

U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Report No. 85-23

Docket No. 50-271

License No. DPR-28

Licensee: Vermont Yankee Nuclear Power Corporation
RD 5, Box 169, Ferry Road
Brattleboro, Vermont 05301

Facility Name: Vermont Yankee Nuclear Power Station

Inspection at: Vernon, Vermont

Inspection Conducted: July 2 - August 2, 1985

Inspectors:

William J. Raymond
W. J. Raymond, Senior Resident Inspector

8/2/85
date

Approved by:

J. E. Tripp
J. E. Tripp, Chief, Reactor Projects
Section 3A, Projects Branch 3

8/7/85
date

Inspection Summary: Inspection on July 2 - August 2, 1985 (Report No. 50-271/85-23)

Areas Inspected: Routine, unannounced inspection on day time and backshifts by the resident inspector of: actions on previous inspection findings; plant power operations, including operating activities and records; plant physical security; strike contingency plans for union picketers; HPCI surveillance testing; new fuel receipt inspections; safeguard effectiveness reviews; evaluation of equipment problems; and, the status of actions on NUREG 0737 TAP Items II.K.3.16B and II.K.3.28. The inspection involved 122 inspection hours.

Results: No violations were identified in 9 areas inspected. Operational status reviews identified no conditions adverse to safe operation of the facility. Further licensee evaluation of potential vendor QA problems appears warranted to determine whether a condition exists that should be reported under 10 CFR 21. Further NRC staff review is required to determine whether the licensee's ISI program meets the intent of Section XI, IWR 3300 regarding the periodic evaluation of position indication for safety related valves.

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DETAILS

1. Persons Contacted

Interviews and discussions were conducted with staff and management personnel to obtain information pertinent to the areas inspected. Inspection findings were discussed periodically with the management and supervisory personnel listed below.

Mr. R. Milligan, Administrative Supervisor
Mr. J. Pelletier, Plant Manager

2. Status of Previous Inspection Findings

2.1 (Open) Follow Item 85-18-04: Status of Licensee Corrective Actions for Receipt Inspection Program Deficiencies.

2.1.1 The licensee response letter to the IR 85-11 violation, FVY 85-48 dated May 29, 1985, stated that revised procedures and new guidelines were to be approved by July 10, 1985 and used to train personnel by the end of July to support implementation of the upgraded program by August 1, 1985. The licensee notified the inspector on July 11, 1985 that procedures AP 0806 and AP 0801 were still under review and would not be approved until July 16, 1985. Draft versions were released for training purposes. The delay in approving the procedures was not expected to impact implementation of the new program.

Based on discussions with the Administrative Supervisor, the inspector noted that the upgraded receipt inspection program was implemented on August 1, 1985. All procedures were issued, personnel training was completed, and tools and references were in place, with the exception of one reference concerning manufacturer standard specification forms. A purchase order for the standard specifications has been issued. The inspector noted that the training on the procedures was conducted by the Stores Department and that YAEC QA personnel provided training of plant personnel on the use of new tools to be used by the receipt inspectors. The inspector also noted that one Quality Assurance Technician is assigned to perform receipt inspections and management has approved a second technician position. The licensee is presently interviewing candidates for the position.

2.1.2 Licensee review of storeroom material identified an additional 23 POs that had questionable receipt inspections due to partially opened packages. The purchase orders included parts for the Target Rock safety relief valves, CAD system valves, RBCCW and RWCW circuits, diesel generator control circuits, and 480 volt MCC starters and controls. These materials were separated from the rest of the stock and evaluated in a manner similar to the 11 NRC items. A safety evaluation dated June 25, 1985 for items installed in the plant concluded no safety concerns exist.

The safety evaluations were based on additional inspections performed on the parts prior to or during installation in the plant, post installation testing of the components or systems, observations or demonstrations of system operability,

periodic surveillance testing, and additional receipt inspections of a representative sample of material from the same purchase order line item. The inspector reviewed the safety evaluations and identified no inadequacies. The engineering evaluations will be reviewed further by the NRC staff on a subsequent inspection.

