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ENCLOSURE 6

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June 29, 1984

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs

Subject: Systematic Assessment of Licensee Performance (SALP)
Report No. 50-412/84-06; 50-334/84-13

Gentlemen:

Thank you for meeting with us on June 12 to discuss the December 1, 1982, through March 31, 1984 SALP report for Beaver Valley Power Station Unit No. 1 and Unit No. 2.

In addition to the items identified in the report, your May 18 transmittal letter identified some specific subjects for discussion at the management meeting. The following summarizes our discussions and later actions on these items:

Item No. 1

The number and nature of deficiencies that have been identified in the piping area (many of which were identified by our inspectors). These appear to be primarily due to deficient engineering documents supplied to the field for use by construction and QC personnel. This has been a recurring problem at Beaver Valley, Unit 2 in that it was also noted in the last SALP report. Of particular concern is the apparent failure of licensee and contractor internal processes and reviews to discover such problems before they are found by our inspectors. Are any changes in approach contemplated in view of the failures of present management control system(s) to detect and prevent such deficiencies? You should be prepared to discuss why such failures have occurred plus any plans/programs to determine if similar problems have occurred in other areas.

Response

Engineering documents are prepared, reviewed, approved, and controlled in accordance with a formal Engineering Assurance Program and project specific requirements. These requirements reflect the criteria established in 10CFR50 Appendix B; ANSI-N45.2.11, and other industry standards and practices. These activities are constantly monitored by numerous Quality Assurance audits).

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Possible inconsistencies and omissions are identified by the existing programs and by virtue of cross-discipline and supervisory reviews. The engineering documents of primary interest to construction and quality control are specifications, procedures, drawings, electrical tickets, vendor information, change and nonconformance reports, and other computer-generated reports which summarize information available elsewhere. The "failures" discussed in your letter have occurred primarily because of changes in engineering criteria, some lack of clear installation requirements, and insufficient communication between engineering and construction as discussed in our answer to Inspection Report 84-03.

We are in the process of strengthening the SEG through the addition of senior engineers. The individuals will be experienced in the types of problems frequently encountered in the testing and start-up phase of nuclear projects as well as understanding the project base design and engineering guidelines. These engineers will expedite solutions to existing problems. By virtue of their review of changes to engineering documents issued for construction, these personnel will minimize future problems similar to those already identified.

We have initiated an Engineering Confirmation program in 1983 to accomplish the following objectives.

1. Assure that a comprehensive engineering data base is transferred to the operating facility upon plant completion.
2. Assure that all licensing and design commitments have been met.
3. Identify and schedule all remaining engineering activities necessary for plant completion, licensing and power operation.

Item No. 2

The continued slow progress in resolving electrical cable separation problems remains an NRC concern. Although Duquesne Light Company did commit to comply with Regulatory Guide 1.75 in the December, 1983 meeting with NRC, many deviations from RG 1.75 (and even from earlier engineering specifications) already exist. Additional deviations have occurred during installation work since December while plans were being made to implement these commitments. We regard the lack of appropriate progress in this area to be indicative of inadequate management attention and/or prioritization. You should have, and be prepared to discuss, a systematic program with a timely schedule for resolution of cable separation problems. In particular, your program should demonstrate the proper management commitment to resolve these problems.

Response

The resolution of cable separation problems required major adjustments to Engineering Criteria Documents, Engineering Specifications, Field Construction Procedures, QC Inspection Plans, and Training Programs for Engineering Design, Construction, and QC personnel. Following our commitment to RG 1.75, Rev. 2, that was made during NRC Inspection 83-05, plans were implemented to make the required adjustments. Following our meeting with the NRC on December 20, 1983, in Bethesda, MD, our implementation plans were prepared.

Site implementation was delayed until after Engineering, Construction, and QC program adjustments had been made and personnel were trained in the new requirements. By May 18, 1984, the above program changes and initial training were completed and the revised Engineering, Construction, and QC programs were fully implemented. Work done after May 18, 1984, is in accordance with the revised minimum separation requirements.

Minimum free air separation requirements in the new program have been intentionally selected to enable the future installation of cable wrap material. Therefore, achievement of the minimum separation requirements included in the new program with in-process QC inspection, ensures the ability to implement a cable wrapping program in the future. Progress achievement toward the resolution of separation problems has been planned in two specific site-related areas as follows:

- a. Resolution of problems existing prior to May 18, 1984.
- b. Adjustments to design, construction, and inspection activities performed after May 18, 1984, to limit the instances where additional deviations are identified.

