

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-133/87-06

Docket No. 50-133

License No. DPR-7

Licensee: Pacific Gas and Electric Company
77 Beale Street
San Francisco, California 94106

Facility Name: Humboldt Bay Power Plant Unit 3

Inspection at: Eureka, California

Inspection Conducted: December 15-18, 1987

Inspector:

C. A. Hooker
C. A. Hooker, Radiation Specialist

1/11/88
Date Signed

M. Ellis Fox
G. P. Yuhas, Chief
Facilities Radiological Protection Section

1/12/88
Date Signed

Summary:

Inspection on December 15-18, 1987 (Report No. 50-133/87-06)

Areas Inspected: Routine unannounced inspection of a facility in extended shutdown (preparation for SAFSTOR) including: actions on previous inspection findings; management organization and controls; radioactive waste management; transportation; followup on IE Information Notices; followup on Licensee Event Report; and facility tours. Inspection procedures addressed included 30703, 88005, 88035, 86721, 90712 and 92701.

Results: Of the areas inspected, no violations or deviations were identified.

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DETAILS

1. Persons Contacted

Pacific Gas and Electric Company (PG&E) Personnel

- R. T. Nelson, Plant Manager
- *P. E. Rigney, Power Plant Engineer
- *R. C. Parker, Senior Chemistry and Radiation Protection Engineer (SC&RPE)
- *R. D. McKenna, Supervisor, Operations
- *D. A. Peterson, Supervisor, Quality Control
- D. Richardson, Supervisor, Maintenance
- T. K. Tyler, Instrument and Electrical Foreman
- *T. J. Williams, Environmental Coordinator
- *P. G. Rasmussen, Senior Power Production Engineer

*Denotes those present at the exit meeting on December 18, 1987.

2. Licensee Action on Previous Inspection Findings

(Closed) Followup (50-133/87-02-01): This item involved movement of water from the Spent Fuel Pool (SFP) liner gap into the French Drain (FD). The licensee determined that routine sampling of the FD increased differential pressure between the two systems. This resulted in water leakage from the SFP liner gap into the FD. The inspector noted that the licensee had evaluated the situation and was preparing to install a FD sampling system that will keep the hydraulic pressure of the FD above that of the SFP liner gap. The inspector had no further questions regarding this matter.

No violations or deviations were identified.

3. Management Organization and Controls

The inspector reviewed the licensee's management organization and controls to determine the licensee's compliance with Technical Specification (TS) requirements and licensee procedures.

a. Organization and Staffing

The licensee's organization and staffing has remained substantially unchanged since the last inspections in this area (50-133/86-03 and 50-133/87-02). As of January 1987, the licensee had discontinued the use of contract personnel for decontamination and waste processing activities in preparation for SAFSTOR, since these activities were essentially complete. The licensee had recognized that they were apparently understaffed with Radiation Protection Monitoring Technicians who also perform various duties associated with the operating non nuclear plants (Units 1 and 2). The licensee was in the process of acquiring an additional person in this area.

Responsibilities and authority were adequately delineated in Nuclear Plant Administrative Procedure, NPAP A-1, Plant Staff Organization and Responsibilities for Normal Operations. Organization and staffing met TS requirements under current plant conditions.

No violations or deviations were identified.

b. Procedure Controls

Nuclear Plant Administrative Procedures, NPAP E-4, and NPAP E-4, Supplement No. 1, Procedures, delineates the licensee's procedure control program. Based on review of selected licensee procedures and procedure history review system, the inspector determined that periodic (biennial) procedure reviews, new procedures, procedure changes were done pursuant to TS IX.D.f.1 and licensee procedures.

No violations or deviations were identified.

c. Internal Reviews and Audits (IRA)

The inspector discussed the licensee's IRA program with licensee representatives, and reviewed the following procedures and documents:

Procedures

- ° NPAP A-55, Random Weekend and Backshift Inspection
- ° NPAP C-10, Supplement No. 1, Housekeeping

Documents

- ° Monthly Housekeeping Inspection reports, July 29, 1987, through November 30, 1987.
- ° Plant Staff Review Committee (PSRC) Meeting Minutes for routine monthly and special meetings, August 6, 1987, through November 12, 1987.
- ° Random Weekend and Backshift Supervisory Inspection Data Sheet reports, July 30, 1987, through November 12, 1987.

