

APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-382/89-07

Operating License: NPF-38

Docket: 50-382

Licensee: Louisiana Power & Light Company (LP&L)  
317 Baronne Street  
New Orleans, Louisiana 70160

Facility Name: Waterford Steam Electric Steam Station, Unit 3 (W3SES)

Inspection At: W3SES, Taft, Louisiana

Inspection Conducted: February 27 through March 3, and March 13-17, 1989

Inspectors:

*A. Barnes for*

L. D. Gilbert, Reactor Inspector, Materials and  
Quality Programs Section, Division of Reactor  
Safety

4/12/89  
Date

*Wm McNeill*

W. M. McNeill, Reactor Inspector, Materials and  
Quality Programs Section, Division of Reactor  
Safety

4/12/89  
Date

*A. Barnes for*

R. C. Stewart, Reactor Inspector, Materials and  
Quality Programs Section, Division of Reactor  
Safety

4/12/89  
Date

Approved:

*I. Barnes*

I. Barnes, Chief, Materials and Quality  
Programs Section, Division of Reactor Safety

4/12/89  
Date

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Inspection Summary

Inspection Conducted February 27 through March 3, and March 13-17, 1989  
(Report 50-382/89-07)

Areas Inspected: Routine, unannounced inspection of action on previously identified findings, licensee self-assessment capabilities, and procurement activities.

Results: The licensee has established programs and procedures in regard to onsite and offsite review committees as well as an independent safety engineering group (ISEG). The activities of the Safety Review Committee (SRC) appeared to be well documented and followup on items was satisfactory with some minor exceptions. One apparent violation was identified (paragraph 3.a) in regard to the failure of SRC to review certain 10 CFR 50.59 evaluations. Activities of the Plant Operations Review Committee (PORC) were not, in general, well documented. In certain cases, the lack of detail regarding PORC meeting comments was such that actions on comments could not be verified. Two examples of one apparent violation were identified (paragraph 3.b) in regard to the failure of PORC to satisfy the requirements of the Technical Specifications (TS). Specifically, PORC failed to meet in a quorum for all meetings and also failed to review two radioactive releases. ISEG was also found to be in need of improvement in regard to control and documentation of work activities. In general, programs for procurement, receipt, storage, and handling of safety-related equipment and materials, including the dedication of commercial grade components, were found to be satisfactory. One apparent violation was identified (paragraph 4) in regard to the absence of measures for control of items for which vendors had made unsolicited shelf life recommendations. Items were also observed in storage without imposed shelf life limitations and for which current procurement practices would request shelf life information from vendors. The licensee has committed in response to Violation 382/8902-03 to establish an overall program for control of limited shelf life materials, including review of items currently stocked in warehouses.

DETAILS

1. Persons Contacted

LP&L Personnel

- \*R. C. Azzaretto, Nuclear Operations Engineering & Construction (NOEC) Manager
- \*P. N. Backes, Assistant Plant Manager
- \*D. E. Baker, NOSA Manager
- B. C. Baptist, Materials Management Superintendent
- \*R. P. Barkhurst, Vice President
- \*L. L. Bass, Nuclear Operations Engineering & Construction (NOEC) Supervisor
- R. F. Burski, Nuclear Safety & Regulatory Affairs Manager
- \*N. S. Carnes, Plant Manager
- B. Collyer, Fire Protection Engineer
- \*G. M. Davis, Event Analysis Manager
- S. E. Farkas, Licensing Engineer
- \*D. V. Gallodoro, Procurement Engineering Supervisor
- \*E. B. Hyatt, Nuclear Safety Review Engineer
- \*J. E. Howard, NOEC Manager
- \*J. H. Johnston, Operations Assessment and Information Dissemination (OA&ID) Engineer
- \*G. F. Koehler, Quality Assurance (QA) Audit Supervisor
- W. T. LaBonte, Radiation Protection Superintendent
- \*L. W. Laughlin, Site Licensing Supervisor
- J. Lawrence, Associate Analysts
- M. L. Layton, NOSA Engineer
- H. C. Leason, Radiological Engineer
- B. G. Morrison, Licensing Engineer
- \*D. F. Packer, Assistant Plant Manager, Operations & Maintenance
- O. P. Pipkins, Safety Review Committee, Support Engineer
- R. J. Pollock, QA Auditor
- \*P. V. Prasankumar, Assistant Plant Manager, Technical Services
- J. A. Ridgel, Assistant Radiation Protection Supervisor
- R. D. Riser, Procurement Engineer
- C. Schmaltz, Warehouse Foreman
- \*J. Sleger, Nuclear Safety Review Manager
- H. R. Sommers, OA&ID Engineer
- \*P. E. Troy, Independent Safety Engineering Group (ISEG) Supervisor
- J. H. Wade, QA Engineer
- M. Wilson, Warehouse Foreman
- R. F. Wilson, Systems Engineer
- \*J. J. Zabritski, QA Manager

