

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-409/85014(DRS)

Docket No. 50-409

License No. DPR-45

Licensee: Dairyland Power Cooperative
2615 East Avenue - South
La Crosse, WI 54601

Facility Name: La Crosse Boiling Water Reactor

Inspection At: La Crosse Site, Genoa, WI

Inspection Conducted: September 16 through October 4, 1985

Inspector: *[Signature]*
R. A. Westberg

10/17/85
Date

Approved By: *[Signature]*
F. C. Hawkins, Chief
Quality Assurance Programs Section

10/17/85
Date

Inspection Summary

Inspection on September 16 through October 4, 1985 (Report No. 50-409/85014(DRS))

Areas Inspected: Routine, announced inspection by one regional inspector of licensee action on previous inspection findings; maintenance; QA/QC administration; tests and experiments; receipt, storage and handling; and procurement. The inspection involved 72 inspector-hours onsite.

Results: No violations or deviations were identified.

DETAILS

1. Persons Contacted

Dairyland Power Cooperative

*R. R. Wery, Quality Assurance Supervisor
A. N. Foster, Administrative Assistant
P. E. Gray, Mechanical Maintenance Supervisor
D. M. Carroll, Assistant Maintenance Supervisor
R. E. Gardner, Instrument and Electrical Supervisor
*G. S. Boyd, Operations Supervisor
L. S. Goodman, Operations Engineer

US NRC

*N. Villalva, Senior Resident Inspector

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

*Indicates those personnel attending the exit meeting on October 4, 1985.

2. Licensee Action on Previous Inspection Findings

- a. (Closed) Open Item (409/84012-01): Procedure No. ACP-04.1, Issue 10, was in revision to incorporate qualified reviewer requirement. The inspector reviewed Procedure No. ACP-04.1, "Design and Facility Change Control," Issue 11, and identified one concern: Paragraph 4.7 stated that the design, if not done by the LACBWR plant staff, shall have a design verification performed by the LACBWR staff; however, no mention was made of design verification of designs completed by the LACBWR staff. This concern was discussed with the QA supervisor who agreed that the procedure, as worded, was somewhat ambiguous. A procedure change was initiated and approved on September 19, 1985. The inspector reviewed Issue 12 of Procedure No. ACP-04.1 and found it acceptable.
- b. (Closed) Open Item (409/84012-03): Additional procedural changes and preventive maintenance controls were required for circuit breakers. The inspector reviewed Procedures No. I&E-74-06, Issue 3, and No. I&E-74-08, Issue 2, which were revised to include instructions regarding breaker current transformer polarity checks and maintenance checks for the auxiliary contacts. The inspector also reviewed the preventive maintenance program for circuit breakers and verified that the following breakers were included: No. 74-76-011, 1B Reactor Feedwater Pump; No. 74-77-001, 1A Off-gas Stack Blower; and No. 74-77-025, 1A Air Compressor Motor. The inspector had no further concerns.

- c. (Closed) Open Item (409/84012-04): Incomplete documentary evidence of Safety Review Committee (SRC) audit report reviews. The inspector reviewed the SRC minutes from October 26, 1984, to the present. Starting with the January 14, 1985, minutes, the SRC minutes have had a section titled "audits." In addition, the reference section lists the report numbers of the audits that were reviewed. The inspector had no further concerns.
- d. (Closed) Open Item (409/84012-05): Item 1-Procedure No. FPP-6.9, Issue 0, did not reference the required Technical Specification (TS) Section. The inspector's review of Procedure No. FPP-6.9, Issue 1, indicated that TS requirement 5.2.18.3(a) was referenced. Item 2-Procedure No. FPP-6.9 did not include the minimum Halon bottle weight specified in TS 4.2.18.3(a). The inspector's review of the revised procedure indicated that an acceptance criteria of a loss of greater than 5% of the nameplate weight of the bottle requires refill. The inspector determined that this would be acceptable if the correct Halon bottle was installed. Field verification indicated that the 270 pounds of Halon met the TS requirement. Item 3-Procedure No. FPP-6.9 did not include a step which records the pressure of the Halon bottle. The inspector's review of the revised procedure indicated that a new section was added to record the pressure. A chart giving temperature correction factors and acceptance criteria were also added.
- e. (Closed) Open Item (409/84012-07): A torque wrench calibration program had not been developed. The inspector reviewed Procedure No. ACP-13.1 "Control of Measuring and Test Equipment," Issue 9, and found it an acceptable program. In addition, the preventive maintenance (PM) program was the tracking system used to ensure that the torque wrenches were recalled and calibrated on schedule and that the mechanical maintenance department had purchased a calibrated torque wrench and trained a mechanic in its use. The inspector also verified that all the torque wrenches were included in the PM program and had been calibrated on schedule. The inspector had no further concerns.
- f. (Closed) Open Item (409/85003-02): Agenda for SRC should include the nine items required by the Technical Specifications. The inspector's review of the SRC minutes from October 26, 1984, to present indicated that starting with the March 6, 1985, meeting, the nine TS items were included in the agenda. The SRC minutes document this review by referencing the TS paragraph as part of the heading for each agenda item. The inspector had no further concerns.
- g. (Closed) Open Item (409/85003-03): No policy for approval of SRC audit checklists prior to use when audits are performed by others. The inspector verified that there was no specific policy for prior approval of the SRC audits which have been delegated to site QA; however, the SRC chairman receives copies of all audit checklists prior to the start of the audit. Further, all SRC members receive a copy of the yearly audit schedule. This allows the SRC chairman and members to communicate their concerns or specific audit questions to QA. The inspector