Relative to (a) above, two subprogram elements have been implemented to identify the deviations from the revised separation program requirements. These elements involve Engineering/Construction walkdowns and QC inspection activities. The walkdown activities will be completed by August 15, 1984 and are identifying the specific types of separation problems that exist in each plant area. By September 15, 1984, specific solutions for each type of problem will be identified and scheduling of rework activities will begin. Information from this walkdown is input to a computer tracking system to ensure identified problems are resolved.

Site Engineering forces are working with Construction and QC personnel to ensure that ongoing activities are adjusted to either provide for achievement of RG 1.75 separation distances or to ensure that the separation problems are reworkable in the future. Implementation of this program has resulted in significant reductions in raceway/cable construction installation rates.

A list of Separation Program Management Action Plan items are included as Attachment No. 1. This attachment provides a listing of planned action

elements directly related to and directly associated with the resolution of the separation problems. The project realizes that the resolution of RG 1.75 problems in a vacuum, could create a multitude of future problems. Therefore, the action plan items address both related and associated subjects. For example, if a specific separation problem were resolvable by the installation of a barrier, the program requires that it be known that the barrier design can be seismically qualified and installed and that its configuration not adversely affect cable qualification.

In addition to the installation of cable tray covers, barriers and cable wrapping, we plan to qualify, by testing or by analyses based upon our test results or the results of tests performed by others, each deviation from the spacing requirements of IEEE standard 384. This approach is in full compliance with the standard and is absolutely necessary for a plant with buildings and structures designed and sized prior to the issuance of the standard and the regulatory guide.

Item No. 3

Many of the problems in the engineering area appear to be due to difficulties that occur at engineering/construction interfaces. In particular, several engineering documents prepared at your architect-engineer's home offices have apparently not received adequate "constructability reviews" before they are transmitted to the site for use. When problems are encountered in the field, resolution is often cumbersome. Furthermore, corrective actions usually involve additional inspections, but fail to identify and correct the root cause(s) of such problems. You should be prepared to discuss how you plan to improve the engineering/construction interface.

Response

The following six actions are being taken to improve the engineering/construction interface.

1. We had established a constructability review group at the site. This group is reviewing engineering output before issuance to provide assurance that engineering instructions to craft and inspection are clear, consistent, and able to be executed. Initially established to review pipe support designs, the concept will be expanded to include other areas which the project determines require clarification because of the great detail and complexity of the instructions. Potential candidates include the Regulatory Guide 1.75 backfit effort and ASME instrumentation tubing installation.
2. The drawings are being redrafted to clarify details. The amount of detail has increased in later years of the project, some of the drawings have become cluttered, the notes reworded or deleted, and detailed changes made which are difficult to interpret. We have

commenced an effort to identify these drawings and to reissue them in a more legible form.

3. We are establishing a formal program which requires feedback from construction and quality control on the clarity of engineering instructions. The project has had many workshops over the duration of construction to bring the engineering and construction personnel together to discuss design details. These have been useful in effecting some changes in the way engineering instructions are issued and have certainly improved the understanding of construction as to what the engineers intended in their designs. However, there was no formal feedback at the management level as to what changes were desired or required to enhance understanding of engineering instruction. A formal program involving senior personnel from engineering, construction, contractors, and quality control will be developed to ensure that problems are regularly reported, evaluated, and resolved to the maximum benefit of the project. The feedback programs will identify changes in the content of engineering instructions and the method by which they are issued to construction and quality control. These changes will be identified to engineering, construction, and quality control personnel through formal training.
4. We have established a program to identify the full scope changes earlier. When changes to systems, structures, and components are required, a team will evaluate the change to determine all engineering instructions requiring revision as a result of the change. This will enable earlier reissue of the documents, resulting in less impact on construction and minimization of the problems which occur when documents requiring changes are discovered subsequent to installation and/or inspection.
5. We are improving the construction supervision and engineering presence in the plant. Related to all of the above points, we are requiring the engineers and construction supervisors, including top levels of construction and site engineering management to spend more time in the plant to gain better first-hand knowledge of the problems being encountered. This will ensure that problems experienced in the last year are not repeated and will provide an environment in which the proper personnel are more cognizant of daily erection problems. We are also making engineers available at meetings held between construction supervisors and crafts. In addition, we are now developing a formal construction rework control program to ensure that all required physical changes are properly identified and tracked through completion and quality control inspection. This program will be implemented in July 1984.
6. Senior project management personnel will be required to participate in the trend reporting program. Although the existing Corrective Action Committee has effectively isolated issues requiring action

by one or more parts of the project organization, it has been primarily limited to site personnel. This will be changed to require participation by senior managers of all aspects of the project irrespective of location or organizational affiliation.

