ENCLOSURE 2

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.:	50-382
License No.:	NPF-38
Report No.:	50-382/96-24
Licensee:	Entergy Operations, Inc.
Facility:	Waterford Steam Electric Station, Unit 3
Location:	Hwy. 18 Killona, Louisiana
Dates:	October 21-25, 1996
Inspectors:	G. E. Werner, Project Engineer T. W. Pruett, Resident Inspector
Approved By:	P. H. Harrell, Chief, Project Branch D

ATTACHMENTS:

Attachment: Supplemental Information

EXECUTIVE SUMMARY

Waterford Steam Electric Station, Unit 3
NRC Inspection Report 50-382/96-24

This special inspection included aspects of licensee operations, maintenance, and engineering.

Operations

- The inspectors identified the first example of a violation for the failure to prestage a nitrogen bottle as a backup motive air supply for Valve CC-135B, Dry Cooling Tower B inlet isolation valve, as required by Offnormal Procedure OP-901-511, "Instrument Air Malfunction," Revision 13. Specifically, personnel failed to take immediate corrective actions to prestage a nitrogen bottle for Valve CC-135B (Section O2.1).

- Operations exercised site leadership by implementing prompt and thorough corrective actions in response to the inspectors' identification of marginal condensate storage pool (CSP) and wet cooling tower (WCT) basin inventory (Section E1.1).

Maintenance

- The inspectors identified a violation for the failure to perform inservice testing (IST) that verified the operational readiness of safety-related air accumulators associated with ASME Class 3 valves (Section M1.1).

Engineering

- Engineering used nonconservative reasoning in excluding the safety-related air actuating systems from IST requirements for ASME Class 3 valves (Section M1.1).

- During review of a condition report (CR), the inspectors identified a second example of a corrective action violation in which engineers failed to identify all potential water usage sources from the CSP following a design basis tornado event. The failure to account for all water usage sources resulted in less than 24 gallons of margin to safely cool the plant down following a design basis tornado event (Section E1.1).

- The inspectors determined that the containment spray header and component cooling water (CCW) to containment fan cooler containment isolation valves appeared to have a closed safety function; however, the licensee stated that the valves only had an open safety function and, therefore, no testing was required to demonstrate closure capability. The function of these valves was identified as an unresolved item pending resolution of Task Interface Agreement 96TIA017 (Section E2.1).

Report Details

Background Information

On September 13, 1996, during a walkdown of safety-related instrument air (IA) and nitrogen systems, the inspectors noted that the identification tag for the air regulators to Valves CS-125 A(B), Containment Spray Header A(B) isolation, indicated that the regulato must be set to 90 psig. However, the regulator pressure gauges indicated 72 psig and 67 psig, respectively.

The inspectors questioned the licensee to determine the basis for the minimum set pressure for the regulator and the minimum working pressure for the valve actuator. In response, the licensee initiated CR 96-1429, which documented several discrepancies between the Updated Final Safety Analysis Report (UFSAR) and design basis documents (DBD):

- The UFSAR listed Valves CS-125A(B) and -128A(B), Containment Spray Header A(B) check valve, as the two boundaries for Containment Penetrations 34 and 35. However, Valves CS-125A(B) fail open, and the associated air accumulators were not leak-tested to ensure the valves can be maintained closed postaccident.

- DBD W3-DBD-014, "Safety-Related Air Operated Valves," listed Check Valves CS-117A(B), Containment Spray Header A(B) stop check valve, as the containment isolation function in lieu of Valves CS-125A(B). However, Valves CS-117A(B) were not tested to demonstrate a closed safety function as required by ASME Section XI.

- DBD W3-DBD-024, "Inservice Testing," credited the second isolation barrier for Containment Penetrations 34 and 35 as the containment spray piping water seal below a containment pressure of 17.7 psia and the containment spray pump running above a containment pressure of 17.7 psia.

