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AUTH.NAME AUTHOR AFFILIATION
CONWAY,W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power
LEVINE,J.M. Arizona Public Service Co. (formerly Arizona Nuclear Power
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to violations noted in Electrical Distribution Sys
Functional Insp Repts 50-528/90-42,50-529/90-42 &
50-530/90-42.Corrective actions:Calculation 13-EC-MA-212
will be updated using vendor computer program.

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-01974-WFC/TRB/JJN
February 4, 1991

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station: P1-37
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Reference: (1) Letter from R. P. Zimmerman, Director, Division of Reactor Safety and Projects, NRC, to W. F. Conway, Executive Vice President, Nuclear, Arizona Public Service (APS), dated December 27, 1990.

(2) Letter from W. F. Conway, Executive Vice President, Nuclear, APS, to J. B. Martin, Regional Administrator, NRC, dated January 25, 1991.

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1, 2, and 3
Docket No. STN 50-528 (License No. NPF-41)
Docket No. STN 50-529 (License No. NPF-51)
Docket No. STN 50-530 (License No. NPF-74)
Reply to Notice of Violations 50-528/90-42-01, 02, and 06
File: 91-070-026

This letter is provided in response to the Electrical Distribution System Functional Inspection (EDSFI) conducted by Mr. C. W. Caldwell, and other personnel from October 1 through November 9, 1990. Based upon the results of the inspection, three apparent violations of NRC requirements were identified. A restatement of the violations and APS's response are provided in Appendix A and Attachment 1, respectively. An extension to reply to the subject violations was requested and approved as documented in Reference (2).

Reference (1) requested APS to provide an appraisal of previous assessments of electrical systems. This appraisal, and a clarification of the purpose, scope, and/or results of each assessment, is provided in Attachment 2.

APS has reviewed the inspection report and, in general, concurs with the findings and summaries of actions that we are taking to address these findings. However, some clarifications to the report are considered necessary and are identified in Attachment 3.

IE01
1/1

Should you have any questions regarding this response, please contact me.

Very truly yours,

James M. Levine for WFC

WFC/TRB/JJN/dmn

Attachments

cc: J. B. Martin
D. H. Coe
C. M. Trammell
A. H. Gutterman
A. C. Gehr

APPENDIX A

NOTICE OF VIOLATION

Arizona Nuclear Power Project
Palo Verde Unit 1, 2, and 3

Docket Nos. 50-528, 50-529 and 50-530
License Number NPF-41, NPF-51, and NPF-74

During an NRC inspection conducted on October 1 through November 9, 1990, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violations are listed below:

A. 10 CFR Part 50, Appendix B, Criterion III, states that design controls will be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions.

Section 8.1.4.1 of the Palo Verde Nuclear Generating Station (PVNGS) updated Final Safety Analysis Report (UFSAR) states that one of the principal design bases applied to the offsite power system is that: "The outage of a single startup transformer does not jeopardize continued plant operation, i.e., at least one offsite source to plant auxiliaries and ESF (engineered safety features) buses is available with a single startup transformer outage."

Contrary to the above, the offsite power system was not designed to minimize the likelihood of simultaneous failure of both offsite sources when three Units are powered from two startup transformers and a fast bus transfer of non-Class 1E loads from the unit auxiliary transformer to the startup transformer occurs. For example, from August 9 to August 12, 1988, the ratings of startup transformer X01 and X03 (Z and Y output windings respectively) may have been exceeded due to excess current if a reactor trip, turbine trip, or loss of coolant accident had occurred in Unit 2. This may have resulted in a loss of both offsite power sources to Unit 2.

This is a Severity Level IV Violation (Supplement I) applicable to Units 1, 2, and 3. (50-528/90-42-02).

B. 10 CFR Part 50, Appendix B, Criterion V, as implemented by 17.2.5 of the Palo Verde Nuclear Generating Station (PVNGS) Updated Final Safety Analysis Report (UFSAR), states that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions procedures, or drawings.

Procedure 81-DP-4CC04, Revision 1, "Calculations," requires that calculations be prepared in accordance with procedure 81-DP-0CC05. Procedure 81-DP-0CC05, Revision 0, "Design and Technical Document Control," requires the responsible engineer to ensure that all affected engineering and plant configuration documents are addressed for update and to provide a design that meets all the functional requirements called for by the design change request.

