

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/85021(DRP)

Docket No. 50-461

License No. CPPR-137

Licensee: Illinois Power Company  
500 South 27th Street  
Decatur, IL 62525

Facility Name: Clinton Power Station

Inspection At: Clinton Site, Clinton, IL.

Inspection Conducted: April 16 through May 28, 1985

Inspectors: T. P. Gwynn  
W. F. Christianson  
P. L. Hiland  
F. J. Jablonski

Approved By: *F. J. Jablonski for*  
T. P. Gwynn  
Chief, Projects Section 1B

5/31/85  
Date

Inspection Summary

Inspection on April 16 through May 28, 1985 (Report No. 50-461/85021(DRP))

Areas Inspected: Routine safety inspection by resident inspectors of construction and preoperational testing activities including applicant action on previous inspection findings; review of allegations; employee concerns; plant maintenance procedures review; operating staff training; independent inspection of Safeteam concern responses; functional or program areas (including site surveillance tours and cable installation activities); preoperational test program implementation verification; review of overinspection program results (regional request); review of overinspection program implementing procedure changes (regional request); and site activities of interest. The inspection involved a total of 225 inspector-hours onsite by three resident inspectors and one region-based inspector, including 42 inspector-hours onsite during off-shifts.

Results: Of the eleven areas inspected, no items of noncompliance or deviation were identified.

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## DETAILS

### 1. Personnel Contacted

#### Illinois Power Company (IP)

D. Antonelli, Supervisor - Plant Operations  
\*G. Bell, Director, Construction and Procurement QA  
R. Campbell, Director - Quality Systems and Audits  
W. Connell, Manager - Quality Assurance  
J. Cook, Assistant Power Plant Manager, Operations  
\*H. Daniels, Project Manager  
S. Fisher, Manager, Nuclear Support  
L. Floyd, Special Projects  
\*W. Gerstner, Executive Vice-President  
D. Glenn, Director - Safeteam  
K. Graf, Director - Nuclear Support  
J. Greene, Manager - Startup  
\*D. Hall, Vice President, Nuclear  
\*M. Hassebrock, Director - Quality Engineering and Verification  
D. Hoem, Supervisor, Maintenance and Planning  
\*D. Holtzsch, Supervisor, Technical Assessment  
M. Hurshman, General Training Development Specialist  
J. Jones, Supervisor, Mechanical Maintenance  
S. Krushas, Compliance Analyst, Departmental Training Coordinator  
\*J. Loomis, Construction Manager  
M. Lyon, Senior Instructor Operations  
M. Maher, Supervisor, Electrical Maintenance  
J. Miller, Director - Startup Programs  
H. Nodine, Supervisor, Control and Instrumentation  
\*J. Palchak, Supervisor - Compliance & Configuration Control Department  
J. Patten, Director - Nuclear Training Department  
J. Perry, Manager - Nuclear Program Coordination  
S. Razor, Supervisor - Construction QA  
S. Richey, Assistant Power Plant Manager - Maintenance  
\*F. Spangenberg, Director - Nuclear Licensing and Configuration  
J. Sprague, Licensing, Project Specialist  
\*L. Tucker, Director - Startup Testing  
D. Wier, Electrical Lead Startup Engineer  
H. Victor, Manager - Nuclear Station Engineering  
C. Yeazle, Assistant Supervisor Electrical

#### Baldwin Associates (BA)

\*R. Green, Assistant Manager, Quality and Technical Services  
\*A. King, Project Manager  
L. Osborne, Manager - Quality and Technical Services

#### WIPCO/Soyland Power

J. Greenwood, Manager - Power Supply

\*Denotes those attending the monthly exit meeting.

The inspectors also contacted others of the construction project and operations staffs.

2. Applicant Action On Previous Inspection Findings

- a. (Closed) Noncompliance Item (461/84030-01): The installation of pipe support 1D018010G violated several procedural requirements. These violations were not identified in the quality reviews performed by the applicant's contractor.

Refer to inspection reports 50-461/85005, 85012, and 85015. During this inspection, the inspector reviewed nonconforming material reports (NCMRs) 1-0338 and 1-0457. The inspector found that all required actions under these NCMRs were complete. All corrective actions committed by the applicant in response to the notice of violation have been completed. This item is closed.

- b. (Open) Open Item (461/85012-03): Plant staff procedures for document control were misclassified and did not receive an appropriate level of review.