The inspectors also reviewed the requirements for air-operated containment isolation valves associated with engineered safety feature (ESF) systems. The licensee concluded that (1) ESF system containment isolation valves did not have a closed safety function and (2) remote manual ESF containment isolation valves were not required to have the capability to be closed because the position of greater safety was open. Consequently, the licensee either deleted or failed to implement testing requirements to demonstrate the ability of remote manual ESF system containment isolation valves to close.

I. Operations

O2 Operational Status of Facilities and Equipment

O2.1 ESF System Walkdowns

a. Inspection Scope (71707)

As part of the inspection to review ESF air-operated valves, the inspectors performed a walkdown of the following valves:

- CS-125A(B), Containment Spray Header A(B) isolation valve
- CC-807A, Containment Fan Cooler C CCW inlet isolation valve
- CC-807B, Containment Fan Cooler B CCW inlet isolation valve
- CC-808A, Containment Fan Cooler A CCW inlet isolation valve
- CC-808B, Containment Fan Cooler D CCW inlet isolation valve
- CC-822A, Containment Fan Cooler A CCW outlet isolation valve
- CC-822B, Containment Fan Cooler D CCW outlet isolation valve
- CC-823A, Containment Fan Cooler C CCW outlet isolation valve
- CC-823B, Containment Fan Cooler B CCW outlet isolation valve
- CC-134A(B), Dry Cooling Tower A(B) bypass valve
- CC-135A(B), Dry Cooling Tower A(B) inlet isolation valve

With the exception of Valves CC-134A(B) and CC-135A(B), the inspectors did not identify any significant equipment or material discrepancies.

b. Observation and Findings

The air actuators for Valves CC-134A(B) and CC-135A(B) fail as is on a loss of the normally supplied, nonsafety-related IA. If IA malfunctions, motive air is provided by the safety-related air accumulators. UFSAR Section 9.2.5.3.3, "Site Related Phenomena" describes that, during the design basis tornado accident, the operators must open Valves CC-134A(B) and close Valves CC-135A(B) to maintain the DCTs bypassed for approximately 2 hours. The 2-hour period enables the operators to isolate damaged DCT bundles. At the end of the 2-hour period, Valves CC-134A(B) and CC-135A(B) must be repositioned to establish flow to the DCT.

On October 21, 1996, during an inspection of the Trains A and B DCT and WCT areas, the inspectors noted a nitrogen bottle staged near Valves CC-134A and CC-135A but not for Valves CC-134B and CC-135B. The nitrogen bottle provided an alternative means to stroke the valves on loss of nonsafety and safety-related IA.

The inspectors reviewed Procedure OP-901-511. The procedure required a backup motive gas cylinder be connected to the affected accumulator when accumulator

pressure dropped below a prescribed value. Attachment 5, Note 1, stated that accumulators for CC-135A(B) have pre-staged motive cylinders.

During followup conversations with the shift supervisor, the inspectors noted that CR 96-1603 was initiated on October 14, 1996, for the same concern. However, no immediate actions were taken to place a nitrogen bottle by Valve CC-135B even though the interim corrective actions required that a nitrogen bottle be placed in the Train B DCT area in order to comply with Procedure OP-901-511. The failure to promptly implement required corrective actions by placing a nitrogen bottle in the Train B DCT area is the first example of a violation of 10 CFR Part 50, Appendix B, Criterion XVI (50-382\9624-01).

After the inspectors informed the shift supervisor of the missing nitrogen bottle, personnel immediately placed a nitrogen bottle in the area of Valve CC-135B. In addition, the necessary equipment (hoses, fittings, and regulator) were prestaged with the nitrogen bottle.

c. Conclusion

The inspectors identified an example of a violation for failure to take prompt corrective actions. The inspectors determined that the shift supervisor's actions were comprehensive.

