

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-440/85020(DRS)

Docket No. 50-440

License No. CPPR-148

Licensee: Cleveland Electric Illuminating Company
Post Office Box 5000
Cleveland, OH 44101

Facility Name: Perry Nuclear Power Plant, Unit 1

Inspection At: Perry Site, Perry, OH

Inspection Conducted: April 15-19 and April 29-May 3, 1985

Inspectors: R. A. Westberg

5/21/85
Date

Hand for
R. J. Smeenge

5/21/85
Date

Approved By: F. C. Hawkins, Chief
Quality Assurance Programs Section

5/21/85
Date

Inspection Summary

Inspection on April 15-19 and April 29-May 3, 1985 (Report No. 50-440/85020(DRS))

Areas Inspected: Routine announced inspection by two regional inspectors of licensee action on previous inspection findings; control of test and measuring equipment; document control; audits; QA/QC administration; surveillance testing and calibration control; and records. The inspection involved 108 inspector-hours onsite and 20 inspector-hours of in-office procedure review.

Results: No violations or deviations were identified.

8505310650 850522
PDR ADOCK 05000440
Q PDR

DETAILS

1. Persons Contacted

Cleveland Electric Illuminating (CEI) Company

- *C. M. Shuster, Manager, Nuclear Quality Assurance Department (NQAD)
- *B. D. Walrath, General Supervising Engineer, Operational Quality Section (OQS)
- *J. J. Lausberg, Unit Supervisor, OQS
- J. L. Hansen, Surveillance Coordinator, Perry Plant Technical Department (PPTD)
- G. R. Anderson, Electrical and I&C Lead, PPTD
- D. L. Geisweidt, Supervisor, Information Processing
- D. R. Cleavenger, Reproduction Services Lead
- S. A. Braunfield, Supervisor, M&TE Calibration Lab
- R. Scherman, Lead Supervisor, Maintenance
- T. A. Boss, Supervisor, Quality Audit Unit
- *R. Farrell, Manager, Perry Plant Services Department (PPSD)
- *F. J. Kocsis, Supervisor, Records Management, PPSD
- *W. R. Kanda, General Supervising Engineer, PPTD
- *J. G. Marjenin, Senior Project Engineer, Nuclear Design and Analysis (ND&AS)
- *J. H. Bellack, General Supervising Engineer, ND&AS
- *C. Bangerter, Senior Engineering Technician, ND&AS
- *J. J. Waldron, Manager, PPTD
- *N. J. Lehman, Staff Analyst, PPTD

USNRC

J. A. Grobe, Senior Resident Inspector

Other personnel were contacted as a matter of routine during the inspection.

*Indicates those attending the exit meeting on May 3, 1985.

2. Licensee Action on Previous Inspection Findings

- a. (Closed) Unresolved Item (440/85011-03). Review of proposed trending procedure. The licensee issued Procedure No. NQADP-1602, "Trend Analysis." The inspector reviewed the implementation of this procedure and has no further questions.
- b. (Closed) Open Item (440/85014-01). Review of revised functional position descriptions (FPDs). The inspector reviewed the revised FPDs and determined that the personnel filling these positions met the education and experience requirements.

- c. (Closed) Open Item (440/85014-02A). Review of revised procurement program procedure. The inspector reviewed Procedure No. POP-0401, "Procurement Control," Revision 1, and determined that it accurately reflected the operations procurement program.
- d. (Closed) Open Item (440/85014-02B). Ten design change and modification procedures were in revision, draft, or approval status. The inspector reviewed the affected procedures and had no further concerns.

3. Control of Test and Measuring Equipment

The inspector reviewed the program to verify that the licensee had implemented a program to control test and measuring equipment that was in conformance with regulatory requirements and the applicable industry guides and standards.

a. Documents Reviewed

- (1) NQADP 1201, "Control of Measuring and Test Equipment," Revision 0
- (2) OM1A PAP-1201, "Control and Calibration of Measuring and Test Equipment," Revision 1
- (3) OM1C MAP-1201, "Control of Maintenance Section's Measuring and Test Equipment," Revision 0
- (4) OM1E RAP-1202, "Control and Calibration of Chemistry Equipment, Standards, Sources and Reagents," Revision 0
- (5) OM1E RAP-1203, "Control and Calibration of Health Physics Instruments and Standards," Revision 0

b. Results of Inspection

The inspector reviewed the test and measuring equipment records in the instrument and calibration (I&C) area, maintenance area, and the chemistry unit. All equipment examined in these areas were found to have current calibration stickers or tags and were stored in a limited access area. Usage records were being maintained for all the equipment.

