



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

JUL 19 1985

MEMORANDUM FOR:

J. Crews, RV
A. Chaffee, RV
L. Miller, RV
C. Myers, RV
J. Eckhardt, RV
G. Perez, RV
R. Scarano, RV
G. Lainas, AD/OR, NRR
S. Miner, Project Manager, NRR
L. Norderhaug, RV
M. Cillis, RV
R. Fish, RV
P. Qualls, RV

54-312

FROM:

D. Kirsch, Acting Director
Division of Reactor Safety and Projects, RV

SUBJECT:

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)
FOR RANCHO SECO (Period December 1, 1983 through
May 31, 1985)

References:

- (1) NRC Manual Chapter 0516
- (2) Proposed changes to the SALP process, J. M. Taylor
Memorandum dated June 27, 1985
- (3) Region V Instruction 0701
- (4) SALP Board Schedule, J. B. Martin Memorandum
dated July 18, 1985

Pursuant to references (1), (2), (3) and (4) above, the regional SALP Review Board meeting for Rancho Seco is scheduled to convene at the Region V Walnut Creek office on August 7, 1985, at 8:30 a.m. The board members will consist of the above addressees and myself who will serve as chairperson.

This assessment will cover the 18 month period from December 1, 1983, through May 31, 1985. Since this period ends during completion of a refueling outage, the evaluation period will be updated to include recent events through July, 1985.

Members of the Rancho Seco SALP Board are herewith provided a review guidance package to be used in preparing performance analyses of the various functional areas. This package consists of the following:

- ° Description of functional areas (Attachment 1)
- ° Evaluation criteria (Attachment 2)
- ° Attributes for the evaluation criteria (Attachment 3)
- ° Performance categories (Attachment 4)
- ° SALP evaluation matrix (Attachment 5)
- ° Sample SALP functional area performance analysis (Attachment 6)
- ° Supporting Data and Summaries (Attachment 7)

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The following is the anticipated outline of the Rancho Seco SALP report, along with the individuals assigned lead responsibility for preparing input for each section.

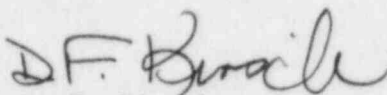
I	Introduction	Myers
II	Criteria	Myers
III	Summary of Results	Myers
IV	Performance Analysis	
	1. Plant Operations	Eckhardt
	2. Radiological Controls	Cillis
	3. Maintenance	Eckhardt
	4. Surveillance	Eckhardt
	5. Fire Protection	Qualls
	6. Emergency Preparedness	Fish
	7. Security and Safeguards	Norderhaug
	8. Refueling	Eckhardt
	9. Quality Programs and Administrative Controls Affecting Safety	Eckhardt
	10. Licensing Activities	Miner
	11. Engineering & Construction	Crews/Eckhardt
	12. Training	Eckhardt
V	Supporting Data and Summaries (Including tables)	Myers

Each person assigned lead responsibility for a functional area shall prepare a performance analysis and submit it to C. J. Myers by C.O.B. July 26, 1985. Each performance analysis shall be prepared as follows:

1. Assess the licensee's performance in the functional area based upon inspections performed, available data and observations of the licensee's performance during the SALP period. Obtain inputs from others who had inspection responsibilities in the functional area. In assessing the licensee's performance, use the guidance in Attachment 1 through 4.
2. Prepare a performance analysis for the functional area following the format of Attachment 6. If possible, discuss the trend of the licensee's performance since the previous SALP period. The analysis should reference pertinent data, enforcement items or events, when appropriate, but should be principally a quantitative analysis of the licensee's performance in the area (depending upon the level of activity, approximately one to one and one-half page in length when single space typed).
3. Include recommendations for licensee actions related to the functional area.
4. Provide a copy of the SALP evaluation matrix (Attachment 5), assigning a performance category for each evaluation criterion.

By copy of this memorandum, the Director, Office of Investigations, San Francisco Field Office, is requested to provide a summary of major investigative activities and results involving Rancho Seco by July 26, 1985.

In addition, by copy of this memorandum, the offices of NMSS and AEOD are requested to provide performance analyses by July 26, 1985 (or updated earlier submittals to address the extended SALP period).