Item No. 4

In late April 1984, changes were made in the functional project organization wherein it appears that Duquesne Light Company has reduced their involvement in day-to-day construction activities with a commensurate increase in Stone and Webster's responsibility. We consider it essential that licensees have strong involvement and control in all areas involving licensed activities. You should also be prepared to discuss the intent of these organizational changes and describe how adequate Duquesne Light control and involvement is to be maintained.

Response

The recent functional organizational changes were made in recognition of the project's evolution to the construction completion and testing phase. This major transition in project emphasis requires an increasing focus on site activities by all personnel. The complex problems encountered at this phase not only requires some adjustments in the specific responsibilities of the site participants but also requires that senior management become more directly involved in site-related activities. The primary office and functions of the Stone & Webster Project Manager have been moved to the site and he reports directly to the DLC Vice President of Nuclear Construction. Also reporting to the DLC Vice President at the site are the DLC Managers for Start-Up and Project Controls and, in Robinson Plaza, the Engineering Project Team. DLC supervisors are being placed directly in charge of both primary and secondary plant construction. In that position these supervisors are required to see that all construction is accomplished in accordance with established field construction procedures and to assure that any changes to these procedures are approved by the Duquesne Light Company. In addition a Duquesne Light Company group for liaison between engineering and construction has been established.

The Start-Up Manager and his staff have complete responsibility for verifying that all plant equipment is satisfactory for testing and operation, that all required documentation is available, and that all plant systems are capable of performing their required functions. The Manager of Project Controls supervises the activities of the Productivity, Cost, and Planning Advisory Groups which are also directed by Duquesne Light supervisors. Our Robinson Plaza office basic engineering, licensing, and administrative services departments are still intact and performing their usual functions. The QA/QC organization remains a DLC operation with complete independence from the engineering, construction and start-up organizations.

We have placed Duquesne Light Company Superintendents in positions of line responsibility for Construction activities. They are responsible for plant completion. All post-turnover maintenance and rework will be performed under the direction of the Duquesne Light Company Start-up Manager.

We believe that these changes will strengthen the Duquesne Light Company control of this project as a result of the assumption of line responsibility for construction activities.

The Duquesne Light Company review and approval of Field Construction Procedures and other project administrative activities will continue.

The new project organization is designed to perform the following:

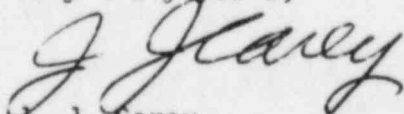
1. More clearly establish the lines of authority, responsibility and accountability on the project.
2. Place Duquesne Light Company personnel in a position of line responsibility for system completion.
3. Provide more Duquesne Light Company upper level management presence on the site.
4. Integrate all scheduling activities under a single Duquesne Light Company Manager.
5. Assure that the Stone and Webster Project Manager is intimately familiar with all problems encountered on site.
6. Expedite the face-to-face discussions between senior management personnel of Stone and Webster and Duquesne Light Company on a daily basis.

Attachments 2 and 3 are provided to depict the new project organization. We are prepared to make further changes to achieve our goal of designing and constructing a quality plant.

It is our goal to achieve a SALP Level I rating in each of every category for both Beaver Valley units. We intend to take the necessary actions to achieve this goal.

If you have any questions concerning these responses, please contact my office.

Very truly yours,



J. J. Carey
Vice President, Nuclear Group

United States Nuclear Regulatory Commission
Mr. Richard W. Starostecki
Systematic Assessment of Licensee Performance (SALP)
Report No. 50-412/84-06; 50-334/84-13