NRC Personnel

- \*T. R. Staker, Resident Inspector
- \*W. F. Smith, Senior Resident Inspector

\*Denotes those persons that attended the exit meeting on March 17, 1989. In addition, the NRC inspectors contacted other members of the licensee's staff.

2. Followup on Previous Inspection Findings (92701 and 92702)

- a. (Closed) Open Item (382/8823-04): The Safety Issues Management System (SIMS) had blanks in the safety-related data fields.

The NRC inspector reviewed the licensee's actions set out in Memorandum W3M88-124 dated October 4, 1988. The SIMS data base was searched on March 16, 1989, at the request of the NRC inspector for any blanks in safety-related fields. Only four items were found which had blank fields because of apparent data entry errors. This is a significant reduction from the 1500 blanks that had been found earlier. The processing and updating of SIMS now appears in control. This item is considered closed.

- b. (Closed) Violation (382/8810-01): Failure to have documentation of qualification for the containment cooling fan motors which use Mobil-Temp SHC-32 grease in lieu of Chevron SRI-2.

During this inspection, the NRC inspector reviewed the applicable correspondence relative to the compatibility of the subject greases, including analysis conducted by Mobil Oil Corporation, letter dated April 20, 1987, and an analysis conducted by Bolt & Associates Consulting Services, letter dated November 29, 1988. The results of those studies indicate that the two greases are compatible and that there is no potential safety concern; however, the licensee plans to replace the Mobil-Temp SHC-32 grease with the Chevron SRI-2 during the next extended plant shutdown period. This item is considered closed.

- c. (Closed) Violation (382/8811-01): Failure to follow procedures with respect to evaluation of Quality Notices (QNs) for 10 CFR Part 21 reportability.

During this inspection, the NRC inspector reviewed the licensee's letter of response to this violation and the referenced QAP-012 and UNT-6-015 procedure revisions dated June 15, and July 1, 1988, respectively. In addition to the procedure revisions, the licensee's corrective actions included the change of responsibility for review and coordination of QNs for potentially reportable 10 CFR Part 21 items to the event analysis reporting and response group. Also, the NRC inspector reviewed the licensing QN log and verified that all valid QNs were properly recorded as having been reviewed for Part 21 reportability. This item is considered closed.

- d. (Closed) Unresolved Item (382/8815-01): QN QA-87-069, relating to valve stroke time data, remained open on the current QN status report

despite a completion schedule 9 months earlier and without supportive justification.

During this inspection, the NRC inspector observed that this QN was also identified in Violation 382/8811-01 noted above. Based on the licensee's corrective actions, which incorporates this issue, this item is closed.

### 3. Licensee Self-Assessment Capabilities (40500)

The objective of this inspection was to evaluate the effectiveness of the licensee's self-assessment programs. In this regard, the NRC inspector reviewed the activities of the SRC, the PORC, and the ISEG. The thrust of this inspection was to measure how effective these groups were in identifying of concerns and following them to resolution.

#### a. SRC

The activities of the SRC were governed by a manual which contained the charters of the SRC and its two subcommittees. The current SRC manual is under review and revision by the licensee to incorporate such changes as a new subcommittee on corrective action. The SRC currently meets every other month with a quorum of nine: the Vice President-Nuclear, and managers of Nuclear QA, Nuclear Safety and Regulatory Affairs, Nuclear Operations Engineering and Construction, Nuclear Plant Operations, Nuclear Operations Support and Assessment (NOSA), and also three consultants. The meetings addressed agenda items such as:

- ° Plant operating status (trips, outages, team inspections, etc.)
- ° Outstanding action items
- ° Reviews by Operations Assessment and Information Dissemination (OA&ID) of Institute of Nuclear Power Operations' (INPOs) Significant Operating Experience Reports (SOERs), and Significant Event Reports (SERs), and Combustion Engineering (CE) Availability Data Program Reports, as well as, Licensee Event Reports (LERs) and NOSA Surveillances and Assessments
- ° NRC issued violations
- ° Reports of design deficiencies
- ° QA audits and findings
- ° Licensee amendments and Technical Specification (TS) changes
- ° Standing committee reports (audit subcommittee and review subcommittee)

The NRC inspector reviewed the last three meeting minutes in detail which were numbered 89-01, 88-19, and 88-16. It was noted that prior to the above point in time, a different format for SRC meeting was used. There were additional meetings of SRC which were called "special" in which TS change requests were addressed. The NRC inspector attended the 89-02 meeting.

Some observations by the NRC inspector were the following:

- Agenda Item III-B in the 89-01 meeting discussed Potential Reportable Event (PRE) 88-054 which dealt with the installation in Station Modification No. 138 of a refueling level indication system with an excess length of tygon tubing. The root cause analysis by the licensee concluded that the shift supervisor should not have accepted the station modification in a partial status, namely, without an implementation procedure for the operation of the refueling level indication system. It appeared that the SRC did not question the historical and generic impact. In other words, were there other station modifications without an implementation procedure for the system or equipment modification.
- Agenda Item III-C addressed two recommendations of a Quality Effectiveness Assessment Report received by LP&L which was performed at W3SES by Middle South Utilities. It was not clear to the NRC inspector if all, or at least the significant recommendations, would be discussed by SRC in future meetings. The Quality Effectiveness Assessment had 26 recommendations and six dealt with the SRC. The NRC inspector then asked how such items as INPO evaluations were dealt with by SRC. The NRC inspector found that the most recent evaluation had been addressed in Meetings 88-01 and -02 before the INPO report had been issued to LP&L. The discussions were only of the tentative or possible findings, and not of the final report's findings and the corrective actions associated with such. It appeared that the final reports of external assessments such as INPO evaluations of W3SES were not subject to a review of SRC.
- Agenda Item IV-B of 89-01 addressed follow up on the revision of Procedure NOP-014 on design change control. The subject was closed although it was not clear that the specific question raised in the 88-19 meeting on the controls to be in the procedure, in regard to partial closed versus partial turnover, was addressed. There appeared to be only a general discussion of the design change process. The tracking of the question from one meeting to the next appeared to have been lost in this case.
- Agenda Item X-A addressed QA audits and states that no significant QNs were issued. The NRC inspector noted that the attachment summarized that there had been three QNs on the subject of bypassing and other controls of "hold points" and the Quality Effectiveness Assessment had observed the same problem

and found it significant enough to issue a recommendation. It would appear that what is significant for SRC discussion has not been clearly defined.

- Agenda Item X-B addressed the SRC review subcommittee activities. The attachment to the minutes, which was the review subcommittee report, stated that the 1988 annual 10 CFR 50.59 report contained 39 evaluations of which 14 had not been received by the subcommittee. At the request of the NRC inspector, the licensee followed up further on this subject. As a result, it was established that 32 of the 65 safety evaluations in the report were not received by SRC until after the annual 10 CFR 50.59 report. It was identified that the following four 10 CFR 50.59 evaluations had not been submitted to SRC:
  - (1) Project Evaluation/Information Request (PEIR) No. 20000, "Spent Fuel Pool Heat Load Calculation," with an August 27, 1986, 10 CFR 50.59 evaluation and no apparent PORC review.
  - (2) PEIR No. 70795, "Use of the Refueling Water Storage Pool Cross Connect Line," with a October 8, 1986, 10 CFR 50.59 evaluation and October 14, 1986, PORC review.
  - (3) Condition Identification (CI)/Work Authorization (WA) Nos. 255672/01017834, "In-Core Instrument Thimble Failure," with a May 26, 1988, 10 CFR 50.59 evaluation and May 27, 1988, PORC review.
  - (4) Special Test Procedure No. 99000104-1, "Seal Oil System Post Mod Operation," with an April 12, 1988, 10 CFR 50.59 evaluation and May 17, 1988, PORC review.

The failure to perform SRC reviews of these 10 CFR 50.59 evaluations was identified as an apparent violation of TS (382/8907-01).

