

SUMMARY OF FINDINGS

Enforcement Action

A. Items of Noncompliance

1. Infraction

Contrary to Criterion III, Appendix B, 10 CFR 50 and the FSAR Section 1A, Operating Quality Assurance Plan, Section III, plant design change C/M 0800, Modification of Diesel Generator Air Start System, was completed during 1974 without receiving prior Generation Engineering Department review and approval as required by Generation Engineering Procedure GP 1003, Control of Design Changes. (Detail 6.1.(3))

Licensee Action on Previously Identified Enforcement Items

The licensee had taken the corrective actions specified in his letter dated January 30, 1975, to the violations identified in Report 50-289/74-35, Detail 2.a(3)(d) and 2.a(7)(d). This item is resolved. (Detail 6.a. and b.)

Unusual Occurrences

An unplanned gaseous release from the Auxiliary Building via the Plant Vent occurred during this inspection. (Nonroutine Report 75-01, Telegram to IE:I dated February 26, 1975). (Detail 5)

Other Significant Findings

A. Current Findings

1. Acceptable Areas (These are areas which were inspected on a sampling basis and findings did not involve an Item of Non-compliance, Deviation, or Unresolved Item)
 - a. Plant Operations (Detail 2)
 - b. Adherence to Commission Order of December 27, 1974. (Detail 3)

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- c. Corrective action taken to return the Auxiliary and Fuel Handling Building Ventilation System to within FSAR performance specifications. (Detail 4)
- 2. Unresolved Items (These are items for which more information is required in order to determine whether items are acceptable or Items of Noncompliance)
 - a. Surveillance/Preventive Maintenance Program for the Auxiliary and Fuel Handling Building Ventilation System. (Detail 4)
 - b. Licensee actions relative to the unplanned gaseous release on February 24, 1975. (Detail 5)
 - c. Licensee submittal of a report to the Commission pursuant to R. G. 1.20. (Management Interview, Item 6)
- B. Status of Previous Unresolved Items
 - 1. The following items were reviewed and are acceptable:
 - a. Administrative Procedure for Auxiliary Log Sheets. (Detail 2.g)
 - b. Control Rod Drive Repatching Procedure. (Detail 6.e)
 - c. General Employee, Industrial Health and Safety Training. (Detail 6.f)
 - d. Operating Procedure OP 1102-4 (Detail 6.a)
 - e. Evaluation of Existing Temporary Shielding. (Detail 6.h)
 - f. Snubber Seal Replacement Program (Detail 6.i)
 - g. Piping Vibration in "A" Makeup Pump Section Line (Detail 6.j)
 - h. GORB Review of Technical Specification Changes 4 and 5. (Detail 6.k)
 - i. Management Control of 8 Design Changes (Detail 6.1)

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2. The following items were reviewed and remain unresolved:
 - a. FSAR Amendment - Post Accident Purge System. (Detail 6.c)
 - b. AO 74-13 Corrective Action. (Detail 6.d)
 - c. Licensee Acceptance of MCP-15 Test Data. (Detail 6.g)

Management Interview

An exit interview was held onsite on February 27, 1975 at the conclusion of this inspection.

Personnel Attending:

Mr. J. Herbein, Station Superintendent
Mr. J. Colitz, Unit 1 Superintendent
Mr. J. Floyd, Supervisor of Operations
Mr. J. O'Hanlon, Nuclear Engineer
Mr. W. Potts, QC Supervisor

The following summarizes the items discussed:

1. Review of Plant Operations including resolution of an unresolved item and methods for enhancing the effectiveness of station logs. (Detail 2)
2. Adherence to Commission Order. (Detail 3)
3. Performance of the Auxiliary and Fuel Handling Building Ventilation System including the unresolved item. (Detail 4)
4. The unplanned gaseous release including the unresolved item. (Detail 5)
5. Licensee action on previously identified enforcement and unresolved items including the current status of these items and the identification of the apparent Item of Noncompliance. (Detail 6)
6. The licensee was informed that the FSAR (Section 13) required vibration measurements on reactor internals be performed in accordance

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with RG 1.20, but that the licensee had not submitted a report to the Commission as required by Paragraph D.4 of RG 1.20. The licensee stated that a report would be submitted. The inspector also informed the licensee of the typographical error in Paragraph D.4 of RG 1.20, i.e., C.5 should read C.6. Item is unresolved pending submittal of this report to the Commission.