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ATTACHMENT 1

R.G. 1.75 ACTION PLAN ITEMS

I. ITEMS RELATED TO THE BV-2 PROJECT COMMITMENT TO R.G. 1.75 (REV. 2) and IEEE 384 (74)

A. DIRECTLY RELATED ITEMS

1. Installation of Conduit, Tray (RACEWAY), and Cable
 - a. Identification and Correction of Insitu* Separation Problems both Inside and Outside of Panels
 - b. Installation of New* Cable and Raceway to Revised Criteria/Separation Requirements both Inside and Outside of Panels
2. Personnel Training In Revised Separation Requirements
 - a. Engineering and Design Personnel
 - b. Construction Personnel
 - c. QC Personnel
3. Computer Tracking Systems of Separation Problems, Rework Design, and Construction Completion of Rework
 - a. Cable in Free Space to Other Items
 - b. Raceway to Other Items
4. Engineering and Construction Walkdown to Identify Generic Problem Types
 - a. Walkdown Complete by 8/15/84
 - b. Rework Requirements by 9/15/84
5. QC Inspection of Cable and Raceway to Revised Separation Requirements
 - a. Insitu* Installations
 - b. New* Installations
6. Tests - Qualification of Some Insitu* Conditions for Limited and/or Continual Acceptability (Require NRC Acceptance)
7. Analyses - Qualification of Some Insitu* Conditions for Limited and/or Continual Acceptability (Require NRC Acceptance)

B. DIRECTLY ASSOCIATED ITEMS

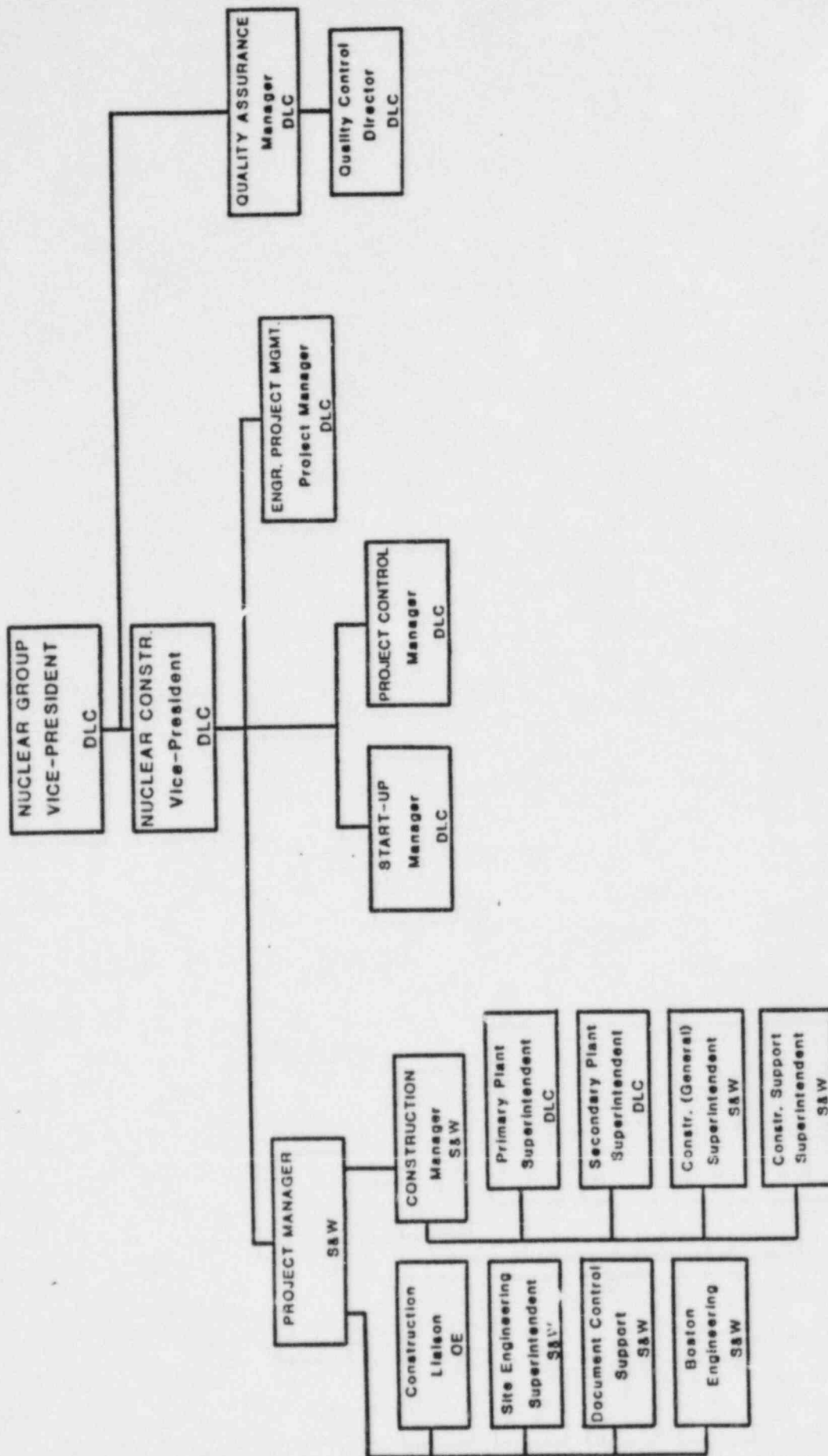
1. Cable Tray, Cable Tray Configuration, and Cable Tray Fill
