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Inspection Summary:

Inspection Conducted: July 6 through August 1, 1989 (Report
50-445/89-51; 50-446/89-51)

Areas Inspected: Unannounced, resident safety inspection of applicant's actions on previous inspection findings, follow-up on violations/deviations, and assessment of allegations.

Results: Within the areas inspected, no violations or deviations were identified. No significant strengths or weaknesses were noted during this inspection.

DETAILS1. Persons Contacted

- *J. L. Barker, Manager, ISEG, TU Electric
- *J. W. Beck, Vice President, Nuclear Engineering, TU Electric
- *O. Bhatti, Issue Interface Coordinator, TU Electric
- R. D. Bird, Electrical Maintenance, TU Electric
- *M. R. Blevins, Manager of Nuclear Operations Support,
TU Electric
- *H. D. Bruner, Senior Vice President, TU Electric
- *H. M. Carmichael, Senior QA Program Manager, CECO
- *D. J. Chamberlain, Licensing Lead Engineer, Unit 2, CECO
- *J. T. Conly, APE-Licensing, Stone and Webster Engineering
Corporation (SWEC)
- *W. G. Counsil, Vice Chairman, Nuclear, TU Electric
- *B. S. Dacko, Licensing Engineer, TU Electric
- *D. L. Davis, Nuclear Operations, Results Engineer Manager,
TU Electric
- *R. J. Daly, Manager, Startup, TU Electric
- *G. G. Davis, Nuclear Operations Inspection Report Item
Coordinator, TU Electric
- *G. L. Edgar, Attorney, Newman and Holtzinger
- *D. M. Ehat, Consultant, TU Electric
- *J. C. Finneran, Jr., Manager, Civil Engineering,
TU Electric
- *C. A. Fonseca, Deputy Director, CECO
- *B. P. Garde, Attorney, CASE
- *J. H. Greene, Site Licensing, TU Electric
- *W. G. Guldmond, Manager of Site Licensing, TU Electric
- *P. E. Halstead, QC Manager, TU Electric
- *J. C. Hicks, Licensing Compliance Manager, TU Electric
- *C. B. Hogg, Chief Manager, TU Electric
- *R. T. Jenkins, Manager, Mechanical Engineering, TU Electric
- *J. J. Kelley, Manager, Plant Operations, TU Electric
- *J. J. LaMarca, Electrical Engineering Manager, TU Electric
- *D. M. McAfee, Manager, QA, TU Electric
- *S. G. McBee, NRC Interface, TU Electric
- *W. E. Nyer, Consultant, TU Electric
- *G. Ondriska, Startup, TU Electric
- *E. F. Ottney, Program Manager, CASE
- *S. S. Palmer, Project Manager, TU Electric
- *P. R. Raysircar, Deputy Director/Senior Engineer Manager, CECO
- *D. M. Reynerson, Director of Construction, TU Electric
- *A. H. Saunders, Quality Surveillance, TU Electric
- *A. B. Scott, Vice President, Nuclear Operations, TU Electric
- *J. C. Smith, Plant Operations Staff, TU Electric
- *J. F. Streeter, Director, QA, TU Electric
- *C. L. Terry, Unit 1 Project Manager, TU Electric
- *R. D. Walker, Manager of Nuclear Licensing, TU Electric
- *J. R. Waters, Site Licensing Engineer, TU Electric
- *R. G. Withrow, EA Systems Manager, TU Electric

The NRC inspectors also interviewed other applicant employees during this inspection period.

*Denotes personnel present at the August 1, 1989, exit meeting.

2. Applicant's Action on Previous Inspection Findings (92701)

(Closed) Open Item (445/8946-O-01): Follow-up on engineering management's effort to reduce the backlog of design change authorizations with confirmation required (DCA/CRs) that exceed the 30 day confirmation requirements.

As of June 26, 1989, this backlog of DCA/CRs was 156 and had been decreasing at a rate of 10 to 15 per week. As stated in our previous NRC Inspection Report (50-445/89-46; 50-446/89-46), engineering management committed to concentrating their efforts toward reducing this backlog. The effectiveness of this management effort was dramatically demonstrated by the reduction of this backlog to six by July 17, 1989.

