

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/85045(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: August 20 through October 3, 1985

Inspectors: T. P. Gwynn

P. L. Hiland

D. E. Keating

Approved By: *RF Warrick for*
T. P. Gwynn
Chief, Projects Section 1B

10/23/85
Date

Inspection Summary

Inspection on August 20 through October 3, 1985 (Report No. 50-461/85045(DRP))

Areas Inspected: Routine safety inspection by resident inspectors of construction and preoperational testing activities including applicant action on previous inspection findings; applicant action on 10CFR50.55(e) items; employee concerns; review of allegations; functional or program areas (including technical specifications review, site surveillance tours, and fuel receipt and storage); independent inspection effort (including visual weld acceptance criteria training and control rod drive housing support steel installation); and site activities of interest. The inspection involved 196 inspector-hours onsite by three resident inspectors including 16 inspector-hours onsite during off-shifts. The inspection also included 71 inspector hours in the Region III office by six regional based inspectors during review of the Clinton Power Station technical specifications.

Results: Of the ten areas inspected, no violations or deviations were identified. The lack of adequate communication, as discussed in paragraph 4 of the report details, could be a factor contributing to the high number of allegations received by the NRC concerning the Clinton Power Station.

DETAILS

1. Personnel Contacted

Illinois Power Company (IP)

- *K. Baker, Project Engineer (Licensing), I&E Interface
- G. Bell, Director, Construction and Procurement QA
- J. Brownell, Staff Specialist Licensing
- *R. Campbell, Director - Quality Systems and Audits
- W. Connell, Manager - Quality Assurance
- J. Cook, Assistant Power Plant Manager
- E. Corrigan, Director - Quality Engineering and Verification
- *H. Daniels, Project Manager
- S. Fisher, Manager, Nuclear Support
- D. Glenn, Director - Safeteam
- J. Greene, Manager - Startup
- *D. Hall, Vice President, Nuclear
- E. Kant, Assistant Manager, NSED
- *J. Loomis, Construction Manager
- *J. Miller, Director - Startup Programs
- *R. Morgenstern, Director - Technical
- H. Nodine, Supervisor, Control and Instrumentation
- *J. Palcnak, Supervisor - Plant Support Services
- *J. Perry, Manager - Nuclear Program Coordination
- S. Rasor, Supervisor - Construction QA
- G. Reed, Assistant Supervisor, Plant Operations
- *S. Richey, Director - Maintenance
- *F. Spangenberg, Manager - Licensing and Safety
- J. Wilson, Manager - Clinton Power Station

Baldwin Associates (BA)

- R. Greer, Manager - Quality and Technical Services
- *J. Thompson, Manager - Quality Engineering

Soyland/Wipco

- *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 (92701/92702)

- a. (Closed) Open item (461/85005-02): Verify vibration measurement and inspection program of reactor vessel internals performed during preoperational testing program (SER Paragraph 3.9.2).

The inspector witnessed portions of Reactor Vessel Flow Induced Vibration preoperational test (PTP-RV-01). As reported in Inspection Report 50-461/85042, paragraph 11.e., the inspector previously witnessed single pump operation flow testing for PTP-RV-01.

The inspector observed post flow inspections performed in accordance with paragraph 7.3 of PTP-RV-01. Specifically, the inspector accompanied the applicant's Start Up and Quality Control personnel inside the reactor vessel during the conduct of post flow inspections. The inspector reviewed preliminary results of PTP-RV-01 and did not identify any open items or areas of concern. The program for vibration measurement and inspection of reactor vessel internals accomplished during preoperational testing was reviewed by the inspector and determined to be in accordance with the applicant's procedures. This item is closed.

- b. (Open) Unresolved Item (461/85032-02): (Reference Allegation RIII-A-0116) Socket weld fitups were observed which did not appear to conform to code requirements. The applicant stated that the answers to two NRC questions would be provided to resolve this issue.

On September 23, 1985, the applicant provided information to the resident inspector answering this unresolved item. The package was transmitted to the cognizant Region III based specialist inspector for followup inspection. That inspection will be documented in a subsequent inspection report. This matter remains unresolved.

- 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.