 - a. Tray seismic qualification with respect to unsupported cable length (B.5.c) at last rung, cables over side rail, and cable drop outs in mid span on one rung.
 - b. Ability to install tray covers and/or bottoms in the future as an acceptable R.G. 1.75 raceway enclosure method.
2. Cable Wrap - Ability to Install Wraps in the future Where Needed to Resolve Separation Problem
3. Barriers - Ability to Install Seismically Supported Barrier(s) in the Future to Resolve Separation Problem
4. ECSIS Modifications to Provide Input/Output Relative to the following:
 - a. Installed Actual Cable Lengths (See B.5.b)
 - b. Tray Loadings (#/Linear Ft. - See B.7.b)
 - c. Cable Bend Radius Limits
 - d. Fire Loading (B.6.a)
5. Cable Related Items
 - a. Derating Possibility Due to Wraps (B.2)
 - b. Ampacity Due to Length (B.4.a), Covers, Barriers, 1.75 Wraps (B.2), and Appendix R Encapsulation (B.6.b)
 - c. Free Air Support Requirements Due to Unsupported Lengths and/or Wraps (83-12-03)
 - d. Qualification-Compatibility with Wraps and Barriers, Maximum Tension on Insulation System, Conductors, and Shields
6. Appendix R
 - a. Fire Loading Due to Actual Versus Assumed Cable in a Fire Zone (B.4.b)
 - b. Cable Derating Due to 1-hour or 3-hour Fire Encapsulation Around Raceways and Cables and Fire Stops and Seals Around Cables
 - c. Raceway Support Systems Where Raceways are 1-hour or 3-hour Encapsulated

