

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-440/85037(DRS)

Docket No. 50-440

License No. CPPR-148

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

Facility Name: Perry Nuclear Power Plant, Unit 1

Inspection At: Perry Site, Perry, Ohio

Inspection Conducted: June 10-14 and 24-28, 1985

Inspector: *M. M. Mozer*
for R. A. Westberg

7/11/85
Date

Approved By: *R. L. Spessard*
F. C. Hawkins, Chief *for*
Quality Assurance Programs Section

7/11/85
Date

Inspection Summary

Inspection on June 10-14 and 24-28, 1985 (Report No. 50-440/85037(DRS))

Areas Inspected: Routine unannounced inspection by one regional inspector of licensee action on previous inspection findings, safety evaluation report review and followup, operating staff training, and maintenance program. The inspection involved 74 inspector-hours onsite.

Results: No violations or deviations were identified.

DETAILS

1. Persons Contacted

Cleveland Electric Illuminating Company (CEI)

- B. S. Ferrell, Licensing Engineer
- *J. J. Lausberg, Unit Supervisor, QA
- D. J. Takacs, General Supervisor, Maintenance
- D. L. Geisweidt, Supervisor, ICU
- K. C. Kaplan, Senior Engineering Technician
- H. E. Ravellette, Records Management Supervisor
- *C. M. Shuster, Manager, QA Department
- B. D. Walrath, General Supervising Engineer, QA
- M. D. Lyster, Manager, Perry Plant Operating Department
- R. J. Tudyach, General Supervisor, Operations
- T. A. Boss, Supervisor, Quality Audit Unit
- *F. R. Stead, Manager, Nuclear Engineering
- W. R. Kanda, General Supervising Engineer, Perry Plan Technical Department
- *S. F. Kensicki, Technical Supervisor
- A. F. Silakoski, General Supervisor
- F. J. Kocsis, Acting Chairman, ISEG
- *N. J. Lehman, Staff Analyst
- *K. E. Turosky, Associate Staff Analyst
- *L. R. Teichmaan, Supervisor Maintenance Planning
- *K. A. Matheny, Senior Engineer, NTS
- *R. L. Scherman, Lead Maintenance Supervisor
- *J. L. Hansen, Surveillance Coordinator
- *G. Chasko, Surveillance Engineer
- *R. L. Jones, Unit Supervisor, Operations

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- J. A. Grobe, Senior Resident Inspector, Operations
- D. E. Keating, Senior Resident Inspector, Construction

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

*Indicates those attending the exit meeting on June 28, 1985.

2. Licensee Action on Previous Inspection Findings

- a. (Closed) Open Item (440/85020-02): Procedure No. POP-1701 did not describe the use of the records management retrieval manual. The inspector reviewed the program revision notice to the procedure which documented the use of the retrieval manual.
- b. (Closed) Open Item (440/85020-03): No retention period identified for records generated by special reactor tests and experiments. The inspector reviewed the record retention and disposition schedule (RRDS) dated January 30, 1985. This schedule established the retention period as "life of the plant".

- c. (Closed) Violation (440/82009-04d): CEI failed to adhere to storage requirements specified by Procedure Nos. 3-1302 and 7-1302. The inspector reviewed two of the remaining field storage maintenance requirement (FSMR) forms for Unit 1 and verified that the requirements were met.
- d. (Closed) Violation (440/82009-04f; 441/82009-04f): Contrary to Procedure No. 1-1806, CEI in process audit reports did not either reflect the persons contacted or contain an evaluation statement. The inspector reviewed Procedure No. 21-1801, "In Process Audits", which replaced procedure No. 1-1806. In addition, 17 audits for 1984 and 11 audits for 1985 were reviewed and found to contain evaluation statements and documentation of persons contacted.
- e. (Closed) Violation (440/83031-07): Storage, issuance, application, and installation of fasteners and some components were not adequately controlled. Specific examples previously identified and their resolution during this inspection are as follows:

- (1) SA-193 Gr B7 bolts were found in a bin and carton marked A-325. The inspector reviewed audit report No. 995 and action request No. 995-001 which determined that SA-193 B7 bolts are equal to or better than A-325 bolts if substituted.
- (2) Bolts for battery rack Nos. 1R42-5002 and 2R42-5003 were not marked SAE Grade 2 as specified. The inspector reviewed the licensee's response that indicated that SAE Grade 2 bolts were not required to be marked. The inspector determined this to be correct per SAE J429-1980.

