

December 4, 1992

Docket No. 50-395

MEMORANDUM FOR: David M. Verrelli, Director
Division of Reactor Projects, Region II

FROM: Elinor G. Adensam, Director
Project Directorate II-1
Division of Reactor Projects - II

SUBJECT: SUMMER 50-59 INSPECTION REPORT

From September 28, 1992, to October 1, 1992, the Project Manager conducted an inspection of the licensee's program for changes, tests, and experiments under the provisions of 10 CFR 50.59. The findings of this inspection are enclosed. These findings have been transmitted to the Resident Inspectors for use in their monthly report.

ORIGINAL SIGNED BY:

Elinor G. Adensam, Director
Project Directorate II-1
Division of Reactor Projects - I/II

Enclosure:
50-59 Inspection Report

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50.59 INSPECTION REPORT

From September 28, 1992, to October 1, 1992, an inspection of the licensee's program for evaluation of changes, tests, and experiments under the provisions of 10 CFR 50.59 was conducted. The inspector looked at the areas of Procedures and Controls, Training and Qualification, and Implementation.

Procedures and Controls

The inspector verified that formal guidance for implementing the requirements of 10 CFR 50.59 at Summer Station has been established in Station Administrative Procedure SAP-107. This procedure contains guidance for determining whether 10 CFR 50.59 applies, and whether an unreviewed safety question is involved. The procedures for determining applicability and evaluating whether an unreviewed safety question exists are detailed below. Adherence to SAP-107 will ensure that all changes, tests, and experiments are evaluated for 10 CFR 50.59 applicability, and that safety evaluations are performed when appropriate. Adherence to the procedure will also ensure that independent reviews are performed on all evaluations of changes, tests, and experiments.

The inspector verified that formal reports of all changes, tests, and experiments are sent to the Commission annually. These reports contain a brief description of each change, test, or experiment and a brief summary of the safety evaluation. Adequate records of changes, tests and experiments are being maintained in an easily auditable format.

The inspector verified that procedures have been established to ensure that the Final Safety Analysis Report (FSAR) is updated to include appropriate changes, tests, and experiments. The licensee's update interval meets the requirements of 10 CFR 50.71(e)(4).

The inspector verified that personnel who prepare 10 CFR 50.59 safety evaluations and applicability determinations have adequate licensing basis documentation available.

Training and Qualifications

The inspector verified that training and qualification standards have been established for personnel who prepare, review, or approve 10 CFR 50.59 packages. A formal procedure for qualification of individuals to perform 10 CFR 50.59 reviews is in place. The qualification procedure requires formal training, supervisory recommendation, and formal designation by the General Manager, Nuclear Plant Operations, for all individuals who perform 10 CFR 50.59 evaluations.

The licensee maintains a current list of individuals currently designated to perform 10 CFR 50.59 evaluations. The inspector checked this list against the names of the lead engineers on several 10 CFR 50.59 packages. No discrepancies were noted.

The licensee maintains records of who has successfully completed formal 10 CFR 50.59 training. The inspector reviewed a list of lead engineers on 10 CFR 50.59 packages, the date the packages were prepared and the date the lead engineer completed formal training. The licensee's date for completion of training for one such lead engineer was found to be 2 months after that engineer prepared the reviewed package. Further review of this package revealed that the lead engineer was a contractor. At the time that the package in question was prepared (before the implementation of SAP-107), the qualification of contractors was handled under a different procedure. In addition, the package did receive adequate supervisory review by personnel qualified in the licensee's 10 CFR 50.59 training program.

The licensee's training materials are consistent with the internal guidance on the handling of 10 CFR 50.59 safety evaluations. The licensee has a feedback system to evaluate 10 CFR 50.59 packages to identify weaknesses and, thus improve training; however, there are no provisions in the licensee's program for re-training or upgrading.

The lesson plans and training exercises used in the licensee's 10 CFR 50.59 training class were well organized and thorough. The 10 CFR 50.59 training and qualification program was found to be a strength.

Implementation

The inspector looked at 20 10 CFR 50.59 packages including various plant modifications (MRF's) and Emergency Preparedness Plan changes. In general, the safety evaluations were thorough, easy to follow, and could be audited without licensee assistance.

In making changes under 10 CFR 50.59, the licensee employs a two step procedure. The first step serves to determine, in accordance with 10 CFR 50.59(a)(1), whether or not a 10 CFR 50.59 safety evaluation should be performed for a given action. This is accomplished by answering, in writing, the following four questions pertaining to the proposed action:

1. Does it represent a change to the procedures described in the FSAR or Fire Protection Evaluation Report (FPER)?
2. Does it represent a change to the facility as described in the FSAR or FPER?
3. Does it represent a test or experiment not described in the FSAR or FPER?
4. Does it represent a change to the Technical Specifications?

If the answer to any of these questions is "yes," the licensee performs a safety evaluation of the proposed action. The inspector found the licensee's procedure for determining 10 CFR 50.59 applicability to be acceptable; in addition, in the 20 packages reviewed by the inspector, no deficiencies in the area of determining whether a safety evaluation should be performed were noted.