The inspector reviewed the status of this item with respect to additional information provided by an allegor. As a result, two additional items were added to the scope of the review under this unresolved item as follows:

- (1) The qualification and training records of three specific document reviewers named by the allegor; and
- (2) The results of reviews performed by BA under CAR 240. CAR 240 addresses the adequacy of work performed by a former BA document reviewer.

The inspector reviewed the status of CAR 240 and found it was scheduled for completion at the end of the inspection period. The results under CAR 240 will be reviewed during a subsequent inspection.

The inspector reviewed IP QA surveillance report Q-01537 dated July 5, 1985. That surveillance was performed to determine if BA Quality Assurance Engineers, Level II Document Reviewers, had properly verified education and experience on file prior to certification as procedurally required. The IP surveillance included a sample of personnel certified prior to March 12, 1985, and 100% of all applicable personnel certified after that date. No deficiencies resulted from that surveillance.

The inspector also reviewed certification and training records for eight personnel certified prior to March 12, 1985, including the three individuals specifically named. The review was conducted to determine the level of past experience of each individual prior to certification and to determine if verification of past education and experience required for certification had been accomplished.

This activity was still in progress at the conclusion of the inspection period. This matter remains unresolved.

- d. (Open) Unresolved Item (461/85012-02): Plant administrative procedures did not require an independent technical review of procedures; and procedures were not properly classified in accordance with technical specification requirements.

The inspector reviewed the status of applicant actions to provide independent review of safety related procedures prior to fuel load. The schedule for completion of procedures prior to fuel load was also reviewed. The applicant appeared to be making satisfactory progress toward completion of this activity.

In addition, the applicant reported that the review of procedure classifications in accordance with the CPS technical specifications was complete; however, the controlling document, the CPS Operating Manual Status Report, had not been upgraded at the time of this review.

These matters remain unresolved pending further action by IP and subsequent NRC review.

- e. (Closed) Unresolved Items (461/81018-03 and 461/81025-06): Heating Ventilating and Air Conditioning (HVAC) ducts and hangers in the containment classified as seismic, nonsafety related were only inspected by QC at the interface with the containment liner. The ducts and associated hanger installations were installed directly over the fuel pool and fuel transfer tube area.

The applicant was requested to demonstrate that the postulated failure of this material would not jeopardize safety related equipment.

The resident inspector reviewed Sargent and Lundy (S&L) letter SLMI-7138, S&L Specification K-2910, HVAC WORK, Section 113.5, as amended June 1, 1983, and Item 13, revised December 15, 1983, of the Recovery Plan-HVAC. Specification K-2910, Section 113.5 as revised required implementation of the same QC program aspects for systems identified as nonsafety related as well as those systems identified as safety related. Both categories were seismically designed thereby assuring the structural integrity of the duct systems under dynamic loading. Installations prior to the imposition of these inspection requirements were addressed by the Recovery Plan-HVAC. Based on the review of these documents, these items are closed.

- f. (Closed) Open Item (461/83005-04): Project Management Procedure (PMP) 11.5, "Vendor Service Representatives," Revision 0, did not assure that vendor representatives were qualified to perform their intended functions on safety related equipment or equipment important to plant safety.

In order to assure that vendor representatives were qualified to perform their intended functions, the following program changes were made by IP: PMP 11.5, Section 4.7.4, was revised and issued June 30, 1983, and applicable checklists used in vendor evaluations were revised including Quality Engineering Calibration Services Checklist dated June 22, 1983, and Standard Pre-Award Survey Checklists dated June 23, 1983. The resident inspector reviewed these program changes and determined that vendor representatives would be qualified to perform their intended functions if the revised program were followed. This item is closed.

- g. (Closed) Open Item (461/83009-05): Seismic design analysis affected by input of incorrect wall thickness; a potential generic problem discovered at three other reactor sites. The NRC determined that as-specified nominal wall thicknesses were being used for fittings, elbows, and tees, even though as-installed thicknesses of twice the specified value had been measured. The applicant and Stone and Webster investigated the effects of the resultant changes in flexibility and dead weight upon the overall piping design analyses.