In the above review effort, it was noted that Station Modification Packages (SMPs) 0097, 0441, 0502, 0804, 1225, 1427, and 1494 were revised after SRC review. Insufficient time was available during the inspection to ascertain whether additional 10 CFR 50.59 evaluations were performed and which were reviewed by the SRC. This is an NRC inspector followup item (382/8907-04).

- The 89-02 meeting was attended by a QA representative, who had also attended a PORC meeting where some of the same agenda items were reviewed; e.g., TS Change No. 88-21. Attendance at both meetings appears to have occurred because of a recent change in the organization. The individual in question did not excuse himself from the discussion, and he mentioned the PORC review comments. This situation would appear to be inconsistent with TS requirements for independent review of PORC by SRC.

### Summary

The SRC meetings appeared to be well documented and followup on items appeared to be satisfactory with the exceptions noted above. It should be noted that the above review was possible because of the excellent level of detail and documentation in the SRC meeting minutes. Also it should be noted the apparent violation on 10 CFR 50.59 reviews reflects more on the failure of PORC to input into the SRC.

#### b. PORC

The activities of the PORC were governed by Administrative Procedure No. UNT-1-003 and some associated procedures. The current procedures were under review by the licensee in order to simplify and clarify the process of PORC review. The PORC currently meets every week with a quorum of seven: Assistant Plant Managers of Operations, Maintenance, and Technical Services; Manager of Operations QA; and Superintendents of Plant Engineering, Operations, Maintenance, and Radiation Protection. The meetings addressed such agenda items as:

- Procedure changes and revisions
- LERs and PREs
- TS changes
- SMPs and Design Changes
- CIs and WAs
- Justification for Continued Operations

The NRC inspector reviewed the meeting minutes numbered 88-100 through -127. The NRC inspector attended PORC Meeting 89-24.

Some observations by the NRC inspector were the following:

- A significant fraction of the PORC meeting minutes were characterized as "walk-through" meetings where PORC did not meet as a quorum meeting with all members present. It appeared that only one or two items were addressed in each of these "walk-through" meeting minutes. The "walk-through" process was a serial ballot review technique in which the members sequentially reviewed an agenda item. This was described in the implementing procedure in Step 5.2.7.2. It should be noted that American National Standard Institute (ANSI) N18.7-1976, a commitment of W3SES, states in 4.3.2.3 for a meeting to be held, a quorum shall be present. The failure to have a quorum present for "walk-through" meetings was identified as one example of an apparent violation (382/8907-02).
- At Meetings 88-107 and -112 radioactive releases were presented to PORC which were not voted upon or apparently reviewed except to the extent to conclude that the releases were not to be given PORC review. The releases in question occurred on April 3 and



May 23, 1988, and were minor in character and for which LERs were not required. The review of accidental, unplanned or uncontrolled radioactive releases including the evaluations, recommendations, and disposition of the corrective actions to prevent recurrence is required by TS. The failure to review these releases was identified as the second example of an apparent violation (382/8907-02).

- ° Because of the use of the same forms by PORC and the normal document review process to document comments, it is not always clear what were the comments made at the PORC level of review. In certain cases, the recorded PORC level comments made during meetings failed to have sufficient detail to allow verification of resolution of the comments. It appeared that comments made in regard to Procedure MI-C-462 made at 88-120 and -127 meetings were not complied with by the staff. Because of the lack of detail, an effective evaluation of PORC review activities was not possible.

#### Summary

Improvement is needed in the area of documentation of PORC review activities which would allow verification of the identification of items and followup on such. The licensee plans revision of the PORC procedures and activities.

#### c. ISEG

The activities of the ISEG were governed by Procedure NOSAP-102 and a supporting procedure. The licensee was planning an additional procedure, NOSAP-109, to further define ISEG activities. ISEG was staffed with a supervisor and four other engineers. ISEG addressed items identified by management of ISEG and other management sources. In addition, ISEG performed surveillances and assessments in accordance with a schedule.

Operating experience, outside and inside W3SES, was reviewed by ISEG. The NRC inspector reviewed the monthly reports for the last 3 months, the 1988 schedule, and a sample of "Assessment" and "Surveillance" reports.

Some observations by the NRC inspector were the following:

- ° The monthly reports for December through February were inaccurate in that the number of recommendations were not reported correctly.
- ° A schedule for 1989 had not been established as of the time of this inspection.

