

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-266/85009(DRS); 50-301/85009(DRS)

Docket No. 50-266; 50-301

License No. DPR-24; DPR-27

Licensee: Wisconsin Electric Power Company
231 West Michigan
Milwaukee, WI 53203

Facility Name: Point Beach, Units 1 and 2

Inspection At: Two Creeks, Wisconsin (June 4-7, 1985)
Wisconsin Electric Power Corporate Office
Milwaukee, Wisconsin (June 12, 1985)

Inspection Conducted: June 4-7, and 12, 1985

Inspectors:

[Signature]
N. C. Choules

7/2/85
Date

[Signature]
H. A. Walker

7/1/85
Date

Approved By:

[Signature]
F. C. Hawkins, Chief
Quality Assurance Programs Section

7/2/85
Date

Inspection Summary

Inspection on June 4-7, and 12, 1985 (Report No. 50-266/85009(DRS);
50-301/85009(DRS))

Areas Inspected: Routine, announced inspection by two regional inspectors of the licensee's actions on previous inspection findings. The inspection involved a total of 50 inspector-hours onsite and 12 inspector-hours at the corporate headquarters.

Results: Of the 17 findings reviewed, 14 were closed. One deviation was identified relating to qualification/certification of inspectors.

DETAILS

1. Persons Contacted

Wisconsin Electric Power Company (WEPCo)

- *J. Zach, Manager, Point Beach Nuclear Plant
- *R. Link, Superintendent, Engineering, Quality, and Regulatory Services
- R. Franz, Administrative Specialist
- W. Herrman, Superintendent, Maintenance and Construction
- *J. Reisenbuechler, Superintendent, Technical Services
- J. Mielke, Supervisor, Administrative Services
- G. Maxfield, Superintendent, Operations
- F. Flentje, Supervisor, Staff Services
- N. Hoefert, Modifications Engineer
- **G. Krieser, General Superintendent, Quality Assurance Section
- **R. E. Helden, Superintendent, Nuclear Quality Assurance Division

USNRC

- *R. Hague, Senior Resident Inspector
- R. Leemon, Resident Inspector

*Denotes those attending the exit meeting at the Point Beach Plant on June 7, 1985.

**Denotes those attending the exit meeting at the Wisconsin Electric Power Company corporate offices in Milwaukee, Wisconsin on June 12, 1985.

2. Licensee Action on Previous Inspection Findings

- a. (Open) Violation (266/83-21-02; 301/83-20-02): Failure to provide training to instrumentation and control (I&C) and maintenance personnel performing QC inspections. A contractor was selected to develop a program covering the required training. The inspector was informed that the program was developed; however, subsequent review by Wisconsin Electric Company determined the program to be inadequate. The program is currently being re-written and training should start in September 1985. This item remains open pending completion of the training program and conduct of the training.
- b. (Open) Unresolved Item (266/83-21-03; 301/83-20-03): Failure to provide training to personnel performing activities affecting quality. The inspector was informed that the development of this program is nearing completion. Training of personnel is expected to start in July 1985. This item remains open pending verification of program implementation.
- c. (Closed) Open Item (266/83-21-04; 301/83-20-04): Weaknesses in the corrective action program. The licensee has written, approved, and implemented two new corrective action procedures: PPNP 2.3.11, "Nonconformance Reports", and QP 16-1, "Corrective Action Request Systems". The new work request system includes provision for corrective action tracking. Review of the offsite review committee's minutes indicates the items requiring corrective action and followup are being tracked.

- d. (Closed) Open Item (266/83-21-05; 301/83-20-05): Weaknesses in the work request (WR) procedure and WR form. The licensee had revised both WR procedure PBNB 3.1.3, "Maintenance Work Request", and the WR form. Implementation of the procedure and form was verified.
- e. (Closed) Open Item (266/83-21-07; 301/83-20-07): Independent verification of instrument and control (I&C) valves following maintenance on instruments performed during power operation had not been addressed. Calibration procedures for instruments requiring independent verification of I&C valves have been revised to require independent verification.
- f. (Closed) Violation (266/83-21-08A; 301/83-20-08A): Lack of procedures for the setting of torque switches on limitorque valves. The licensee had prepared two maintenance instructions for the setting of torque switches on limitorque valves (MI 5.1.1, "Limitorque MOV Torque and Limit Switch Adjustment for Gate and Globe Valves", and MI 5.1.2, "Limitorque MOV Torque and Limit Switch Adjustment for Butterfly Valves").
- g. (Closed) Violation (266/83-21-08E; 301/83-20-08E): Lack of a procedural requirement in the maintenance and construction department to perform an evaluation of M&TE found out of calibration. As previously reported in NRC Inspection Report 266/84-17 and 301/84-15, the licensee had revised procedure PBNP 5.5, "Control of Measuring and Test Equipment", to require an evaluation when M&TE is found out of calibration. However, the procedure did not specify who performed the evaluation, who approved the evaluation, or what is to be addressed in the evaluation. The procedure has been revised to address these items.
- h. (Closed) Open Item (266/83-21-12; 301/83-20-12): Weakness in design change procedure PBNP 1.2. The licensee had revised modification procedure PBNP 3.12, "Modification Request (MR)", and the MR form. Implementation of both the procedure and form was verified.
- i. (Closed) Violation (266/83-21-17A; 301/83-20-17A): Failure of Engineering, Quality, and Regulatory Services (EQRS) to perform audits under the direction of a designated lead auditor as required by ANSI N45.2.23. Section 1.8.18 of the Point Beach QA Program has been revised (Revision 1) to specify that the Nuclear Quality Assurance Department (NQAD) performs the audits necessary to meet regulatory requirements. This position is also described in Section 18 of the Nuclear Power Department QA Policy Manual, Revision 0. As reflected by these documents, audits conducted by onsite (EQRS) personnel are considered supplemental and will not necessarily be conducted to ANSI N45.2.12 and N45.2.23 requirements. The inspector reviewed NQAD audit schedules and records. These audits provide adequate coverage of areas required to be audited by Criterion 18 of 10 CFR 50, Appendix B, and the Technical Specifications. The inspector has no further concerns in this area.