The inspector reviewed the results of a detailed review conducted by the applicant in response to the inspector's concern. That review, documented in IP letter Y-30630 dated 5/24/85 confirmed that additional action was required of the plant staff and of IP Nuclear Support in order to provide an effective, programmatic approach to document control for station operations. The review did not identify any improperly controlled documents.

The applicant expects to have a schedule to complete required actions by June 7, 1985. The inspector will continue to monitor the applicant's actions with regard to this matter.

- c. (Open) Unresolved Item (461/85005-47): A former BA document reviewer was terminated by BA for falsification of education on the resume he presented as part of the basis for his employment. NRC review of the individual's certification and training records confirmed that the individual was not properly certified. BA had not taken any corrective action as a result of their findings, other than to terminate the individual. This matter remained unresolved pending NRC review of BA corrective action commitments and results under Corrective Action Request (CAR) 221.

Additional concerns related to past employment history of individuals working in the BA Document Review Group (DRG) were identified in inspection report 50-461/85015. Those concerns were documented by BA in CAR 239.

During this report period, the inspector reviewed preliminary results under BA CAR 221, and the closure of BA CAR 239.

Review of CAR 221 revealed that the sampling technique utilized by BA in their review of the individual's past work was not correctly applied. This matter was discussed with the applicant who directed BA to perform the review in an acceptable manner. This CAR remains open; the inspector will continue to follow the applicant's actions under this CAR.

Review of the closure justification for BA CAR 239 revealed several inconsistencies which were discussed with the applicant. The applicant was reviewing BA actions with respect to this CAR at the conclusion of the inspection period.

This matter remains unresolved pending a determination of the adequacy of the program undertaken by BA in 1984 to assure that document review personnel were adequately qualified (in terms of past education and experience).

- d. (Closed) Open Item (461/85015-04): SER paragraph 13.2.1 - Verify management directive emphasizing management responsibility for shift supervisor (TMI item I.C.3).

This item was opened in error. It directly duplicates open item (461/85005-30). This item is closed.

- e. (Closed) Open Item (461/85015-05): SER paragraph 13.5 - Verify that procedures have been completed to ensure independent verification of system lineups prior to fuel load.

This item was opened in error. It directly duplicates open item (461/85005-32). This item is closed.

- f. (Closed) Open Item (461/84025-02): Review of Safeteam responses to employee identified concerns.

The inspector reviewed the status of the last remaining concern regarding Safeteam responses to employee identified concerns. As documented in inspection report 50-461/85012, the response to concern No. 10024-A was not complete. Review of the matter documented in the concern indicated that additional action had been taken by the applicant to resolve the identified concern which was not reflected in the Safeteam response.

The Safeteam director provided additional information in the investigative file to substantiate the Safeteam response and stated that no additional response was required. The inspector requested that the Safeteam provide one additional piece of information prior to closure of this item. The Safeteam director provided that information which indicated that the matter related to concern No. 10024-A had been rereviewed and found to be acceptable as is under nonconforming material report No. 1-0628. This item is closed.

No items of noncompliance or deviation were identified.



### 3. Employee Concerns

The resident inspectors reviewed concerns expressed by site personnel from time to time throughout the inspection period. Those concerns related to regulated activities were documented by the inspectors and submitted to Region III. Three concerns were transmitted to the regional office during this report period.

### 4. Review Of Allegations

- a. (Closed) Allegation (RIII-84-A-0152) (#105): On October 10, 1984, the NRC Resident Office at the Clinton Power Station received an anonymous letter which alleged noncompliance to site procedures during the installation of a safety related pipe hanger. Subsequent inspections conducted by the Clinton resident inspector resulted in a Notice Of Violation (NOV) (noncompliance 461/84030-01) being issued to the applicant in Inspection Report (IR) 50-461/84030.

The applicants' written response dated January 9, 1985 did not address the first item of the NOV dealing with the failure of Baldwin Associates document review group (DRG) to identify certain document deficiencies during final document review (reference inspection report 50-461/85005). The applicants' supplemental response dated February 20, 1985 satisfactorily addressed all items cited in the NOV (reference inspection report 50-461/85012). The inspector reviewed and documented in IR 50-461/85015 the applicants' actions committed in response to the NOV and supplement.

The applicant has completed corrective action commitments made in response to the NOV (see para. 2.a. above).

This allegation was substantiated. The applicant has satisfactorily responded to the Notice Of Violation and completed corrective action. This matter is closed.