D. F. Kirsch
SALP Board Chairman
Acting Director, Division of Reactor
Safety and Projects

Enclosures: As Stated

cc: J. Davis, NMSS
R. Seyfrit, AEOD
O. Shackleton, OI/SFFO
J. Carter, NRR
F. Wenslawski, RV

Functional Areas.

a. Operating Phase Reactors

1. Plant Operations

Consists chiefly of the activities of the licensee's operational staff (e.g., licensed operators, shift technical advisors, and auxiliary operators). It is intended to be limited to operating activities such as plant startup, power operation, plant shutdown, and system lineups. Thus, it includes activities such as reading and logging plant conditions; responding to off-normal conditions; manipulating the reactor and auxiliary controls; and training/retraining of licensed operators, shift technical advisors, and auxiliary operators.

2. Radiological Controls

Includes controls for occupational radiation protection; radioactive materials and contamination controls; radiological surveys and monitoring; processing of gaseous, liquid, and solid wastes; transportation of radioactive materials; radiological effluent and environmental monitoring; and the results of the NRC's independent measurement program.

3. Maintenance

Includes all activities associated with preventive or corrective maintenance of instrumentation and control equipment and mechanical and electrical systems.

4. Surveillance

Includes all surveillance testing activities as well as all inservice inspection and testing activities. Examples of activities included are: instrument calibrations, equipment operability tests, containment leak rate tests, special tests, inservice inspection and performance tests of pumps and valves, and all other inservice inspection activities.

5. Fire Protection

Includes routine housekeeping and fire protection/prevention program activities. Thus, it includes the storage of combustible material; fire brigade staffing and training; fire suppression system maintenance and operation; and those fire protection features provided for structures, systems, and components important to safe shutdown.

6. Emergency Preparedness

Includes activities relating to the implementation of the emergency plan and implementing procedures. Thus, it includes such activities as licensee's performance during exercises which test the licensee, state, and local emergency plans; plan administration and implementation; notification; communications; facilities and equipment; staffing; training; assessment; emergency classification; medical treatment; radiological exposure control; recovery; protective actions; and interfaces with onsite and offsite emergency response organizations.

7. Security

Includes all activities whose purpose is to ensure the security and continued operability of the plant. Specifically it includes all aspects of the licensee's security program (e.g. access control, security checks, badging).

8. Refueling

Includes all activities associated with refueling. Thus, it includes outage management, and the manipulation of new and spent fuel.

9. Quality Programs and Administrative Controls Affecting Quality

Includes all verification and oversight activities which affect or assure the quality of plant activities, structures, systems and components. This area may be viewed as a comprehensive management system for controlling the quality of work performed as well as the quality of verification activities that confirm that the work was performed correctly. The evaluation of the effectiveness of the quality assurance system should be based on the results of management actions to ensure that necessary people, procedures, facilities and materials are provided and used during the operation of the nuclear power plant. Principal emphasis should be given to evaluating the effectiveness and involvement of management in establishing and assuring the effective implementation of the quality assurance program along with evaluating the history of licensee performance in the key areas of: committee activities, design and procurement control, control of design change processes, inspections, audits, corrective action systems, and records.

10. Licensing Activities

Includes the adequacy and timeliness of all licensing submittals, responsiveness to NRC licensing initiatives, and the licensee's approach to resolution of technical issues from a safety standpoint.

11. Engineering and Construction

Includes all design and installation activities associated with plant modifications including design changes and reviews.

12. Training

Includes the following facility training categories:

Non-licensed operators
Control room operators
Senior control room operators/shift supervisors
Shift Technical advisors
Instrument and control technicians
Electrical maintenance personnel
Mechanical maintenance personnel
Radiological protection technicians
Chemistry technicians
Onsite technical staff and managers

045 Evaluation Criteria. Elements which must be considered when assessing a licensee's performance in a functional area.

- a. The evaluation criteria are as follows:
 - 1. Management involvement in assuring quality .
 - 2. Approach to resolution of technical issues from safety standpoint .
 - 3. Responsiveness to NRC initiatives
 - 4. Enforcement history ,
 - 5. Reporting and analysis of reportable events
 - 6. Staffing (including management)
 - 7. Training effectiveness and qualification
- b. Guidance for using these criteria to arrive at a category assignment is found in the Appendix to this Chapter.

