

U. S. NUCLEAR REGULATORY COMMISSION  
REGION I

Report No. 50-333/85-13

Docket No. 50-333

License No. DPR-59

Licensee: New York Power Authority

P. O. Box 41

Lycoming, New York

Facility Name: James A. FitzPatrick Nuclear Power Plant

Inspection At: Scriba, New York

Inspection Conducted: April 29 - May 3, 1985

Inspector: William Oliveira  
W. Oliveira, Reactor Engineer

8/13/85  
date

Approved by: P. K. Eapen  
Dr. P.K. Eapen, Chief, Quality  
Assurance Section, OB, DRS

8/13/85  
date

Inspection Summary:

Routine unannounced inspection conducted on April 29 - May 3, 1985 (Report No. 50-333/85-13).

Areas Inspected:

Licensee action on previous inspection findings; records and document control programs; and facility modifications. The inspection involved 56 hours onsite inspection by one region based inspector and a supervisor.

Results:

No violations were identified.

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## DETAILS

### 1.0 Persons Contacted

#### New York Power Authority

- \*R. Baker, Technical Services Superintendent
- \*W. Childs, Senior Nuclear Licensing Engineer
- P. Contempo, Facility Manager
- \*R. Converse, Superintendent of Power
- W. Fernandez, Operations Superintendent
- \*H. Glovier, Resident Manager
- \*R. Patch, Quality Assurance Superintendent
- \*B. Prucnal, Office Manager
- H. Riley, Design Draftsman
- \*V. Walz, Senior Plant Engineer Supervisor
- \*E. Zufelt, Drafting Supervisor

\*Denotes those present at the exit interview

### 2.0 Action on Previous Inspection Findings

(Closed) Open Item (333/78-14-06): Schedule for full implementation of ANSI N45.2.9-1974 for records management. The licensee has completed the implementation of an ANSI N45.2.9-1974 Records Management Program in early 1985. Based on the review of the licensee's newly established records management program detailed in paragraph 3 of this report, this item is closed.

(Closed) Open Item (333/84-11-02): Revise Component Quality Assurance (QA) Classification Procedure to incorporate generic review and human factors consideration. Licensee has incorporated this information in the Engineering and Design Procedure (EDP) - 12.

This item is closed.

(Open) Open Item (333/84-11-03): Perform engineering evaluation on equipment in the warehouse prior to use in Category I system if equipment is not in the Preventive Maintenance Program. Licensee has issued a new maintenance procedure MPT-28 on the subject and revised Work Activity Control Procedure (WACP)-10.1.5 accordingly. The implementation of this program will be reviewed during a future NRC inspection.

This item remains open pending implementation review by the NRC.

### 3.0 Records and Document Control

#### 3.1 Requirements/References

1. ANSI N18.7-1972, Administrative Controls for Nuclear Power Plants.
2. ANSI N45.2.9-1974, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants.
3. ANSI N45.2.11-1974 Quality Assurance Requirements for the Design of Nuclear Power Plants.
4. FitzPatrick Technical Specifications Section 6.
5. FSAR Chapter 13 and 17.
6. New York Power Authority (NYPA) Quality Assurance Program Manual.
7. Plant Standing Order (PSO) 4, Rev. 2, Quality Assurance Operating Records.
8. PSO 5, Rev. 0, Control of Drawings and Technical Manual.
9. PSO 41, Rev. 0, Operation of Archival Storage Facility.
10. Work Activity Control Procedure (WACP) 10.1.1, Rev. 9, Work/Event/Deficiency/Form.

#### 3.2 Program Review

The inspector reviewed the licensee's Quality Assurance Records and Document Control programs. These programs were established to meet the requirements of the documents referenced in paragraph 3.1. The licensee's procedures adequately identified the records and documentation including drawings required to be maintained and tracked. Responsibilities and controls for storage and filing, transfer, retention, maintenance and disposition of records and documents are also identified and assigned in the licensee's procedures.

#### 3.3 Program Implementations and Findings

The inspector verified the implementation of the QA Records and Document Control Programs by reviewing the records in several department storage areas and the records in the storage vault. The document control center personnel:

- (1) readily retrieved any records or documents, including microfiche located in specific areas throughout the plant.