7. The inspector was informed by the licensee that due to procurement problems the modification to the Reactor Building Personnel Hatch door interlock system could not be completed by mid-April 1975, as previously committed to IE:I (Report 50-289/75-01, Detail 3.b). The licensee stated that this change would be completed by June, 1975. The inspector acknowledged this information.

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DETAILS

1. Persons Contacted

Mr. J. Barton, Startup and Test Manager, GPUSC
Mr. K. Beale, Radiation Protection Supervisor
Mr. E. Bulmer, Lead Mechanical Engineer
Mr. J. Colitz, Unit 1 Superintendent
Mr. W. Cotter, Mechanical Engineer
Mr. J. Floyd, Supervisor of Operations
Mr. C. Hartman, Electrical Engineer
Mr. J. Herbein, Station Superintendent
Mr. G. Kunder, Mechanical Engineer
Mr. L. Lawyer, Manager, Operational Quality Assurance
Mr. B. McCutcheon, QA Engineer
Mr. G. Miller, Unit 2 Superintendent
Mr. J. O'Hanlon, Nuclear Engineer
Mr. V. Orlandi, Lead I&C Engineer
Mr. R. Porter, Shift Supervisor
Mr. W. Potts, QC Supervisor
Mr. M. Ross, Shift Supervisor
Mr. J. Seelinger, Supervisor of Training
Mr. M. Shatto, Mechanical Engineer
Mr. D. Shovlin, Supervisor of Maintenance
Mr. B. Smith, Shift Supervisor
Mr. R. Summers, Project Engineer (Mechanical)

2. Review of Plant Operations

The following items, which were not reviewed during inspection number 50-289/75-01, were examined during this inspection:

a. Computer Printouts (Midnight)

Records for the period December 21-31, 1974, were reviewed. Values for Reactor Power, Imbalance, Quadrant Tilt, Reactor Coolant Pressure and Flow, and Rod Withdrawal Index were observed to be in accordance with Technical Specification requirements.

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b. Control Room Operator Log Sheets

Records for the period February 10-20, 1975, were reviewed. Entries were observed to be in accordance with AP 1016, Revision 5, Section 4 (Proposed).

c. Primary Auxiliary Operators Log - Tour Readings

Records for the period February 10-20, 1975, were reviewed. Entries were observed to be in accordance with AP 1016, Revision 5, Section 4 (Proposed).

d. Primary Auxiliary Operators Log - LWDS Panels

Records for the period February 10-20, 1975, were reviewed. Entries were observed to be in accordance with AP 1016, Revision 5, Section 4 (Proposed).

e. Secondary Auxiliary Operator Log Sheets

Records for the period February 10-20, 1975, were reviewed. Entries were observed to be in accordance with AP 1016, Revision 5, Section 4 (Proposed).

f. Out-Building Tour Log Sheets (Auxiliary Operator)

Records for the period February 10-20, 1975, were reviewed. Entries were observed to be in accordance with AP 1016, Revision 5, Section 4 (Proposed).

g. Administrative Procedure for Auxiliary Log Sheets

The inspector observed that Section 4.0 (The Operations Surveillance Program) of AP 1016 had been recently revised (Proposed Rev. 5). This procedure change had been reviewed by the PORC and approved by the Station Superintendent. However, since this procedure is also an implementing procedure of the Operational Quality Assurance Plan, issuance of this revision had been delayed pending concurrence of the Manager, Operational Quality Assurance. Section 4 of AP 1016 (Proposed Rev. 5) governs the use and evaluation of the data sheets identified in 2.b. thru f. above in addition to other

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aspects of the surveillance program. The inspector's previous concern regarding this matter is considered resolved (Report 50-289/74-35, Detail 2.a.(2) and Report 50-289/75-01, Detail 8.g).

Additionally, the inspector and the licensee discussed methods of enhancing current data sheet contents and documentation practices relative to implementation of that portion of the surveillance program encompassing the data sheets identified in 2.b. thru f. above. The inspector has no further questions of this matter at this time.

h. Problem Identification Systems

The following systems utilized by the licensee to identify problems were examined to determine if identified problems involved Technical Specification reporting or LCO requirements.