EVALUATION CRITERIA WITH ATTRIBUTES FOR ASSESSMENT OF LICENSEE PERFORMANCE

1. MANAGEMENT INVOLVEMENT AND CONTROL IN ASSURING QUALITY

<u>Category 1</u>	<u>Category 2</u>	<u>Category 3</u>
consistent evidence of prior planning and assignment of priorities; well stated, controlled and explicit procedures for control of activities	evidence of prior planning and assignment of priorities; stated, defined procedures for control of activities	little evidence of prior planning and assignment of priorities; poorly stated or ill understood procedures for control of activities
well stated, disseminated and understandable policies	adequately stated and understood policies	poorly stated, poorly understood or non-existent policies
decision making consistently at a level that ensures adequate management review	decision making usually at a level that ensures adequate management review	decision making seldom at a level that ensures adequate management review
corporate management frequently involved in site activities	corporate management usually involved in site activities	corporate management seldom involved in site activities
audits complete, timely and thorough	audits generally complete, and thorough	audits frequently not timely, incomplete or not thorough
committees properly staffed and functioning in almost all cases	committees usually properly staffed and functioning	committees not properly staffed or functioning
reviews timely, thorough and technically sound	reviews generally timely, thorough and technically sound	reviews not timely, thorough or technically sound
records complete, well maintained and available	records generally complete, well maintained and available	records not complete, not well maintained or unavailable
procedures and policies strictly adhered to	procedures and policies rarely violated	procedures and policies occasionally violated
corrective action systems promptly and consistently recognize and address non-reportable concerns	corrective action systems generally recognize and address non-reportable concerns	corrective action systems rarely recognize and address non-reportable concerns
procurement well controlled and documented	procurement generally well controlled and documented	repetitive breakdown in procurement control
design well controlled and verified	rare breakdowns of minor significance in design control or verification	repetitive breakdown in designs control or verification

2. APPROACH TO RESOLUTION OF TECHNICAL ISSUES FROM A SAFETY STANDPOINT

<u>Category 1</u>	<u>Category 2</u>	<u>Category 3</u>
clear understanding of issues demonstrated	understanding of issues generally apparent	understanding of issues frequently lacking
conservatism routinely exhibited when potential for safety significance exists	conservatism generally exhibited	meets minimum requirements
technically sound and thorough approaches in almost all cases	viable and generally sound and thorough approaches	often viable approaches, but lacking in thoroughness or depth
timely resolutions in almost all cases	generally timely resolutions	resolutions often delayed

3. RESPONSIVENESS TO NRC INITIATIVES

<u>Category 1</u>	<u>Category 2</u>	<u>Category 3</u>
meets deadlines	generally timely responses	frequently requires extensions of time
timely resolution of issues	few longstanding regulatory issues attributable to licensee	longstanding regulatory issues attributable to licensee

technically sound and thorough responses in almost all cases

acceptable resolutions proposed initially in most cases

viable and generally sound and thorough responses

acceptable resolutions generally proposed

often viable responses, but lacking in thoroughness or depth

considerable NRC effort or repeated submittals needed to obtain acceptable resolutions

4. ENFORCEMENT HISTORY

Category 1

major violations are rare and are not indicative of programmatic breakdown

minor violations are not repetitive and not indicative of programmatic breakdown

corrective action is prompt and effective

Category 2

major violations are rare and may indicate minor programmatic breakdown

multiple minor violations or minor programmatic breakdown indicated

corrective action is timely and effective in most cases

Category 3

* multiple major violations or programmatic breakdown indicated

minor violations are repetitive and indicative of programmatic breakdown

corrective action is delayed or not effective

5. REPORTING AND ANALYSIS OF REPORTABLE EVENTS

Category 1

events promptly and completely reported

events are properly identified and analyzed

corrective action is effective as indicated by lack of repetition

Category 2

events are reported in a timely manner, some information may be lacking

events are accurately identified, some analyses are marginal

corrective action is usually taken but may not be effective as indicated by occasional repetition

