

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-456/85055(DRS)

Docket No. 50-456

License No. CPPR-132

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Facility Name: Braidwood Station, Unit 1

Inspection At: Braidwood Site, Braidwood, Illinois

Inspection Conducted: December 3-6, 10 and 12, 1985

Inspector: H. A. Walker *H. A. Walker*

12/27/85
Date

Approved By: *F. Hawkins*
F. Hawkins, Chief
Quality Assurance Programs Section

12/27/85
Date

Inspection Summary

Inspection on December 3-6, 10 and 12, 1985 (Report No. 50-456/85055(DRS))

Areas Inspected: Announced inspection by one regional inspector of licensee action on previous inspection findings and of preoperational testing quality assurance activities. The inspection involved a total of 47 inspector-hours onsite. This inspection was conducted in accordance with NRC Inspection Procedures 30703B, 35301B and 92701B.

Results: No violations or deviations were identified.

8512310061 851227
PDR ADOCK 05000456
Q PDR

DETAILS

1. Persons Contacted

Commonwealth Edison Company (CECo)

C. M. Allen, Licensing Engineer
*P. L. Barnes, Licensing Engineer
*W. R. Betourne, Quality Assurance (QA) Engineer
*D. L. Cecchetti, Licensing Engineer
*G. E. Groth, Assistant Construction Superintendent
J. K. Jasnosz, Technical Staff Group Leader
*L. Kiine, Project Licensing Supervisor
R. D. Kyrouac, Station QA Supervisor
*E. R. Netzel, QA Supervisor
D. E. O'Brian, Assistant Superintendent Administrative Support Services
T. E. Quaka, Site QA Superintendent
*C. W. Schroeder, Project Licensing Superintendent
*D. L. Shamblin, Project Construction Superintendent
*D. J. Skoza, Project Field Engineer
*S. Stapp, QA Inspector
*C. J. Tomashek, Startup Superintendent
M. J. Wallace, Project Manager
*H. A. Zimmerman, Project Startup Testing Supervisor

U.S. Nuclear Regulatory Commission (NRC)

*M. J. Farber, Reactor Inspector
*W. J. Kropp, Resident Inspector
T. M. Tongue, Senior Resident Inspector
*R. D. Schulz, Resident Inspector

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

*Indicates those attending the exit meeting on December 12, 1985.

2. Licensee Action on Previous Inspection Findings

(Open) Unresolved Item (456/84041-01(DRS)): Failure to specify quality program documents for the preoperational test phase. During the followup of this item the inspector was provided a copy of site quality instruction SQI-38, Revision 0, "Site/Station Quality Assurance Agreement." This document contains an Appendix B which provides a list of applicable QPs from the QA manual that apply to the startup organization. Wording on this listing indicates this table provides guidelines. Appendix A indicates the QA organization (site or station) that has audit and

surveillance responsibilities of the various startup activities. Although this document provides some guidance in determining the specific quality program requirements which apply to startup, it is a site QA procedure for use by the quality assurance organization. It does not impose these requirements on the startup organization and statements by startup personnel were not consistent with the definition provided by the document. This item remains open pending definition of the quality program covering startup in documents which impose these requirements on the startup organization.

3. Preoperational Testing Quality Assurance

This inspection involved a review of the quality assurance program used for preoperational testing. Program implementation was also reviewed. Compliance with regulatory requirements and quality assurance program commitments was verified. The inspection was performed by observing work activities, conducting personnel interviews and reviewing applicable procedures and records. Reviews included audits and surveillance of pre-test, testing and post-testing activities by the quality assurance organization. Test evaluations and reviews by the startup organization, as well as methods used for tracking and resolving test deficiencies were also included in the review.