IP requested S&L to provide criteria for substituting heavier than specified fittings in safety-related piping systems. S&L letter SLMI-11838 established criteria which were subsequently incorporated into Specification K-2882, "Phase II Piping, Misc. Equip., & Equip. Erection." BA reviewed large bore material substitutions made by both BA and Southwest Fabrication. BA prepared 42 NCRs describing the situations where the established criteria had not been met.

The NCRs were evaluated by S&L in reference to S&L letter SLMI-11838, and Specification K-2882. There were three instances that required replacement of piping sections. Review of the above actions by the resident inspector showed that licensee actions were appropriate. This item is closed.

- h. (Closed) Noncompliance Item (461/81032-01): Performed cleaning of steam generator without procedures.

During a surveillance conducted by the resident inspector, it was noted that the reactor steam separator was in the process of being washed down with water from a hose. The separator was stored in the upper containment pool at 820 foot level. Personnel were on top of the separator washing the sides of the surrounding pool walls. The sides of the separator were uncovered and wet. Craft personnel stated they also intended to wash the separator. It was noted that the shroud head and separator equipment traveler, B13-004, did not contain a step or operation for cleaning or washing the steam separator. Contractor supervision stated they were verbally instructed by the licensee to perform the operation and that water quality was acceptable. It was also noted that there were no written instructions for cleaning the separator, nor were there any written water quality requirements or results available in the work areas or included in the traveler package. When notified, the contract QC inspector took appropriate stop-work action. A subsequent follow-up surveillance was performed, and the inspector noted that an inspection report (M-82-240), a CAR (CAR 076), and a NCR (NCR 6073) had been initiated.

The resident inspector reviewed the disposition of the referenced NCR which revised traveler B13-004 and resolved the water quality issue. Procedure changes were made to reflect that material cleaning operations be directed by an established work document. BA procedure BAP 3.2.2, "Construction Cleaning", was changed by Procedure Change Request (PCR) 43-82 and incorporated into Revision 8 of the procedure. BAP 3.2.6, "Reactor Pressure Vessel Cleaning and Cleanliness Control", was changed by PCR-44-82. A review of these procedural changes by the inspector indicated that construction cleaning of equipment will be adequately controlled. Routine observations made by resident inspectors have not disclosed any further violation relating to construction cleaning of equipment. This item is closed.

- i. (Open) Unresolved Item (461/83009-09): Field Change Requests (FCR's), by procedure, were used to identify hardware mislocations, interferences, or misalignments discovered prior to installation. An FCR was written to identify a condition which would be nonconforming if work was to proceed.

Review by the resident inspector revealed the following:

1. Four FCR's, 18233, 18226, 18127, and 17909 appeared to go beyond the scope of the FCR system in that generic changes to design specifications were requested. Examples of the changes included additional or revised welding tolerances or relaxed inspection criteria. These types of changes should have been requested through the Engineering Change Notice (ECN) system.
2. The FCR's referred to in #1 above appeared to relax the weld inspection requirements as specified in the design specification and the American Welding Society (AWS) Code. The Quality organizations of IP and BA were requested to provide a comparison of code and subject FCR welding inspection requirements.
3. The resident inspector again requested that IP review its involvement in the project FCR system through its QA organization. This request was made because several examples indicated that QA should perform some function in the initial review process of FCRs which would provide a system of checks and balances to prevent misuse of the FCR system. The existing system of quality audits and surveillances did not appear sufficient for this purpose.

During this inspection the resident inspector reviewed procedure BAP 1.2, "Field Change Request," which defines the FCR as "The means of changing a condition affecting design documents and/or specifications which, during or prior to construction, prevents meeting the requirements for installation, inspection, and/or testing." It appeared that the four cited FCR's were used to perform this function. Two of the four FCR's, FCR 18127 and FCR 18226, dealt with relief from weld inspection acceptance criteria of AWS D-1.1. Also reviewed was S&L letter SLS-I-4054 dated August 29, 1983, which provided the technical justification and a comparison to AWS D-1.1 requirement.

The use of either an FCR or an ECN appeared to accomplish the desired change in an adequately controlled manner. The inspector also reviewed IPQA Surveillance Y-17498 to determine if FCRs were used instead of NCRs; none were identified. This item remains open.