The licensee elected to replace all the bolts with SAE Grade 5 material as specified by the disposition of nonconformance report No. OQC-307. The inspector reviewed the closure of this report and surveillance Nos. R83-4364 and R83-3460, which witnessed and inspected the bolt replacement.

- (3) Bolts installed for 4 KV interframe bolting were not marked SAE Grade 2. See (2) above for resolution.
- (4) Flanged joints of diesel starting air line No. 1RU4509 had missing and unmarked bolts. The inspector reviewed the licensee's response that indicated that the subject bolts were temporary. The inspector determined this to be correct and reviewed the documentation of the permanent bolt's installation per procedure No. 1X-5.
- (5) Incorrect washers installed on Class 1E motor control center No. 21224-5019 interframe bolting. The inspector reviewed the documentation of the closure of nonconformances written by the licensee, the certificate of conformance for the new washers, and the inspection reports documenting their installation.

- (6) Pullman craft personnel were not maintaining traceability of small items and threaded pieces of component supports. The inspector reviewed the licensee's commitment to perform audits and surveillances in this specific area and the corrective action taken for the examples cited.
- f. (Closed) Violation (440/83-31-08): Three of 500 nonconformance reports were closed prior to completion of the required corrective actions. The inspector reviewed to procedure No. PA-1501, "Project Nonconformance Control", Revision 5 and No. PA-1504, "Contractor Initiated NR's", Revision 3. Both which cautioned QC inspectors to verify that physical work is completed and steps to prevent recurrence are implemented and verified prior to closeout. The inspector also reviewed the closeout of the specific examples cited and the results of related inprocess QA audits.
- g. (Closed) Open Item (440/85020-01): Four of six surveillance test procedures were in draft or revision status when the program was initially reviewed. The inspector reviewed the following procedures:
- (1) PAP-0212, "Technical Specification Surveillance Program", Revision 0.
 - (2) PAP-0903, "Repetitive Task Program", Revision 1.
 - (3) PAP-1105, "Surveillance Test Control", Revision 1.
 - (4) PAP-1113, "Surveillance Requirement Tracking", Revision 0.
 - (5) PAP-1114, "Operational Condition Change Checklist", Revision 0.
 - (6) TAP-0503, "Preparation of Technical Specification Surveillance Instructions", Revision 4.
- h. (Closed) Open Item (440/85022-04): Determine that training and qualifications of licensee personnel have been established in accordance with SER Section 13.2.1.

The inspector reviewed the program for training and qualification of licensee personnel and determined that it was consistent with the program described in the Perry Safety Evaluation Report (SER), Section 13.2.1 and TMI Action Plan requirements Nos. 1.A.2.1, 1.A.2.3, and 1.A.3.1.

3. Operating Staff Training

The inspector reviewed the operating staff training program to verify conformance with regulatory requirements, FSAR commitments, and industry guides and standards.

a. Documents Reviewed

TM-6, "NRC Licensed Operator Training", Revision 0.

b. Results of Inspection

To assess implementation of the program, the inspector reviewed training records of individuals in the following job classifications: (1) principle staff member, (2) reactor operator candidates, (3) senior reactor operator candidates, and (4) QA/QC technicians.

At the time of this inspection, the written training program for the remainder of the operating staff was neither approved nor implemented. Licensee personnel stated that this part of the training program is planned to be implemented by August 8, 1985. Pending further review, this matter is considered open (440/85037-01).

4. Maintenance Program

The inspector reviewed the maintenance program to verify that it was in conformance with regulatory requirements, Technical Specifications, and industry guides and standards. The following items were considered during this review: corrective maintenance, equipment control, motor operated valve maintenance program, preventive maintenance, special processes, cleanliness control, and housekeeping control.

a. Documents Reviewed

- (1) PAP-0902, "Work Request System", Revision 1.
- (2) PAP-0903, "Repetitive Task Program", Revision 1.
- (3) PAP-0905, "Work Order Process", Revision 2.
- (4) PAP-1401, "Equipment Tagging", Revision 1.
- (5) MAP-0203, "Conduct of Maintenance", Revision 0.
- (6) PMI-0030, "Maintenance of Limitorque Valve Operators", Revision 0.
- (7) PAP-0204, "Housekeeping/Cleanliness Control Program", Revision 1. Draft 1.

b. Results of Inspection

The inspector's review of the maintenance program procedures indicated that the written program was acceptable.

5. 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 Paragraph 3.

6. Exit Interview

The inspector met with licensee representatives on June 28, 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.