2.1.3 In his May 29, 1985 response, the licensee stated that he would complete a comprehensive management review of the QA program to identify any further corrective actions that may be needed to demonstrate the adequacy of QA related activities. The scope and schedule for the review has yet to be determined. This item is considered open pending NRC review of the scope, schedule and results of the management review (IFI 85-23-01).

2.1.4 Based on the above, the corrective actions appear acceptable to correct the identified deficiencies. Final review of the corrective actions will be completed by an inspection scheduled subsequent to implementation of the upgraded receipt inspection program in August, 1985.

2.2 (Open) Unresolved Item 85-10-06: Peer Inspection Program Status. Licensee actions to upgrade the peer inspection program continued during the inspection period. The Task Force created to evaluate the process completed its work and provided recommendations for program improvements. The Plant Manager accepted the recommendations in a revised Plant Position Paper, and summarized the scope of the recommendations for the inspector on July 10, 1985.

The licensee has decided to retain the peer inspection approach to provide independent QC of activities at the site. To further strengthen the current process, the task force made additional suggestions which will remain in effect pending development of the long term improvements. Special measures will be taken to augment the interim program to provide adequate QC coverage during the outage scheduled to start in September, 1985. The long term program changes will require the development and issuance of new procedures, and additional personnel training. The final upgraded program is scheduled to be implemented by January 1, 1986.

The licensee requested a meeting with NRC personnel to discuss the peer inspection program deficiencies and the status of corrective actions. A meeting is scheduled for August 7, 1985 in NRC Region I. This item remains unresolved pending further NRC review of the deficiencies identified by the licensee, the proposed resolutions, and the implementation schedule for corrective actions.

2.3 (Open) Unresolved Item 85-10-04: Operator Training on New Emergency Procedures (OEs). The simulator training program for licensed operators continued during the inspection period. The inspector interviewed three operators from two crews who have completed the training. All stated that the training was beneficial and that they felt confident in their ability to implement the new procedures. The inspector will interview additional operators regarding the OE training on subsequent inspections. This item remains open pending completion of the training for all operators, completion of the licensee's assessment of the training effectiveness, and subsequent review by the NRC.

2.4 (Open) Unresolved Item 84-23-02: Shelf Life Controls for Non-Metallic Material in Stores. The licensee responded to the NRC concerns in this area by letter FVY 85-53 dated May 31, 1985. The licensee committed to evaluate materials purchased prior to 1983 without discrete end-of-life dates and to disposition the items regarding suitability for further use in the plant. The licensee stated that all items would be dispositioned by September 14, 1985, prior to the outage. The licensee instituted the following controls during the interim while the evaluation program is developed and implemented: (i) material issued from stores will be covered by shelf life control to the extent possible; and, (ii) non-metallic safety related spare parts will be subjected to inspection for deterioration prior to use.

The Administrative Supervisor notified the inspector on July 22, 1985 that work on the evaluation program had been in progress for about 4 weeks. During this time it became apparent that the manpower and costs required to complete the evaluations far exceeded the original scope anticipated for the work. Out of 18,500 items in the Stores stock list, 9000 line items were designated safety related and required further evaluation. Each stock list line item represents one or more (e.g., 50) individual components. 6850 of those 9000 line items were purchased prior to 1983 and required additional detailed review. Of the 741 line items reviewed as of July 20, 1985, 293 were found to not need shelf life controls, 236 were found to require shelf life controls, and 212 required further inspection to determine how they should be categorized. Based on the time required to complete the bidding and contractor selection process, and to complete the evaluations, the licensee requested an extension until December 31, 1985 to complete the work.

The inspector reviewed the work in progress to evaluate items for shelf life controls and noted that materials were tagged with yellow stickers to identify questionable parts for further evaluation prior to use. Following discussion of this item with NRC management, the inspector informed the licensee that the additional time to complete the program was acceptable provided he continue, as a minimum, the interim measures identified in his May 31, 1985 letter. The inspector stated that the licensee should also implement whatever additional measures are possible to assure parts without established shelf life controls are not introduced into the plant during the outage.

The inspector informed the licensee that he should provide a supplemental response letter to NRC Region I for Inspection Item 84-23-02 that establishes his commitment to the above. This item will be examined further on a subsequent inspection.