Category 3

event reporting is frequently late or incomplete

events are poorly identified or analyses are marginal, events are associated with programmatic weaknesses

corrective action is not timely nor effective, events are repetitive

6. STAFFING (INCLUDING MANAGEMENT)

Category 1

positions are identified, authorities and responsibilities are well defined

vacant key positions are filled on priority basis

staffing is ample as indicated by control over backlog and overtime

Category 2

key positions are identified, and authorities and responsibilities are defined

key positions usually filled in a reasonable time

staffing is adequate, occasional difficulties with backlog or overtime

Category 3

positions are poorly identified, or authorities and responsibilities are ill-defined

key positions are left vacant for extended periods of time

staffing is weak or minimal as indicated by excessive backlog and overtime

7. TRAINING AND QUALIFICATION EFFECTIVENESS

Category 1

training and qualification program makes a positive contribution, commensurate with procedures and staffing, to understanding of work and adherence to procedures with few personnel errors

training program is well defined and implemented with dedicated resources and a means for feed back experience; program is applied to nearly all staff

Category 2

training and qualification program contributes to an adequate understanding of work and fair adherence to procedures with a modest number of personnel errors

a defined program is implemented for a large portion of the staff

Category 3

training and qualification program is found to be the major contributing factor to poor understanding of work, as indicated by numerous procedure violations or personnel errors

program may be either lacking, poorly defined, or ineffectively applied for a significant segment of the staff

Criteria for Use in Evaluating Training Functional Area

Category 1

management frequently involved in review of training activities

acceptable resolution to NRC training initiatives proposed initially in most cases

few significant events have occurred that are indicative of a training deficiency

Category 2

management occasionally involved in review of training activities

acceptable resolution generally proposed

occasional significant events have occurred that are indicative of a training deficiency

Category 3

management seldom involved in review of training activities

considerable NRC effort needed to obtain acceptable resolutions

frequent significant events have occurred that are indicative of a training deficiency

Performance Categories. A rating of licensee performance in a given functional area.

a. Category 1

Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used so that a high level of performance with respect to operational safety or construction is being achieved.

b. Category 2

NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and reasonably effective so that satisfactory performance with respect to operational safety or construction is being achieved.

c. Category 3

Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used so that minimally satisfactory performance with respect to operational safety or construction is being achieved.

EVALUATION MATRIX FOR OPERATING

PHASE FUNCTIONAL AREAS

	Management Involvement in Assuring Quality	Approach to Resolution of Technical Issues from a Safety Standpoint	Responsiveness to NRC Initiatives	Enforcement History	Reporting and Analysis of Reportable Events	Staffing (Including Management)	Training and Qualification Effectiveness
Plant Operations							
Radiological Controls							
Maintenance							
Surveillance							
Fire Protection							
Emergency Preparedness							
Security							
Refueling							
Quality Programs and Administrative Controls							
Licensing Activities							
Engineering & Construction							
Training							

4. Surveillance

The surveillance program has been inspected on a monthly basis by the resident inspectors throughout this SALP period. (See also Section IV.5, Fire Protection).

During this SALP period the licensee asked the NRC for, and received, Technical Specifications changes to delay surveillances because of outage delays. However, good planning and scheduling techniques and stronger management control could have precluded the need for some of these changes. Even though specific surveillance tests were covered in certain Technical Specifications changes, there have been a number of licensee event reports (LERs) written on missed surveillances.

In general, there was a decline in the licensee's performance in this area. Partially in response to NRC criticism of this area, the licensee has instituted a daily management meeting in which the status of surveillances is discussed. The effectiveness of this meeting in eliminating missed surveillances is yet to be determined by the inspectors.

An item of noncompliance issued during this SALP period dealt with the failure to meet surveillance and technical specification requirements on purge valve leakage. The licensee did not respond in a timely manner to the failure of the surveillance because of an apparent lack of awareness of Technical Specifications by the engineer in charge of the work. This illustrates the fact that there may not be proper sensitivity at all levels in the organization on issues important to safety or, as the inspectors have stated in past inspection reports, there may be a communications problem between people within the operating organizations. The LER synopsis (Table 5) in this SALP report indicates that a number of reports have been issued which are surveillance related. Communications related problems contributed to a number of these LERs.

Conclusion

Performance assessment - Category 3. This represents a decline in performance from the Category 2 assigned during the previous SALP cycle.