reviewed transmittal memorandums for QA audits from QA to the chairman of the SRC dated May 15, April 11, and July 17, 1985. The inspector also reviewed correspondence from the SRC chairman and one of the members suggesting areas of concern for upcoming audits. The inspector was satisfied that the SRC audit program was being properly controlled.

- h. (Closed) Unresolved Item (409/85003-04): Qualifications of SRC personnel unknown and not charted against requirements. The inspector reviewed a resume book and a matrix which charted the personnel qualifications of SRC members and alternates against the TS requirements and found them acceptable.
- i. (Closed) Unresolved Item (409/83002-01): Interpretation of "to the extent necessary", as it relates to procurement activities. The inspector determined that because the licensee was committed to ANSI N18.7-1976, and through this standard to ANSI N45.2-1971, that "to the extent necessary" meant invoking specific requirements which meet the intent of ANSI N45.2-1971 for safety-related systems. A sample of purchase orders for the reactor coolant pressure boundary, safe shutdown systems, reactor protection, and emergency power system indicated that sufficient QA requirements were being imposed on vendors.

3. Maintenance

The inspector verified that the licensee had implemented a written program relative to maintenance activities that was in conformance with Technical Specifications, regulatory requirements, commitments and industry guides or standards. The following aspects of the maintenance program were reviewed during this inspection: corrective maintenance, equipment control, preventive maintenance, special processes, cleanliness control, and housekeeping control.

a. Documents Reviewed

- (1) ACP-02.5, "Housekeeping, System and Components Cleanliness," Issue 5.
- (2) ACP-10.1, "Control of Special Processes," Issue 5.
- (3) ACP-11.1, "Inspections," Issue 4.
- (4) ACP-13.1, "Control of Measuring and Test Equipment," Issue 9.
- (5) ACP-15.1, "Installation and Removal Jumpers, Lifting, and Replacement of Leads," Issue 7.
- (6) ACP-15.2, "Equipment Lock and Tag Control," Issue 6.
- (7) ACP-17.3, "Maintenance Requests," Issue 19.
- (8) ACP-50.1, "LACBWR Preventive Maintenance Program," Issue 3.

b. Inspection Results

The inspector's review of the maintenance program indicated that the written program was acceptable with one exception: The Quality Assurance department does not review safety-related maintenance requests. This concern was discussed with the QA supervisor who indicated that he assured compliance with the maintenance request procedure through audits. The inspector reviewed the 1984 operations audit which included the maintenance request system; however, this audit looked only at the operations supervisor's duties relative to work requests. The inspector was concerned that the audit did not address important aspects of the maintenance request program, such as (1) description of malfunctions; (2) documentation of work performed; (3) work instructions; (4) required tests; (5) verification of LCO and operating conditions; (6) approvals; (7) releases; (8) and independent verifications. This concern was discussed further with the QA supervisor who indicated that the work request procedure was scheduled as part of the December 1985 operations audit and that the audit would document the review of maintenance requests in greater depth. Pending NRC review of this scheduled audit, this matter is considered unresolved (409/85014-01(DRS)).