- j. (Closed) Noncompliance Item (461/81008-01): Eight areas of poor housekeeping and fire protection were pointed out to the licensee for action. The subject areas contained scattered piles of combustibles (such as trash, wood, Visqueen) that could easily be ignited by welding sparks. Also, the plastic protective covering over the top of the insulation panels on the two RHR heat exchangers was torn open, and the roof of the

steam tunnel was removed subjecting the insulation panels on these heat exchangers to the elements. There were four areas in the Auxiliary Building with examples of improper material protection, storage, and segregation of safety and nonsafety material. Seven examples of these types of conditions were also identified outside of the power block. The inspector noted that some of these conditions were repeats of those identified in NRC Inspection Report 50-461/81-06. The storage conditions were not the "momentary result of daily construction" but had remained throughout the month.

The inspector reviewed the licensee's corrective action concerning these items. IPQA Surveillance Y-11490 dated July 17, 1981, verified that the specific examples cited were corrected. In addition, BA created the position of Compliance Coordinator in order to affect timely resolution to BAQC Housekeeping Inspection Reports by interfacing between BAQC and the construction superintendents. A subsequent IPQA surveillance indicated that similar housekeeping problems were recurring. A Management Corrective Action Request (MCAR #1) was issued March 17, 1982, citing the failure to maintain acceptable housekeeping practices. A corrective action plan was approved by IPQA, and implementation of the plan has been verified by IPQA. MCAR #1 was closed by IPQA letter Y-18464 dated September 30, 1983. BA developed and implemented a corrective action program capable of identifying and correcting deficiencies such as those documented in MCAR #1. IPQA conducts regularly scheduled surveillances and verifies implementation of the BA housekeeping program. Routine inspections by the resident inspectors have on occasion identified instances of poor housekeeping. In most instances management has been responsive to NRC concerns and taken corrective action. This item is closed.

- k. (Closed) Open Items (461/83009-07 and 461/83009-08): The referenced items relate to the proper definition of American Society of Mechanical Engineers (ASME) Section III, Subsection NF and American Institute of Steel Construction (AISC) code boundaries in piping supports for Clinton Power Station.

A meeting was held in Chicago, Ill. on November 20, 1984, between representatives of NRC's Nuclear Reactor Regulation (NRR), Region III, IP, and S&L. Comparisons between the construction requirements of NF and non-NF portions of the jurisdictional boundaries were discussed. By letter of January 29, 1985, a copy of the IP presentation and meeting minutes were formally submitted to the NRC.

NRR accepted IP's definition of ASME NF code boundaries in a letter from NRR to Region III dated June 24, 1985. These items are closed.

1. (Closed) Notice of Violation (461/84004-02): Riser clamp installed with bolt threads installed in shear plane in violation of drawings and ASME Section III NF 4722B.

Two installed load bolts of RHR pipe riser clamp M-IRH07105R were full length threaded rod rather than the 1-3/4" diameter stud bolts threaded at each end as specified on the drawing bill of material. As a result the load bolt threads were located in the shear plane of the riser clamp, which was in violation of ASME code requirements. Also, on RHR pipe hanger clamp M-IRH05005V the load bolt, while threaded at each end as specified, had threads located in the shear plane.

The resident inspector reviewed the disposition to NCRs 14968 and 15334. Calculations done by Basic Engineers supported the "use as is" disposition of the installed threaded bolt subjected to shear plane forces. Specifications were changed to allow installations of this type provided a specific analysis had been performed. Several similar travelers were reviewed. No additional instances of fastener substitutions were identified.

BA CAR 157 was also reviewed. It had been issued to affect programmatic corrective action including the training of inspection personnel. BA procedure BAP 1.0, "Nonconformances", covering management review of NCRs closed in-process and training records covering the requirements for in-process closure of NCRs were reviewed and found acceptable by the inspector. This item is closed.

No violations or deviations were identified.

3. Applicant Action On 10CFR50.55(e) Item (99020)

(Closed) 50.55(e) Item (461/84022-EE): Screenhouse gallery platforms were fabricated and supplied as Seismic Category 1 structural steel. These galleries were erected as non-safety related in seismic category I structures.