2.5 (Closed) Follow Item 85-18-01: Guard Instructions Regarding Interstate Carriers. The licensee issued a memorandum to the guard force on July 29, 1985, which explained the provisions of 49 CFR 392.5. Section 392.5 prohibits an interstate carrier from possessing or being under the influence of an intoxicating liquor while operating on public highways. The licensee instructed the guard force to deny site access to any interstate driver who arrives onsite with alcoholic beverages. The driver would be held at Gate 2 while plant personnel are contacted to resolve the matter. Based on a discussion with the Plant Manager on August 1, 1985, the inspector confirmed that the licensee's intent, as stated in the memorandum, would be to prevent any such interstate carrier from taking possession of a radwaste shipment. This item is closed.

3.0 Observations of Physical Security

Selected aspects of plant physical security were reviewed during regular and back-shift hours to verify that controls were in accordance with the security plan and approved procedures. This review included the following security measures: guard staffing; verification of physical barrier integrity in the protected and vital areas; random tours of the central and secondary alarm stations; verification that isolation zones were maintained; and implementation of access controls, including identification, authorization, badging, escorting, personnel and vehicle searches. No inadequacies were identified.

The inspector reviewed the compensatory measures taken on July 15, 1985 during construction work near the protected area boundary. The inspector also reviewed the actions taken during the security alerts declared on July 12 and on July 15-18, 1985 when union personnel established a picket at the main entrance to the plant. No inadequacies were identified.

4.0 Shift Logs and Operating Records

Shift logs and operating records were reviewed periodically to determine the status of the plant and changes in operational conditions since the last log review, and to verify that: (1) selected Technical Specification limits were met; (2) log entries involving abnormal conditions provided sufficient detail to communicate equipment status, correction, and restoration; (3) operating logs and surveillance sheets were properly completed; (4) log book reviews were conducted by the staff; (5) potential reportable occurrences were filed as licensee event reports when required; and, (6) Operating and Special Orders did not conflict with Technical Specification requirements. No unacceptable conditions were identified.

4.1 The inspector reviewed PRO 85-14 dated March 14, 1985 concerning the discovery by the licensee that valve RV-40 was not inspected under Section IWV 3300 of the ISI program prior to adoption of the 1980 edition of the ASME Section XI code in October, 1984. The 1974 edition of the code required the licensee to observe inaccessible valves during outages or at least every two years to confirm that the remote position indications are correct. The 1980 edition of the code provides no exclusion for inaccessible valves, but simply requires that all valves subject to the ISI program with remote position indication be inspected every two years. The licensee dispositioned the PRO with the conclusion that, since RV-40 is a valve that is accessible for inspection during normal operations, the requirements to inspect its position indication began with adoption of the 1980 code edition on October 26, 1984, and thus, inspection of RV-40 should be completed prior to October 26, 1986. The item was thus deemed not reportable. The inspector had no further comment regarding the potential reportable occurrence evaluation.

Based on discussions with the ISI Coordinator on July 31, 1985, the inspector noted that the licensee apparently interpreted the 1974 requirements of IWV 3300 to only

require periodic inspection of valves not normally accessible during plant operations. The licensee's program does not provide for periodic observation and evaluation of normally accessible valves. The inspector could not identify any basis for such an interpretation since the apparent intent of IWV 3300 is to ensure that the remote position indication for all safety related valves is accurate. The inspector noted that the licensee is changing his program to provide for periodic evaluation of all remote valve indications by inspection or other acceptable means, such as by leak rate testing.

The licensee is currently committed to the 1974 edition of Section XI by Technical Specification 4.6.E and a proposed change has been submitted for staff approval of the use of the 1980 edition. This item is unresolved pending completion of licensee actions to implement the provisions of IWV 3300 per the 1980 code edition, and pending further inspector review of the licensee's previous program for compliance with the 1974 code requirements (UNR 85-23-02).

5.0 Inspection Tours and Status Reviews

Operational status reviews were performed to verify conformance with the technical specifications and approved procedures. The operational status of emergency and power generation systems was confirmed by direct review of control room panels. Control room staffing and protocol were reviewed to assure manning requirements were met and acceptable working conditions were maintained. Licensed personnel were interviewed regarding existing plant conditions and knowledge of recent changes to the plant and procedures, as applicable. Acknowledged alarms were reviewed with licensed personnel as to cause and corrective actions being taken.