II. Maintenance

M1 Conduct of Maintenance

M1.1 Testing of Safety-Related Air Accumulators

a. Inspection Scope (73756, 92903)

The inspectors reviewed procedures and documents related to IST of DCT Bypass Valves CC-134A(B) and DCT Inlet Isolation Valves CC-135A(B) to determine if the licensee demonstrated the ability of the safety-related air accumulators to provide motive air to position the valves to the required safety position during accident conditions.

b. Observations and Findings

The inspectors reviewed Procedures STA-001-005, "Leakage Testing of Air and Nitrogen Accumulators for Safety-Related Valves," OP-903-118, "Primary Auxiliaries Quarterly IST Valve Tests," and OP-903-050, "Component Cooling Water and Auxiliary Component Cooling Water Pump and Valve Operability Test," and determined that the licensee did not isolate the nonsafety IA supply to the valve actuators during testing of Valves CC-134A(B) and -135A(B). The licensee stated

that testing the ability of the safety-related air accumulator to provide motive air to the valve actuator was not required because (1) leak testing verified the accumulators contained a sufficient volume of air for valve operation, and (2) testing to ensure a flow path existed between the safety-related air accumulator and the valve actuator was not required since personnel verified actuator operability during IST using the nonsafety-related IA system. The licensee stated that not verifying the ability of the safety-related air accumulator to provide motive air during IST was comparable to not starting the emergency diesel generator during stroke testing of motor-operated valves in order to verify that the emergency power source could provide electrical power to the valve actuator.

Information Notice 85-84, "Inadequate Inservice Testing of Main Steam Isolation Valves," indicated that performing IST of components, which mitigate the consequences of an accident, with sources of power not considered in the safety analysis is not in keeping with the objective of periodic testing. Periodic testing should verify operational readiness of equipment under conditions that reasonably duplicate the design basis. Information Notice 86-50, "Inadequate Testing to Detect Failures of Safety-Related Pneumatic Components or Systems," described three examples in which licensees failed to perform testing of air-actuated valves with the nonsafety IA supply secured.

The inspectors determined that the licensee used nonconservative reasoning for not testing the safety-related air actuating system since the 18-month accumulator leak test only verified that excessive system leakage would not reduce the accumulator capacity to unacceptable levels. In addition, the safety-related air supply lines had never been tested to demonstrate safety-related motive air supply capability.

10 CFR 50.55a(g) requires that IST verify operational readiness of pumps and valves whose function is required for safety be accomplished in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. The inspectors noted that the operation of ASME Class 3 Valves CC-134A(B) and CC-135A(B) mitigate the consequences of the design basis tornado event. Additionally, the motive air for the valve actuators during the design basis tornado event would be supplied from the safety-related air accumulator because the nonsafety IA compressors may not be available. The inspectors determined that the failure to perform IST to demonstrate the operational readiness of the safety-related air actuating system associated with ASME Class 3 Valves CC-134A(B) and CC-135A(B) is a violation of 10 CFR 50.55a(g) (50-382/9624-02).

c. Conclusions

The inspectors identified a violation for the failure to perform IST which verified the operational readiness of safety-related air accumulators. The licensee used nonconservative reasoning in determining that the safety-related air actuating system did not require testing in conjunction with IST of ASME Class 3 valves.

III. Engineering

E1 Conduct of Engineering

E1.1 Ultimate Heat Sink Water Inventory

a. Inspection Scope (37551)

The inspectors performed a review of CR 96-0086 to determine if all potential sources of water usage from the CSP following a design basis tornado event were identified.

b. Observations and Findings

UFSAR Section 9.2.5.3.3 stated that damage by tornado missiles to the DCT coils is detected by decreasing CCW surge tank level and automatic bypassing of the DCTs. The licensee must maintain the DCTs bypassed for approximately 2 hours to enable sufficient time to isolate the damaged DCT bundles and place the operable bundles back into service.

On October 16, 1996, during a review of the CCW system response following a design basis tornado event, the inspectors noted that the CCW make-up pump received an automatic start signal at 48 percent indicated CCW surge tank level. Operation of the CCW make-up pump is of concern because unaccounted water usage from the CSP would result in alignment of the emergency feedwater system to the WCT basin sooner than assumed in the design basis.