Contrary to the above, Calculation 13-EC-MA-212 was not revised to reflect the loading information provided in Calculation 13-EC-DG-200. Specifically, various motor loading data used in Calculation 13-EC-MA-212, Revision 7, "Auxiliary System and Transformer Sizes," were taken from Calculation 13-EC-PE-110, Revision 5, dated June 22, 1989, "Diesel Generator Sizing." Calculation 13-EC-PE-110 was then superseded by Calculation 13-EC-DG-200, Revision 5, dated September 6, 1990, "Diesel Generator Load Calculation." This calculation showed engineered safety feature equipment loading values that were greater than the load values in 13-EC-PE-110 by approximately 100 hp. However, as of October 23, 1990, loads indicated in Calculation 13-EC-MA-212 were not updated to reflect the loads indicated in Calculation 13-EC-DG-200.

This is a Severity Level IV Violation (Supplement I) applicable to Units 1, 2, and 3. (50-528/90-42-01)

C. Technical Specification 6.8.1 states, in part; "Written Procedures shall be established, implemented, and maintained covering...the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978." Section 9 of Regulatory Guide 1.33 requires that maintenance that can affect the performance of safety-related equipment be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

General Electric's Load Center Vendor Manual, Maintenance Instructions, specifies as a minimum requirement, an annual check for switchboard devices and connections.

Contrary to the above, as of November 9, 1990 the licensee had not implemented written procedures or schedules for vendor recommended maintenance for class 1E Load Centers D25, D26, D27, and D28 since startup of each unit, except for Load Center D25 in Unit 2.

This is a Severity Level IV Violation (Supplement I) applicable to Units 1, 2, and 3. (50-528/90-42-06)

ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION 50-528/90-42-02

I. REASON FOR THE VIOLATION

The reason for the violation was an engineering oversight in performing the original design calculation (13-EC-MA-212) for the sizing of the startup transformer. The assumptions for the electrical load did not address the unit loads that would be transferred from the unit auxiliary bus to the startup bus during a fast bus transfer.

Although the design of the startup transformer was not entirely consistent with the Updated Final Safety Analysis Report (UFSAR) Section 8.3.1.1.1, the design and operation of the startup transformers did meet General Design Criteria (GDC) 17. APS recognized the design limitations of the startup transformer and the potential to exceed its ratings. As such, operating procedure 4xOP-xNA01 (where x = 1, 2, and 3 for Units 1, 2, and 3 respectively) for the "13.8KV Electrical System (NA)" included a precautionary note as follows:

> "If a startup transformer does not have sufficient capacity to accept an 'Auto Transfer' from an operating unit, Unit #1 shall block or direct the affected unit to block "auto transfer" of the

applicable 13.8KV bus, by placing its auto transfer mode selector switch in the 'Manual' position."

The first step following the caution note stated:

"Determine the combined load to be placed on Startup Transformer NAN-X01, is less than 2929 amp, on the secondary side of the transformer, proceed. If not, reduce loads as required."

Therefore, the administrative controls were in place to ensure that a reliable source of power was readily available to loads important to safety as required by GDC 17.

As a point of clarification, there is no information such as load data or operational logs to support the statement in the Notice of Violation that on August 9 to August 12, 1988, the ratings of startup transformers X01 and X03 (Z and Y output windings respectively) may have been simultaneously exceeded due to excess current if a reactor trip, turbine trip, or loss of coolant accident had occurred in Unit 2. Although the transformer lineup had the potential to exceed the startup transformers' rating if all loads had been at their design maximum, actual load data, operator's logs, and operational practices were reviewed subsequent to the inspection and, in fact, indicated that the startup transformers'

rating would not have been simultaneously exceeded.

II. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A Quality Deficiency Report (QDR) 90-0410 was issued to document the identified deficiency. As corrective action in response to QDR 90-0410, on October 26, 1990, a safety evaluation was completed and Operating Procedure 4xOP-xNA01, (where x = 1, 2, and 3 for Units 1, 2, and 3 respectively) procedure change notices (PCN) were issued to replace the "caution note" in the procedure with a step requiring that before additional buses can be connected to the startup transformer the operator is to verify the load on the startup transformer. If the startup transformer does not have sufficient capacity, the operator is directed to block auto transfer of the applicable bus. The previous precautionary note contained the same direction, but had not been a mandatory step in the procedure.