- ° Reports of "Assessments" and "Surveillances" failed to include significant details. For example, Report 239-88 failed to identify that a recommendation in the report was also identified in a QN and that the closeout of the recommendation would be via closeout of the QN.
- ° The status of recommendations and reports was misleading. Reports 194-88 and 197-88 were signed off as closed, when in fact, their status was open. Report 183-88 was not signed off as closed, when in fact, its status was closed.
- ° There appears to be a lack of timely followup on recommendations which were the result of "Assessments" and "Surveillances." In 1988, there had been 54 recommendations issued of which 27 were open as of the time of this inspection.
- ° There was no documentation of the reviews performed of NRC Notices, Bulletins, Notice of Violations, LERs, 10 CFR 50.59 reviews, PREs, SMPs, procedures and other operating experience reports when the review by ISEG did not result in a comment or recommendation.
- ° The licensee had performed a QA audit of ISEG activities and identified some of the above observations. The QA audit did not identify the problems above as findings and the report was in a draft status as of the time of this inspection.

#### Summary

ISEG activities were found to be in need of improvement. ISEG activities in the past appears to have been better managed in certain areas, such as monthly reports, and should be reviewed again after implementation of NOSAP-109.

#### d. Other Organizations

The activities of WOSA, in particular OA&ID and the assessment group, were reviewed. These activities were governed by Procedures NOSAP-103 and 104. OA&ID performs reviews of operating experience reports such as Significant Occurrence Reports (SORs) and PREs in accordance with a checklist for reportability on the nuclear network. INPO SOs, SOERs, and SERs are also reviewed by OA&ID. Several recent evaluations of PREs and SERs by OA&ID were examined by the NRC inspector. The identification of items and followup appeared satisfactory.

In regard to the assessment group, it was noted that it shared the same problem ISEG had, as identified above, in regard to timely followup of recommendations. The assessment group reviewed third party audits of W3SES by INPO, Middle South Utilities, and others, in

order to establish priorities for its assessment and surveillance schedule.

Summary

Other organizational activities in regards to self-assessment appeared to be implemented at W3SES. Some of these activities appeared to cover areas that are normally addressed by ISEG.

4. Procurement, Receipt, Storage, and Handling of Equipment and Materials Program (38701, 38702, and 38703)

Initial NRC inspection of the programs for procurement, receipt, storage, and handling of equipment and materials is documented in NRC Inspection Report 50-382/89-02. During this inspection, the NRC inspectors reviewed the following additional documents in order to verify that administrative controls exist and that they provide measures to ensure that received materials and equipment will be examined for conformance with requirements specified in the procurement documentation. The documents were reviewed to verify that acceptance criteria were clearly established and that requirements for documenting the performance of receipt inspections were delineated. They were also reviewed to assure that controls exist with respect to storage and maintenance of safety-related items, and responsibilities were assigned in writing.

<u>Document No.</u>	<u>Revision</u>	<u>Title</u>
NOFP-004	1	The Engineering Procurement Process
QAP-251	2.0	Material Storage Inspection
UNT-8-013	3	Receiving, Handling, and Storage
ME-4-703	7	Routing Electrical Equipment Inspection and Maintenance

The NRC inspectors reviewed the licensee's computer listing of commercial grade parts or components which were designated Quality Class 3 items that had been installed in safety-related systems or equipment and selected the following items for review of the procurement and dedication processes:

<u>Condition Identification</u>	<u>Purchase Order</u>	<u>Stockcode</u>	<u>Description</u>
252256	14436	101-A04159	Flanged Bearing for Personnel Air Lock Hand Wheel Shaft
254069	16795	135-C11563	Diaphragm for Resin Tank Isolation Valve

256126	15740	151-F00027	Adhesive Thread Sealant for Reactor Coolant Loop 2A Cold Leg Temperature Detector
257372	11740 22961	135-C30772 160-A00034	Insert Disc with Pin and Bellows Subassembly for Charging Pump A Discharge Header Relief Valve
259165	73018	102-C50002	Stud Bolt Nut for Reactor Coolant Pump 1A and Motor Coupler Assembly
260848	16688 22958  23258	101-D38476 135-C00191 135-C58055 135-C70187 135-C00209	Seal Kit, Jackscrew Assembly, Spiral Assembly, Seal Nut, and Cylinder Assembly for Component Cooling Water Supply Valve Operator

The NRC inspectors reviewed the procurement and receiving inspection documents while reviewing the commercial grade dedication process for the items selected above. The reviewed documentation consisted of a purchase order, a receipt checklist which addresses shipping damage, identification, documentation received, protective devices, and cleanliness, and an engineering evaluation. The programs for procurement, receiving inspection, and dedication of commercial grade parts and components appeared to be effective with respect to meeting the committed objectives.