(1) PORC Meetings

PORC Meeting Minutes (No. 259-266) for the period December 2, 1974 - January 24, 1975 were reviewed with respect to their evaluation of problems. Findings were acceptable.

One of these items involved a reevaluation of the results for TP 151/1 Reactor Building Isolation Valve Leak Test. The licensee discovered that during the performance of this preoperational test, calibration data for certain flow instruments for measuring valve leakage was used incorrectly. As a result, the original data was reevaluated and accepted by the licensee. The test results showed that although the valve leakage was more than originally calculated, the test results (as corrected) still meet Appendix J to 10 CFR 50 requirements, i.e., total Type B and Type C leakage was $0.366 L_a$ vs the acceptance criterion of $<0.6 L_a$ (Appendix J limit). The licensee intends to report this matter in his Semi-Annual Operating Report pursuant to Technical Specification 6.7.1. Additionally, the licensee has taken steps to insure this type of error is not made during future surveillance tests conducted pursuant to Technical Specification 4.4.1.2. The inspector has no further questions on this matter at this time.

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A second item involved the licensee's continuing evaluation concerning erosion of the makeup pump bypass orifices (Reference: Report 50-289/74-33, Details II, 4.). The orifices (design #2) for the A and B Makeup Pumps show (by radiography examinations) erosion of the 2nd, 3rd, and 4th plates, but no pipe wall damage. The erosion appears to have stabilized. The C Makeup Pump is normally in standby, and its orifice (design #2) shows no apparent erosion. The original letdown block orifice, which had exhibited erosion damage, was replaced with a design #3 orifice. Radiography examination of this new orifice shows no apparent erosion to date. The licensee has revised his surveillance program from weekly to monthly radiography examinations. Three replacement orifices (design #3) for the Makeup Pumps are onsite, and two of these have been approved for installation. The remaining orifice remains in QC hold pending acceptance by the licensee. Plans are to replace the bypass orifice on each Makeup Pump at a time convenient to the licensee. The inspector has no further questions on this matter at this time.

(2) Maintenance Work Requests

WR's 6869, 6733 and 6647 containing PORC review and the Station Superintendent's approval were reviewed. Findings were acceptable.

(3) Staff Meetings

The inspector attended the daily staff meeting on February 27, 1975 where the Plan of the Day was reviewed. Findings were acceptable.

i. Facility Training Program

Two licensed operators were questioned on the contents of Abnormal Procedure 1203-1 Load Rejection (one of the procedures covered during a recent training session) to verify a knowledge commensurate with the licensee's documentation. The inspector determined that the operators were familiar with the contents of this procedure. No attempt was made to evaluate the competency of these operators to stand a watch.

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j. Plant Tour Station Superintendent

On February 27, 1975, the inspector was informed that the last tour made by the Station Superintendent occurred on the previous day.

3. Order for Modification of License

The inspector observed that Operating Procedure OP 1102-4, Revision 5 (Power Operations) was consistent with the requirements of the Commission Order dated December 27, 1974. On February 26, 1975, control rods were observed to be positioned in accordance with OP 1102-4, Revision 5. Additionally, the licensee's analysis of the Maximum Linear Heat Rate (MLHR) (daily computer printouts Group 20 and 34) is being compared with the most restrictive values. Data indicates the MLHR is substantially below the most restrictive values.

4. Performance of the Auxiliary and Fuel Handling Building Ventilation System

References: Report 50-289/74-31, Detail 2h
Nonroutine 30-Day Report 74-01, dated November 8, 1974

Based on a review of records, discussions with the licensee, and observations during a tour of the Control Room and the Auxiliary and Fuel Handling Building, the inspector determined the licensee's corrective actions described in the referenced nonroutine report had been completed and the ventilation system flow rates were in accordance with FSAR design requirements. The inspector has no further questions on this matter at this time.