Plant tours were conducted to observe activities in progress and verify compliance with administrative requirements. Systems and equipment in areas toured were observed to confirm operational status and to monitor for fluid leaks and abnormal vibrations. Pipe snubbers and restraints were observed for proper conditions. Plant housekeeping conditions were observed for conformance with AP 0042, Plant Fire Prevention, and AP 6024, Plant Housekeeping. Reviews and findings were as described below.

5.1 A licensed senior reactor operator broke his left forearm in a bicycle accident while off duty on July 1, 1985. Following an operation on July 2, 1985, the operator was released from the hospital with a cast which extended from just above the left elbow to the knuckle of his hand. After discussing this matter with the Operator Licensing Section in NRC Region I, the inspector requested that the licensee perform an evaluation of the operator's motor coordination to confirm his ability to perform his licensed duties. The inspector further requested that the results of the evaluation be submitted to NRC Region I per 10 CFR 55.41.

The licensee completed an evaluation of the operator and concluded he was capable of performing his licensed duties. The evaluation included a demonstration of the operator's ability to manipulate controls. The results of the evaluation were

documented in a letter to NRC Region I dated July 16, 1985 (VYV 85-327). The operator returned to work on July 9th and resumed normal shift duties on July 13, 1985. No inadequacies were identified.

5.2 The inspector reviewed the feedwater sparger leakage detection system and the monthly performance summary provided by the licensee in accordance with letter FVY 82-105. The licensee reported that, based on the leakage monitoring data reduced as of June 30, 1985, there were no deviations in excess of 0.10 from the steady state value of normalized thermocouple readings, and no failures in the 16 thermocouples initially installed on the 4 feedwater nozzles. No unacceptable conditions were identified.

5.3 The Residual Heat Removal, Residual Heat Removal Service Water, High Pressure Coolant Injection, Core Spray, Standby Liquid Control, Standby Gas treatment and Reactor Core Isolation Cooling systems were reviewed to verify the systems were properly aligned and fully operational in the standby mode. The review included: (1) verification that accessible, major flow path valves were correctly positioned; (2) verification that power supplies were properly aligned; and, (3) visual inspection of major components for leakage, proper lubrication, cooling water supply, and general condition. No inadequacies were identified.

5.4 Radiation controls established by the licensee, including radiological surveys, condition of access control barriers, and postings within the radiation controlled area were observed for conformance with the requirements of 10 CFR 20 and AP 0503. Work activities were reviewed for conformance with RWP requirements. No inadequacies were identified.

5.5 The recirculation weld leakage detection system (LDS) remained inoperable at the start of the inspection period. Plant operators checked the status of the system periodically but could not obtain status information from the detectors. The system was shutdown. There were no indications of recirculation system leakage based on data from the drywell equipment and floor drains leakage collection systems. When the system was energized again around mid-July, all trouble alarms had cleared and status information from all six detectors was available. There were no indications of weld leakage. The LDS remained operable for the remainder of the inspection period. No inadequacies were identified.

5.6 The maintenance request log was reviewed to determine the scope and nature of work done on safety related equipment. The review confirmed that the repair of safety related equipment received priority attention, and the performance of alternate safety related systems was not impaired. No inadequacies were identified.

5.7 The inspector reviewed the actions taken by plant operators when equipment covered by the technical specifications was taken out of service to verify that the appropriate action statements were met.

The actions taken by plant personnel for the following items were reviewed: ground indications on the A station battery charger on July 6, 1985; removal of the 'B' standby gas treatment train on July 10, 1985 for scheduled charcoal replacement; removal of the HPCI system from service on July 18, 1985 to repair a fitting leak on the seal water line to the first stage pump; removal of the containment radiation monitors from service on July 19, 1985 to perform repairs on the containment hydrogen/oxygen analyzers; and, removal of offgas radiation monitor 3128 from service on July 29, 1985 for repairs. No inadequacies were identified.

