

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/85-05
50-446/85-04

Construction Permits: CPPR-126
CPPR-127


Dockets: 50-445
50-446

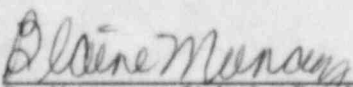
Licensee: Texas Utilities Electric Company (TUEC)
Skyway Tower
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

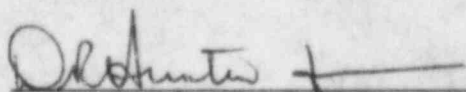
Facility Name: Comanche Peak Steam Electric Station (CPSES), Units 1 and 2

Inspection At: Glen Rose, Texas

Inspection Conducted: March 12-15, 1985

Inspector:  4/8/85
R. E. Baer, Radiation Specialist, Facilities
Radiological Protection Section Date

Approved:  4/8/85
B. Murray, Chief, Facilities Radiological
Protection Section Date

 4/23/85
D. M. Hunnicutt, Team Leader, Task Force Date

Inspection Summary

Inspection Conducted March 12-15, 1985 Report (50-445/85-05; 50-446/85-04)

Areas Inspected: Routine, unannounced inspection of the licensee's radioactive waste program including: organization, liquid radwaste, gaseous radwaste, solid radwaste, air cleaning systems, instrumentation, audits and reviews, and onsite storage of low-level waste. The inspection involved 35 inspector-hours onsite by one NRC inspector.

Results: Within the eight areas inspected, no violations or deviations were identified.

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DETAILS

1. Persons Contacted

Texas Utilities Generating Company

- *R. A. Jones, Manager, Plant Operations
- *L. G. Barnes, Operations Supervisor
- *D. W. Braswell, Engineering Superintendent
- *D. E. Deviney, Operations Quality Assurance (QA) Supervisor
- L. E. Dunn, Results Staff Engineer
- *R. E. Fishencord, Radiation Protection Supervisor
- R. L. Jeanes, Technical Support Engineer
- R. T. Jenkins, Operations Support Supervisor
- *B. T. Lancaster, Radiation Protection Engineer
- S. R. Lueders, Radwaste Coordinator
- M. T. McVean, System Engineer
- T. S. Neckowicz, Nuclear Engineer
- J. O'Donnell, Staff Health Physicist
- R. J. Sanford, QA Technician
- E. J. Schmitt, Staff Chemist
- L. A. Wojcik, Nuclear Engineer

Others

- P. A. Corwin, Consultant, MT&F Corporation
- A. D. Quam, Startup Test Engineer, Impell Corporation
- *J. E. Cummins, NRC Resident Inspector
- D. L. Kelley, NRC Senior Resident Inspector
- W. F. Smith, NRC Resident Inspector

The NRC inspector also interviewed several other licensee employees including radiation protection, administrative, engineering, and operations personnel.

*Denotes those present at the exit interview on March 15, 1985.

2. Licensee Action On Previous Inspection Findings

(Closed) Open Item (445/8314-07;446/8308-07): Air Cleaning Systems - This item involved the lack of approved preoperational test procedures and completion of preoperational tests. The licensee had developed and approved preoperational test procedures, and also completed preoperational testing.

This item is considered closed.

(Closed) Open Item (445/8314-08; 446/8308-08): Instrumentation - This item involved the lack of determination of the validity of calibration standards and representative sampling by off-line effluent monitors, completing operational, calibration and surveillance procedures, and system functional testing. The licensee had determined the validity of calibration standards and particulate plate-out correction factors for off-line effluent monitors. The licensee had also completed operational, calibration, and surveillance procedures as part of the preoperational functional testing of the radiation effluent monitoring system.

This item is considered closed.

3. Radioactive Waste Management Organization

The NRC inspector reviewed the licensee's onsite organization involved in radioactive waste management to determine compliance with Final Safety Analysis Report (FSAR) commitments.

The licensee had employed a health physicist to be responsible for radioactive material transportation in addition to other assigned duties. This individual had limited prior experience with radwaste transportation activities. He had attended station radwaste system training and vendor provided transportation and burial site training provided by an offsite vendor.

The NRC inspector reviewed station radwaste procedures listed in Table 1 which had been revised since the last radioactive waste management inspection.

No violations or deviations were identified.

4. Liquid Radioactive Waste System

The NRC inspector reviewed the licensee's liquid waste system to determine compliance with FSAR commitments.

The NRC inspector discussed with licensee representatives liquid system flow paths and process monitor locations, the reverse osmosis system operation (this system had been placed in long term, greater-than-seven-day shutdown), and initial startup test Procedure ISU-237A, "Gaseous and Liquid Radwaste System Performance" Revision 0, June 18, 1984, which is to be performed at various power levels.

No violations or deviations were identified.

5. Gaseous Radioactive Waste System

The NRC inspector reviewed the licensee's gaseous radioactive waste system to determine compliance with FSAR commitments. The NRC inspector

determined that there had been no changes to the gaseous waste system since the last inspection and that instrumentation specified in the proposed Technical Specifications for gaseous effluent monitoring was operational.

No violations or deviations were identified.

6. Solid Radioactive Waste System

The NRC inspector reviewed the solid radioactive waste system to determine compliance with FSAR commitments.