The inspector questioned the licensee about what actions would be taken to insure that the performance of this system does not deteriorate below FSAR design requirements over the lifetime of the plant. The licensee stated that a surveillance/preventative maintenance program would be developed and implemented. The details of this program were not established during the inspector's discussions with the licensee; however, the licensee believed that the monitoring and evaluation of key parameters, such as system flows, filter ΔP 's, static pressure regulator settings, local air flow direction measurements, etc. could be easily factored into the current operator surveillance program. Additionally, the licensee has ordered a 6 foot long pitot tube for making more refined air

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flow measurements of this system. The development and implementation of a suitable program is considered to be an unresolved item pending completion by the licensee and review by IE:I.

5. Unplanned Caseous Release

During this inspection, the licensee informed the inspector that an unplanned release had occurred on February 24, 1975. The details of the release, which were documented in the licensee's telegram to IE:I dated February 26, 1975, were discussed with the licensee. The inspector noted that Technical Specification release limits were not violated and that plant personnel had not been exposed to excessive concentrations pursuant to 10 CFR 20. This matter is considered to be an unresolved item pending the licensee's submittal of the required 10 day report and IE:I evaluation of this report and inspection followup, if necessary.

6. Enforcement and Unresolved Items from Previous IE Inspections

a. Failure to Comply with Technical Specification 3.5.2.4.b.1 and 10 CFR 50.36(c)(2)

References: (1) IE:I letter dated January 3, 1975 and
Report 50-289/74-35, Detail 2.a(3)(d)
(2) Report 50-289/75-01, Detail 8.f
(3) Met Ed letter dated January 30, 1975

Based on a review of OP 1102-4, Revision 5, a review of the Revised Procedure Review Book, and discussions with licensee management and Shift Supervisors, the inspector determined that the licensee's action described in Reference (3) was completed as stated with the following exception. The modification to the Reactor Protection System is to be completed by June, 1975 per Reference (3), and therefore, was not included in the inspector's review. This item is resolved.

b. Failure to Comply with Technical Specification 6.7.2.a.4

References: (1) IE:I letter dated January 3, 1975 and
Report 50-289/74-35, Detail 2.a.(7)(d)
(2) Met Ed letter dated January 30, 1975

Based on discussions with licensee management and PORC members, the inspector determined that the licensee action described in Reference (2) was completed as stated. This item is resolved.

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c. FSAR Amendment - Post Accident Purge System

Reference: Report 50-289/74-18, Detail 3.b.(1)(s)

The inspector was informed by the licensee that Reactor Licensing (RL) had been advised of this matter and that a FSAR amendment was in preparation for submittal to RL. Item remains unresolved pending submittal of the amendment.

d. AO 74-13 Corrective Action

References: (1) Report 50-289/74-30, Detail 2
(2) Report 50-289/74-35, Detail 3.d

The inspector was informed by the licensee that numerous difficulties had been encountered in obtaining a suitably qualified (Seismic) replacement switch and that Met Ed Engineering had selected a switch which would be evaluated by the licensee's AE. Following qualification of the replacement switch the licensee intends to install it on a priority basis. Item remains unresolved pending completion by the licensee.

e. Control Rod Drive Repatching Procedure

Reference: Report 50-289/74-29, Detail 6.b

The inspector observed that SOP 156, CRD Repatch 253 Days Core 1, dated February 21, 1975 had been issued. This procedure is to be used in conjunction with OP 1105-9 for repatching control rods following 253 ± 10 EFPD of operation. Item is resolved.

f. General Employee, Industrial Health and Safety Training

Reference: Report 50-289/74-32, Detail 2.e

Based on a review of records and discussions with the licensee, the inspector determined that the licensee had established definitive requirements relative to control of personnel attending the subject training lectures. These requirements are contained in Training Department Administrative Memo No. 7, dated November 22, 1974. Item is resolved.