5.8 The licensee instituted roving 2 hour fire watches as part of the compensatory measures for certain deficiencies identified by the November, 1984 Fire Hazards Analysis. The status of fire watches within the Reactor and Turbine buildings was reviewed on July 6, 1985 after coverage for the activity by NEPSCO personnel was interrupted with the departure of NEPSCO as a contractor from the site.

Craft personnel from the Mercury Company assumed responsibility for the work. The inspector interviewed a fire watch while performing his rounds on July 6, 1985 and noted that the worker was knowledgeable of the areas to be toured, as well as his assigned responsibilities. The inspector noted that the fire watch coverage continued uninterrupted during the inspection period. No inadequacies were identified.

5.9 The inspector observed the status of steam leaks in the turbine high pressure heater bay area on July 3, 1985. The leaks on the 'D' control valve, the crossover piping to the moisture separator, and the turbine steam seal regulator valve (V60-6) remained small and showed no adverse trends. No inadequacies were identified.

5.10 During a tour in the Southeast corner room of the reactor building at 3:30 P.M. on July 11, 1985, the inspector noted that scaffolding was constructed around RHRSW valve V72-89B. The valve is a normally closed motor operated valve on the discharge side of the 'B' RHR heat exchanger and must be throttled remotely by the control room operator when using the RHR system for decay heat removal. The scaffolding was constructed around the valve in such a manner that it provided possible interference with valve operation. The inspector contacted the control room to request operations personnel to evaluate the situation and take actions as required.

The licensee concluded that the valve was operable in the as found condition since there was enough room between the valve stem (position indication) follower and the scaffolding so that the operators could throttle the valve to the 50% open position required to deliver the design 2700 gpm cooling water flow to the heat exchanger. However, actions were taken immediately to remove the possible interference between the scaffolding and valve 89B. The inspector observed the valve at 5:00 P.M. and noted that the interference had been removed.

This was the first instance observed by the inspector where a possible interference was inadvertently created between operating equipment and construction material. Based on the above, the inspector had no further comment on this item at the present time. The control of materials so as to avoid interferences with operating equipment will be reviewed on subsequent routine inspections

5.11 The 'A' Turbine Building Closed Cooling Water (TBCCW) pump tripped at 11:25 A.M. on July 16, 1985 due to a malfunction in its supply breaker. The reactor was operating at 96% FP at the time in end of cycle coastdown. The 'B' TBCCW pump tripped at 11:28 A.M. on thermal overload, which caused a loss of cooling to turbine auxiliary loads. Plant operators reduced plant load to remove a condensate pump, a reactor feedwater pump, and other loads from the TBCCW system. The 'B' TBCCW pump was restarted at 11:36 A.M. and the plant was stabilized at 70% FP. Following replacement of the magnetic starter and a control relay in its breaker, the 'A' TBCCW pump was restarted at 1:45 P.M. and the plant returned to full load at 3:10 P.M.

The inspector reviewed the plant response and the operator actions following the event. No temperature limits on operating equipment were exceeded. The operator actions were consistent with Section B of OP 2183, Revision 8, Turbine Building Closed Cooling Water System. No inadequacies were identified.

6.0 Review of Strike Contingency Plans

A seven man picket was set up at 6:05 A.M. on July 12, 1985 at the plant main entrance. The informational picket was established by members of the IBEW local 421 union to protest the use of a non-union contractor at the site on July 8, 1985. Plant security declared a Security alert at 6:05 A.M. The local police department was notified and provided support for traffic control.

Plant union employees, represented by the IBEW local 300 union, entered the plant to perform routine duties. The security force is non-union and reported for work. Contractor electrical union workers honored the picket line and did not enter the plant. There were no jobs critical to plant safety in progress that were disrupted. The licensee contacted union representatives to discuss the pickets. The resident inspector was onsite and followed developments.

The inspector had recently reviewed the licensee's ability to operate the plant with non-union, licensed employees (reference Inspection Report 85-20). Following discussions with NRC Region I management, the licensee developed a strike contingency plan on July 12, 1985 that could be implemented in the event of a work stoppage by critical plant employees. The inspector reviewed a draft copy of the contingency plan and concluded that the licensee could safely operate the plant for a limited time under strike conditions.