7. Raceway Seismic Support System Qualification
 - a. Appendix R Encapsulation (B.6.c)
 - b. Actual Tray Loading (#/Linear Ft. of Cable - B.4.b)
 - c. Other Items Supported on System, i.e. Covers, Bottoms, Barriers, Wraps, Transition Points
 - d. Final Combined Loads on Raceway Supports
8. Hazards Analysis - Barriers Needed for Isolation due to Specific Non-Fire or Electric Fault-Related Area Hazards.
9. System Turnover - Ability to implement future fixes without significantly restraining or rescheduling established turnover schedule.
 - a. Implement specific fixes pre-turnover
 - b. Implement remainder of fixes post-turnover with cables energized

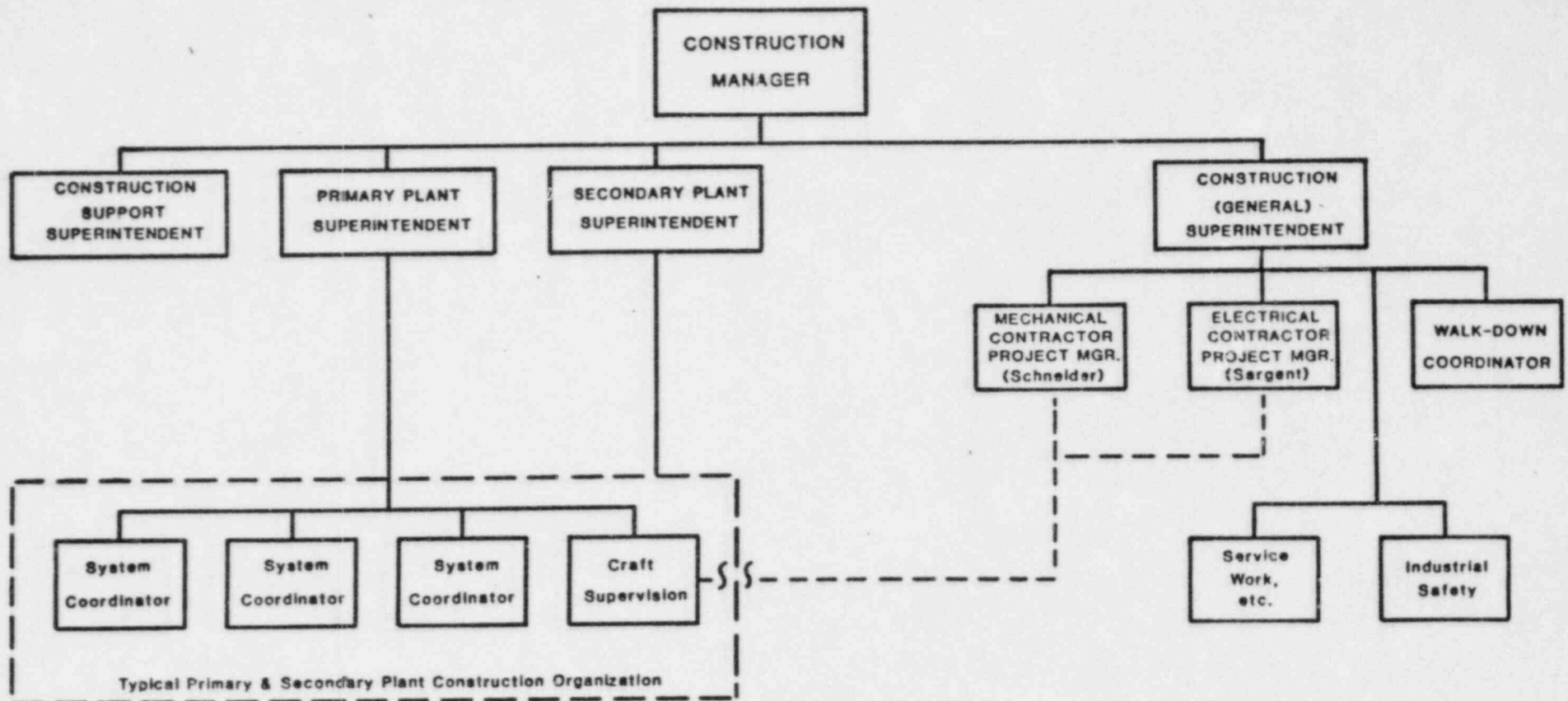
* Insitu - Those installations and designs in existence prior to May 18, 1984 when 2BVS-931, FCP-420, FCP-431, SECO-5D Series, and IP-8.3.3, IP-8.3.4, IP-8.4.1, and IP-8.5.2 were issued and implemented to invoke the project commitment to R.G. 1.75, Rev. 2.

* New - Those installations made or designs issued after May 18, 1984.

BVPS-2 PROJECT ORGANIZATION



KEY CONSTRUCTION ORGANIZATION FOR SYSTEM COMPLETION



——— Solid lines indicate direct supervisory authority.
 - - - - Dotted lines indicate administrative and technical direction.

ATTACHMENT 4

THE RESPONSES TO THE ITEMS DISCUSSED IN THE FUNCTIONAL AREAS OF REPORT NO. 50-412/84-06 FOLLOW:

Functional Area 4.2 - Containment and Other Safety-Related Structures

A failure to identify the test requirements prior to releasing the requirements to the field was identified.

Response

We are instituting a formal engineering review of future specifications issued by our architect engineer for NED compliance to Code and Regulatory Guide requirements.

Functional Area 4.3 - Piping Systems and Supports

A number of specific items were cited as evidence of insufficient attention to problems in this area. The assessment concluded by stating, "However, the root cause of many of the problems has not received adequate attention. In particular, increased emphasis is needed by the licensee to assure that basic documents are correct and contain sufficient and clear details and requirements before they are issued to construction. This would reduce the high number of design changes and errors caused by inadequate design/installation documents as well as reduce Quality Control reinspections. In summary, with the increased work activities which occurred during this SALP period, a marked increase in deficiencies and errors were noted. These are occurring at the level of generation and approval of the basic documents. When basic documents are deficient, this jeopardizes the hardware acceptance and causes increased reinspections and rework of the hardware. Significantly increased licensee and contractor attention to this area is needed. Additional discussions on engineering weaknesses are included in Functional Area 10."

Response

The specific items cited in this section have been the subject of detailed correspondence between NRC Region I and ourselves. Many of the items have been closed and the rest are under discussion between our staffs.

In our general response to your cover letter, we have identified project actions which are intended to specifically address and rectify problems associated with content of engineering documents. Because the preponderance of engineering documents have already been issued for use, the action is to place more senior, experienced engineers at the site to mitigate problems and expedite solutions.

We will institute a formal QA review of generic welding procedures produced by the mechanical contractor. This review being in addition to that performed by the ASME Certificate Holder. In addition, a Welding Management

Group has been formed on the site. One of this group's functions is to assure compatibility of Code requirements with applicable site procedures.

Over a period of more than seven years, we have had to make very few additions to our QC inspection plans to include essential characteristics that were omitted in the original issue.