The inspectors questioned the licensee to determine if the automatic operation of the CCW make-up pump was considered in the water usage requirements associated with the CSP following a design basis tornado event. The licensee stated that the CCW make-up pump operation had not been identified as a CSP water usage source during their review of CR 96-0086. CR 96-0086 was initiated on January 22, 1996, to determine if adequate WCT basin water inventory existed with one train of the ultimate heat sink inoperable.

On October 22, in response to the inspectors' concerns, engineering performed additional calculations to support the automatic operation of the CCW make-up pump. Engineering determined that, based on minimum TS levels, the WCT and CSP contained 344,000 gallons of water. The total amount of water consumed during the first 24 hours of the design basis tornado event, including CCW make-up pump operation, is 343,976 gallons. The inspectors noted that no compensatory measures were planned even though the remaining water inventory was reduced to 24 gallons.

On October 22, the inspectors noted that 20-inch Swing Check Valves CC-181A(B), Dry Cooling Tower A(B) CCW outlet header check valve, isolated the DCT outlet

during the design basis tornado event. The inspectors noted that any appreciable check valve leakage during the first 2 hours of the design basis tornado event would consume the 24-gallon surplus of WCT basin water inventory. The inspectors determined that the IST program tested Check Valves CC-181A(B) to verify the open and closed safety function. However, no testing of the check valves was performed to demonstrate the leak tightness of the valves.

Subsequently, the licensee initiated CR 96-1652 and entered Site Directive W4.101, "Operability/Qualification Confirmation Process." To ensure adequate CSP and WCT capacity existed, operations increased the minimum CSP administrative limit from greater than 92 percent to greater than 96 percent (approximately 6,000 gallons). Additionally, operations performed a special test that determined the actual leakage through DCT Valves CC-181A(B) and CC-135A(B) was within acceptable leakage limits. The as-found leak rates for Trains A(B) DCT measured 0.04 and 0.008 gpm, respectively.

10 CFR Part 50, Appendix B, Criterion XVI, requires, in part, that conditions adverse to quality be promptly identified and corrected. Engineering's failure to identify the CCW make-up pump and the DCT outlet check valves as additional water losses from the CSP during the review of CR 96-0086 is the second example of a violation of 10 CFR Part 50, Appendix B, Criterion XVI (50-382/9624-01).

c. Conclusions

The inspectors identified a second example of a violation for the failure to identify an adverse condition, in that, all potential water usage sources from the CSP following a design basis tornado event had not been considered in WCT basin calculations. The inspectors determined that operations exercised site leadership by providing prompt and thorough response to the CSP and WCT inventory concerns.

E2 Engineering Support of Facilities and Equipment

E2.1 Containment Spray Header and CCW to Containment Fan Cooler Containment Isolation Valves

a. Inspection Scope (37551)

The inspectors reviewed licensee correspondence with the NRC, licensee internal correspondence, the Safety Evaluation Report, the Standard Review Plan, the UFSAR, General Design Criteria (GDC) 56 and 57, and numerous regulatory guidance documents to determine the applicability of a closed safety function for the containment isolation valves associated with containment spray and CCW systems.

b. Observations and Findings

b.1 Containment Spray Isolation Valves CS-125A(B)

Containment spray lines penetrate containment through Penetrations 34 and 35. Technical Requirements Manual Table 3.6-2, "Containment Isolation Valves," lists containment isolation valves that are applicable to Technical Specification 3.6.3, "Containment Isolation Valves." For Penetration 34, Valves CS-125A and CS-128A were listed as containment isolation valves. For Penetration 35, Valves CS-125B and CS-128B were listed as containment isolation valves. In addition, UFSAR Table 6.2-32, "Containment Penetrations and Isolation Valves," list Valves CS-125A(B) as one of the two containment penetration isolation valves.