The picket line was taken down at 4:00 P.M. on July 12, 1985 and remained down for the weekend. The IBEW local 421 union re-established an informational picket at 5:55 A.M. on July 15, 1985 to continue the protest of the use of a non-union

electrical contractor at the site. The picket remained in place daily for the period from July 15-17, 1985. Licensee union employees continued to report for work to perform routine duties. Contractor electrical workers honored the picket line and did not report for work.

Members of the IBEW local 421 union left the plant entrance at 1:00 P.M. on July 17, 1985. Contractor labor personnel resumed normal work on July 18, 1985. No inadequacies were identified.

7.0 Safeguards Effectiveness Review

The inspector participated in a safeguards effectiveness review that was completed by a special security team during the period of July 15-19, 1985. The results of that review will be documented by the NRC at a later time in a separate report. No discrepancies warranting immediate corrective actions and no violations of regulatory requirements were identified during the appraisal. Certain concerns and observations regarding security effectiveness were identified that should be followed to verify licensee corrective actions are satisfactory. This item is considered unresolved pending issuance of the NRC report documenting the results of the safeguards effectiveness review, and pending NRC review of the licensee actions to correct or otherwise resolve the identified discrepancies (UNR 85-23-03).

8.0 VSNAP Meeting

The inspector and the NRC Region I Director of Reactor Projects attended the Vermont State Nuclear Advisory Panel meeting on July 30, 1985 in Brattleboro, Vermont, to discuss the status of the corrective actions for the receipt inspection program, and the results of the most recent SALP report for the facility.

9.0 Surveillance Testing

The inspector witnessed testing of the HPCI system on July 17-19, 1985 per OP 4120 to verify that testing was performed by qualified personnel; test data demonstrated conformance with Technical Specification requirements; and, system restoration to service was proper. The test data showed that the pump performance parameters met the technical specification requirements. However, readings taken on the pump on July 16, 1985 for ISI requirements showed vibrations levels in excess of the 'required action' range on all four bearings. The plant entered a 96 hour evaluation period, per Section XI requirements, to either resolve the discrepant measurement data or declare the HPCI pump inoperable.

The first set of readings were taken with an IRD Model 310 portable instrument with a magnetic coupler for the probe. Readings taken with a second portable vibration instrument with a magnetic coupler also showed unacceptable results.

Readings taken with a third instrument with a hand held probe showed more favorable results. However, the licensee could not determine which readings represented the accurate vibration levels, and the test results could only be accepted based on measurements made with the same type of instrument used to obtain the baseline vibration data.

The licensee hired a consultant to evaluate the pump vibration spectrum and rented an additional portable vibration instrument of the type used to obtain baseline data on the pump. New measurements taken on July 19, 1985 showed the vibration levels on all pump bearings to be within the acceptable range, with the exception of the Y2 reading on the outboard bearing of the booster pump which read in the 'alert' range at 3.6 mils. The licensee accepted the July 19th test results and considered the HPCI system operable.

The licensee plans to perform the HPCI surveillance within 2 weeks as required by Section XI with one vibration reading in the 'alert' range. The July 19th measurement also suggested there is a slight misalignment between the HPCI turbine and the booster pump. The licensee plans to realign the turbine and pump during the next scheduled test. This item is considered open pending completion of licensee actions to align the HPCI turbine and subsequent review by the NRC (IFI 85-23-04).

10.0 Fuel Receipt Inspections

The inspector reviewed activities in progress on July 10-11, 1985 to perform receipt inspections and channeling operations for new fuel assemblies. The inspector verified that OP 1401, New Fuel Inspection and Channeling, Revision 13 dated July 9, 1985, was technically adequate to perform the work, and was available and in use by plant personnel. The inspector observed the receipt inspections of five new fuel assemblies by the licensee and noted that the inspections were performed in accordance with OP 1401.

The inspector also witnessed the training sessions provided to certify new inspectors and to requalify experienced inspectors on July 10, 1985. The certifications were completed by a fuel vendor representative. The training was thorough and sufficient to cover all items in the receipt inspection checklist. The inspector also verified that health physics personnel were assigned to the job and completed surveys as the new fuel was uncrated. No inadequacies were identified.