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g. Initial Startup Test MGP-15

Reference: Report 50-289/74-33, Detail I, 3.0

Based on a review of records and discussions with the licensee, the inspector determined that testing was complete, the data package including CPUSC QA signoff was turned over to Met Ed in January, 1975, and review of the data package by Met Ed was in progress. Licensee review relative to data acceptance was about 50% complete, and the licensee's target date for completion was the end of April, 1975. Item remains unresolved pending completion by the licensee.

h. Evaluation of Existing Temporary Shielding

References: (1) Report 50-289/74-35, Detail 2.b.(5)
(2) Report 50-289/75-01, Detail 8.h

Based on discussions with the licensee, the inspector learned that the Supervisor of Operations evaluated the existing shielding and determined that no restrictions existed. Additionally, future shielding installations are to be of a maze design to allow easier access for valve operation and packing adjustments. During a tour of the Auxiliary Building, the inspector observed shielding installed in accordance with the new guidelines. Item is resolved.

i. Snubber Seal Replacement Program

References: (1) Report 50-289/74-35, Detail 2.b.(8)
(2) Report 50-289/75-01, Detail 8.i.

Based on a review of records, discussions with the licensee, and observations during a tour of the Intermediate Building, the inspector determined that the licensee has implemented the subject program. The work is being performed in accordance with an appropriately approved Work Request (WR 4438) which includes detailed steps for rebuilding, an acceptance test of the rebuilt units, QC signoff, and reinstallation instructions. One maintenance crew has been specifically assigned to perform this task. Appropriate records and QC Surveillance Reports were readily available and reflected the current status of the program which was about 15% complete. The program was at a standstill

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at the time of this inspection due to a shortage of hydraulic fluid, but is to be resumed when the fluid is received. To date most of the work has taken place in the Intermediate Building and has involved the Main Steam, Feedwater, and Emergency Feedwater Systems. The licensee anticipates completing this program by the end of the first refueling (scheduled March, 1976). This item is resolved.

j. Piping Vibration in "A" Makeup Pump Suction Line

Reference: Report 50-289/75-01, Detail 2.b.(7)

Based on a review of records and discussions with the licensee, the inspector determined that this matter was reviewed by the licensee's AE and the PORC. It was determined that the vibration levels were acceptable. This item is resolved.

k. GORB Review of Technical Specification Changes 4 and 5

Reference: Report 50-289/75-01, Detail 7.e.

Based on a review of records, the inspector determined that the GORB had reviewed the subject changes. This was documented in a letter from the GORB Chairman to the Met Ed Vice President (Generation). Additionally, this is to be further documented in the minutes for GORB Meeting No. 17. This item is resolved.

l. Management Control of Design Changes

Reference: Report 50-289/75-01, Detail 6.b(2)

Based on review of records and discussions with the licensee, the inspector determined the following relative to the licensee's control and review of the 9 design changes identified in the referenced report:

- (1) Design Change C/M 0135 involved a change to the Integrated Control System, and this system is not included in the Quality Assurance Systems List (GP 1008). Therefore, design control via the QA Program for Operations and likewise Technical Specification 6.1.I.2.b.2) was not required. Appropriate control for this change was accomplished via AP 1016. Item is resolved.

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- (2) Design Changes C/M 0076, 0031, 0068, 0039, 0071, 0048 and 0102 were accomplished in accordance with the GPUSC Start-up and Test QA Plan, Section III (Procedure AEFCEP-1). This control is consistent with the licensee's Operational Quality Assurance Plan described in the FSAR (Section 1A). Item is resolved.
- (3) Design Change C/M 0080 involved a change of the Diesel Generator Air Start System, and this system is included in the Quality Assurance Systems List (GP 1008). The change was accomplished in accordance with AP 1016. Records indicated that no attempt was made to control this change via the GPUSC Startup and Test QA Plan, but rather the change package had been forwarded to Met Ed Generation Engineering. The licensee was unable to provide documentation relative to Generation Engineering Department's review and approval of this change prior to the change being made. Additionally, the licensee stated, during the referenced inspection, that this review and approval had not been accomplished.

Failure to control this design change is contrary to the requirements of Criterion III, Appendix B, 10 CFR 50 and the FSAR Section 1A, Operating Quality Assurance Plan, Section III. The OQA Plan, Section III states in part, that "Design control is implemented by means of Generation Engineering Procedures which include: ...design review requirements..." GP 1003, Control of Design Changes requires specific design control measures to be taken to assure review and approval at the corporate level prior to implementing the change. Failure to control this change at the corporate level is also contrary to Technical Specification 6.1.I.2.b.2). This finding of noncompliance is considered to be an infraction.

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