- b. (Open) Allegation (RIII-85-A-0096) (#142): Inadequate storage conditions in the laydown area east of Midway Industrial Contractors Sandblasting Building. As a result of this allegation, the NRC resident inspectors toured the identified laydown area and noted numerous discrepancies. The resident inspectors requested IPQA to conduct a surveillance of this laydown area. IP surveillance report No. CY-26753 documented the discrepant conditions and reported the corrective action taken.

This allegation was substantiated, however the applicant took immediate corrective action and the laydown area in question was not representative of the general site storage conditions (see paragraph No. 8.a.). This allegation will remain open pending followup of additional concerns being tracked under this allegation tracking number.

- c. (Open) Allegation (RIII-85-A-0055-2) (#128): BAP 1.5, Material Identification, conflicts with the installation procedures for electrical raceway and conduit installations. After January 1, 1984, heat (HT) number, receipt inspection report (RIR) number, and QC accept stamp were required to be on the material whenever material was cut. The stamp has been deleted from some procedures.

As documented in inspection report 50-461/85015, the inspector contacted the concerned individual on April 13 and 14, 1985. The individual identified BAP 3.3.6, Electrical Raceway Support Installation, and BAP 3.3.14, Conduit Support Installation, as the procedures in question. The concerned individual stated that, although the procedures appeared to provide the necessary instructions, the procedures were being interpreted differently by QC supervision. As a result, NCRs were not being initiated for certain electrical hanger materials identified by QC inspectors as installed after January 1, 1984 with no QC accept stamp applied.

This matter was reviewed with the applicant on several occasions throughout the report period. The applicant agreed that the procedures in question could be improperly interpreted. Misinterpretation of the procedural requirements could result in an apparent conflict with BAP 1.5 concerning the control of shim stock. The requirements of BAP 1.5 were the governing procedures and were correct. The applicant initiated procedure change requests in order to correct the apparent conflicts in BAP 3.3.6 and BAP 3.3.14.

The matter concerning the proper use of a QC accept stamp was still under review at the conclusion of the inspection period. This matter will be reviewed further in a subsequent inspection.

No items of noncompliance or deviation were identified.

## 5. Plant Maintenance Procedures Review

The inspector continued the plant maintenance procedure examination (refer to inspection reports 50-461/85-12 and 85015 (DRP)) to confirm that procedures are prepared to adequately control maintenance of safety related systems within applicable regulatory requirements.

### a. Applicable Regulatory Requirements and Applicant Commitments

- (1) 10CFR50
- (2) Regulatory Guide 1.33, revision 2, "Procedures for Performing Maintenance
- (3) ANSI N18.7-1976, "Administrative Controls and Quality Assurance for Operational Phase of Nuclear Power Plants"
- (4) ANSI N45.2-1977, "Quality Assurance Program Requirements for Nuclear Facilities"

- (5) CPS No. 1005.01, revision 13, "Preparation, Review, and Approval of Station Procedures and Documents"

b. Procedures Examined

The inspector examined the procedure content in the following categories:

- (1) Procedures for Performing Maintenance: includes preventative maintenance and repair procedures
- (2) Surveillance Procedures: includes mechanical (ME), electrical (E), and instrumentation and control (I&C) surveillance procedures

The following CPS safety related procedures were examined:

- (1) CPS No. 8120.20, revision 0, Dresser Relief Valve Maintenance
- (2) CPS No. 8120.30, revision 0, Relief Valve Setpoint Check
- (3) CPS No. 8625.04, revision 0, Recirc Loop Flow Control Valve Channel Calibration
- (4) CPS No. 94.33.35, revision 0, Low Pressure Coolant Injection System Response Time Test
- (5) CPS No. 8120.04S, revision 0, Maintenance of Anchor Darling Tilting Disc Check Valves
- (6) CPS No. IMP8121.02S, revision 0, Control Rod Drive Overhaul
- (7) CPS No. IMP8207.02S, revision 0, Emergency Diesel Maintenance
- (8) CPS No. IMP8216.02S, revision 0, Safety/Relief Valve Removal and Installation
- (9) CPS No. IMP8225.01S, revision 0, RR Pump Seal Removal/Installation
- (10) CPS No. IMP8503.01S, revision 0, 4160V Westinghouse Circuit Breaker Maintenance
- (11) CPS No. IMP8507.01S, revision 0, Diesel Generator Division 1/2 Electrical Maintenance
- (12) CPS No. IMP8513.01S, revision 0, HPCS Pump Motor Maintenance
- (13) CPS No. IMP8634.01S, revision 0, ECCS LPCS Injection Valve Pressure 049/050 Channel Calibration
- (14) CPS No. 1SP9434.03S, revision 0, ATWS Logic System Functional Test

c. Results

The procedures were in various stages of rereview; removing "laters", incorporating applicable technical specifications, and were subject to an independent review.