On December 14, 1990, another PCN was issued to Operating Procedure 4xOP-xNA01 which improved the methodology for verifying the startup transformer loading and provided further administrative controls including monitoring to assure that operators verify that their actions cannot result in the startup transformer becoming overloaded.

III. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID VIOLATIONS

A change to the UFSAR has been initiated to revise the description of the startup transformers design requirements to make clear that administrative controls are utilized to preclude overloading of the startup transformers.

APS is actively performing those activities associated with a design basis program review. In part, this program is reverifying calculations. The calculation reverification program is described in Attachment 2 of this letter. The reverification process also requires the review of the relevant UFSAR and other licensing basis document statements to identify the regulatory requirements applicable to the system or calculation being reverified. Reverification of calculation 13-EC-MA-212 is scheduled to be completed by December 31, 1992.

IV. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on October 26, 1990, when PCN's to Operating Procedure 4xOP-xNA01 were approved. Subsequently, on December 14, 1990, PCN's were issued to 4xOP-xNA01 which improved the methodology for verifying startup transformer loading.

REPLY TO NOTICE OF VIOLATION 50-528/90-42-01

APS denies the violation.

I. REASON FOR THE DENIAL

Calculation 13-EC-MA-212, "Auxiliary System and Transformer Sizes" was not updated as of October 23, 1990, however, it was addressed for update as required by 81DP-0CC05, "Design and Technical Document Control," in that APS had identified the need to update this and other electrical load calculations. To perform this update, APS purchased a vendor computer program (prior to the subject NRC inspection) for use in reverifying calculation 13-EC-MA-212 and other related calculations.

The update of the load calculations was in part a response to a previously identified programmatic deficiency in maintaining the calculations current. An assessment of the safety significance and prioritization was performed as discussed in Attachment 2 of this response. A calculation re-verification program is now in progress to address the larger issue of revalidating and maintaining current required design calculations.

As a point of clarification, neither calculation 13-EC-PE-110 nor 13-EC-DG-200 is used as an input to calculation 13-EC-MA-212. However,

some of the inputs for each of these calculations are the same. Secondly, although calculation 13-EC-MA-212, "Auxiliary System and Transformer Sizes" was not updated as of October 23, 1990, as stated in the Notice of Violation, APS's procedural requirement is "to ensure that all affected engineering and plant configuration documents are addressed for update...". The vendor computer program was procured for the intended purpose of updating calculation 13-EC-MA-212 and other related calculations. Calculation 13-EC-MA-212 would have been and will be updated.

II. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

On October 24, 1990, a Quality Deficiency Report (QDR) 90-0408 was issued to document the identified loading deficiency. An evaluation was conducted concerning the electrical loadings. This evaluation determined that the discrepancies had no safety significance. The additional load (approximately 100 hp or 0.1 MVA) compared to the total loading on the startup transformer (40MVA) is insignificant (less than 1/2 of one percent) and therefore did not require any immediate action in addition to the actions already planned as described above.

Since the time calculation 13-EC-DG-200 was first issued, the Quality Deficiency Report (QDR) program has been implemented specifically for the documentation and resolution of non-material deficiencies or

conditions adverse to quality. Procedure 81DP-0CC05 was revised to reference the QDR procedure.

III. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID VIOLATIONS

Calculation 13-EC-MA-212 will be updated utilizing the vendor computer program as discussed above. APS has recently procured a common database for the inputs to the calculations for use with the vendor computer program. The use of a common database for related electrical calculations will ensure that the inputs used for future calculations are the same. As a result, discrepancies between input data such as identified in this Notice of Violation will be eliminated for calculations associated with this database.

APS is actively performing those activities associated with a design basis program review. In part, this program is reverifying calculations. The calculation reverification program is described in Attachment 2 of this response. The reverification of calculation 13-EC-MA-212 is expected to be completed by December 31, 1992.

IV. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved at all times.

REPLY TO NOTICE OF VIOLATION 50-528/90-42-06

I. REASON FOR THE VIOLATION

As a point of clarification, the preventive maintenance (PM) tasks were scheduled at once per three refueling outages. The PM tasks were prepared but were not approved or implemented at the time of the inspection since, in part, the PMs were not due.

APS recognizes that the vendor recommendation for the PM frequency was not properly evaluated. Precise documentation to define the cause does not exist, however, APS believes that the frequency was set at once per three refueling outages to be consistent with similar tasks for similar equipment.

II. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The frequency for the PM task has been revised to once per refueling.