IP's investigation of the above revealed that all but three (3) platforms were erected as safety related structures. These three were evaluated by S&L. S&L concluded that as erected no safety related equipment would be adversely affected if any of the structural elements should break loose and fall during a seismic event.

The resident inspector reviewed applicable IP documentation, including letters Y-25902 dated November 2, 1984, Y-25892 dated October 31, 1984, and Y-25913 dated November 6, 1984, and an IP letter dated November 19, 1984, requesting engineering review of NCRs written during the 10CFR50.55(e) investigation. The inspector further

reviewed the result's of S&L's engineering review. This item was determined to be not reportable by IP. The resident inspector's review of the documentation determined that the applicant's actions were acceptable. This item is closed.

No violations or deviations were identified.

4. Employee Concerns (99014)

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

In addition to the above, the resident inspector reviewed a concern raised by a site employee regarding the adequacy of an investigation conducted by IP. The individual stated that IP had investigated a concern referred to them by Safeteam related to intimidation of a BA QC supervisor. In particular, the individual was concerned that the investigation into Safeteam concern No. 12143-A was not properly performed. When the individual related his understanding of the investigation results, it was apparent to the NRC inspector that the investigation results portrayed to the concerned individual were not consistent with results previously provided to the NRC inspector by IP.

The resident inspector requested that IP arrange a briefing for all BA Quality Control Civil/Structural (QCCS) inspectors (the affected group) concerning the actual results of the IP investigation and corrective actions taken. The briefing was conducted on September 23, 1985, in the presence of the resident inspector. The briefing provided an open forum in which the QCCS inspectors could ask questions and obtain answers from BA Quality & Technical Services upper management. The resident inspector noted that the briefing accurately portrayed the results of the IP investigation.

Subsequent contact between the resident inspector and the concerned individual revealed that he had no information which indicated that the IP investigation was faulty or that the results were incorrect. No further action was deemed necessary on this matter.

No violations or deviations were identified.

5. Review Of Allegations (99014)

- a. (Closed) Allegation (RIII-85-A-0101) (#145): A local attorney, acting on behalf of an individual who had been terminated by BA, contacted the BA Project Manager and alleged that his client

had been unjustly terminated. In particular, the attorney alleged that the individual had "been terminated for not following a proper procedure in doing a certain welding job, when in fact the instructions that he was aware of at the time of making the weld required him to do the work as it was actually done by him".

Region III attempted to obtain additional information from the allegor on two occasions. No additional information was provided. Subsequently, Region III requested in correspondence dated July 29, 1985, that the applicant investigate this matter to determine what, if any, hardware concerns were related to this matter (that is, was the welder properly qualified; did he use an approved procedure, etc). IP responded to Region III in letter U-600232 dated August 22, 1985. IP investigation results, as identified in their letter, were as follows:

"Our review determined that the welder was qualified and used the correct welding procedures. However, the welding was performed on the wrong welds. This resulted in the welder being terminated for performing unauthorized work. Documentation supporting our review will be maintained in our files for your review during subsequent inspections."

NRC Review

The NRC inspector reviewed the IP file concerning this matter. The file contained records indicating that the individual in question was a former electrician welder who had been terminated for cause (unauthorized work) by BA on January 26, 1984. The individual had been assigned to rework welds on an electrical cable tray hanger described by traveler #E30-1002-02A-H26. The records in the IP file clearly indicated that the individual had reworked welds other than those authorized by the traveler. The unauthorized work was documented on BA NCR 14198 dated January 25, 1984. Corrective actions described on the NCR had been completed by BA. Records clearly showed that the welder was properly qualified to the procedure specified in the work traveler.

Results

This allegation was not substantiated. The individual involved was terminated because he performed unauthorized work on safety related welds. The hardware conditions identified had been appropriately corrected by BA. This matter is closed.