We have recently instituted a practice under which the Site Engineering is requested to review QC Inspection Plans after issuance. This practice should insure that all engineering requirements are fully addressed.

Functional Area 4.6 - Electric Power Supply and Distribution

Several specific problems were identified. However, the major thrust was related to the Regulatory Guide 1.75 backfit effort. The assessment concluded by stating, "In summary, it appears that day-to-day construction by the contractor is good. QC inspection is good with minor exceptions and minimal problems are occurring in this phase. Deficiencies in documents used for field work (primarily documents generated by Engineering) have led to problems in that they often have insufficient information and/or are not fulfilling design requirements. Major reinspection and rework are a result of these omissions. The licensee/contractor has been very slow in developing and implementing an approach that will meet cable separation commitments and requirements so as to resolve widespread cable separation problems to achieve acceptable cable installation."

We share your concerns about the approach and scheduling of the resolutions to the Regulatory Guide 1.75 separation problems. Although basic plans have been developed and Engineering documents and Field procedures adjusted to preclude accumulation of problems in on-going efforts, additional efforts to resolve in-situ problems are being taken in order to assure quality and schedule objectives.

In recognition of the concerns and the complexity of the issues, a detailed management plan is being developed under DLC direction. The purpose of the plan is to provide the necessary project direction and management overview of those actions required for the installation of physical barriers, wraps, etc. and proposed engineering analysis and tests.

Actions have been underway to establish the scope and impact of in-situ problems. These efforts, along with the management plan, will provide the basis for a detailed schedule leading to a systematic and timely resolution.

In recognition of the close relationship of the issues relating to Cable Support with those of RG 1.75, resolutions of those issues will be included in the management plan being developed for RG 1.75.

We intend to schedule a meeting with the NRR technical reviewers to discuss the details of our action plan in late summer.

Functional Area 4.7 - Instrumentation and Controls

The report stated: "Discuss with the licensee management the desirability of 100% reinspection of vendor supplied items"

Response

"The inspection of safety-related electrical equipment will be performed by Site QC. Equipment, other than NSSS, will be 100% inspected (all cabinets will be inspected). Ten percent of NSSS electrical equipment will be inspected, and, pending the results, discontinued or expanded depending upon findings."

The QC inspection activities are underway. As individual inspections are completed, identified problems are corrected in accordance with existing QC, Construction, and Engineering programs.

Functional Area 4.8 - Licensing Activities

A meeting was arranged with the training program reviewer to more clearly define the necessary documentation for submittal in response to the questions. This meeting was held at the BVPS Training Facilities on April 24, 1984, and provided the reviewer with sufficient understanding of the BVPS Training Program to request specific documents to be docketed in support of the review. A draft package of responses to the SER outstanding issues was provided on May 9, 1984, for informal comment by the reviewer prior to formal submittal.

Functional Area 4.10 - Engineering/Construction Interface

This summarized issues which arose during the report period which were related to the clarity and accuracy of instructions issued to craft and inspection personnel. The assessment concluded by stating, "In summary, the ratings in the two Category 3 functional areas were affected by the numerous deficiencies in the contents of design-related documents issued by vendors or contractors. The 'Engineering Confirmation Program' could help alleviate concerns in this area if results demonstrated that such deficiencies are not widespread and do not adversely affect the overall integrity of safety related systems. Effective corrective actions to improve performance in the engineering area would lead to increased confidence in plant design/construction as well as favorably affecting future SALP ratings in other functional areas."

Response

The NRC concerns in this section have been addressed in the general response to the SALP report. Specific steps have already been taken and additional

measures are being developed to strengthen this interface. We would welcome further discussion with you or any of your staff on this subject, and if we can provide any additional information, please advise.

ATTACHMENT 5

THE RESPONSES TO THE ITEMS DISCUSSED REPORT NO. 50-334/84-13 FOLLOW:

Functional Area 4.1 - Plant Operations

Item No. 1

First line supervision must receive continued encouragement to exercise firm control over the conduct of operations in the Control Room.

Response

An Operations Personnel Responsibility Review program was initiated, which includes revised job descriptions and interview checklists to clearly define responsibilities of supervisors and operators. This review was performed with all currently licensed individuals and will be part of an initial interview for all new operating supervisors and operators, prior to their assuming responsibility for shift duties.

Item No. 2

Methods to identify and direct unnecessary congestion during periods of high activity must receive further consideration.