Valves CS-125A(B) are air-operated gate valves that fail open on loss of IA. Nonsafety-related IA is the normal air supply with backup air supplied by safety-related air accumulators. Valves CS-125A(B) receive an open signal on a containment spray actuation signal.

The containment spray system is classified as an open system inside containment. GDC 56 specifies acceptable means to meet the required containment isolation provisions for systems open to containment atmosphere. The inspectors determined that the containment isolation provisions for containment spray headers were satisfied in accordance with GDC 56 by having one automatic valve (Check Valves CS-128A(B)) inside containment and one remote manual isolation valve (Valves CS-125A(B)) located outside containment. Remote manual valves located outside containment are allowed by American National Standard (ANSI) N271-1976, "Containment Isolation Provision for Fluid Systems," Section 3.6, "Other Defined Basis," Subsection 3.6.3, "Remote Manual Valves," provided provisions are made to detect possible failure of the fluid lines inside and outside containment and the capability is maintained to remote manually isolate these lines.

For Valves CS-125A(B), the control circuitry was designed in such a manner that, once a containment spray actuation signal exists, the valves cannot be shut until the containment spray actuation signal clears; however, the circuitry could be jumpered to allow closure of the valve in the malfunctioning containment system train. This is significant since an alternate isolation valve cannot be closed until 6 hours after a LOCA because of high radiation levels in the minus 15-foot valve enclosure bay area of the reactor auxiliary building.

b.2 CCW to Containment Fan Cooler Containment Isolation Valves

CCW to the containment fan cooler lines penetrate containment through Penetrations 15 through 22. Technical Requirements Manual Table 3.6-2 lists the CCW to containment fan cooler valves as containment isolation valves applicable to Technical Specification 3.6.3. Further, UFSAR Table 6.2.32 listed Valves CC-807A(B), -808,A(B), -822A(B), and -823A(B) as containment isolation valves.

The CCW air-operated, butterfly CCW to containment fan cooler isolation valves fail open on loss of IA. Nonsafety-related IA is the normal air supply with backup air being supplied by safety-related air accumulators.

The CCW to containment fan cooler lines form closed systems inside containment. GDC 57 specifies that for closed systems that penetrate containment, the lines shall have at least one containment isolation valve which is either automatic, or locked closed, or capable of remote manual operation that is located outside containment. The inspectors determined that the containment isolation provisions were satisfied for the CCW to containment fan cooler penetration lines by having a closed CCW system inside containment and remote manual valves located outside containment.

Once a safety injection actuation signal exists, the control circuitry for the containment fan cooler isolation valves does not allow the CCW to containment fan cooler isolation valves to be shut until the safety injection actuation signal clears; however, the circuitry could be jumpered around to allow closure of the valve in the malfunctioning CCW system train.

b.3 Common Containment Isolation Requirements

Regulatory Guide 1.141, "Containment Isolation Provisions for Fluid Systems," April 1978, endorsed the use of ANSI N271-1976, with some exceptions not applicable to the affected valves. ANSI N-271 approved containment configurations required to meet GDC 56 and 57. Safety Evaluation Report, Section 6.2.4, "Containment Isolation System," stated, in part, that the containment isolation provisions met the requirements of GDC 54, 55, 56, and 57, and satisfied the guidance of Regulatory Guide 1.141.

UFSAR Section 6.2.4.1.2, "Criteria for isolation of Fluid Systems Penetrating the Containment," required that each penetration line contain one isolation valve outside containment that shall be capable of either automatic or remote manual operation or locked closed. Further, Section 6.2.4.1.2 required that remote manual valves have the capability to be shut to isolate a faulted ESF system and that "Valves isolating penetrating lines serving engineered safety feature systems are not closed automatically by the CIAS [containment isolation actuation signal], but have the ability to be closed by remote manual operation from the main control room, thereby isolating any engineered safety feature system which malfunctions." The inspectors determined that UFSAR Section 6.2.4.1.2 was consistent with regulatory requirements.

b.4 Licensee Position for ESF System Containment Isolation Valves

Throughout the inspection and during the exit meeting, licensee management maintained the following positions:

- Based on the original design and licensing of the plant, the subject valves were considered containment isolation valves.
- All regulatory requirements for containment isolation were satisfied.
- The subject valves did not have a closed safety function.
- The NRC's preliminary position that the valves have a closed safety function is a backfit.
- No testing was required to demonstrate the ability of the accumulators to provide backup air to stroke the subject valves in the closed direction and to maintain them closed since the valves did not have a closed safety function.