The procedure contents appeared to be consistent with the regulatory requirements and were technically adequate to assure that maintenance activities are conducted in a planned and documented manner to assure protection of the health and safety of the public.

Additional inspection will be performed in this area prior to fuel load to verify the adequacy of outstanding applicant actions noted above.

No items of noncompliance or deviation were noted.

6. Operating Staff Training

The inspector examined the CPS operating staff training programs to confirm that the applicant was training the operating staff; that a continuing training program was in progress; and that replacement employees receive training or have experience equivalent to that required for originally selected personnel. The inspector verified that the documented training program was established and was consistent with the CPS FSAR training commitments in the following areas:

a. Centralized Training - Nuclear Training Department (NTD)

The NTD is an independent department reporting to the Vice President - Nuclear. The Director - Nuclear Training is responsible for directing, planning, and coordinating the IP Nuclear Training program activities at CPS. The Director - Nuclear Training is assisted by four supervisors in the following areas:

(1) Supervisor - Training Development

Responsible for the development, evaluation, upgrading and accreditation of NTD programs, including procedures and instructions.

(2) Supervisor - Instruction

Responsible for the implementation, revision, and administration of training programs and assists in the development of NTD program material.

(3) Supervisor - Training Facilities

Responsible for providing the direction and administration of the simulator training facilities, equipment and materials, and development and maintenance of simulator certification and evaluation.



(4) Supervisor - Training, Assessment and Support

Responsible for directing, planning, organizing, scheduling, and coordinating support services associated with the NTD program.

The NTD is responsible for the following:

- (1) Provide centralized training
- (2) Obtaining and maintaining accreditation by Institute for Nuclear Power Operations (INPO) of training programs
- (3) Concurring in long range training plans and schedules
- (4) Evaluating the centralized, departmental and contracted training
- (5) Conducting licensed operator training and certification
- (6) Maintaining training records
- (7) Developing training standards
- (8) Performing job and task analysis
- (9) Approving training program
- (10) Training and qualifying training instructors

The NTD program is presently based on Corporate Nuclear Procedure 1.02, Nuclear Training, revision 1, the FSAR, and departmental implementing procedures. The NTD was developing a NTD Manual for program cohesion. The manual was issued April, 1985 and contained five (5) chapters. The manual, as presently planned, will contain twenty (20) chapters and was tentatively scheduled to be completed in August, 1985.

As a Near Term Operating License (NTOL), the applicant was committed to have ten (10) training programs ready for INPO accreditation within two years of plant startup (initial criticality). NTD's proposed plan is to submit the ten (10) programs for accreditation by November, 1987 (based on a January 1986 fuel load).

The NTD appeared to meet the requirements established by the FSAR, Section 13.2, Training.

b. Departmental Training

Department Managers/Directors are responsible for the following:

- (1) Establishing qualification and training requirements for each job category

- (2) Establishing departmental qualification programs
- (3) Ensuring that required proficiency is achieved and maintained
- (4) Ensuring that personnel training needs are established
- (5) Preparing and approving training goals and objectives
- (6) Providing on-the-job performance feed back to modify and improve department and NTD training methods
- (7) Maintaining on-the-job qualification checklists

The departmental training appeared to meet the requirements established by the FSAR, Section 13.2, Training, based on examination of the procedures and documentation referenced below in section e., On-The-Job Training.

c. Reactor Operator Training - Licensing Applicants

The inspector examined the NTD training records of seven (7) candidates for the NRC cold licensing examinations; four (4) Senior Reactor Operators (SRO) and three (3) Reactor Operators (RO). The record examination indicated that the candidates meet the eligibility and training requirements specified in the following references:

- (1) CPS FSAR, Section 13.2.1, "Training Programs"
- (2) ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel"
- (3) ANSI/ANS 3.1-1981, "Selection, Qualification and Training of Personnel for Nuclear Power Plants"
- (4) Letter from H. Denton (NRC) to "All Power Reactor Applicants and Licensees"; subject: Qualification of Reactor Operators, March 28, 1980.
- (5) NUREG-0737, "Clarification of TMI Action Plan Requirements", November, 1980, I.A.2.1 (SRO Experience), I.A.3.1 (Simulator Exams), II.B.4 (Training for Mitigating Core Damage).
- (6) NUREG-1021, "Operator Licensing Examiner Standards", October, 1983

d. General Employee Training (GET)

The inspector examined the GET program administered by the IP Nuclear Training Department. The lesson plans listed below satisfied the commitments of the FSAR, Section 13.2.1.1.1 paragraph c. - "General Employee Training":

- (1) Organization and Administration - Lesson Plan 1.0-9.03
- (2) Plant Description - Lesson Plan 1.0-9.04
- (3) Plant Security - Lesson Plan 1.0-9.02
- (4) Industrial Safety - General - Lesson Plan 1.0-9.01
- (5) Industrial Safety - Fire Protection - Lesson Plan 1.0-9.01.3
- (6) Industrial Safety - Chemical Hazards - Lesson Plan 1.0-9.01.2
- (7) Radiation Protection - Lesson Plan 1.0-9.08
- (8) Quality Assurance and Quality Control - Lesson Plan 1.0-9.05
- (9) Emergency Plan Overview - Lesson Plan 1.0-9.13

Employees must pass a written examination to successfully complete GET.

e. On-The-Job Training

The inspector examined programs, procedures and documentation for on-the-job training in the following areas:

(1) Operations - Non-Licensed Training

The following implementing procedures were examined:

- (a) CPS No. 1401.01, revision 4, Operations Department Organization, Responsibilities, and Minimum Qualifications
- (b) CPS No. 1401.02, revision 4, Shift Complement
- (c) CPS No. 1402.01, revision 3, Indoctrination of Operations Department Personnel
- (d) CPS No. 1402.02, revision 3, Licensed Training
- (e) CPS No. 1402.02C001, revision 0, Shift Routine Checklist
- (f) CPS No. 1402.02C002, revision 0, E Work Area Qualification Checklist
- (g) CPS No. 1402.02C003, revision 0, D Work Area Qualification Checklist
- (h) CPS No. 1402.02C004, revision 0, C Work Area Qualification Checklist

- (i) CPS No. 1402.03S, revision 0, Licensed Retraining
- (j) CPS No. 1402.04, revision 1, Operations Department Watchstanding Organization and Qualifications
- (k) CPS No. 1402.04C001, revision 0, Shift Supervisor Qualification Checklist
- (l) CPS No. 1405.01, revision 4, Performance of Operational Activities

Examination of the training qualification checklists maintained by the operations department indicated that the program was implemented and appeared to meet the requirements of the FSAR and Corporate Nuclear Procedure 1.02, revision 1. Procedural changes were necessary and planned in the area of documentation to standardize training records from all departments transferred to the Nuclear Training Department.

(2) Maintenance

The inspector examined maintenance department procedures and documentation for on-the-job training listed below:

- (a) CPS No. 1501.01, revision 2, Maintenance Department Organization, Responsibilities and Minimum Qualifications
- (b) CPS No. 1502.03N, revision 2, Personnel Qualifications for Maintenance Activities
- (c) CPS No. 1501.02, revision 3, Conduct of Maintenance
- (d) CPS No. 1502.03N, revision 0, Qualification and Certification of Personnel for Testing and Examination Activities
- (e) CPS No. 1502.04S, revision 1, Qualification and Certification of Personnel for Inspection, Testing and Examination
- (f) CPS No. 1502.06S, revision 0, Welding Training

The inspector examined on-the-job training records of six mechanical maintenance personnel (four repairmen and three welders) and four electrical maintenance personnel (three IP electricians and one contract electrician). The examination indicated that the on-the-job training program meets the commitments of the FSAR.

This inspection will be continued in a subsequent report.

No items of noncompliance or deviations were identified.



