrument rack. Appropriate clearances, anchorage details and equipment configuration were examined. The inspector later reviewed numerous walkdown packages that documented the field reviews.

One discrepancy regarding switchgear welding details has resulted in the issuance of Startup Nonconformance Report S-59-M. The engineering drawing was misinterpreted by site personnel and some welds were found missing. The licensee re-examined similar components to identify the scope of this problem.

The inspector attended a training session conducted for personnel participating in the environmental qualification walkdown program. The procedure and checklists were reviewed, after which the group was taken out into the plant with a sample checklist to look at some typical installations. The field samples were selected to include several installations which would require notations to be made on the checklists in order that engineering personnel can perform an evaluation of adequacy and suitability.

No violations were identified.

9.0 Independent Design and Construction Assessment (251053, 235020)

On July 7, 1988, PECO submitted a planned program to independently assess the quality of design and construction efforts at Limerick 2. Stone and Webster Engineering Corporation (SWEC) was selected to perform the assessment. The scope of the assessment was to examine the containment heat removal mode of the residual heat removal system. By letter dated July 28, 1988, the NRC accepted the proposed approach.

The inspector monitored the performance of the Stone and Webster personnel during the field implementation of the construction phase. The inspector accompanied the SWEC personnel during an examination of station batteries, battery charger, electrical cables and terminations. The SWEC personnel were noted to have the appropriate design documents related to the battery racks and vendor supplied equipment. The examination was performed in a very thorough manner and several discrepancies were identified by SWEC. The associated checklists for the B division battery equipment was reviewed.

The inspector has reviewed the following SWEC review plans:

- LK-C-1901, "Welding and Nondestructive Examination"
- LK-C-1902, "Mechanical Components/HVAC System"
- LK-C-1903, "Civil/Structural"
- LK-C-1904, "Electrical"

- LK-C-1905, "Piping and Pipe Supports"
- LK-C-1906, "Procurement, Receipt and Storage"
- LK-C-1907, "QA/QC"
- LK-C-1908, "Instrumentation"

The inspector questioned some review plan attributes regarding cable routing verification, inspection sample size, in-process inspection attributes and review of safe end welding. The inspector was informed by SWEC personnel that the review plans would be modified to address the areas questioned.

In the area of nondestructive examinations (NDE) and welding the inspector sampled radiographs under review by SWEC and examined portions of pipe weld documentation covered by the SWEC review. The scope and depth of the SWEC review of radiographs, NDE documentation and pipe weld records was noted to be thorough and to consider the requirements of both site construction procedures and the applicable national standards including the ASME code. Where the SWEC team identified problems they were properly identified as action items (AI) or observation reports (OR) in accordance with the ICA procedure 11.0.

For piping, mechanical equipment and pipe supports, the inspector participated in walkdowns of components, observed the SWEC team members in their measuring and examinations of the size and condition of items including comparison to applicable plant drawings. The inspector noted the use of careful methodical inspection techniques with adequate documentation by the SWEC team members. The scope of the SWEC field walkdowns and documentation review were in accordance with the IDCA program revision and review plans LK-C-1902 and 1905.

Overall, the NRC inspectors were involved in observing and evaluating the scope, depth and effectiveness of the SWEC independent construction assessment (ICA) of the Limerick Unit 2 construction. By examination of the ICA review plans, participating in plant walkdowns, discussion of observations and findings with SWEC team members and review of documentation; the NRC inspectors concluded that the intent of the ICA was being achieved by the SWEC effort.

No violations were identified.

10.0 In-Process Welding (255150)

The inspector examined a socket weld opening on main steam isolation valve air accumulator 2A001D. The presence of internal particulate contaminants was noted. The socket weld was later completed. PECO quality assurance verified, through a quality control document review, that the appropriate cleanliness check was completed satisfactorily prior to completing the weld.

The inspector examined in-process welding activities at the following locations:

- GBC-201-12 Field weld 65
- GBC-201-13 Field weld 65
- Whip restraint C-Shim-PR-0243, 0242 and 247
- SP-DCD-212-K9

The filler metal authorization forms were reviewed, issued filler metal was checked, joint preparation was examined, weld integrity was examined, and adherence to quality holdpoints was verified. No violations were identified.

11.0 Assurance of Quality

The Nuclear Review Board (NRB) continues to maintain an active oversight of Unit 2 startup activities. The NRB plans to review the following items to determine Unit 2 readiness for fuel load:

- Compare startup program to Regulatory Guide 1.68
- Assure NU REG 1275 concerns are addressed
- Assure lessons learned from Limerick 1 and Peach Bottom 2 and 3 startups have been accounted for in Limerick 2 program.
- Readiness verification program results
- Organizational readiness program results
- Preoperational and acceptance test results
- Limerick 1 and 2 operator differences
- Status of administrative and plant procedures
- Surveillance test results
- Technical specification status
- Tie-in of Unit 2 to Unit 1 during second refueling outage

The involvement of the NRB will provide additional verification of Limerick 2 readiness.

Plant operating staff has performed a thorough review of planned preoperational test activity (section 6.0). The possible failure modes for potential leak paths was addressed in detail by the shift superintendent. This indicates a healthy questioning attitude by the plant staff.

Seismic walkdowns of installed plant equipment by Bechtel project engineering identified four switchgear assemblies that were not installed in accordance with the engineering intent (section 8.0). The augmented qualification verification ensured that the design intent was fulfilled by the field installations.

Thorough pre-test procedure review by a test engineer identified instances of equipment not being tested in the procedure referenced. Prompt actions were taken to add them to the procedure being performed (section 6.0).

Test Change Notices issued against some procedures have resulted in changes of QC witness points for verifying proper restoration. Good communications are evident as the system test engineer and a representative of PECO QC met, and revised the witness points as necessary to conform with the new test method before the testing was resumed (section 6.0).

Quality Control Inspection Reports (QCIRs) for test procedures have been written to include signoffs for each specific procedure step calling for restoration to be performed. This is indicative of thorough QC inspection planning.

12.0 Meetings with Licensee (230703B)

The NRC resident inspector discussed the issues and findings in this report with members of the licensee's staff on a weekly basis, and at an exit meeting held on September 9, 1988. Based on discussions held with licensee representatives on September 9, 1988, it was determined that this report does not contain information subject to 10 CFR 2.790 restrictions.