The NRC inspector reviewed Preoperational Test XCP-PT-60-01, "Solid Waste Disposal System," Revision 1, July 23, 1983, approved by the Joint Test Group (JTG) on December 21, 1984. This test involved crane, hoist, and spent filter transfer cask operation. The inspector noted that replacement and handling of all three types of filters used at the plant had been demonstrated. The NRC inspector also reviewed Preoperational Test XCP-PT-60-02, "Radioactive Waste Solidification System," Revision 1, February 10, 1984, approved by the JTG on November 2, 1984. This test had been modified to demonstrate the capability to transfer spent resins, evaporator concentrates, and chemical drain tank effluents to a bulk disposal outlet where a vendor supplied portable solidification system will be connected.

The NRC inspector discussed with licensee representatives the portable solidification system placement and proposed method of connecting to the bulk disposal outlets. The licensee stated that the general location for placement of the portable system had been determined; but the exact location would not be known until the unit actually arrives onsite. The portable unit will not be ordered until after a low-power license is issued. The hoses from the portable solidification system to the bulk disposal outlets will be of the protected type, and the hose routing will be determined after siting. The NRC inspector stated that the vendor supplied portable solidification system would need to be tested to assure that waste can be processed and that hoses are able to be back-flushed to maintain acceptable radiation levels in the area. The NRC inspector stated that provisions needed to be established to assure that this testing will be completed prior to exceeding five percent power level.

No violations or deviations were identified.

7. Air Cleaning Systems

The NRC inspector reviewed the licensee's air cleaning systems to determine compliance with FSAR commitments, and the recommendations of ANSI Standards N509-1980, N510-1980, and Regulatory Guides 1.140 and 1.52.

The licensee had completed preoperational testing on all four systems: ICP-PT-07-03, "Control Room Filtration System," ICP-PT-24-03, "Primary Plant Ventilation System," ICP-PT-45-07, "Containment Pre-Access Filtration System," and ICP-PT-46-02, "Containment Hydrogen Purge Filtration System." The NRC inspector reviewed the approved, completed tests identified above, and Test Deviation Reports (TDR)-3968 through 3971 which were being included, one with each test, to resolve a reproduction copy legibility deficiency that had been noted by the licensee.

The NRC inspector reviewed TDR-3740 on Procedure ICP-PT-07-03, which had been written to provide for the missing data sheets on iodine removal efficiency tests, noted deficient in NRC Inspection Report 50-445/84-42; 50-446/84-16. This TDR contained legible copies of the data sheets.

No violations or deviations were identified.

8. Radiation Monitoring Instrumentation

The NRC inspector reviewed the licensee's inplant radiation monitoring systems for compliance with FSAR commitments and NUREG-0737 requirements.

The NRC inspector reviewed Preoperational Test ICP-PT-70-01 "Radiation Monitor System Functional Test," which had been approved by the JTG on December 21, 1984. This test package provided for ensuring the proper operation of the associated software, hardware, and included control deficiency reports (CDR's) which had been issued during this test. All CDR's had been satisfactorily resolved. The NRC inspector also reviewed test data associated with Preoperational Test TNE-NU-CA-7000-126, "Radiation Monitor Sampling Line Particulate Plateout Test Analysis." These test data provided the methodology used to determine the following parameters: total integrated stack flow rate, probe and tubing plateout correction factors, particle counter correlation coefficients and errors, sample line particle plateout losses and associated errors, sample line particle size distribution surface area loss, sample line particle size distribution mass loss, and sample line plateout correct vendor supplied final report "Monitor Sample Line Plateout Measurement Results at Comanche Peak Units 1 and 2."

Correction factors have been supplied for XRE-5568 A & B north and south stack monitors, XRE-5570 A & B low range, XRE-5570 A & B mid/high range north and south stack wide range noble gas monitors, and IRE-5502 containment particulars, iodine, and gas monitor. The licensee stated that these correction factors would be entered into the digital radiation monitoring system computer and chemistry procedures for the appropriate instruments.

No violations or deviations were identified.

9. Audits And Reviews

The NRC inspector reviewed the licensee's internal audit/review program regarding radioactive waste management and transportation activities to determine compliance with FSAR commitments.

The NRC inspector reviewed Surveillance Report QSR-84-038 which had been performed in November 1984 on the receipt, storage, packaging, and shipment of radioactive material. The NRC inspector reviewed the qualifications and experience of the auditor for the above surveillance.

No violations or deviations were identified.

10. On-Site Storage of Low-Level Waste

The NRC inspector discussed with licensee representatives the status of the onsite low-level waste storage building. The licensee stated that it would take approximately one year to construct the facility once the decision has been made to build and funds had been appropriated.

No violations or deviations were identified.

11. Exit Interview

The NRC inspector met with licensee representatives identified in paragraph 1 at the conclusion of the inspection on March 15, 1985. The NRC inspector discussed the scope and findings of the inspection. The NRC inspector stated that actions had been completed to resolve open items in the radioactive waste management program that needed to be completed before issuance of an operating license. The NRC inspector stated that Open Item 445/8314-06; 446/8308-06 will need to be resolved prior to exceeding the five percent power level.

Table 1

Radwaste System Procedures

RWS-102, "Drain Channel A", Revision 1, November 1, 1984
RWS-103, "Drain Channel B", Revision 1, November 23, 1984
RWS-104, "Drain Channel C", Revision 1, November 20, 1984
RWS-201, "Gaseous Waste Processing System", Revision 1, October 22, 1984
RWS-301, "Radwaste Solidification System", Revision 1, December 12, 1984