The NRC inspectors also inspected for proper storage of safety-related equipment and materials in Warehouses 7B and 2B, and the Service Building Warehouse. The buildings were designated Storage Level B except for a small room in the Service Building which was controlled as a Storage Level A. The NRC inspectors reviewed the Warehouse Surveillance Inspection Records of the storage areas for March 6-12, 1989. The environmental conditions in the storage areas were consistent with the storage level requirements of Procedure UNT-8-013. Electric motors, which are required to be heated while in storage, were observed with heaters energized and maintained as specified in Procedure ME-4-703. During the tour of the storage areas, the NRC inspectors selected the following items to verify the tagging or marking for traceability of the item to purchase documents, receipt documents, quality certification documents, and if applicable, limited shelf life.

<u>Stockcode</u>	<u>Purchase Order</u>	<u>Description</u>
120-A73132	83287	Stainless Steel Tubing
135-B81240	48296	Globe Valve
107-C00001	66121	Alumina Activated Desiccant

105-A46185	19475	Limiterque Electric Motor
135-B80910	14639	Valve Solenoid
152-C19300	16679	Mass Flowmeter
138-A15424	10458	Welding Material
151-B15408	66101	Welding Material
151-B15407	66101	Welding Material
101-D53873	96954	O-Ring
102-C53947	16176	O-Ring Gland Plate
102-C54033	23305	O-Ring
102-C53944	20768	O-Ring Gland
127-B38461	24764	Spare Parts Kit
127-B53849	24764	O-Ring

The above items were traceable to purchased documents, receipt documents, and quality certification documents; however, discrepancies were noted regarding the identification of limited shelf life for the following items:

a. Unsolicited Shelf Life Limitations Provided by Vendors

- ° The Material Management Information System specified no shelf life requirements for Stockcode 152-C19300 but the vendor documentation received for the mass flowmeter gave an unsolicited shelf life of 3 years.
- ° The Material Management Information System specified no shelf life requirements for Stockcode 101-D53873 but the vendor documentation received for the O-Ring gave an unsolicited shelf life of 20 years.

Although the licensee was attempting to implement unsolicited shelf life limitations received from vendors, no formal program was in place to handle this matter. The licensee stated that a procedure will soon be issued to promulgate the requirements for limited shelf life, including handling of unsolicited information. This is an apparent violation for failure to identify and control limited shelf life materials. (382/8907-03)

b. Shelf Life Limitations Not Requested From Vendors

- ° The Material Management Information System specified no shelf life requirements for Stockcode 102-C53947. The vendor was not requested to provide shelf life limitations for this O-Ring gland plate, therefore no information was provided.
- ° The Material Management Information System specified no shelf life requirements for Stockcode 102-C54033 from Purchase Order 23305. The vendor was not requested to provide shelf life limitations for this O-Ring, therefore no information was provided. However, a shelf life was received on another purchase order for this stockcode.

- The Material Management Information System specified no shelf life requirements for Stockcode 127-B38461. The vendor was not requested to provide shelf life limitations for this spare parts kit, therefore no information was provided.
- The Material Management Information System specified no shelf life requirements for Stockcode 127-B53849. The vendor was not requested to provide shelf life limitations for this O-Ring; therefore no information was provided.

The above discrepancies are additional examples of a recent inspection finding, Violation 382/8902-03, documented in NRC Inspection Report 50-382/89-02. The licensee has written Quality Notice QA-89-071 which will assure that these items are included in the corrective action developed for Violation 382/8902-03. The licensee has committed in response to this violation to establish an overall program for control of limited shelf life materials, including review of items currently stocked in warehouses.

5. Exit Meeting

An exit meeting was held on March 17, 1989, with those individuals denoted in paragraph 1 of this report. At this meeting, the scope of the inspection and the findings were summarized. The NRC resident inspectors also attended. The licensee did not identify as proprietary any of the information provided to, or reviewed by the NRC inspectors.