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JOSEPH W. GALLAGHER
MANAGER
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May 10, 1979

Re: Docket Nos: 50-277
50-278

Inspection Nos.: 50-277/79-11
50-278/79-12

Mr. Eldon J. Brunner, Chief
Reactor Operations & Nuclear Support Branch
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Brunner:

Your letter of April 20, 1979 forwarded combined Inspection Report 50-277/79-11 and 50-278/79-12. Appendix A to your letter addresses two items which did not appear to be in compliance with Nuclear Regulatory Commission requirements. Item A is categorized as an infraction and item B is categorized a deficiency. Items A and B are restated below with our response.

A. Technical Specification 6.8.1 states, in part: "Written procedures and administrative policies shall be established, implemented, and maintained. . ."

Contrary to the above, the following examples of failure to follow plant procedures were identified.

1. Station Procedure S.3.2.A.1, Revision 4, dated May 15, 1978, provides a check-off list, S.3.2.A.1.A.2, for positioning the Residual Heat Removal System manual valves for operation.

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On April 12, 1979, the Unit 2 RHR pressurizing to head spray header inner valve was found to be incorrectly positioned and not in accordance with check-off list S.3.2.A.1.A.2. No maintenance or operations affecting this valve was in progress.

2. Station Procedure S.3.2.A.1, Revision 4, dated May 15, 1978, provides a check-off list, S.3.2.A.1.A.2, for positioning the Residual Heat Removal System manual valves for operation.

   On April 12, 1979, the Unit 2 RHR pressurizing to shutdown cooling suction header outer valve was found to be incorrectly positioned and not in accordance with check-off list S.3.2.A.1.A.2. No maintenance or operations affecting this valve was in progress.

3. Station Procedure S.8.4.A, Revision 3, dated July 13, 1977, provides a check-off list, S.8.4.A, for making the appropriate mechanical and electrical checks to set up the diesel generators locally for automatic operation.

   On April 12, 1979, two of seven valves required to be locked closed in accordance with S.8.4.A were found to be closed but not locked. No maintenance or operations affecting these valves was in progress.

   This item is recurrent in that similar items of this nature concerning the Standby Liquid Control System were identified during Inspection No. 50-277/77-19, dated June 30, 1977; and Inspection Nos. 50-277/78-12 and 50-278/78-16, dated June 30, 1978.

   Note: Inspection confirmed that the valves as listed above, were properly repositioned as required and secured (Item A-3).

Response

Our investigation of these items reveals the following:

Item A1 addresses to a fill system valve on the RHR head spray accumulator which was found closed. The fact that the valve was closed has no safety significance because the head spray line is also supplied from the associated Low Pressure Coolant Injection (LPCI) loop and is monitored by its own high point automatic level vent system with control room annunication. No such alarm condition occurr[illegible] The valve found closed was reopened immediately.

Item A2 was a procedural deficiency in that the checkoff list called for both series valves to be closed, but in reality only one valve needs to be closed as is reflected in the applicable piping and instrument diagram. The checkoff list changes have been initiated to correct the inconsistencies.

Item A3. Further investigation of this item indicates that none of the valves which are required to be locked closed by check-off list S.8.4.A were mispositioned or unlocked. Our investigation showed that apparently both our operator and the inspector misidentified the subject valves due to the valves location below the floor grating. Two air lines were mistaken for the two adjacent fuel oil lines due to poor visibility of the lines and their identification tags.

To avoid further items of noncompliance similar to A1, shift personnel have been instructed on the importance of proper positioning of valves. Emphasis was placed on the positions of the core spray and RHR fill system valves. In addition to the above, tags will be hung on the fill system valves to indicate their normal position. Because item A2 is a single minor deficiency in a check-off list and will be corrected, no further action is required. Since the valves in question in A3 were in the proper position and secured, no further action is required.

B. Technical Specification 6.8.3 states, in part: "Temporary changes to procedures . . . may be made, provided:

b. The change is approved by two members of the plant management, at least one of whom holds a Senior Reactor Operator's license on the affected unit.

c. The change is documented, reviewed by the PORC, and approved by the Station Superintendent within 14 days of implementation."

Contrary to the above, on August 11, 1978, a temporary procedure change was made to Surveillance Test, ST 1.3, Revision 3, dated May 9, 1978, "PCIS Logic System Functional Test - Unit 3," without complete approval by two members of the plant management. Further, subsequent PORC review had not been accomplished as of April 13, 1979.

Response

The Technical Specification Section 1.0 Definitions under Surveillance Frequency recognizes that "...Surveillance tests are not required on systems or parts of systems that are not required to be operable or are tripped."

On July 14, 1978, Revision 4 of Administrative Procedure A-3, "Procedure for Temporary Changes to Approved Procedures", was issued with the following change:

"Selected portions of a procedure need not be performed or classified a temporary change if:

1. Portions of the procedure need not be performed to satisfy the purpose for which the procedure is being implemented; . . . and

2. A PORC member designates on the procedure those steps or portions of the procedure that are not required to be performed, and

3. The PORC member records the reason for performing only selected portions on the front of the procedure or on the MRF and initials same."

While performing surveillance test, ST 1.3, "PCIS Logic System Functional Test - Unit 3" on August 11, 1978, it was determined that steps 1-74 thru 1-76, which involve test closing of the inboard main steam line drain valve MO-2-74, could not be performed as this valve was inoperable at the time. Because the outboard main steam line drain valve MO-2-77 was closed and being checked closed daily per Tech Spec 4.7.D.2., the individual performing the surveillance test felt that item 1 of the above criteria was satisfied. Hence, the affected steps were designated not to be done, the reason for the action explained, and signed by a PORC member as outlined above.

During the inspection on April 9-13, 1979 surveillance test, ST 1.3, was reviewed by the NRC inspector and it was determined that the deleted steps did constitute a temporary procedure change. The required two PORC signatures were obtained and the surveillance test was reviewed by the PORC on April 18, 1979. To prevent future misinterpretations of Administrative Procedure, A-3, the procedure will be revised to more clearly define what need not be classified as a temporary procedure change.

Very truly yours,

J. W. Gallagher