## 7. Independent Inspection of Safeteam Concern Responses

The inspector reviewed additional examples of Safeteam responses to employee identified concerns. This review was conducted primarily to determine that there was no indication of wrong doing associated with the identified concerns. The following list identifies those concerns reviewed:

| <u>Concern Number</u> | <u>Concern Number</u> | <u>Concern Number</u> |
|-----------------------|-----------------------|-----------------------|
| 10010-C               | 10027-C               | 10030-A               |
| 10040-B               | 10044-C               | 10081-A               |
| 10087-A,B,C,E         | 10099-C               | 10155-B               |
| 10155-C               | 10161-A               | 10176-D               |
| 10177-A               | 10177-L               | 10182-C               |
| 10192-A               | 10192-D               | 10195-B,C             |
| 10199-A               | 10225-C               | 10251-A               |
| 10270-B               | 10271-A               | 10272-B               |
| 10272-E               | 10282-B               | 10283-F               |
| 10298-F               | 10311-A,B,E,F,G,H     | 10316-B               |
| 10321-A               | 10337-A               | 10343-A               |
| 10376-D               | 10376-E,F             | 10376-G               |
| 10376-H               | 10379-A               | 10407-D               |
| 10407-K               | 10408-A               | 10408-D               |
| 10410-A               | 10416-C               | 10436-B               |
| 10436-C               | 10442-A               | 10489-A               |
| 10501-A               | 10506-A               | 10572-B               |
| 10579-A               | 10581-A               | 10603-A               |
| 10614-A               | 10618-A               | 10629-A               |
| 10633-B               | 10633-C               | 10682-A               |
| 10688-A               | 10691-A               | 10698-B               |
| 10730-A               | 10724-D               | 10747-B               |
| 10747-C               | 10754-C               | 10757-A               |
| 10797-C               | 10819-B               | 10832-A               |
| 10832-B               | 10836-A               | 10838-A               |
| 10867-A               | 10891-B               | 10936-A               |
| 10947-A               | 10955-E               | 10961-B               |
| 10961-C               | 10968-A,B             | 10973-A               |
| 10975-A               | 10988-A               | 11020-C               |
| 11041-A,B,D,E         | 11052-B               | 11111-B               |
| 11198-B               | 11203-C               | 11218-E               |
| 11218-K               | 11223-E               | 11223-K               |
| 11224-E               | 11224-K               | 11227-C               |
| 11260-A               | 11301-A               | 11332-A               |
| 11438-A               | 11468-A               | 11552-A               |
| 11553-A               | 11568-B               | 11570-A               |
| 11581-A               | 11582-A               | 11583-D               |
| 11603-A               | 11654-A               | 11692-A               |
| 11744-A               | 11749-B               | 11749-D               |
| 11773-A               | 11791-A               | 11802-A               |
| 11803-A               | 11804-A               | 11807-A               |
| 11807-D               | 11807-E               | 11808-A               |

| <u>Concern Number</u> | <u>Concern Number</u> | <u>Concern Number</u> |
|-----------------------|-----------------------|-----------------------|
| 11809-A               | 11815-A               | 11820-A               |
| 11821-A               | 11829-A               | 11848-A               |
| 11854-A               | 11859-A               | 11862-A               |
| 11864-A               | 11865-A               | 11869-A               |
| 11878-A               | 11879-A               | 11888-A               |
| 11898-A               | 11900-A               | 11913-A               |
| 11917-A               | 11919-A               | 11930-A               |
| 11934-C               | 11942-B               | 11942-D               |
| 11943-A               | 11946-A               | 11948-C               |
| 11949-A               | 11950-C               | 11951                 |
| 11953-E               | 11954-A,B,D           | 11956-A               |
| 11960-A               | 11960-B               | 11960-C               |
| 11960-D               | 11960-E               | 11961-A               |
| 11961-B               | 11970-B               | 11973-A               |
| 11982-A               | 11983-B               | 11999-A               |
| 12001-A               | 12003-C               |                       |

One Safeteam concern response was forwarded to Region III during the report period for further review, as follows:

11923-A

No items of noncompliance or deviation were identified.

8. Functional or Program Areas Inspected

a. Site Surveillance Tours

At periodic intervals during the report period, surveillance tours of areas of the site were performed. Those surveillances were intended to assess: cleanliness of the site; storage and maintenance conditions of equipment and material being used in site construction; potential for fire or other hazards which might have a deleterious effect on personnel or equipment; and to witness construction activities in progress. In general, the storage and maintenance of safety-related material and equipment was acceptable throughout the laydown areas and the power block. However, as reported in paragraph No. 4.b. above, a small laydown area east of the Midway sandblasting building exhibited housekeeping discrepancies which were brought to the applicant's attention.

The inspector will continue to review site housekeeping during subsequent inspections.

