



SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

RECEIVED
NRC

1985 JUN 10 PM 12:06

RJR 85-282

REGION V ICE

June 3, 1985

J B MARTIN, REGIONAL ADMINISTRATOR
REGION V OFFICE OF INSPECTION AND ENFORCEMENT
U S NUCLEAR REGULATORY COMMISSION
1450 MARIA LANE SUITE 210
WALNUT CREEK CA 94596

DOCKET 50-312
LICENSE NO. DPR-54
RESPONSE TO NOTICE OF VIOLATION INSPECTION 85-01 FOLLOW-UP

As a result of the NRC team inspection 85-01 performed on January 7-11, 1985, a notice of violation was issued due to discrepancies in the as-built configurations with respect to design drawings for HVAC supports in the Nuclear Services Electrical Building (NSEB).

As an immediate action in response to the above notice of violation, the District performed a walkdown on all visually accessible HVAC supports which were of the same type as those investigated by the NRC team in the NSEB. It was determined by this inspection that minor discrepancies (i.e., deviations which did not jeopardize the intended function of the support) did exist. The engineering evaluation of those discrepancies revealed no adverse effect on the safety of the plant. In addition, a root cause evaluation was performed which indicated that one temporary quality control inspector had been involved in all the discrepant cases identified by the NRC.

To assure that no safety concerns existed, a further investigation was planned for the supporting systems of HVAC and other systems within the NSEB and other buildings to ensure that this was the case. In a meeting with NRC representatives on March 12, 1985, the District's plan for further investigation was presented to ensure that the Commission was kept informed of the District's intentions.

Further investigations have been performed on randomly selected samples per internationally accepted statistical sampling technique MIL-STD-105D. This investigation involving the efforts of 20 engineers and QC inspectors with an approximate total expenditure of 3000 manhours, was concluded on May 30, 1985. The random samples covered the supporting systems of HVAC, piping, cable trays, and conduits in the NSEB, Auxiliary, and Diesel Generator Buildings. All results are available for NRC review.

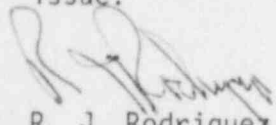
8507090189 850603
PDR ADOCK 05000312
G PDR

11
IE-01

June 3, 1985

The District's further investigation confirmed the preliminary finding that no safety problems exist even though minor discrepancies were observed and documented on NCRs. Engineering evaluations of all discrepancies indicated sufficient design safety margin existed to assure the operability of plant supports under all operating conditions. This evaluation provides adequate confidence that no safety concerns exist and no further investigation is warranted.

As a result of this investigation, the District has identified programmatic weaknesses which are listed in Attachment 1 along with their corrective actions. These corrective actions will be accomplished by October 1, 1985. Please contact Mr. Ron W. Colombo at the Rancho Seco Nuclear Generating Station to discuss any questions or comments you may have concerning this issue.



R. J. Rodriguez
Assistant General Manager, Nuclear

Attachment

IDENTIFIED WEAKNESS

1. Design personnel are not consistently indicating sufficient installation tolerances on design drawings.
2. Craft personnel occasionally install supports with discrepancies.
3. Field engineers are not consistently identifying configuration discrepancies during installation and prior to inspection.
4. Some instances were noted concerning QC inspectors failing to document discrepancies.
5. Insufficient number of permanent SMUD QC inspectors to adequately oversee the temporary/contract inspectors.
6. Construction surveillance program was not completely implemented.
7. Construction Inspection Data Reports (CIDRs) have lacked sufficient inspection requirements in some instances.
8. Difficulty in determining if the noted discrepancies had previously been documented on an NCR.
9. Bracing members removed to facilitate maintenance and new work was not replaced in a few occasions.

CORRECTIVE ACTIONS

1. Implement Design Guides (new Nuclear Engineering Procedures) and improve the training for the design personnel to emphasize need to indicate tolerances on design drawings.
2. Improve training of craft supervision with respect to installation in accordance with design drawings and properly receive instructions.
3. Assure that the training for field engineers addresses verification of the installation prior to QC inspection.
4. Ensure that training is provided for QC inspection personnel emphasizing that inspection and acceptance of work must be performed to approved design documents. (Initial training for QC inspectors was accomplished during initial phase of Inspection 85-01 Investigation.)
5. The District will reorganize to combine two separate plant QC groups into a single department and improve the supervision for temporary/contract inspectors.
6. The QA surveillance program was re-emphasized in the first quarter of 1985 with the issuance of scheduled QA surveillance.
7. Implement new Construction Engineering Procedures/Inspection Standards (NEPs) and provide training to appropriate personnel.
8. The District will investigate methods to enhance the retrievability of information about NCRs.
9. Provide additional procedural controls for removed bracing members.