The licensee maintained that Valves CS-125A(B) never had a closed safety function as discussed in various letters between the utility and the NRC. The licensee contended that Letter W3P84-0577, dated March 16, 1984, informed the NRC that a water barrier would be maintained in the containment spray system piping. Discussions with various licensing personnel indicated that, based upon this letter, the licensee determined that Valves CS-125A(B) did not have a closed safety function and that containment integrity would be maintained with the water barrier in the containment spray system because it formed a closed system outside containment.

The inspectors noted that Letter W3P84-0577 was used to justify relief from performing Appendix J leak rate testing on various containment isolation valves, including Valves CS-125A(B). Enclosure 1, of the letter, indicated that a water barrier could be maintained in the containment spray system piping for 30 days assuming Valves CS-125A(B) remained closed. However, the valves fail open on loss of IA and cannot be closed without using some type of backup air.

From 1989 to 1994, internal licensee correspondence documented the safety function (both open and closed) for valves CS-125A(B). In 1994, the licensee concluded the valves had no closed safety function and discontinued accumulator testing in August 1994 (last test completed March 8, 1994 under Work Authorization 01121332). This was documented in a 10CFR50.59 screening titled "Revision 1 to STA-001-005, Leakage Testing of Air and Nitrogen Accumulators Safety-Related Valve." The licensee justified not testing CS-125A(B) because, "credit may be taken for containment spray train isolation using CS-117A(B) [stop check valve located outside containment] and CS-118A(B) [normally closed manual recirculation valve to the RWSP]. The CS-125A(B) accumulator tests are therefore not required."

The licensee also maintained that the CCW to containment fan cooler isolation valves did not have a closed safety function. Various licensee documents justified

this position by stating that the CCW system is classified as a Seismic Category I, Safety Class 3, closed system whose failure does not have to be postulated during a loss of coolant accident. Therefore, the containment isolation barrier would be the CCW piping system inside containment.

During the inspection and at the exit, licensee management stated that they believed the original design was consistent with regulatory requirements. Licensee management contended that the NRC knew that the containment spray header and CCW to containment fan cooler containment isolation valves could not be shut once a containment spray actuation signal or safety injection actuation signal existed and, therefore, licensed the plant with an approved containment penetration design. Further, management indicated that the requirement for these valves to have a closed safety function was a change in previous NRC position, thereby constituting a backfit.

b.5 Licensee and NRC Management Conference Call

On October 25, 1996, Region IV and NRR personnel, including NRC management, held a conference call with the licensee to understand the licensee's position. During this call, NRC agreed to allow the licensee time to submit a letter detailing the licensing basis for the subject containment isolation valves. In the interim, the Vice President, Operations, committed to performing actions to ensure the isolation capacity of the associated penetrations while NRC evaluated the licensee's position. The commitment involved testing of each containment isolation valve accumulator and establishing procedural guidance to enable closure of the valves from the control room for a line or system fault during accident conditions.

The ten containment isolation valve accumulators and actuating systems were leak tested satisfactorily by November 8, 1996. Valves CS-125A(B) passed without any rework. All of the CCW to containment fan cooler isolation valves required extensive rework. Numerous leaks were repaired on fittings, solenoid valves, and actuating mechanisms. The leakage would have prevented the ability to maintain the valves closed, if containment isolation was required.

