

Errata Sheet No. 1

SALP Board Report No. 50-312/85-18

Part IV, Performance Analysis
Section 4, Surveillance
Page 11, Paragraph 3, lines 1 through 4

Now Reads:

"In the surveillance areas, one notice of violation was issued during this SALP period; this dealt with the procedures for safety-related battery testing. The procedures contained numerous errors and in certain cases data had been incorrectly recorded."

Should Read:

"In the surveillance area, three violations were issued during this SALP period. One dealt with procedures for safety-related battery testing, which contained numerous errors including incorrect data. A second violation concerned incomplete calibration program records for plant gages. The third violation identified a failure to test additional system valves following a valve operational failure during testing."

Basis:

SALP report tables 1 and 2 had been updated to include Inspection Report 85-23 which added two additional Level IV violations in the area of surveillances. However, these additional violations were not discussed in the text of Section 4. The above change references the additional violations for completeness and consistency with the tables.

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4. Surveillance

The surveillance program has been inspected periodically by the resident and regional inspectors throughout this evaluation period. During the previous SALP period the licensee exhibited a decreasing performance in the surveillance program; the performance rating for this area was a Category 3. This was mainly based on poor management controls in the planning, scheduling, and performance of surveillances required by the Technical Specification.

During this SALP period, the licensee has effectively used the daily management meetings to provide status of surveillance tests. This increase in management attention has greatly reduced the amount of missed surveillances and requests for Technical Specification changes to delay surveillances.

In the surveillance area, one notice of violation was issued during this SALP period; this dealt with the procedures for safety-related battery testing. The procedures contained numerous errors and in certain cases data had been incorrectly recorded. The licensee has begun a program to identify and correct the surveillance program. The licensee identified in nine LERs that surveillance procedures did not provide the proper criteria or were missing equipment or were basically improperly written to satisfy the stated purpose. Some of the corrective actions in the surveillance area include:

- ° Technical specification requirements to be provided in the surveillance procedure,
- ° A list developed to cross reference surveillance requirements by surveillance procedure,
- ° A review of all pertinent Rancho Seco documents to develop all licensee surveillance commitments
- ° A surveillance procedure writer's guideline,
- ° A review of all existing surveillance procedures against the writer's guideline.

These items are at different stages of completion but are scheduled to be completed late in 1985. This program should identify areas where some surveillance procedures have failed to include all pertinent criteria from the Technical Specifications and provide the licensee further assurance that the surveillances are testing the systems in a manner appropriate with the systems function.

The licensee is also discussing the concept of system engineering, where one engineer is responsible for a given system. This would include maintenance, modifications, operational requirements, industry problems, and surveillance trending of the system. This should enhance the surveillance program by providing additional levels of assuring the systems operability.

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Errata Sheet No. 2

SALP Board Report No. 50-312/85-18

Part IV, Performance Analysis

Section 9, Quality Programs and Administrative Controls

Page 21, Paragraph 2, lines 1 and 2

Now Reads:

"A total of eight violations (Level IV and V) were issued in this functional area. An additional nine violations (Level IV and V) in...."

Should Read:

"A total of 10 violations (Level IV and V) were issued in this functional area. An additional 8 violations (Level IV and V) in...."

Basis:

SALP table 2 lists a total of 18 violations, eight of which were identified as PAB findings, including one violation with two examples. The above change corrects the text of Section 9 to be consistent with the tables.

report's recommendations are sufficient to ensure substantial quality program improvement occurs at Rancho Seco.

A total of eight violations (Level IV and V) were issued in this functional area. An additional nine violations (Level IV and V) in this area were issued as a result of the Performance Appraisal Branch (PAB) inspection performed in November 1983. These PAB findings, although issued as violations during the present SALP cycle, were actually used to evaluate the previous SALP period and thus were not used for the present assessment. The violations identified during this period were all of a minor nature, but are an indication that the need to follow the details of administrative requirements needs emphasis.

One of the major weakness identified by PAB (and factored into the previous SALP results) was in the area of administrative controls of the safety review committees, that is, the Plant Review Committee (PRC) and the Management Safety Review Committee (MSRC). The inspectors have noted performance improvement in both of these committees, not only from an administrative viewpoint but, more importantly, from the viewpoint of safety and the depth of evaluating and resolving issues. Examples of the improved thoroughness of these committees were noted during recent problems with reactor trip breakers and recent concerns with the auxiliary feedwater system.

The Quality Assurance organization itself has undergone a reorganization and expansion during this SALP cycle and appears to have made some improvements and contributions in the area of surveillances of daily routine activities such as health physics practices and operations. In addition, the Quality Control organizations, which have previously been two separate organizations (one reporting to plant engineering and the other to nuclear engineering through construction) have been combined into one organization which now reports to Quality Assurance. This reorganization has the potential for improving the independence and effectiveness of quality control. However, notwithstanding these changes, the staff considers that the Quality Assurance organization must expand the scope of their activities and become more aggressive in areas such as engineering, construction, and maintenance. Management needs to continue to support the Quality Assurance effort and demand that it be a strong and viable tool to ensure quality. Close scrutiny of progress is needed.

A root cause program has been created in the regulatory compliance organization during this SALP cycle. The purpose of this group is to determine the cause of plant events so as to minimize the potential for similar future events. This program is considered to be extremely valuable and management should continue to support its development and implementation. It is too early to tell if it will be effective.

In summary, it is obvious that the management of Rancho Seco and the SMUD Board of Directors have made a change over the past several

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