

5-82
50-348/364-CIVP
5/18/92

Staff Exh. #82



Alabama Power
USNRC

Gen. 1193

Subject: Joseph M. Farley Nuclear Plant
Composite Audit Report No. 83/19
SAER File: A35.94.1
Log: 83-417

Date: December 2, 1983

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To: Mr. R. P. McDonald
Mr. W. G. Hairston, III

From: J. W. McGowan
At: Safety Audit &
Engineering Review

OFFICE OF SECRETARY
DUCKETT & SLEIGHT
BRANCH

Attached are reports of SAER audits recently conducted at the Farley Nuclear Plant. A schedule of Routine and Four-Month Interval SAER audits to be conducted within the next four (4) months and a schedule of SAER audits to be performed offsite are also attached.

The following is information concerning the attached audit reports:

<u>Report Date</u>	<u>Activities Or Areas Audited</u>	<u>Type Audit</u>	<u>Auditor Or Audit Team Leader</u>
11-15-83	Environmental Qualification Program	Spot	R. V. Badham
11-17-83	Plant Changes and Modifications	Routine	W. G. Ware
11-21-83	Unit II Turbine Generator Maintenance conducted by Westinghouse	Vendor	R. V. Badham
12-2-83	Four-Month Interval	Routine	G. M. Grove

J. W. McGowan

DAJ:sh
Attachments

xc + Attachments: Mr. W. O. Whitt
Mr. F. L. Clayton, Jr.
Mr. H. O. Thrash
Mr. W. G. Ware (SSAER Record)
Mr. G. M. Grove
Mr. D. A. Johnson

ALABAMA POWER COMPANY
JOSEPH M. FARLEY NUCLEAR PLANT
REPORT OF SAER AUDIT

A. Audit Description

Organization Audited: Farley Nuclear Plant Staff
General Area Audited: Environmental Qualification Program
Occasion of Audit: Spot
Date(s) of Audit: October 20 - November 15, 1983
Audit Team Leader: R. V. Badham

<u>Principal Sections of Audit</u>	<u>Individual Auditor(s)</u>	<u>Audited Organization Representatives</u>
1. Pre-audit Conference	W. G. Ware R. V. Badham	W. G. Hairston, III J. D. Woodard R. G. Berryhill L. W. Enfinger
2. Conduct of Audit	R. V. Badham J. F. Cheney W. R. Sampson	R. G. Berryhill L. W. Enfinger L. M. Stinson J. B. Hudspeth L. Huey J. Scales
3. Post-audit Conference	W. G. Ware J. F. Cheney W. R. Sampson	J. D. Woodard R. G. Berryhill L. W. Enfinger D. N. Morey L. M. Stinson

B. Noncompliances

FNP-NC-47-83/19(8)

FNP-O-ETP-4108 par. 2.3 requires that "NETS will forward the Environmental Qualification Report Evaluation (EQRE), CEWS, appropriate calculations evaluation summaries and vendor test reports" to the Systems Performance Superintendent for storage in Document Control. Contrary to this, the EQREs are not in Document Control and several of the test reports referenced in Appendix III are not available.

NOTE: Per Paragraphs (i) and (j) of 10CFR50.49, it appears these records are required to be maintained in auditable form.

FNP-NC-48-83/19(8)

The OQAPM, par. 3.5.2 requires in part, "The following are to be accomplished and recorded for each...design change...Completion of drawing, technical manual...and other documentation changes as applicable." Contrary to this, a review of instruction books and vendor drawings for two systems (Feedwater Control and Containment Cooling and Purge) listed in the Master List (Appendix I of ETP-4108) which have had numerous changes to install environmentally qualified equipment revealed that in no case had the vendor drawings or instruction books been revised to reflect the new equipment.

Discussion: A review of some of the PCNs that implemented these changes revealed that in no case had instruction books or vendor drawings been identified as requiring changes. The PM program for this environmentally qualified equipment requires that appropriate vendor service manuals (FNP-O-ETP-4108 par. 3.1.2) be referenced for the performance of PM tasks. Although the appropriate vendor drawings and instruction books are referenced in the PM Program in no case where a design change had occurred did those references reflect the current equipment installed.

FNP-NC-49-83/19(8)

10CFR50.49(d) requires that "The licensee shall prepare a list of electric equipment important to safety". 10CFR50.49(a) requires "Each holder of ...a license...shall establish a program for [environmentally] qualifying electrical equipment." Contrary to this, Section C of APCo's letter to the NRC dated May 20, 1983 which was written to comply with those requirements incorrectly identifies Containment Cooler Fan Motors (TPNS #Q2E12M001B, C & D) as Type P. These motors are Type M/YE which is not an approved Model based on the Acceptable Test Reports List.

NOTE: Section C of the above letter has been incorporated into FNP-O-EIP-4108 as Appendices I and II.

C. Comments

1. Several of the Acceptable Test Reports in Document Control do not reference the specific equipment for which they are approved.
2. A definition should be provided for "Date Installed" as used in the Component Maintenance and Replacement Schedule." It appears that the date the applicable Unit returned to service after an outage (or initial startup) is being used for this date. The actual installation date for the specific item of equipment is not being used.

C. Comments Con't

3. The following errors were noted in FNP-O-ETP-4108 Rev. 0:
 - a. Par. 3.1.6 assigns the Maintenance Planners who write MWRs to the Maintenance Group.
 - b. No Model number is listed on the Acceptable Test Reports List for Limitorque MOVs.
 - c. Unit 1 - Master List has numerous model number errors for the Feedwater Control System (C-22).
 - d. An incorrect installation date for the limit switches on system P15.
 - e. Par. 2.3 references a Figure 1 and 2. These figures are missing from the procedure. Also Figures 3 and 4 are missing.
4. FNP-O-ETP-4108 which was issued on 10/20/83 has not received a cross-disciplinary review although various plant groups are assigned responsibilities therein. Also, it does not appear that personnel implementing this procedure have received training.
5. Based on two systems reviewed there are several discrepancies between the Master List and Component Maintenance and Replacement Schedule as regards model number for a particular TPNS number.
6. Limit switches Q1P134S2866B and 2867B (per the Component Maintenance and Replacement Schedule) are on the Master List as 2866D and 2867D. This same discrepancy occurs on Unit II.
7. Although 10CFR50.49(j) requires that documentation be maintained in auditable form for the entire period during which the covered item is installed or stored for future use no RTYPE or retention time has been designated for these environmental records.

D. Reaudit Results

1. Open noncompliances:
N/A, First Audit
2. Closed noncompliances:
N/A, First Audit
3. Reconfirmed noncompliances:
N/A, First Audit

E. Summary

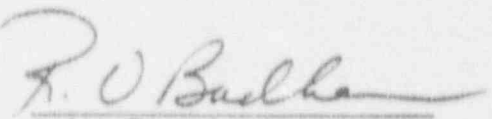
1. Identifications of last equivalent audit: N/A, First Audit.
2. Number of noncompliances last audit: N/A. This audit: 3.

E. Summary Con't

3. Trend since last equivalent audit in significance of individual noncompliances: N/A, First Audit.
4. Auditor's evaluation of the effectiveness of the OQA program elements audited: As noted in the above findings, the Environmental Qualification Program does not yet fully comply with the requirements of 10CFR50.49. In its present state of development the program does not provide assurance that the environmental qualification of equipment will be maintained throughout the life of the plant.

F. Recommendations

None


Audit Team Leader