APS had previously identified additional concerns with the PM program. As a result, a PM task force was established in June, 1989 to review the existing PM program and supporting programs, to compare these programs with industry standards, and to recommend actions to improve the programs. The results of this review and action plan were discussed

during an APS and NRC management meeting on September 12, 1989 and documented in Inspection Report 50-528/89-47. One of the actions discussed was the review of the bases for the PM tasks and documentation of new or revised bases. An audit of approximately 5,000 PM tasks was conducted to determine the need and severity of the deficiencies. This audit discovered minor deficiencies. Based on these results, a schedule has been developed for the PM task evaluation and procedure update. These tasks have been incorporated within APS's Business Plan.

III. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID VIOLATIONS

As discussed above, APS has created a PM task force to review and evaluate each PM task. This process is occurring on a system by system basis. All systems are expected to be reviewed by December 31, 1991.

At the time of the inspection, the instrument AC power system had not been reviewed, however, the instrument AC power system is expected to be reviewed and evaluated by August 30, 1991. Affected PM tasks will be revised based on a schedule consistent with the PM task force results.

IV. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved by February 1, 1991, when the frequency for the performance of the inspection and cleaning PM task, as required by the vendor technical manual, was revised to once per refueling.

ATTACHMENT 2

APPRAISAL OF APS ELECTRICAL DISTRIBUTION SYSTEM ASSESSMENTS

The cover letter transmitting the subject inspection report requested APS to provide an appraisal of why the discrepancies identified in the NRC inspection were not identified in any of the previous assessments of the electrical distribution system (EDS). The inspection report on page 31 provided further elaboration that the team was concerned that APS has completed an SSFI, an electrical systems reliability study, and an electrical systems assessment and none of these efforts identified concerns with calculations. APS believes that a clarification of the purpose, scope, and/or results of each assessment is necessary to understand why these deficiencies were not identified.

SSFI

The APS Quality Assurance organization performed an SSFI of the Emergency Diesel Generator (EDG) system. The purpose of the SSFI was to determine the operational readiness of the EDG system for each of the three units to perform its intended function by determining if the EDG system had been designed, installed, tested, operated, maintained, and managed in accordance with the original design basis, applicable regulations, standards and commitments. The general boundaries of the EDG SSFI included safety related components and system interfaces as shown on the plant and instrument drawings for the Diesel Generator and Diesel Fuel Systems. Assessments of components, systems, and activities beyond the general boundaries were conducted only where reasonable justification was present to indicate a potential impact on EDG readiness. The SSFI identified some minor discrepancies in the conservative direction in the EDG load calculation. Therefore, the EDG SSFI would not be expected to identify the particular calculation problems discussed in the subject report since the calculations extend beyond the EDG system scope described above and were not directly related to the EDG system.

ELECTRICAL SYSTEMS RELIABILITY STUDIES SUMMARY REPORT

Probabilistic reliability studies were performed on the design of the 525 KV switchyard, the non-class 1E electrical distribution system, and the reactor coolant pump power and control circuits to determine their effects on contributions to plant trips. The purpose of these studies was to provide status of the condition of the equipment and the efforts necessary to ensure reliability. The problems with the potential startup transformer overloading and calculation are beyond the scope of this reliability study.

Typically, the goals for performing these plant reliability assessment analyses are to identify key contributors to system/plant performance problems in areas of equipment reliability, operations, and maintenance practices. Another very important use of reliability assessment is that it is an

effective tool for the management of important issues since the analyses is focused toward the dominant event scenarios. As such, the issue of potentially overloading the startup transformer involved postulation of multiple rare failures and unusual coincidental operating conditions. The probability of this scenario is extremely low and would not have dominated the results of previously performed reliability assessments.

The analysis in general is based on the plant as-designed, as-built configuration. One of the fundamental assumptions made in reliability assessments is that equipment will perform as required to meet the design specifications and configuration. These assessments cannot be used to identify or resolve issues related to degraded equipment performance, and design calculations must be performed to evaluate these specific circumstances.

The reliability assessments did identify several important issues such as breaker maintenance. Subsequent corrective actions have been performed to improve the system reliability.