Based on the above reviews and discussions, the inspector determined that the licensee's audits were effective in identifying and reporting deficiencies to management. Appropriate corrective actions were generally timely and effective. QC audits and inspections were adequately delineated in plant procedures and conducted with prepared checklists.

No violations or deviations were identified.

d. Quality Assurance Program (QAP)

The licensee's current QAP, established pursuant to the criteria outlined in 10 CFR 50, Appendix B, is described in PG&E's QA Manual which is a corporate level document. QA audits to verify that Humboldt Bay Power Plant implements the QAP requirements are performed by PG&E's Corporate QA Department. Inspection Report No. 50-133/87-05 describes the most recent QA audit of HBPP.

With respect to HBPP's proposed SAFSTOR operations, the licensee has developed and submitted a Custodial SAFSTOR Facility Quality Assurance Plan to the NRC and is described in the Commission's Safety Evaluation Report, dated April 29, 1987. During this inspection the inspector reviewed a draft QA Manual (QAM) for HBPP's - Unit 3 SAFSTOR operations.

Based on the reviews and discussions during this inspection, and observations during previous inspections, the inspector determined that the licensee has effectively implemented their existing QAP, and has established a program that should be effective during SAFSTOR operations.

During the inspection the inspector also noted that on December 15, 1987, a member from PG&E's Corporate QA staff provided on-site training on the licensee's Quality Problem Reporting (QPR) system. The training was conducted to provide an understanding of the licensee's QPR system and their responsibilities for identifying and resolving quality problems.

No violations or deviations were identified.

4. Radioactive Waste Management

The inspector reviewed the licensee's radioactive liquid and airborne effluent control programs, and solid radioactive waste activities to ensure compliances with 10 CFR Part 20, TS requirements, and recommendations outlined in various industry standards.

a. Audits

Inspection Report No. 50-133/87-05 describes the last QA audit performed for these areas.

No violations or deviations were identified.

b. Radioactive Liquid Effluent Control

Inspection Report No. 50-133/87-02 describes previous inspection efforts related to this area.

During this inspection the inspector examined radioactive liquid waste discharges to the outfall canal from October 22 through December 14, 1987. The licensee had made four discharges during this period. The inspector verified by manual calculations the MPC values for batch release no. 87-25. No errors or anomalies were noted.

The inspector reviewed records of tests and calibration data for the liquid radwaste sump high level alarm and pump start switches, and the liquid radwaste vent monitor. Calibrations and tests were noted to have been conducted in accordance to licensee procedures and at the required frequency.

Calibration of the liquid radwaste effluent monitor and problems associated with background radiation were described in Inspection Report No. 50-133/87-05. As of this inspection, the licensee had not resolved this matter, and was noted as an open item (50-133/87-05-01) in the previous inspection. The licensee was considering relocating the effluent monitor to lower background area within the facility.

TS VIII.B.1. limits the licensee's liquid radwaste inventory to 10,000 Ci. The licensee's current inventory was noted to be about 8.0 Ci.

No unmonitored release paths were identified. Radioactive liquid discharges were noted to be less than the limits specified in 10 CFR Part 20, Appendix B, Table II. Column 2. Operation and sampling analysis were conducted in accordance with TS VIII.A.1.

No violations or deviations were identified.

c. Airborne Effluents

Inspection Report No. 50-133/87-02 describes previous inspection efforts related to this area.

Weekly plant stack samples from June 30, 1987, through December 1, 1987 were examined. Quarterly vent grab samples of the hot chem lab, hot shop and liquid radwaste building for 1987 were also examined. All sample data indicated that sample results were well below the 10 CFR Part 20, Appendix B, Table II, Column 1, limits. No unmonitored release paths were identified.