11.0 Review of NUREG 0737 Items

The status of licensee actions on the following NUREG 0737 items was reviewed to verify actions were completed in accordance with commitments made to the NRC.

11.1 TAP Item II.K.3.16.B - Challenges and Failures to Relief Valves. This item was open pending completion of licensee actions to change certain trip setpoints that would help reduce the number of challenges to the safety relief valves. The PCIS trip setpoint for low steamline pressure with the mode switch in Run was changed from 850 psig to 800 psig by Amendment #84 to the operating license. The PCIS trip setpoint for high main steamline flow was changed from 120% to 140% of rated flow by Amendment #86 to the operating license. This completes the licensee's actions on this item. No inadequacies were identified.

11.2 TAP Item II.K.3.28 - Qualification of ADS Accumulators. The licensee had responded to this item with an evaluation which concluded that the ADS accumulators were qualified to the initial design basis established for the plant. The NRR staff accepted the licensee position in a Safety Evaluation Report dated March 4, 1985. This completes the licensee's actions on this item. No inadequacies were identified.

12.0 Equipment Evaluations

The licensee notified the inspector of two potential equipment problems that require further review to determine what additional actions may be appropriate, as described below.

12.1 Station Batteries - The Technical Support Superintendent briefed the inspector on July 8, 1985 regarding a recent engineering review which questioned the adequacy of the sizing of the main station batteries. Engineering review of the sizing was still in progress and was not final. The issue arose based on considerations to change out both station batteries during the upcoming outage due to the observed 'mossing' problem. Licensee management had decided to replace the batteries on a one-for-one basis. However, the licensee's engineering group questioned that approach based on the results of preliminary calculations which indicated the batteries are fully loaded with no margin for the conservatism and design margins normally included in sizing calculations.

The draft calculations indicated that at 72 degrees F (the FSAR assumed minimum temperature for the battery room), the A battery is at 83% of design capacity and the B battery is at 102% of design capacity. Based on the above, there is no room for expansion on the B battery or the vital ac motor generator set. The significance of these numbers if they are upheld in the final calculations is that the present bases for technical specification 3.10 is inaccurate and nonconservative. The technical specifications define a battery to be operable with one of 60 cells in each station battery to be out of service. All 60 cells on each station battery are presently operable and in service.

The licensee subsequently reported to the inspector that the final calculations were completed and showed that the initial numbers were conservative due to overly

conservative assumptions used in the calculations. The final calculations were not yet available at the site. The bases for the calculations were discussed with licensee personnel and further information was requested for inspector followup review. This item is unresolved pending NRC review of the final calculations for battery sizing (UNR 85-23-05).

12.2 Potential Part 21 Report - The Technical Support Superintendent notified the inspector on July 10, 1985 of an issue that had been submitted to the YAEK engineering organization under a service request to evaluate for reportability under 10 CFR Part 21. The problems were summarized in a potential reportable occurrence (PRO) report dated June 27, 1985 which had been approved by the Plant Manager on July 9, 1985. Plant management concluded that the item was not reportable under 10 CFR 50.72 or 50.73.

The PRO summarized information regarding material and documentation deficiencies that were noted during receipt inspections performed at the plant which revealed poor manufacturing and QA practices by the Aloyco Company, which supplies parts used in Walworth valves. Many of the parts received from the vendor had to be returned for rework due to obvious defects found on the disc surfaces during receipt inspection.

The PRO contained an evaluation of valve discs manufactured by Aloyco that are installed in the following locations: HPCI-14, SW-22C and SW-22D. HPCI-14 is the steam admission valve to the HPCI turbine and the SW valves are the normally closed service water supply valves to the recirculation motor generator set coolers. The licensee's evaluation demonstrated that use of the Aloyco components in these locations was acceptable and did not adversely affect plant safety.

The inspector reviewed the licensee's evaluation and identified no inadequacies. This item is open pending completion of the licensee's review of the June 27, 1985 PRO for reportability under 10 CFR 21, and subsequent review by the NRC (UNR 85-23-06).

13.0 Management Meetings

Preliminary inspection findings were discussed with licensee management personnel periodically during the inspection. A summary of the inspection results was also discussed at the conclusion of the inspection prior to report issuance.