- b. (Closed) Allegation (RIII-85-A-0123) (#154): A BA QC inspector contacted the resident inspector and expressed a concern regarding intimidation. The individual stated that he had found a note from a craftsman attached to a traveler package he was assigned to inspect which stated "ATTN TS MGR. HANGER E27-1004-03A-H38 Why don't you take a look at this hanger with [name deleted] He must have been looking at the wrong one. If he had the right hanger maybe you should get his money and hire someone who'll do the job right. (signed) [Name deleted]". The concerned individual, who was named in the note, believed that the note was intended to intimidate him. He stated that the originator of the note had received a verbal reprimand from supervision but that the action taken was not, in his opinion, sufficient. The individual stated that no threats had been made to him and his work performance had not been affected by this incident.

NRC Review and Results

The resident inspector reviewed the allegation and determined that no regulatory requirements were involved and that quality was not affected. Management action taken to address the note was appropriate considering the circumstances. No investigation was warranted based on the details of the allegation. This matter is closed.

No violations or deviations were identified.

6. Functional or Program Areas Inspected

a. Technical Specifications Review (71301)

The Clinton - Unit 1 Operating License, Appendix A, Technical Specifications, was issued in draft by NRR for proof and review on August 28, 1985.

During this inspection period, Region III and the resident inspectors reviewed the CPS technical specifications. The review was intended to assess the clarity and enforceability of the technical specifications including accuracy of set points based on Final Safety Analysis Report values; capability to perform surveillances as stated in the technical specification; and the policies set forth in Section 6, Administrative Controls, of the technical specifications. The CPS technical specifications were further compared with BWR-6 Standard Technical Specifications (STS).

Comments resulting from the proof and review were transmitted to NRR.

No violations or deviations were identified.

b. Site Surveillance Tours (71302)

At periodic intervals during the report period, surveillance tours of selected 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, maintenance, and preoperational testing activities in progress.

The storage and maintenance of safety-related material and equipment was acceptable throughout the laydown areas and the power block.

The inspector noted an increase in the applicant's surveillance of cable protection/housekeeping (ref. IPQA surveillance reports #CQ-01581 and #CQ-01585). These surveillance reports confirmed the inspectors concern over cable tray cleanliness reported in Inspection Report 50-461/85042 paragraph 6.a. A significant increase in housekeeping activities for cable trays was noted during the inspection period. The applicant's QA surveillance program appeared to have effectively corrected the housekeeping problem in the cable tray area.

No violations or deviations were identified.

c. Fuel Receipt And Storage (60501)

During the report period, the applicant commenced receipt of new fuel. The inspector witnessed receipt of new fuel to ascertain whether fuel received was properly accepted, safeguarded, and stored in accordance with the Special Nuclear Material (SNM) license requirement. The applicant's SNM license was issued August 7, 1985.

The inspector verified that the applicant's actions were in accordance with the SNM license by personal observation of the following:

- witnessed new fuel receipt security inspections/control
- witnessed Radiation Protection (RP) activities during initial fuel receipt and QC inspection.
- witnessed plant staff handling of fuel containers, fuel bundles, and attachment hardware
- reviewed SNM custodian logs
- reviewed RP logs
- witnessed QC inspections of fuel channels and fuel bundles
- observed access control to the security boundary (Fuel Building).

The inspector noted a significant level of management attention to this activity. The applicant's QA surveillance efforts for new

fuel receipt was particularly effective in assuring compliance with the SNM license, site specific procedures, and the radiological control program.

At the conclusion of this report period, the applicant had received 78% (490 of 624) of the new fuel bundles required for initial fuel load. New fuel receipt is expected to be complete by mid October 1985.

No violations or deviations were identified.

7. Independent Inspection Effort (48063C/55063C)

a. Visual Weld Acceptance Criteria Training (48063C)

The applicant conducted training to interpret new visual weld acceptance criteria established by the Nuclear Construction Issues Group (NCIG). By agreement with NRR, the applicant notified the resident inspector of the schedule for training sessions conducted. The training was conducted in two parts; Part I was given to familiarize site QA/QC personnel with the new visual weld acceptance criteria; Part II was given to BAQC personnel and was specific to certain Engineering Change Notices (ECN), Field Engineering Change Notices (FECN), and Field Change Requests (FCR). The resident inspector observed one of each of the training sessions and found them consistent with overall program criteria and requirements.

b. Control Rod Housing Support Steel Installation (55063C)

The inspector observed a portion of the installation of the Control Rod Drive Housing Support Steel (CRDHSS). The CRDHSS is an engineered safety feature provided to limit the travel of a reactor control rod in the unlikely event of the failure of the control rod drive housing while the reactor vessel is pressurized.