No items of noncompliance or deviation were identified.

b. Cable Installation

During the report period, the inspector witnessed cable pull activities associated with the Control Rod Drive Turnover Package RD-3P1. The inspector witnessed two separate cable pulling crews installing a total of seventeen (17) cables. For the pulls witnessed, the following was observed: latest approved pull card was used; size and type of cable was appropriate; identification (cable number, color code) was appropriate; temperature of cable; bending radius; and protection from damage.

No items of noncompliance or deviation were identified.

9. Preoperational Test Program Implementation Verification

At periodic intervals during the report period, surveillance tours of selected areas of the site were performed. Those surveillances were intended to assess: plant cleanliness; storage and maintenance conditions of materials and equipment; potential for fire hazards which might have a deleterious effect on personnel or plant equipment; and to witness construction, maintenance, and preoperational test activities in progress. Only limited testing activities were observed during the report period.

No items of noncompliance or deviation were identified.

10. Review Of Overinspection Program Results (Regional Request)

The inspectors continued a review of IP OI program results in the area of piping and mechanical supports; reviewed applicant responses to Region III questions and comments concerning overinspection program results in the area of safety related piping and mechanical supports; and attended a meeting held in Region III on April 22, 1985 to discuss OI program results. The results of that meeting were documented in inspection report 50-461/85024.

The inspectors reviewed data provided by the applicant in response to Region III questions and comments transmitted to the applicant in a letter dated April 11, 1985. Review of that data revealed several inconsistencies which resulted in action by the applicant to verify the data. This review will continue after the applicant has confirmed the data.

No items of noncompliance or deviation were identified.

11. Review of Overinspection (OI) Program Implementing Procedure Changes

By letter dated March 29, 1985, IP identified that changes were being made to OI implementing procedures to conform more closely with the practice which was originally intended by the overinspection program plan. This inspection was undertaken in order to verify that the

implementing procedure changes being made did conform to the original intent of the overinspection program plan and that the changes were as described in the applicant's letter.

a. Procedures Reviewed

- (1) QAI-710.08, revision 3, Overinspection Sample Plan
- (2) QAI-710.09, revision 3, Overinspection Evaluation Analysis Program
- (3) BQA-196, revision 4, Field Verification Evaluation Analysis
- (4) NSED Procedure D.34, revision 0, Processing of Overinspection Results Evaluation Reports
- (5) Sargent & Lundy (S&L) Instruction PI-CP-068, revision 2, Overinspection Evaluation Program

b. Results

The above listed procedures were reviewed to verify that changes made to the procedures were in accordance with the OI Program Plan previously reviewed and concurred in by Region III and that the changes conformed to statements made in the applicant's letter. No deviations were identified.

The procedure listed in b.(5) above was used by S&L in evaluating OI program results for safety significance. S&L evaluations of OI NCRs for which credit was taken for future activities (e.g., preoperational testing) in determining no safety significance treated those NCRs the same as NCRs which were either written in error or which identified cosmetic deficiencies. This matter will be reviewed further in a scheduled Region III inspection at S&L.

No items of noncompliance or deviation were identified.

12. Site Activities Of Interest

a. IP Management Changes

The IP Director, Quality Engineering and Verification will be leaving IP at the end of May. The applicant was actively recruiting a qualified replacement at the end of the inspection period.

b. Construction Appraisal Team Inspection

On May 20, 1985, the NRC Construction Appraisal Team (CAT) commenced an inspection at the Clinton Site. The inspection team consisted of 15 inspection specialists covering a broad range of construction experience. The inspection was scheduled to continue through June 21, 1985 with a one week break from June 1 through 9, 1985.



The NRC resident inspectors have been and will continue to provide support and assistance to the CAT.

No items of noncompliance or deviation were identified.

13. Exit Meetings

The inspectors met with applicant representatives (denoted in paragraph 1) throughout the inspection and at the conclusion of the inspection on May 29, 1985. The inspectors summarized the scope and findings of the inspection activities. The inspectors also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspectors during the inspection. The applicant did not identify any such documents/processes as proprietary. The applicant acknowledged the inspection findings.

The resident inspectors attended exit meetings held between Region III and headquarters based inspectors and the applicant as follows:

| <u>Inspector(s)</u>     | <u>Date</u>    |
|-------------------------|----------------|
| Phillips, Snell, Rohrer | April 24, 1985 |
| Love                    | May 3, 1985    |
| Vandel                  | May 10, 1985   |
| Keating                 | May 14, 1985   |
| Jablonski               | May 23, 1985   |