- (2) controlled the receipt and verification of records including changes and supplemental information. (The inspector reviewed Quality Control Inspection Reports (QCIRS) being submitted to Document Control Coordinator by the QA Department. These records will be stored as microfiche).
- (3) controlled the access to files and the accountability of records.
- (4) were knowledgeable of the retention requirements and the disposition of records.

The primary document for the control and maintenance of records/documents is the Records Retention Schedule. Various computerized indices, such as, the Construction Index, do exist. A handwritten drawing index is available for cross-reference between vendor drawings and their corresponding NYPA drawings.

The storage vault was inspected. This vault met the requirements of a single storage facility discussed in ANSI N45.2.9-1974, Paragraph 5.6. The temperature and humidity gage and drum chart were not permanently installed. They were being moved from place to place in the newly built vault to determine the average temperature and humidity readings. Temperature/humidity information was recorded daily in the inspection checklist. Access to the vault is controlled by the Document Control Coordinator. The permanent records received in the vault include the original contract orders (AP-D); welder qualifications, radiographs, material tests reports, mechanical equipment check lists, and general inspections reports.

The following records and documents were reviewed to verify proper implementation of the programs:

- Quality Control Inspection Reports (QCIRs). QCIRs were being made ready for microfilming. The backlog for processing QCIRs was unsatisfactory by the licensee's own goals. Approximately ten such QCIRs were dated prior to September 1983. The oldest work order, WRED 71/20727 was dated May 2, 1983. QCIRs involving modifications (Mods) are turned over to the Technical Services Department to be processed with the Mod package. Without the QCIR, the Mod package is incomplete and cannot be closed out. The licensee is investigating the QCIR backlog and the status of WRED 71/20727. This is an unresolved item (50-333/85-13-01) pending licensee's completion of the investigation and action to reduce QCIR backlog.

Reportable Occurrences related to NRC Information Notices (IN), IE Bulletins (IEB), Inspection Reports (IR), and Licensee Event Reports (LERs).

- IN 85-12, IN 85-17, IN 85-20, IN 85-22, IN 85-23, IN 85-24, and IN 85-26
  - IEB 84-03, LERs 85-03, 85-04, 85-05, 85-06, and 85-08
  - IR 78-14, IR 82-16, IR 82-24, and IR 84-11.
- Surveillance test records, of F-ST-24A, RCIC Class III Piping Pressure Test; F-ST-9F, Emergency Diesel Generator System Air Start Piping; and F-ST-39D, Reactor Building Leak Rate Test.
  - Operational logs and records such as NCO Logs, Reactor Building Log, Computerized Balance of Plant Log and the Alarm Typer.
  - Hand written drawing index to verify the status of vendor drawings from General Electric Company. The inspector verified the revision of the following Analog Transmitter Trip System (ATTS) Mod drawings were correct: 718E846BA; 729E589BA; 865E365 (sheet 5); and 913E714 (sheet 5).

The Technical Services Engineer is responsible for the control of plant drawings in accordance with PSO 5. A key element in the computerized control effort is the assignment of NYPA numbers to the plant drawings. The inspector reviewed 25 procedures in the areas of Operations, Instrumentation and Control (I&C), and Maintenance. Almost all of the procedures were issued in 1985. The review however, indicated that the procedures referenced vendor drawing numbers instead of NYPA numbers. A sample of these vendor drawings was checked against the hand written drawing index. These drawings had corresponding NYPA numbers. A licensee representative stated that the vendor drawing numbers will be changed to NYPA numbers in future procedure revisions. The new procedures will reference NYPA drawing numbers.

Personnel training records of ten employees were reviewed. The individual training records were in a three ring binder, indexed, legible, complete, current and readily accessible.

The inspector also observed the following activities:

- Data entry on Work Tracking Form (WTF) No. 9 for Maintenance Procedure (MP) T-21 Discharge Test of Replacement Station Battery Cell Type NCX-2400.
- On site preparation by the Quality Control (QC) inspector to witness the disassembly of the RHR Service Water pump in accordance with MP-10.4, QC checklist and QC Inspection Report (QCIR).

- Filing of hard copies that could not be microfiched and the filing of the poor quality microfiche of Batch 8257.

No violations were identified.

### 3.4 QA/QC Interface

Eight audits regarding records and document control were conducted in 1984. Review of these audits and their files indicated the following:

The formal audit reports contained the audit details, attributes, results, and request for corrective action. These audit reports were issued within three days of completion of the audit.