To eliminate or maintain the DCA/CR backlog to a minimum, engineering management issued a memorandum to their personnel on July 14, 1989, restricting the use of DCA/CRs to conditions where it was mandatory for construction or testing to continue. In addition, a process was established such that the individual or organization initiating a DCA/CR was requested to obtain confirmation of the DCA/CR within 48 hours following its approval.

These results and management actions form the basis for closing this open item. This status of DCA/CRs and similar documentation will continue to be monitored by the NRC inspector.

3. Follow-up on Violations/Deviations (92702)

(Closed) Violation (445/8932-V-01): A step in an approved test procedure was not performed as written while QA surveillance was observing the activity; however, the systems test engineer (STE) did not initiate a test deficiency report (TDR) nor did surveillance personnel identify the error as a deficiency, both actions required by procedures.

On June 30, 1989, a TDR was initiated documenting this deviation from the test procedure. As corrective action, this TDR required the STE to be re-instructed in the procedures controlling deviations from test procedures. In the TU Electric response to this violation, commitments were made to

remind both startup and surveillance personnel the importance of making conservative decisions when determining whether a deficiency has occurred and if a deficiency document is required.

The NRC inspector verified through discussions with surveillance personnel that the subject of this violation was a recurring item on the agenda of the daily staff meetings of all construction and operations surveillance personnel in early June. The NRC inspector also reviewed documents retained by startup that provided evidence that all startup personnel had read and understood the significance of this violation.

Based on these actions by TU Electric, as verified by the NRC inspector, compliance has been achieved and should be maintained. This item is considered closed.

4. Assessment of Allegations (99014)

(Closed) Procedure Violation (OSP-89-A-0064): Craft being required to perform work without the proper work orders.

On June 16, 1989, the NRC was informed by an unidentified male that craft workers were being required to perform work on safety and nonsafety equipment without the necessary work orders. The individual cited two instances (a control room air conditioner drain that was plugged, and draining a Unit 2 main transformer sump) where a craft foreman required work to be started without work orders, even after being questioned by the craft workers involved. A QC inspector observed the work on the air conditioner and questioned craft. The QC inspector discussed the matter with the craft foreman and the proper paper work was obtained.

The NRC inspector discussed this matter with the QC inspector. The QC inspector had not initiated a deficiency report because the work appeared to be only cleanup work and an existing work package was open for work on the air conditioner in question. This work order was subsequently revised to include cleanup work on the drain.

The NRC met with representatives of QC and electrical maintenance to discuss the matter further. Based on that discussion, and a review of related documentation, the NRC inspector did not identify any violation of procedures, but did sense that some confusion may exist for both QC and craft personnel when work is done on items in the custody of startup versus operations. To assure this is not the case, electrical maintenance prepared retraining for craft and craft's supervision in the requirements of Procedures STA-606, "Work Requests and Work Orders," and STA-813, "Control of Work on

Systems and Components Under Startup Custody," with particular emphasis on the type of work order documentation required and when such documentation may not be required; e.g., when work performed is observed by the Startup Test Engineer and the work is done in accordance with approved work and inspection procedures.

On July 19, 1989, the first training session was held for the supervisors in electrical maintenance, QC representatives were also present. The NRC inspector attended this session. The events surrounding the incident involving the control room air conditioner were described and compared with the requirements of STA-606 and STA-813. Two important points were related to those supervisors: (1) be sure your workers know and understand when and why a work order is not required and (2) be sure your workers know the scope and boundaries of assigned work orders.

Following this training session each group of workers were similarly trained. So the workers could freely express themselves, their supervisors were not present during these training sessions. The NRC inspector also attended one of these sessions on July 27, 1989.

In summary, it does not appear that procedures were violated in the incident involving the control room air conditioning drain. Due to a lack of specific details, the Unit 2 turbine sump incident could not be followed up. The perceived problem appears to have been the result of confusion associated with the two programs involved - startup and operations. The training provided to craft, their supervisors, and QC should correct this problem; accordingly, this item is being closed and no further inspection of this matter is planned at this time.

5. Exit Meeting (30703)

An exit meeting was conducted August 1, 1989, with the applicant's representatives identified in paragraph 1 of this report. No written material was provided to the applicant by the inspectors during this reporting period. The applicant did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection. During this meeting, the NRC inspector summarized the scope and findings of the inspection.