Response

The Operations Support Group will conduct business related to the Operations group in a place other than the control room. This will reduce activity levels in the Control Room. Consideration is being given to using the alternate Technical Support Center (on site) as a Control Room Annex during periods of high activity.

Item No. 3

Better communication between the Operations and Training Departments is needed to assure that each understands and carries out their assigned role in preparing new operators for their operating responsibilities.

Response

Redefinement of responsibilities of the two departments and development of the necessary logistics to support qualification of newly licensed operators, is in progress. The program, will include "hands-on" assignments with qualified operators as part of their training. This, along with the training noted above on the job responsibilities, will better prepare new operators

for their licensed responsibilities. This item will be complete by October, 1984.

Item No. 4

Attention to operating detail needs further improvement.

Response

This area has been recognized as one in need of attention. New operators have been consistently paired with more experienced counterparts for the on-the-job training and shared experience factors. Specific operating problems have been addressed with the use of redundant verifications after valve manipulations and pump starts following breaker racking. A critical parameters checklist has been instituted for all operating modes to focus attention on plant parameters considered critical to safe operation. The shift turnover checklists were restructured and control board walkdowns required prior to shift turnover.

Control room supervisors will place increased emphasis on attention to detail in performing operational duties. Personnel errors will be investigated and communicated to other operating shifts to prevent recurrence.

Functional Area 4.4 - Surveillance

Item No. 1

Surveillance scheduling was not adaptable to tests required for off normal testing and tests required for changing modes.

Response

The scheduling of Operating Surveillance Tests is now done by the Operations Group. This group is well positioned to recognize the scheduling changes necessitated by operating mode changes. There have been no further problems in this area.

Item No. 2

Management oversight and control of the IST program needs strengthened.

Response

As a result of our review of the problems noted by this comment, we have initiated extensive procedure development to preclude future management or control problem. The IST program has been issued as a controlled document, the most recent 20-month update has been reviewed by the Onsite Safety

Committee (OSC) and approval has been recommended. Also, draft copies of Nuclear Group Directives, Site Administrative Procedures and an overall Inservice Inspection Program Manual have been prepared and will be implemented by October 1, 1984.

Functional Area 4.5 - Fire Protection and Safety

With respect to open items related to NRC inspection 82-30 and discussed during the SALP meeting, the following provides an update of those open items.

Item No. 1

Evaluate the effectiveness of drills performed by Fire Brigade (item IV.B)

Response

The Fire and Safety section provides a critique on the drill reports and a quarterly report is prepared on the drill status of each shift.

Item No. 2

Evaluate supplies to maintain Fire Brigade Equipment

Response

Purchase Requisitions, involving Category F items, are being forwarded to the Fire and Safety section for review.

Item No. 3

Evaluate the combustible procedure.

Response

A review was conducted to determine if the combustible procedures for the various groups is compatible with that of OM 56.B.4. It was determined that Mechanical and Electrical Maintenance, I & C and Chemistry procedures were compatible. Rad Con has prepared a procedure for inclusion into their manual that is compatible with OM 56.B.4. The Stores Department is to include the applicable section of the combustible procedure in the Stores Operating Procedure Manual. The Construction Department has been informed to revise their procedure for clarity and to provide more stringent controls.

The action items associated with Items 1 and 2 above, are complete. The third item will be closed when the revisions/additions will be completed in the above mentioned manuals by August 1984.

Functional Area 4.8 - Refueling and Modification

Item No. 1

Construction Clearance Deficiencies

In support of our efforts for improving our performance in regard to plant modifications, the NECU and the Station Maintenance Group will provide for enhanced construction craft training and indoctrination. This will be provided prior to initiating construction and maintenance activities within the plant. Special attention will be directed toward the review of station and construction procedures that may apply to the activities. A review of past problems will also be conducted with appropriate craft supervision to avoid a recurrence of past difficulties.

Item No. 2

Station Clearance and Containment Industrial Safety Deficiencies

Due to the events that transpired in the March 1984 mini outage on the leaking RCS flange, an investigation was performed to determine the root causes. The results of this investigation indicated that the clearance procedure needed to be clarified and strengthened. This is complete and will be issued during the month of July, 1984. A containment entry procedure has been prepared and is being reviewed at the present time.

ENCLOSURE 7

SALP BOARD ERRATA SHEET
FOR REPORT 50-412/84-06

<u>Page</u>	<u>Line</u>	<u>Now Reads</u>	<u>Should Read</u>
5	Functional Area 2	Category <u>1</u>	Category <u>2</u>

Basis: Typographical error. Board evaluation was Category 2 as discussed in text of report.