In the followup of this violation, the inspector reviewed records of audit No. A-P-85-05. This was an audit of Nuclear Engineering which was conducted April 15-18, 1985. The audit contained ten findings and six observations. During the audit, action was also taken to resolve three findings and four observations written on a previous audit (A-109-84 conducted in December 1984). Action was not satisfactory to close two of the findings and three of the observations. Additionally, reference was made in the audit to eight deficiencies which were noted in a Sargent and Lundy drawing control study conducted in April 1985. The inspector is concerned that the number and significance of the items identified in the audit, as well as the incomplete corrective actions taken in regard to the items noted in the December 1984 audit, indicate that prompt and effective corrective actions are not being achieved. This is considered an open item pending further review (266/85009-01; 301/85009-01).

- j. (Closed) Open Item (266/83-21-18; 301/83-20-18): No documented delineation of authority or responsibility between the Nuclear Quality Assurance Department and EQRS) relative to audits. The inspector reviewed Section 1.8.18, of the Point Beach Quality Assurance Program, Revision 1, and Section 18 of the Nuclear Power Department QA Policy Manual, Revision 0. These documents adequately describe the audit authority and responsibilities of NQAD and EQRS.
- k. (Closed) Unresolved Item (266/83-21-21; 301/83-20-21): Lack of documented requirements for final inspection of open systems prior to closing the system. The licensee had issued maintenance instruction MI 32.4, "Guidelines for the Exclusion of Foreign Material From Plant Systems", which included documenting inspection requirements on the maintenance work request or modification request associated with the closure inspection.
- l. (Closed) Violation (266/83-21-22E; 301/83-20-22E): The I&C Department did not annotate or update drawings in the shop when DCNs were issued. The licensee has issued procedure PBNP 6.7, "I&C Drawing Control", specifying control and updating requirements for drawings under the control of the I&C department. Outstanding DCNs have been incorporated into I&C controlled drawings.
- m. (Closed) Unresolved Item (266/83-21-23; 266/83-20-23): Failure to conduct biannual review of procedures. Procedure PBNP 2.1.2, "Periodic Procedure Review", has been revised to provide better guidance and documentation requirements. The inspector verified by sampling selected procedures in various plant departments that the biannual reviews were being conducted.
- n. (Closed) Violation (266/83-21-24B; 301/83-20-24B): Failure of the Off Site Review Committee (OSRC) to audit actions taken to correct deficiencies in facilities or methods of operation. The inspector reviewed records of corrective action audits conducted in September 1984 and March-April 1985. The audits appeared to be adequate. In reviewing the audit schedule, the inspector noted that future corrective action audits were scheduled at six month intervals.

- o. (Closed) Violation (266/83-21-26; 301/83-20-26): Failure to implement a program to control items with a limited shelf-life. The inspector reviewed procedures PBNP 3.3.3, Revision 2, "Shelf Life Control Program" and PBNP 9.11, Revision 0, "Administration of the Shelf Life Control Program". The procedures were adequate in content. Five purchase orders involving limited shelf life items were selected from the completed purchase order file in material stores and the records were reviewed. The items were also physically located and appropriate marking was verified.
- p. (Open) Unresolved Item (266/83-21-27; 301/83-20-27): Verification of the licensee's corrective action in response to an internal audit of procurement practices. The inspector reviewed corrective action taken in response to the audit. Audit items regarding the lack of receiving procedures for inspection of both I&C equipment and material received and stored in material stores remain open. There is no scheduled date for completion of these procedures; however, the inspector was informed that the required work was expected to be completed by December 31, 1985. This item remains open pending full implementation of corrective action.
- q. (Closed) Unresolved Item (266/84-20-04; 301/84-18-04): Qualification of inspection personnel to ANSI N45.2.6. Wisconsin Electric Power Company (WEPCo) has taken exception to certifying inspection personnel to ANSI N45.2.6 requirements. An alternative method to ensure that inspection personnel are properly qualified was proposed in WEPCo letter dated July 31, 1981, from C. W. Fay to H. R. Denton. The proposal was accepted by the NRC in a letter dated April 19, 1982, from Robert A. Clark to C. W. Fay. The licensee's commitments included the (1) evaluation of personnel to meet minimum qualification requirements, (2) periodic evaluation of inspectors' work performance to ensure a continued high level of qualification, and (3) demonstration of an inspector's proficiency before he is permitted to perform independent inspection.

During the review of records to verify that the commitments were being met, the inspector identified the following:

- (1) There was no objective evidence that an evaluation of inspection personnel had been performed to ensure that they met minimum qualification requirements.
- (2) There was no objective evidence of periodic evaluations of inspectors' work performance to ensure a continued high level of inspection personnel qualification
- (3) There was no objective evidence that inspection proficiency was required to be demonstrated.

These three examples are considered to be a deviation from the licensee's commitments to the NRC regarding the qualification of inspection personnel (266/85009-02; 301/85009-02).

3. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. An open item disclosed during the inspection is discussed in Paragraph 2.i.

4. Exit Meeting

The inspectors met with licensee representatives (denoted in Paragraph 1) at the Point Beach Nuclear Plant on June 7, 1985, and at the corporate offices in Milwaukee, Wisconsin on June 12, 1985. The purpose, scope and findings of the inspection were summarized. The inspectors discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspectors during the inspection. The licensee did not identify any such documents or processes as proprietary.