Board Recommendation

Increased awareness of and attention to related Technical Specifications requirements should be demonstrated by persons involved in scheduling, performing, and reviewing surveillance activities.

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SUPPORTING DATA FOR RANCHO SECO SALP

(12/1/83 - 5/31/85)

OPERATION ACTIVITIES
LICENSEE EVFNT REPORTS (LERs)
SYNOPSIS OF LERs
ENFORCEMENT ITEMS
INSPECTION AND ENFORCEMENT SUMMARY

ATTACHMENT 7

OPERATION ACTIVITIES

During the first three months of the SALP period the plant operated within the range of approximately sixty to ninety percent power except for two automatic reactor trips. The first trip occurred on December 3, 1983 while troubleshooting the "A" inverter power supply. The second reactor trip occurred on February 29, 1984, when the "A" reactor coolant pump tripped off line in coincidence with a power oscillation on the power grid, and the plant was not able to respond and automatically tripped.

On March 19, 1984 while the plant was operating at ninety-two percent power a leak of the main generator cooling medium, hydrogen gas, developed into an explosive mixture in the space between the main generator and the high pressure turbine. A major explosion and subsequent fire occurred. The fire was extinguished by the carbon dioxide fire protection system within fourteen minutes. The operators manually tripped the turbine and reactor. The incident was declared an unusual event.

The licensee brought the plant back to power on April 15, 1984, after completion of repair and maintenance activities. The plant operated at approximately ninety percent power from April 25 through June 1, with exception of a seven day period where the power was reduced to fifty percent to repair a condenser tube leak. On June 1, the reactor experienced an automatic trip due to feedwater overspeed. The plant returned to power and operated at ninety-two percent through July 3, until the plant was manually shutdown for the first of three steam generator tube leak repairs. The plant remained in cold shutdown until August 12 while a licensee investigation of piping fittings was performed. The plant was brought back to power until August 31 when the plant was again manually shutdown due to the second "B" steam generator tube leak. The plant started back to power on October 7, but was shutdown for a "A" steam generator tube leak. The plant returned to power operation on October 11 and had to be shutdown on October 13 to investigate a hot spot on the main generator lead box. Repairs were made and the plant was on line on October 19. The plant remained in operation until the end of December although power was reduced due to feedwater heater leaks. A six day outage occurred to repair the known leak in the feedwater heater system and ended on January 6, 1985 when the plant went critical. The plant remained on line at various power levels until March 15, 1985, when the licensee began the Cycle seven refueling outage.

RANCHO SECO
Licensee Event Reports

Table
(12/01/83 - 05/31/85)

<u>LER</u>	<u>TITLE</u>	<u>SALP AREA/CAUSE CODE*</u>
83-38	DHR PUMP B SUCTION VALVE FROM EWST FAILED TO OPEN	4/E
83-39	OPERABLE PRESSURIZER LEVEL CHANNELS BELOW MINIMUM TECH. SPEC.	4/A,D 9/D
83-40	INCORRECTLY SIZED AUXILIARY FEED FLOW ORIFICES	9/B 11/B
83-41	COOLING WATER FOUND ISOLATED FROM AUX. FEED PUMP TURBINE BEARINGS	1/D 4/D
83-37-01 Followup	REACTOR BUILDING EMERGENCY SUMP VALVE FAILED TO OPEN DURING SURVEILLANCE TEST	4/D
84-01	EXHAUST FAN BEARING FAILURE	2/E
84-02	SUBMITTAL OF ISI RESULTS REPORT TO NRC LATE	9/A,C
84-03	PROCEDURE WRITTEN IN CONTRADICTION TO TECH. SPECS.	4/D
84-05	EMERGENCY SIREN MALFUNCTION	6/E
84-06	FIRE BRIGADE TRAINING	5/X 9/X
84-04	METEOROLOGICAL TOWER POWER FAILURE	6/E
84-07	REACTOR TRIP	1/E
84-08	FAILURE OF ION CHROMATOGRAPH	2/B,E
84-09	LIFTING SLING FAILURE	3/D 9/D
84-10	FAILURE TO COMPLETE SURVEILLANCE PROCEDURE	9/D
84-12	MISSED STACK SAMPLE	2/A
84-11	INCORRECT CONFIGURATION TABLE IN SURVEILLANCE PROCEDURE	4/D
84-13	SECURED HIGH RADIATION AREA DOORS OPEN	2/A

* Cause Codes identified in LER Synopsis Table.