ELECTRICAL SYSTEMS ASSESSMENT

A self assessment was performed to determine if the design, installation, operation and maintenance of the electrical systems and associated support systems are adequate to assure the availability and reliability of the electrical power supply. The assessment included the non-class 1E AC (13.8 kV through 480V), Class 1E AC (4160V and 480V), Class 1E 125V DC, vital 120 V AC instrument power, and non-class 1E 125V DC system. In addition, HVAC and component cooling associated with these systems were assessed with respect to their ability to support system function.

The assessment used a vertical slice technique based upon selective sampling. A selective sampling technique does not identify all existing problems (nor would the assessment consider all possible combinations for the worst case loading on startup transformers), but should be sufficiently complete to identify the relative strengths and weaknesses of a particular system.

The self-assessment of the electrical distribution system did not identify problems with loading of the startup transformers in the event of automatic fast bus transfer to the startup transformer on a reactor trip, turbine trip, or a loss of coolant accident when three units are being loaded from two startup transformers. The assessment, however, did identify a number of weaknesses including calculational deficiencies and recommended that the calculations be reevaluated. Action item #3 of the self-assessment stated that:

> "From calculation 13-EC-MA-212, Rev. 6 ... it is not evident that the load calculations ... [consider] the possible loading on startup transformers while supplying all auxiliary loads on one

station in addition to supplying power to the ESF load groups on another unit."

Although the self-assessment did not identify the specific problem with the load calculation, the self-assessment provided sufficient indication that the calculation 13-EC-MA-212 needed revision. This concern was dispositioned based on the design basis reverification program. This reverification would very likely have detected the specific problem identified in the inspection report. Subsequently, APS has initiated a calculation reverification program. This program will include a reverification of the design assumptions to make sure that they meet the plant licensing commitments and are technically adequate. A description of this program is provided below.

CALCULATION REVERIFICATION PROGRAM

APS has performed a significance and importance review to determine the relative priority of the calculations to be reverified. The calculations were separated into three groups: 1) high priority reverification (1 to 2 years), 2) medium priority (3 to 5 years), 3) nonessential calculations (not to be reverified). The reverification program consists of the following steps: 1) the assumptions and input data for the target calculations will be reviewed for substantive errors or problems, 2) if editorial or no errors are found in that review, then the calculation will not be updated, 3) if minor problems are found, then the problem assumption or input will be updated, but the calculation will not be performed, 4) if substantive problems or errors are found, then the calculation will be updated and reperformed, and 5) if the calculation is reperformed, then the daughter documents that use the output of that calculation will be reviewed and revised as necessary.

ATTACHMENT 3

CLARIFICATIONS TO INSPECTION REPORT 50-528, 529 and 530/90-42

Inspection Report Statement

On page 11, section 3.1, paragraph 3, the Inspection Report states:

> "... the licensee performed a calculation to analyze the effects of waterhammer ... The licensee stated that this effort will be included in Calculation 13-MC-SP-505."

Clarification

The last sentence of this statement should read:

> "The licensee stated that this effort will be included in Calculations 13-MC-SP-501, 13-MC-SP-502, 13-MC-ZY-527, 13-MC-ZY-533, and 13-MC-SP-501R."

Inspection Report Statement

On page 18, section 4.3, subheading Circuit Breaker Testing, paragraph 4 states:

> "Another concern noted with the licensee's program for surveillance testing of medium and low voltage circuit breakers was that it did not address all Class 1E breakers. For instance, no specific procedure existed for testing the 4.16 KV safety related load center breakers that were not included in the TS. The same was true for 480 V load center breakers which were not scheduled for a specific surveillance test, except in the case of motor feeders which were exercised with the respective pumps. Therefore, motor control center feeders were tested only in conjunction with maintenance activities."

Clarification

This statement should read:

> "All TS Class 1E medium and low voltage breakers are included in the licensee's surveillance test program. All non-TS Class 1E and non-class 4.16 KV and 480 V load center breakers are included in the licensee's preventive maintenance program and are tested in accordance with maintenance procedures 32MT-9ZZ34, 32MT-9ZZ35, 32MT-9ZZ25, 32MT-9ZZ26, and 32MT-9ZZ27."

Inspection Report Statement

On page 24, section 4.4, paragraph 1 states:

"The licensee indicated that they intend to eventually include all fuse information in a computer based material control program"

Clarification

This statement should read:

"The licensee indicated that they intend to eventually include all fuse information in Item Procurement Specification, however, not all fuses will be tied to a specific application. Following approval, Item Procurement Specification information will be input into the Station Information Management System and the Material Management Information System."