Calibration recall was controlled by the Measuring and Test Equipment (M&TE) Master List. Calibration standards were found to be traceable to the National Bureau of Standards. Calibration procedures were prepared for each piece of equipment. As-found measurements were recorded prior to calibration. Out of Calibration notices for faulty equipment were sent to all users of the equipment since the last calibration so that they could evaluate and document acceptability of items tested or measured using the faulty equipment.

Records for M&TE identified on five maintenance work orders and five pre-operational tests were reviewed. All M&TE was in current calibration at the time of use. The as-found measurements of all equipment which had been calibrated were within the established tolerances. On completion of a pre-operational test, all the M&TE is sent to the I&C calibration lab so that as-found measurements can be taken. Plant equipment is not turned over to operations until this calibration is completed.

Standards, chemicals, reagents, and solutions stored in the chemistry lab were examined. All containers examined identified a shelf life and none were found with a past due date.

During the review of procedures, the inspector noted that there is no time frame identified for conducting the evaluation and documentation of acceptability of tests conducted using M&TE found to be out of calibration (OOC). Records showed that approximately 50% of the evaluations had not been conducted in a timely manner and the documentation for the evaluations are not being returned to M&TE to complete the plant records: 5 of 14 OOC notices which were 90-120 days old had not been returned, 10 of 19 which were 60-90 days old had not been returned, and 10 of 18 which were 30-60 days old had not been returned. As a result of this delay, it is possible that some M&TE could be calibrated more than one time before the evaluation is performed. The inspector's concern was discussed with the licensee QA and M&TE groups, and it was agreed that the procedures would be revised to include both a specific time for performing the evaluation and a method would be identified to provide a visible record of overdue evaluations. The procedures were revised on May 1, 1985. The inspector reviewed the changes and had no further concerns.

No violations or deviations were identified.

4. Document Control

The inspector verified that a quality assurance program relating to document control had been implemented which was in conformance with FSAR commitments and regulatory requirements. The inspector reviewed administrative controls to verify timely distribution of as-built documents, control of obsolete documents, and maintenance of a master document index.

a. Documents Reviewed

- (1) NQADP-601, "Document Control," Revision 1
- (2) PAP-0607, "Perry Plant Department Drawing Control," Revision 0
- (3) POP-0601, "Document Control," Revision 0
- (4) NEDP-0502, "Program Revision Notices," Revision 0
- (5) 37-0618, "Processing of Approved Drawings," Revision 2

(6) 91-0352, "Design Drawings," Revision 0

b. Results of Inspection

The inspector recorded the revision and posted changes (ECNs) identified on 15 safety-related drawings which were randomly selected from the master file. The revision numbers and posted changes were then compared with the master index and the drawings in the control room, area engineering department, nuclear test section, plant engineering department, and the systems engineering response team department.

The stick file in plant engineering had two drawings that were not the current revisions. Subsequent inspection determined this loss of control to be an isolated case. All other areas had the latest revisions of the drawings; however, three current ECNs had not been posted. After further review, the inspector identified that copies of these ECNs were being distributed by the document control group.

Contractor document stations identified on the controlled distribution lists for these drawings are provided copies by means of a transmittal cover which requires acknowledged receipt and return to the drawing control center. Acknowledged receipts had been returned for all the documents checked.

No violations or deviations were identified.

5. Audit Program

The inspector verified that a quality assurance program relating to audit activities had been implemented and was in conformance with the operational QA Program; the Technical Specifications; 10 CFR 50, Appendix B; and ANSI N18.7-1976.

a. Documents Reviewed

- (1) NQADP 1801, "Audit Program Control," Revision 1
- (2) NQADI 1840, "Audit Performance," Revision 1
- (3) Section 18 of QA Program

b. Audits Reviewed

- (1) P1084-05, Condition Reports and Nonconformance Control
- (2) P1084-08, Design Change
- (3) P1085-04, Control of Measuring and Test Equipment

c. Results of Inspection

The inspector verified that an audit schedule had been prepared, auditors were qualified, procedures for control of audits had been prepared, audits were being performed as required, and audit findings were being tracked and resolved. Several scheduled audits had been delayed because of little or no activity in the areas identified to be audited. The audit packages reviewed were found to be satisfactory.