<u>LER</u>	<u>TITLE</u>	<u>SALP FUNCTIONAL AREA</u> <u>CAUSE CODE</u>
84-14	SURVEILLANCE PROCEURE SP 205.02	4/D,A
84-15	RELATED INCIDENTS TO HYDROGEN EXPLOSION	1/E 3/D
84-16	CONTAINMENT ISOLATION VALVE STROKE TIME IN EXCESS OF TECH. SPEC. LIMIT	4/D
84-17	CORE FLOOD TANK VENT VALVE	1/D
83-0301 Follow-up	TESTING OF MASTER REACTOR TRIP RELAY	4/D
84-18	PLANT TRIP	1/E
84-19	AMBIENT STARTUP OF DIESEL GENERATOR	4/D
84-20	TUBE LEAK OF REACTOR TRIP	1/E 2/E
84-18-01	PLANT TRIP - FOLLOW-UP	1/E
84-21	FAILURE OF SURVEILLANCE PROCEDURE TO SATISFY TECH SPECS	4/D
83-40-01 Revision	AUXILIARY FEEDWATER FLOW ORIFICES	
84-22	TUBE LEAK	1/E
84-24	SIMULTANEOUS PLANT HEATUP AND DEBORATION	1/A
84-25	FEACTOR TRIP	1/E
84-23	FL. TER TESTING	4/D
84-22-01 Supplement	TUBE LEAK	2/E
84-23-01 Follow-up	FILTER TESTING	4/A 9/A
85-01	LOSS OF CONTAINMENT INTEGRITY VIA OPEN VALVES	2/A 9/D
85-02	UNRESTRAINED HEAVY LOAD IN REACTOR BUILDING	3/A
85-03	INCORRECT BORON CONCENTRATION TECH SPEC LIMIT	1/C 9/C
85-04	FIRE DAMPERS NOT INSTALLED	5/B

DRAFT

SPECIAL REPORT

83-08

TITLE

ERROR IN COMPUTER CODE FOR
OFFSITE DOSE CALCULATIONS

AREA/CAUSE

2/B,D

SYNOPSIS OF LICENSEE EVENT REPORTS **

<u>Functional Area</u>	<u>SALP Cause Code*</u>						<u>Totals</u>
	<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>	<u>X</u>	
1. Plant Operations	1	0	1	2	7	0	11
2. Radiation Protection	3	1	0	0	4	0	8
3. Maintenance	1	0	0	2	0	0	3
4. Surveillance	3	0	0	10	2	0	15
5. Fire Protection	0	1	0	0	0	1	2
6. Emergency Preparedness	0	0	0	0	2	0	2
7. Safeguards	0	0	0	0	0	0	0
8. Refueling	0	0	0	0	0	0	0
9. Quality Programs and Administrative Controls Affecting Safety	2	1	2	4	0	1	10
10. Licensing	0	0	0	0	0	0	0
11. Engineering and Construction	0	1	0	0	0	0	1
12. Training	0	0	0	0	0	0	0
TOTALS	10	4	3	18	15	2	52

* Cause Codes:

A-Personnel Error
 B-Design, Manufacturing or Installation Error
 C-External Cause
 D-Defective Procedures
 E-Component Failure
 X-Other

**

Synopsis includes LER Nos. 83-38 through 85-04

NOTE: Several LER's categorized in multiple areas of cause codes --- follow-up LER's which do not identify additional areas or causes were not double accounted along with the original LER during this period.