4. QA/QC Administration

The inspector verified that the licensee had implemented a written program relative to QA/QC administration that was in conformance with Technical Specifications, regulatory requirements, and industry guides and standards.

a. Documents Reviewed

- (1) LACBWR Quality Assurance Program Description (QAPD), Section 0.0, "Introduction," Revision 2.
- (2) QAPD, Section I, "Organization," Revision 2.
- (3) QAPD, Section II, "Quality Assurance Program," Revision 2.
- (4) QAI-1, "Preparation, Issuance, and Distribution of the Quality Assurance Program Description," Issue 1.
- (5) QAI-2, "Preparation and Issuance of Quality Assurance Documents," Issue 2.
- (6) QAI-3, "Controlled Distribution of Quality Assurance Department Documents," Issue 2.
- (7) ACP-01.1, "Preparation, Format, and Content of Administrative Control Procedures," Issue 2.
- (8) ACP-07.1, "Review, Approval, and Issuance of LACBWR Controlling Documents," Issue 26.
- (9) 1985 Audit Reports.

b. Inspection Results

The inspector determined that (1) the scope and applicability of the QA program was adequately defined, (2) controls had been established for the preparation, review and approval of QA/QC procedures, and (3) a system for reviewing and evaluating the QA program had been established.

No violations or deviations were identified in this area.

5. QA Program Implementation

The inspector conducted a review of selected areas of the QA program to verify proper implementation. The results of this review are as follows:

a. Tests and Experiments

The following procedures were reviewed:

- (1) ACP-06.1, "Preparation and Use of Procedures," Issue 10.
- (2) ACP-07.1, "Review, Approval and Issuance of LACBWR Controlling Documents," Issue 26.
- (3) ACP-12.1, "Test Control," Issue 5.
- (4) Special Tests
 - (a) STP-32-01, Issue 0.
 - (b) OP-50-01, Issue 0.
 - (c) OP-50-02, Issue 1.

The inspector selected three recent tests and verified that they were performed in conformance with the procedural controls and that a written safety evaluation pursuant to 10 CFR 50.59 had been prepared.

No violations or deviations were identified in this area.

b. Receipt, Storage and Handling

The following documents were reviewed:

- (1) QAPD, Section VII, "Control of Purchased Material, Equipment, and Services," Revision 2.
- (2) QAPD, Section VIII, "Identification and Control of Materials, Parts, and Components," Revision 1.
- (3) QAPD, Section XIII, "Handling, Storage and Shipping," Revision 1.
- (4) QAPD, Section XV, "Nonconforming Materials, Parts, or Components," Revision 1.
- (5) IQI-2, "Material Control for the La Crosse Boiling Water Reactor," Issue 0.

- (6) QACP-2.1, "Receiving Inspection," Issue 3.
- (7) ACP-08.2, "Receiving Inspection," Issue 8.
- (8) ACP-09.1, "Identification and Control of Materials, Parts, and Components," Issue 4.
- (9) Receipt Inspection Documentation - Various
- (10) Discrepancy Reports - Various

The inspector selected a sample of safety-related items stored in the LACBWR warehouse and verified that the items were properly receipt inspected, that the tagging system employed provided traceability back to the purchase documents, and that items with limited shelf life were controlled.

The inspector also reviewed all items currently on QA hold status and verified that they were controlled to prevent their inadvertent use and that the reasons for nonconformance were adequately documented.

No violations or deviations were identified in this area.

c. Procurement

The following documents were reviewed:

- (1) QAPD, Section IV, "Procurement Document Control," Revision 1.
- (2) IQI-1, "Procurement and Control of Materials and Services for the La Crosse Boiling Water Reactor," Issue 2.
- (3) ACP-05.1, "Procurement Document Control," Issue 8.
- (4) ACP-17.4, "Compliance with 10 CFR Part 21," Issue 3.

The inspector selected a sample of safety-related purchase orders and verified that sufficient QA requirements were specified. This review was acceptable with one exception: A purchase order to the Foxboro Corporation for a pressure transmitter did not specify that 10 CFR Part 21 was applicable. Because the transmitter's identification number indicated that it was in safety channel No. 1, it met the Part 21 definition of basic component and Part 21 should have been specified. This item was discussed with the QA supervisor who indicated that it was an oversight. Subsequent review of all purchase orders made to Foxboro proved this to be correct. Part 21 was specified in all other cases.

The inspector's review of Procedure No. ACP-17.4 revealed one concern: the paragraph that stated that Part 21 shall be specified on procurements was based on a definition of significant safety hazard while Part 21, Paragraph 21.31, employs the term "basic component". This concern was discussed with the QA supervisor who agreed to revise the procedure as necessary. Pending further NRC review, this item is considered open (409/85014-02).

6. 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. An open item is discussed in Paragraph 5.c.

7. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations or deviations. An unresolved item is discussed in Paragraph 3.b.

8. Exit Interview

The inspector met with the licensee representatives denoted in Paragraph 1, on October 4, 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 did not identify any such documents or processes as proprietary.