Weekly source checks and alarm tests of the stack effluent monitoring system, monthly calibration of the Refueling Building isolation monitors, and quarterly stack air sampler flow rate calibration and airflow alarm tests were examined. The calibrations, source checks and tests were noted to have been conducted in accordance to TS requirements and licensee procedures.

The inspector noted that the licensee had not performed the annual calibration of the stack monitoring system as required by TS.VII.B.2., which was due on October 23, 1987. However, the licensee was aware of this matter and had initiated a Nuclear Plant Problem Report on December 14, 1987, to ensure that the system would be calibrated within the 25% allowance (TS.IX.14).

During review of licensee calibration and test procedures, and discussions with cognizant licensee representatives, the inspector observed that the licensee had no program to determine the accuracy

of the indicated stack flow rate. In about 1980 (actual dates could not be verified during this inspection), major system modifications had been completed to increase the stack flow rate (one fan operating) from 12,500 cfm to about 43,000 cfm. The current indicated flow rate is about 38,500 cfm and is an important parameter in determining radioactive airborne effluent releases. This matter was discussed with the SC&RPE who acknowledged the inspector's observations.

At the exit meeting on December 18, 1987, the inspector further expressed concerns regarding the lack of calibration and/or test programs to verify the accuracy of indicated stack flow rate. The licensee acknowledged the inspector's observations. The licensee's actions regarding this matter will be examined in a subsequent inspection (50-133/87-06-01, Open).

No violations or deviations were identified.

d. Radioactive Solid Waste

The licensee had not disposed of any radioactive solid waste since the last inspection of this area (50-133/86-03). The inspector also noted no changes in the licensee's solid waste program.

TS.VIII.B.2. limits the licensee's inventory of solid waste to 50,000 Ci. The licensee's correct inventory was about 57 Ci of solid waste (resins) in the resin disposal tank, and about 2.0 Ci in assorted waste containers awaiting future shipment for disposal.

No violations or deviations were identified.

5. Transportation of Radioactive Materials

The inspector reviewed the licensee's radioactive material transportation programs for compliance with the requirements of 10 CFR Parts 20, 70, and 71 and 49 CFR Parts 171 through 178.

a. Audits

The last QA audit of this area was discussed in Inspection Report No. 50-133/87-05.

No violations or deviations were identified.

b. Shipments

The licensee had made one shipment of radioactive material since the last inspection in this area (50-133/87-03).

This shipment involved the licensee's transfer of their nominal 5.0 Ci PuBe instrument calibration source to an authorized recipient, Shipment No. 554, on November 11, 1987.

Based on review of the shipping documentation for this shipment, the inspector determined that QC check lists were properly delineated and had been appropriately checked off. The documentation also indicated that the licensee had shipped and transferred the PuBe source pursuant to regulatory requirements and licensee procedures.

No violations or deviations were identified.

6. Information Notices

The inspector verified that the licensee had received, reviewed and was taking or had completed action on IE Information Notices Nos. 87-31, 87-32, 87-43, 87-45, 87-47 and 87-54.

No violations or deviations were identified.

7. Licensee Event Report (LER)

Based on an in-office review and on-site discussions, LER No. 87-002-00, Activation of the Gas Treatment System, was closed out by the inspector.

The LER was reviewed for event description, root cause, corrective actions taken, generic applicability and timeliness of reporting.

No violations or deviations were identified.

8. Facility Tours

The inspector toured various radiologically controlled areas of Unit 3 making independent radiation measurements with an NRC R0-2 portable ion chamber S/N 4042 due for calibration February 5, 1988.

Inspection Report No. 50-133/87-05 described poor housekeeping practices in the licensee's hot shop. During this inspection, the inspector observed that the licensee had made a great improvement in this area. Housekeeping practices were generally good in all areas toured.

In addition, the inspector observed that all radiation areas and high radiation areas were posted as required by 10 CFR Part 20, and access controls were consistent with TS requirements.

No violations or deviations were identified.

9. Exit Interview

The inspector met with the licensee representatives denoted in paragraph 1 at the conclusion of the inspection on December 18, 1987. The scope and findings of the inspection were summarized.

The inspector informed the licensee representatives that no violations or deviations were identified.