Table

Rancho Seco Enforcement Items
(12/01/83 - 05/31/85)

<u>Inspection Report No.</u>	<u>Subject</u>	<u>Severity Level</u>	<u>Functional Area</u>
83-34	Failure of PRC to review temporary change to emergency diesel generator operating procedure.	IV	9
	Failure of PRC to review a temporary change to an incore instrument surveillance procedure.	IV	9
	Inadequate control of abnormal tags.	V	9
83-36	Failure to follow revised procedure for hydrogen monitor and purge system.		
	Continued operation without minimum required operable pressurizer level instruments.	IV	1
84-02	PRC did not evaluate Technical Specification violations (2 examples)	IV	9
	PRC did not review Abnormal Tags	IV	9
	Inadequate PRC membership	V	9
	PRC failed to review procedure changes	V	9
	Failure to document PRC determination of procedure review	V	9
	Failure to document PRC determination as to unreviewed safety questions	V	9
	MSRC did not review QA audit reports	IV	9
	Tardy responses to QA audit findings	IV	9
	Use of out-of-date equipment classification documents by Maintenance and Procurement	IV	9

<u>Inspection Report No.</u>	<u>Subject</u>	<u>Severity Level</u>	<u>Functional Area</u>
85-02 (continued)	No training programs for Maintenance or Procurement personnel	IV	12
84-07	Failure to maintain up-to-date revisions of surveillance procedures in the Control Room	V	9
84-09	Nuclear instrument calibrations were not performed as required.	IV	1
84-11	Emergency Preparedness training not given after reassignment.	IV	12
	Inadequate data and procedures for meteorological program.	IV	6
84-13	Insufficient records relating to storage and protection of Class IE motor control centers.		9
	A contractor QC inspector was not listed as an authorized inspector.		11
84-14	Welding filler material was not adequately controlled by Tool Room.	V	3
	Written quizzes were not administered during requalification training.	V	12
84-15	Design calculations for the auxiliary feedwater flow orificies plates were not adequately reviewed and approved.	IV	11
84-19	Improper control of combustible materials.	V	5
	Improper setting of code safety valve.	IV	3
84-22	Expanded Fire Brigade Training had not been performed.	Deviation	5
	A Senior Control Room Operator had not been trained in his designated role as fire brigade leader.	IV	5
	Improper control of combustible materials.	IV	5
	Annual training with the Herald Fire Department was not held.	IV	5

<u>Inspection Report No.</u>	<u>Subject</u>	<u>Severity Level</u>	<u>Functional Area</u>
85-25	Inadequate radiological survey of radioactive fragment removed from steam generator.		
	Inadequate placement of personnel monitoring devices.		
	Inadequate records of surveys of radioactive fragment.		
	Improper reporting of unusual radiation levels.		
	Inadequate posting of source of radiation.		
	Improper use of radiological work permit (RWP).		
	Inadequate airborne radioactivity survey.	III (collectively)	2
	MSRC audits of facility staff qualifications did not extend below the level of supervisory personnel.	IV	9
84-29	A Licensed Senior Operator was not present during licensed operator instruction.	Deviation	12
85-01	Inadequate design verification and field change procedures.	Deviation	11
	Four NSEB HVAC seismic supports did not conform to drawings but had been inspected and accepted by QC.	IV	11
85-02	Inaccurate welder recertification records.	V	9
	Incomplete welding filler material control records.	IV (repeat)	9
85-03	Air particulate and charcoal filter samples were not taken and analyzed on a regular weekly schedule.	IV	2
85-08	Inadequate battery testing procedures.	IV	4
	Incomplete updating of drawings associated with NCR dispositions.	V	9

TABLE

INSPECTION ACTIVITIES AND ENFORCEMENT SUMMARY (12/01/83 - 05/31/85)

RANCHO SECO

Functional Area	Inspections Conducted		Enforcement Items					
	Inspection*	Percent	Severity Level**					Dev.
	Hours	of Effort	I	II	III	IV	V	
1. Plant Operations	3671	57				2		
2. Radiological Controls	544	9			1	1		
3. Maintenance	270	4				1	1	
4. Surveillance	108	2				1		
5. Fire Protection	72	1				3	1	1
6. Emergency Preparedness	398	6				1		
7. Security and Safeguards	404	6						
8. Refueling	81	1						
9. Quality Programs and Administrative Controls	378	6				9	8	
10. Licensing	0	0						
11. Engineering & Construction	336	5				2	1	
12. Training	212	3				2	1	1
Total								

*Allocations of inspection hours vs. functional areas are approximations based upon inspection report data, and include onsite and inoffice inspection effort.

**Severity levels are in accordance with NRC Enforcement Policy (10 CFR Part 2, Appendix C).

Data reflects Reports 83-32 through 85-12