No violations or deviations were identified.

6. QA/QC Administration

The inspector reviewed the program for QA/QC administration to verify conformance with regulatory requirements and commitments. The following items were considered during this review: (1) definition of the scope and applicability of the QA program; (2) establishment of appropriate controls for preparation, review, and approval of QA/QC procedures; and (3) establishment of a mechanism for reviewing and evaluating the QA program.

a. Documents Reviewed

- (1) PNPP Quality Assurance Plan, Section 2, "Quality Assurance Program," Revision 0
- (2) PNPP Quality Assurance Plan, Section 6, "Document Control," Revision 0

b. Results of Inspection

The inspector's review indicated that the scope of the QA program clearly identified the structures, systems, components, documents, and activities to which the QA program applies. The administrative controls for QA/QC procedures provided for their review and approval prior to implementation, revision, distribution, and recall. Responsibilities were assigned and methods established to ensure a complete review of the program's effectiveness.

No violations or deviations were identified.

7. Surveillance Testing and Calibration Control

The inspector reviewed the program for the control and evaluation of surveillance testing, calibration, and inspection required by Section 4 of the Technical Specifications and Inservice Inspection of Pumps and Valves as described in 10 CFR 50.55a(g); and calibration of safety-related instrumentation not specifically controlled by the Technical Specifications. The following items, relating to the surveillance testing program and the calibration of safety-related instrumentation, were considered during this review: master schedules for surveillance testing; assigned responsibility for the maintenance of the master surveillance schedule;

formal requirements for the conduct of surveillance tests, calibrations, and inspections; assigned responsibilities and definition of the methods for the review and evaluation of surveillance test and calibration data; assigned responsibility to ensure that required schedules are met; and calibration requirements for safety-related instruments not addressed by the Technical Specifications.

The inspector's review of the program indicated that it was not complete. Of six procedures reviewed, four were in draft or revision status. The licensee agreed to have the required procedures in place by May 10, 1985. Pending further review, this matter is considered open (440/85020-01).

8. Records

The inspector reviewed the records control program to verify conformance with regulatory requirements, FSAR commitments, and industry guides and standards. The following items were considered during this review: administrative controls; assigned responsibility; record retention, and record storage.

a. Documents Reviewed

- (1) POP-1701, "Records Management Program," Revision 1
- (2) POP-1702, "Records Management Advisory Committee," Revision 0
- (3) POP-1703, "Records Retention/Disposition Schedule," Revision 0
- (4) POP-1704, "Records Identification and Handling," Revision 0
- (5) PAP-1701, "Plant Records Management," Revision 0

b. Results of Inspection

The inspector's review of the records control procedures indicated that the written program was acceptable with one exception: procedure No. POP-1701 did not describe the use of the records management retrieval manual. The licensee agreed to revise the procedure to include this item. This matter is considered open pending further review (440/85020-02).

The inspector's review of the program's implementation indicated two problems: First, no retention period had been identified for records generated by special reactor tests and experiments. Subsequent inspection indicated that the record retention periods are generated as a result of the record management department's review of the records capture statement in the procedures. However, in this case, Procedure No. PAP-1107, "Special Test Control," had not been issued or reviewed by records management. Pending further review, this matter is considered open (440/85020-03). Second, inspection of the records storage vault revealed a missing fire rating label on one door. This issue was previously identified during the Appendix R inspection.

The licensee added this door to the list generated for the proposed corrective action plan for that inspection. The inspector has no further questions on this matter at this time.

No violations or deviations were identified.

9. 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. Open items disclosed during the inspection are discussed in Paragraphs 7 and 8.b.

10. Exit Interview

The inspector met with licensee representatives on May 3, 1985, and summarized the purpose, scope, and findings of the inspection. The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee identified all documents reviewed as proprietary; however, none of these documents are quoted in this report.