Independent of the licensee submittal, Region IV submitted Task Interface Agreement 96TIA017, dated November 13, 1996, requesting NRR to review the regulatory requirements for isolation and closure capability for the containment isolation valves. Pending NRR's review of Task Interface Agreement 96TIA017, the operability requirements of the containment spray and CCW to containment fan cooler isolation valves are identified as an unresolved item (382/9624-03).

c. Conclusions

From review of regulatory requirements and discussions with NRR Containment System Branch personnel, it appeared that Valves CS-125A(B) and the CCW to containment fan cooler containment isolation valves have a closed safety function.

Specifically, the valves are required to have the capability to close in case of a line or system malfunction in order to maintain containment integrity under all conditions. However, because of the position expressed by the licensee, Region IV has requested a formal review of the regulatory requirements from NRR.

E.2.2 Review of Facility and Equipment Conformance to UFSAR Description

A recent discovery of a licensee operating a facility in a manner contrary to the UFSAR description highlighted the need for a special focused review that compares plant practices, procedures and/or parameters to the UFSAR descriptions. While performing the inspections discussed in this report, the inspectors reviewed the applicable portions of the UFSAR that related to the areas inspected. The following inconsistencies were noted between the wording of the UFSAR and the plant practices, procedures and/or procedures observed by the inspectors.

UFSAR Section 6.2.4.1.2, specifies, in part, that containment isolation valves for ESF systems that are not closed on a containment isolation actuation signal have the ability to be closed from the control room by remote manual operation. This isolation function would be used to isolate an ESF system which malfunctions. This statement is not accurate since Valves CS-125A(B) and the CCW to containment fan cooler isolation valves cannot be shut from the control room when a containment spray actuation signal or safety injection actuation signal is present, respectively.

UFSAR Table 6.2-32 lists CS-125A(B) as one of the two containment isolation valves for Containment Penetrations 34 and 35; however, several licensee documents credit other items as satisfying the second containment barrier. W3-DBD-014 listed Stop Check Valves CS-117A(B) as satisfying the containment isolation function instead of Valves CS-125A(B). In addition, W3-DBD-024 credited a water seal barrier in the containment spray piping as the second isolation barrier verses Valves CS-125A(B). These inconsistencies will also be resolved through review of Unresolved Item 50-382/9624-03 and the NRR response to Task Interface Agreement 96TIA017.

V. Management Meetings

X1 Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management on October 24, 1996. The licensee acknowledged the findings presented, but disagreed with the violation associated with improper testing of the air accumulators (refer to Section M1.1). In addition, the licensee stated that the closed safety function for the containment isolation valves (CS-125 A(B) and the CCW to containment fan cooler isolation valves) was a new staff position and, therefore, was a backfit.

The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT 1

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

R. G. Azzarello, Manager, Maintenance
P. A. Caropino, Licensing Engineer
C. M. Dugger, General Manager, Plant Operations
J. J. Fisicaro, Director, Nuclear Safety
T. J. Gaudet, Acting Manager, Licensing
D. C. Matheny, Manager, Operations
M. B. Sellman, Vice-President, Operations
D. W. Vinci, Superintendent, System Engineering
A. J. Wrape, Director, Design Engineering

NRC

INSPECTION PROCEDURES USED

37551	Onsite Engineering
71707	Plant Operations
73756	Inservice Testing of Pumps and Valves
92903	Followup - Engineering

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-382/9624-01	VIO	Two examples of Criterion XVI violation for failure to take prompt corrective actions and failure to promptly identify conditions adverse to quality (Sections O2.1 and E1.1)
50-382/9624-02	VIO	Failure to test safety related actuating systems (Section M1.1)
50-382/9624-03	URI	Requirement of a closed safety function for containment isolation valves (Section E2.1)

LIST OF ACRONYMS USED

CCW	component cooling water
CR	condition report
CSP	condensate storage pool
DBD	design basis document
DCT	dry cooling tower
ESF	engineered safety feature
GDC	General Design Criteria
IA	instrument air
IST	inservice testing
UFSAR	Updated Final Safety Analysis Report
WCT	wet cooling tower