Corrective action response was adequate and was submitted within two weeks. Verification of corrective action was timely. The Projected Audit Schedule for 1984-1985 indicated that the scope for 1985 audits is the same as that for 1984. The corrective action audits verified LER corrective actions.

It was noted that the corrective action audits did not include the drawings and records control concerns identified in the NRC inspection 50-333/82-24. (See paragraph 4.4 below for the details of the NRC concerns.) The QA personnel stated that they would expand the scope of audits especially in the hardware implementation and the corrective action verification areas.

## 4.0 Facility Modification

### 4.1 References/Requirements

- FSAR Section 17
- Technical Specifications
- Regulatory Guide 1.64 (October 1973)
- ANSI N45.2.11-1974
- ANSI N18.7-1972
- NRC Inspection Report 50-333/82-24

### 4.2 Details

The plant modification program was reviewed against the requirements of the documents identified in paragraph 4.1 using Modification FI-83-018, Analog Transmitter Trip System (ATTS). It was determined that the licensee had established the following:

- A method for initiating, reviewing, and controlling modifications and temporary changes.
- The documentation of modification activities including those for 10 CFR 50.59 safety evaluations.
- Measures to delineate responsibilities and control interfaces among participating organizations.

#### 4.3 QA/QC Interface

QA Department reviews the modification package and identifies the quality requirements including the witness points by QC Inspection. Quality Control Inspection Reports (QCIRs) are submitted by the QA Department as part of the completed (closed) modification package.

A QA audit sampled two drawings affected by a modification change and found that their revisions were processed in a timely manner. Additional QA audits are discussed in paragraph 3.4.

#### 4.4 Findings

The inspector reviewed the status of problems encountered during the ATTS modification and found these problems were or are being satisfactorily resolved. Given below is a summary of the findings from this review:

<u>Problem</u>	<u>Disposition</u>
1. Brand Rex Cable had lower than expected insulation resistance.	Replaced this cable with other qualified cable.
2. One Reel of Brand Rex Cable had cracked insulation.	Did not use this reel. Vendor provided a new reel. QA investigating the circumstances that led to this problem.
3. Wiring of Panel 9-21 not per drawing.	Resolved by Engineering Change Request (ECR) Nos. FI-82-53-147 and 165.
4. Instrument Racks Required rework to facilitate operability and maintenance.	Resolved by ECR Nos. FI-82-53-147 and 165.



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|----|---|---|
| 5. | One Main Steam Line<br>Differential Pressure instrumentation was improperly installed | Corrected.  |
| 6. | HPCI Level 8 Switch Problem   | Replaced the Switch.  |
| 7. | Several Cables were<br>incorrectly cut.   | Resolved by ECR No. F1-82-053-162.                          |
| 8. | TOPAZ inverters were bad.   | Design change to use DC to DC devices instead of inverters. |

The inspector verified the status of resolution for the drawing revision back log reported in NRC Operational Assessment Team (OAT) Inspection Report (No. 50-333/82-24). The licensee's corrective action was to reduce the back log using a plan reported in JAFP Letter 82-0869 dated August 6, 1982. However, as of May 3, 1985, the licensee has completed less than sixty percent of the drawings scheduled for update in 1984. If the present trend continues, the licensee will not be able to meet the 1985 schedule. This back log is further increased by the 1985 outage, which required more than three thousand drawings to be revised. The White Plains Office Support to the drawing revision efforts appeared to have lost the initial level of attention. Additional corporate management attention is required to meet the drawing revision goal. In response to another OAT concern, the licensee provided a draft revision to the Plant Standing Order (PSO) No. 5 for the NRC review. This draft revision contained measures to provide better on-site control for the drawings and records. However, this draft was never formally issued.

The licensee representatives informed the inspector that the OAT report will be reviewed for action items, a status of all action items will be established and each action item will be tracked to completion.

The inspector stated to the licensee's representatives that the above item (i.e. drawing revision back log and revision of PSO 5) remains unresolved pending completion of licensee action in this regard (50-333/85-13-02).

## 5.0 Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Two unresolved items were identified during the inspection and are discussed in sections 3.3 and 4.4 respectively.



## 6.0 Exit Meeting

The inspectors met with the licensee staff (attendees denoted in paragraph 1) on May 3, 1985, to discuss the scope and findings as detailed in this report. The licensee representatives acknowledged the inspectors' findings.

At no time during this inspection was written material provided to the licensee by the inspector.