The following observations were made:

- a. In reviewing the station quality assurance surveillance report for the post-preoperational surveillance associated with test No. BWPT-AP14, the inspector noted that the surveillance had been closed even though a deficiency was noted in the report. The inspector was informed that under present practices the report is transmitted to the site quality assurance organization, who tracks the deficiencies and ensures their proper closeout prior to turnover of the system to the operations department. In reviewing the site QA BWPT-AP14 review package, the inspector noted that a copy of the surveillance report was not included and could not be readily located by site QA. The deficiency involved L. K. Comstock inspection correction Report No. 2769 which was on a list of L. K. Comstock open items which was included in the QA review package. Although the deficiency should have been noted because of the L. K. Comstock open items list, the inspector is concerned that the system does not contain the positive controls necessary to ensure that all deficiencies and open items are noted and properly addressed prior to turnover of the systems to operations. The site and station QA organizations initiated immediate action to resolve the inspector's concerns. This item is unresolved pending review of the completed action (456/85055-01).
- b. During the review of the post-preoperational surveillance report for test BWPT-AP14 the inspector noted that deficiency reports (issued as tracking documents by the licensee) AP-14-003 and AP-14-004, which

were written on L. K. Comstock NCRs 532 and 534 respectively, were closed when the respective NCRs were closed. Both NCRs were closed without the hardware problem being corrected by converting the NCRs to inspection correction reports (ICRs). Deficiency reports were not written on these ICRs and there was nothing in the test package indicating these ICRs were open at the time of the test. Neither of the problems noted on the two ICRs appeared to impact the test performance. The inspector was concerned that similar action might have been taken on other NCRs which might have impact on tests conducted. Licensee personnel reviewed the closing of 33 other NCRs in the number sequence area of the two noted. No additional examples of this type closing of NCRs were noted. Present L. K. Comstock procedures prohibit the cancelling of NCRs and documenting the nonconformances on ICRs. Reviews and evaluations of all open items were being conducted on the systems prior to turnover to operations. L. K. Comstock ICRs are included in the open items reviewed. Except as noted in paragraph 3.a, the inspector has no further concerns in this area.

- c. The inspector reviewed Section 4.1.4 of the Startup Manual which provides the procedure for completing and processing the deficiency report. The procedure did not appear to be adequate because it does not require approvals and sign-offs by technically competent personnel. The inspector was informed that this document was not a quality document and that this system does not constitute a safety-related control function. Paragraph 4.1.4.1 of the Startup Manual states, "Deficiencies are written and assigned numbers to identify broken, incomplete or improper installation, documentation, design, or testing items identified at the time of turnover for test or thereafter." This definition and the use of the deficiency (as determined by the inspector) establishes the fact that the document performs a safety-related control function. In the absence of other documents to meet the requirements of criteria XVI and XVII, this document is required. This matter is open pending a review of the procedure to verify that adequate procedural definition has been provided (456/85055-02).
- d. The inspector reviewed action taken on a number of selected deficiency reports to verify that nonconformances were being documented and controlled to quality program requirements. Of the eight deficiencies reviewed, five were documented on nonconformance reports (NCRs) and were processed per nonconformance procedures. The following was noted on the other three.
 - (1) CC-10-192 - No NCR was written. Appears to be minor. Capillary tubing replaced.
 - (2) RY-10-158 - This deficiency report was cancelled.
 - (3) WO-10-114 - No NCR was written. A temporary repair was made and another deficiency report (WB-10.2-062) was written to track the temporary repair.

In discussions with licensee personnel on this matter the inspector was informed that it was not the policy of Braidwood to write NCRs on construction damaged items. Additionally, it was stated that NCRs were only written on significant items. When the inspector asked for a definition of significant and procedural coverage for making the determination of significance, neither was available. This item is unresolved pending further review (456/85055-03).

4. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations or deviations. Unresolved items disclosed during this inspection are identified in Paragraphs 3.a and 3.d.

5. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or the licensee or both. An open item disclosed during the inspection is discussed in Paragraph 3.c.

6. Exit Meeting

The inspector met with licensee representatives (denoted in Paragraph 1) at the Braidwood Station on December 12, 1985. The purpose, scope and findings of the inspection were summarized. The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector. The licensee did not identify any such documents or processes as proprietary.