Activities observed during this inspection period included a portion of the initial steel installation, QC inspection by General Electric, and QC surveillance activities conducted by IP. Several minor problems encountered during this activity were identified by the QC inspector and documented on NCRs. All activities observed were conducted in accordance with the applicable QA program requirements. Rework under the identified NCRs was in progress at the conclusion of the inspection period. The inspector will continue to monitor this installation activity in a subsequent inspection.

No violations or deviations were identified.

8. Site Activities Of Interest (71302/92705)

a. IP Management Changes (71302)

The applicant announced several significant management changes during the report period. The changes made were directed toward better preparing the IP organization to function as an operating plant organization. The more significant changes made were as follows:

- (1) Two new manager level positions were created reporting directly to the Vice President Nuclear: Manager - Licensing and Safety, and Manager - Outage Management. The first position was immediately effective and was filled by the former IP Director, Nuclear Licensing and Configuration Management. The second position will not be effective until the second quarter of 1986.
- (2) A new assistant manager level position was created reporting directly to the Manager - Clinton Power Station (CPS). The position (Assistant Manager - CPS) was filled by the former Assistant Power Plant Manager - Operations. The positions under the Manager/Assistant Manager - CPS were all reorganized to be Director level positions (Director - Plant Operations, Director - Technical, etc.).
- (3) The Manager - Nuclear Station Engineering was temporarily replaced by a Stone and Webster contract engineer. The current IP Manager - Startup will assume the duties of Manager - Nuclear Station Engineering during the first half of 1986.
- (4) The IP Director - Nuclear Training was replaced by the former CPS Supervisor - Plant Technical. The former Director - Nuclear Training is now a special assistant to the Vice President Nuclear for emergency planning.

b. Overinspection Program Termination Requests (92705)

Region III reviewed three IP requests to terminate additional commodities included in the Overinspection Program. Commodities for which termination requests were received included conduit, cable tray, conduit and cable tray supports, cable, cable terminations, HVAC duct, and HVAC duct supports. Review by Region III indicated that IP had not provided sufficient data and analysis to support their termination request. The request for termination of overinspection for these commodities was initially denied.

Subsequent to the applicant's request, Region III conducted an additional onsite inspection of as-built conditions. In addition, Region III reviewed the engineering evaluations conducted by S&L of discrepancies identified during overinspection of the commodities subject to these requests. Based on this review and the additional inspection results already available to Region III (including the results of the NRC Construction Appraisal Team) Region III permitted IP to suspend overinspection in the requested commodities, at its risk, pending Region III receipt and review of requested additional information which was scheduled to be submitted to Region III by IP the first week in October.

c. Seismic Qualification Review Team (SQRT) And Pump & Valve Operability Review Team (PVORT) Audits (71302)

NRR, assisted by Brookhaven National Laboratory (BNL), conducted special audits onsite of the seismic qualification of plant equipment (SQRT) and of the pump and valve operability assurance program (PVORT). These audits were conducted simultaneously during the week of August 28, 1985. The results of each audit will be reflected in a future supplement to the CPS Safety Evaluation Report (SER). The PVORT audit team concluded that an additional site visit will be required in order to confirm corrective actions to the audit team's findings. The SQRT findings were of lesser significance and will not require additional site audit efforts.

No violations or deviations were identified.

9. Exit Meetings (30703)

The inspectors met with applicant representatives (denoted in paragraph 1) throughout the inspection and at the conclusion of the inspection on October 3, 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 inspector(s) attended exit meetings held between Region III and/or headquarters based inspectors and the applicant as follows:

<u>Inspector(s)</u>	<u>Date</u>
Lombardo, Miller, Carbonaro	8/29/85
Lee, Bandyopadhyay, Curreri, Kassir	8/30/85
Kendall, Yost	9/3/85
Pirtle	9/4/85
Ulie, West	9/13/85
Jones	9/12/85
Oestmann, Holtzman	9/20/85
Paul, Lasuk	9/27/85