

MEMORANDUM FOR: T. F. Westerman, Chief, Reactor Safety Branch  
FROM: R. G. Taylor, Reactor Inspector  
SUBJECT: [ ] TO JOHNSON MEMORANDUM OF JANUARY 13, 1986

The following addresses the enclosure to subject memorandum:

Enclosure 1:

Structural Steel Supports (480638, 550638, 55065). These procedures were intended to address building and component steel supports. With the exception of the main reactor components, CPSES design uses almost no steel as either building floor supports or for component supports. These elements are all reinforced concrete. Little inspection was warranted in 78/84 and I doubt if its changed.

Records on components (50055-51055). Statement that additional inspection needed is perhaps correct, however, the September 15, 1981, version of MC2512 with its prioritization scheme was implemented shortly after issuance. This scheme sharply curtailed all records review aspects of our construction inspections if only priorities 1 and 2 were implemented. I believe that Mr. Phillips is seeing the results of that decision.

Enclosure 2

With the exception of mid-term QA, virtually all of the QA reviews discussed in this enclosure did not exist until 1980 and then were strongly deemphasized in the prioritization scheme issued in 1981. Rightly or wrongly, until about 1982, the emphasis in MC2512 was the end result of the QA program; i.e., was the finished product acceptable rather than at extensive reviews of program and resulting paperwork.

Enclosure 3

There has never existed a requirement in any of the reporting procedures that each line item of a procedure be in any way accounted for. Generally, the reporting procedures have strongly encouraged briefness in reports in the absence of a finding. This obviously will give rise to situations where the 766 percent completion data may not seem to agree with the reports. Further, the implementation of the 1981 prioritization scheme and the collateral decision to only do priority 1 and 2 level inspections sharply curtailed many of the

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procedural line items. The 766 date was adjusted in 1981 or 82 (by this writer) to reflect completion of a given procedure if all priority 1 and 2 level inspections had been already completed. As to the comment on unresolved and open items which should/could have been violations or deviations, this writer sharply disagrees with Mr. Phillips. Both the NRC management and utility management paid a good deal of attention to unresolved items (open items did not exist until recently) and few unresolved items were written that did not meet the criteria for an unresolved item. Regional management was insistent that unresolved items be justified as such. Mr. Phillips is perhaps correct on the matter of corrective actions, however, 10 CFR 2.201 requires the NRC to "concisely" state the violation which certainly encourages, and perhaps requires, the licensee to "concisely" respond. Mr. Phillips' interpretation of requirements is not consistent with the verbiage of 10 CFR 2.201 even though this writer does essentially agree with Mr. Phillips' interpretation.

#### Enclosure 4 and Appended Charts:

It appears that Mr. Phillips has reclassified all reported findings into the various Appendix B criterion where he now believes they should have been since (a) unresolved items are not generally written in such a way as to denote a criterion that may have been violated and (b) essentially all violations were originally written against Criterion V since from at least 1975 to around 1982 the unofficial "enforcement policy" prohibited violations of criteria where "measures were established" and were part of the SAR. Although unofficial, this policy was effectively implemented since all violations had to be concurred in by the Enforcement Coordinator. As to the broad assertion that a substantial number of unresolved items should have been violations, this writer sharply disagrees. As Mr. Phillips points out, a great deal of research would be required to support his assertion. This writer believes that the various inspectors of record with the facts of a particular situation fresh, were entirely capable of making the proper determination as opposed to someone trying to second guess them years after the fact.

#### Enclosure 5:

With the exception of the comment in 1.b., the rest of the comments of paragraph 1 are not warranted. Substantially none of the procedures referenced were part of the NRC program from 1974 to 1980 and by 1981, even those which were, were sharply curtailed by the priority scheme. As to 1.b., Mr. Phillips is apparently basing his view of the relative shortness of the mid-term inspection on some previous experience. The procedure (35200) existent in 1978 did not require anymore time than was put in at CPSES. The balance of the comments in this enclosure largely pertain to apparent inconsistencies between 766 data and report discussion previously addressed.

Conclusion:

It is apparent that Mr. Phillips' review of the inspection history relied on the inspection program baseline existent today without regard to the inspection program evolutions since CPSES started into construction in late 1974. Any attempt to use the 766 data without a knowledge of CPSES and program history, as Mr. Phillips apparently did, can only lead to erroneous conclusions. It is also apparent that he almost completely disregarded any contribution by the resident inspector in his review. The resident and regional programs were essentially separate but complementary. The overall objective was to have a good picture of each construction activity and exercise judgements as to what and what did not need additional attention without any serious attempt to absolutely account for every line item of every procedure. I have attached a page of MC2512 of September 17, 1981, that fully endorses this approach.

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R. G. Taylor  
Reactor Inspector

Attachment